

**Appeal Ref: APP/E2205/W/21/3284479 for Ashford Application: 21/00790/AS**

Land between Woodchurch Road and Appledore Road, Tenterden, Kent

Objector: Cllr John Crawford

Topic: Index of Objection Letters

Date: 2<sup>nd</sup> December 2021

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**Index of Objection Letters**

For ease of reference, this pack contains all the objections I have submitted for this appeal.

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*John Crawford*

Tenterden Councillor  
South Ward

**Land between Woodchurch Road and Appledore Road, Tenterden, Kent**

**Objection: Cllr John Crawford (Tenterden Town Council)**

**Topic: Non-Compliance with Ashford Local Plan (ALP) Vision and Development Plan**

Date: 12 November 2021

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The development proposal conflicts with the ALP vision and housing delivery plan. The following explains why.

### **ALP Vision**

The 2030 Ashford Local Plan Vision Statement says:

“Ashford Borough will meet its housing and employment needs, and take account of the needs of investors, through the provision of new high-quality development forming attractive places, with the necessary supporting infrastructure and services, and in sustainable and accessible locations that take account of the Borough’s environmental constraints.”

Plus.

“Tenterden will continue to serve the south western part of the Borough as a principal rural service centre with a strong offer of shops and services, conserving and enhancing its historic centre and accommodating development of a suitable scale, design and character.”

The vision categorically highlights that:

- a. 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 proposal will not protect the natural heritage and attractive countryside character, it will destroy a typical Wealden pastoral landscape with a very rich biodiversity habitat. The 145 dwellings would urbanise its appearance and would be very prominent, due to the elevated position of the site.

- b. Tenterden to conserve and enhance its historic centre and accommodate development of a suitable scale, design and character.

This is very similar to wording for the Limes Land site LCA 23 of the Ashford Landscape Character SPD which says “conserve and reinforce”.

This is a major development of 145 dwellings of a density of 27 dwellings per hectare, therefore not of a suitable scale.

- c. Development within all the rural settlements must conserve and enhance the historic centres and heritage and natural assets.

It is not possible for a country park to maintain its own biodiversity and compensate a biodiversity loss of wildlife built on by 145 dwellings, pavilion, car park, roads and football pitches. This application will deliver a net loss. Kent Wildlife Trust and other consultees have said so in their objections.

- d. ALP 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.

This application would not be limited as it would introduce major growth over and above what has been agreed in the local plan.

- e. ALP 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."

It is a clear spatial strategy to focus housing development in urban areas. This is to encourage sustainable development that minimises the need to travel for environmental, work and social benefits. It is recognised that Ashford is a large Borough covering 224 Square miles and is a third the size of London.

The 1,000 windfall homes should be deployed across the entire borough and over a planned 11 year timeframe. Trying to put a "gallon into a pint pot" with one large development in Tenterden is unacceptable.

- f. ALP 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.

This is a unique medieval Wealden field system, dating before Tenterden's earliest town settlement and is integral to its history. No new development is required besides the master planned southern extension to the town and Tilden Gill. Both will fulfil the town's development needs over the Plan period without adversely affecting the character of the town.

- g. ALP 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.

With the existing development at Tent 1 and Tilden Gill, the additional proposed development would create an unsustainable model of housing development.

- h. ALP Para 2.65 and 2.66 - Plan's distribution strategy which identifies new housing land allocations to deliver around 4,872 dwellings in and around Ashford and 1,017 dwellings in the rural parts of the borough.

Any significant divergence from this broad approach, i.e., transferring major housing growth from Ashford to the rural parts of the Borough should be avoided. Not doing so would result in an unsustainable model of development.

The following consequences are particularly true for significant unplanned development in Tenterden:

- i. With limited availability of local jobs, economically active adults will be focused on Ashford and other employment centres for work
- ii. Being poorly served by local sustainable modes of transport, leading to significantly more trips being made by private car,
- iii. Over loading the available local infrastructure
- iv. Reliant on private car for key goods and services in Ashford.
- v. Damaging the intrinsic beauty and character of the local countryside
- vi. Damaging the nature and character of the local rural settlements with a scale and pace of housing that is not proportionate

In addition, not exploiting the existing and planned infrastructure in Ashford:

- i. Proposal shifts development away from where growth and change has previously been planned – and where substantial infrastructure investment has been targeted
  - ii. Not making best use of infrastructure that has been delivered or is about to be delivered at Ashford, including HS1 and strategic road improvements,
  - iii. Undermining the sound planning aspirations for Ashford and the benefits to be delivered through increased housing growth in a way that provides sufficient critical mass to deliver new strategic facilities for the town.
  - iv. Two strategic parks and the wider services and facilities present which benefit the wider borough.
- i. ALP Para 2.80 states "The SHELAA shows that there is very little scope to deliver new housing growth within the confines of rural settlements."
  - j. The Ashford Local Plan for Tenterden is very clear. This application is significant and would fundamentally harm the Weald countryside and the attractive character of Tenterden.
  - k. ALP 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".

Therefore, no extra development should take place in Tenterden.

***There is still considerable land around Ashford, which should be used for housing and would meet the productivity and economic aims of central government. This proposed major speculative application is not appropriate and therefore should be rejected.***

- i. The 2030 Local Planning Inspectors final report says:

Paragraph 34: Tenterden is the second largest settlement in the Borough but the population in Ashford town was about 15 times greater in 2016.

Taking existing commitments and proposed allocations into account some 625 dwellings would be provided in Tenterden over the plan period. This equates to some 5% of the Borough's residual housing requirement in Table 1. This is not a precise 'fit' with the size of the town compared to the Borough as a whole but consideration has to be given to constraints such as the Area of Outstanding Natural Beauty (AONB) that surrounds much of Tenterden.

Paragraph 35: House prices are more expensive [in Tenterden] than the Borough average.

There is no evidence that the vitality and viability of shops and services [in Tenterden] have suffered as a result and the town appears to be thriving. Therefore, it is not essential for the growth strategy to be changed to favour Tenterden in order to arrest potentially serious economic or social consequences.

The distribution of development enshrined in the ALP will allow Tenterden to perform its role as a principal rural service centre as set out in the Vision.

- m. NPPF Para 15 says “The planning system should be genuinely plan-led to set economic, social and environmental priorities”. This allows local people to shape their surroundings. This application is a “developer led” proposal.

***This application proposal is in direct conflict with the Local Plan Assessment.  
Housing Delivery Action Plan***

ABC’s recent Housing Delivery Action Plan August 2020 refers to the delivery of developments in the rural locations of the borough. The relevant extract is as follows:

“The strategy is to target appropriate levels of housing growth to different rural settlements based on their relative sustainability whilst also protecting the attractive characteristics of the countryside and existing rural settlements.

As such, a broad and varied range of rural residential site allocations were identified in the Local Plan 2030 to provide the local housing market with choice. Most of these rural site allocations were phased to be delivered early in the plan process, to assist housing supply in the short to medium term.

The approach to housing in the rural area remains a balanced one – a scale of development is proposed which can be sustainably accommodated in the rural area. This reflects the local circumstances and remains appropriate. This position has recently been supported by two independently appointed Planning Inspectors, as part of the Local Plan 2030.”

This report and the above extract reinforce the 2030 ALP vision, in particular for Tenterden.

The local community will be encouraged that Ashford’s stance is consistent and appropriate across the two reports for the diverse rural and urban areas. Ashford’s Local Plan’s vision, policy framework and this supporting document are the principles that have to be adhered to when determining this application.

It is well known that any further significant development in the planned period would be unabsorbable and unsustainable in Tenterden, as well as corrupting and ruining the character of this iconic, historic and typical Wealden landscape. Since this report confirms the balance between development and sustainability taking into account rural local circumstances, i.e., Tenterden, there are no reasons for the Wates “car dependent” application to be taken any further.

The local community recognise and value the mental and physical health benefits of this site. This has been, and continues to be, exceptionally true during the COVID crises. Residents wish this site to be preserved for generations to come as an accessible wild green space for the benefit of the adjoining large local community population.

The only course of action is to reject Wates application, particularly as the sensitivity of Tenterden has recently been supported by two independent appointed planning inspectors as part of the ALP 2030 adoption.

***The proposal is not supported by Housing Delivery Action Plan.***

### **Tenterden Windfall Trend**

I recognise the best developments for the town are small scale windfalls in the right location that preserve the local character, landscape, biodiversity, comply with the ALP strategic policies and can be integrated and absorbed relatively easily.

During the Ashford Local Planning process assessed this proposed site, which was designated TS3. For various reasons it was rejected. The suitability & achievement assessment states: "The site is relatively peripheral to the town centre. Development here could have a significant impact on the existing rural character of this part of Tenterden and the AONB. Access to the site is limited with potentially a major impact on the character of Appledore Road."

ABC confirmed at the time this site was not required for inclusion in the 2030 Local Plan.

With Tilden Gill development of 100 dwellings, the completion of Tent 1A next year, followed by Tent 1B, plus many infill developments, there is no justification for more major housing development in the current 2030 planning period.

The ALP has stated that it requires 1000 windfall dwellings until 2030, equating to approximately 90 dwellings per year across the whole borough.

Tenterden is just 6% of the total borough size and on that basis means 5½ dwellings per year for the town. If taken by relative population size, it would mean 6 dwellings per year for Tenterden. Massively smaller in numbers than Wates' proposal.

To date, Tenterden Town Council has supported over 105 dwellings to be built in the current 2030 ALP plan. Small scale proposals will no doubt continue and provided the numbers are modest should be abortable.

### **ALP Policies**

In addition, to the non-adherence to the ALP vision, the proposal is also non-adherent to a large number of Ashford Policies. These have been listed below and there will be a separate objection letter against each policy for ease of digesting the relevant facts. These will be lodged with PINS explaining why the proposal does not adhere to each of those policies.

The 2030 Ashford Local Plan (ALP) paragraph 6.35 says: "Residential development which comes forward on sites outside of those allocated in the Local Plan are known as housing 'windfalls'. Historically, the Borough has had a strong tradition of delivering housing windfalls and they will contribute towards meeting our objectively assessed housing needs.

However, this proposal is in the wrong place to meet the needs of the borough and to satisfy the up-to-date development plan which has been constructed in accordance with the NPPF.

Non-adherence to Ashford Policies to deliver the vision:

- a) SP1 Strategic Policy
- b) SP2 Strategic Approach
- c) SP6 High Quality Design

Non-adherence to Ashford Policy relating to windfall sites:

- d) HOU5 Windfall Outside the Settlement Area

Non-adherence to Ashford Policies that will create harm to environmental sustainability are:

- e) ENV1 Biodiversity
- f) ENV3a Landscape Character and Design

Non-adherence to Ashford Policies that will create harm to economic sustainability are:

- a) ENV13 Conservation and Enhancement of Heritage Assets
- b) TRA7 Road network and Development
- c) TRA8 Travel Plans, Assessments and Statements

Non-adherence to Ashford Policies that will create harm to social sustainability are:

- a) ENV6 Surface Water and ENV9 Sustainable Drainage
- b) ENV8 Water Quality, Supply and Treatment

### **Planning Resource Portal**

In a recent article, it is interesting to note developers are particularly inclined to submit contentious applications in districts in the South East.

It is said these kinds of areas are seen as rich hunting grounds by developers. They put in speculative proposals to see the amount of housing councils will accept on a site to push up their profitability. If the councils turn down these ambitious schemes, the aim is to come back with a smaller scheme that will not be quite as audacious and developers push against the boundaries of acceptability.

At the end of the day, all proposals have to comply with the policies within the Local Plan and NPPF.

## **Conclusion**

The ALP provides an overarching vision and a supporting set of policies for sustainable development to be delivered in the borough. This has been through public consultation and scrutinised by two inspectors. The plan was subsequently adopted in February 2019.

The main growth area is Ashford Town with limited allocated sites for planned growth in rural Tenterden. Thereafter during the planned period, only suitable small-scale windfall proposals will be considered.

Due to the significant non-adherence to the development plan, it is concluded the scheme would not deliver sustainable development, nor in the area of the borough that the ALP wishes to develop with the Infrastructure Development Plan. The harm created would severely outweigh the benefits of the development proposal.

Therefore, there is no meaningful weight that can justify the applications permission. Ashford Borough Council were correct in its determination.

*John Crawford*  
Tenterden Councillor

**Appeal Ref: APP/E2205/W/21/3284479 for Ashford Application: 21/00790/AS**

**Land between Woodchurch Road and Appledore Road, Tenterden, Kent**

**Objection: - Cllr John Crawford (Tenterden Town Council)**

**Topic: - Non-Compliance with SP1 Strategic Objectives**

**Date: 18<sup>th</sup> November 2021**

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**Introduction**

SP1 Strategic Objectives is the foundation for assessing all application proposals. This appeal application fails considerably in meeting SP1. This letter is not meant to be comprehensive, but to give an illustration of the major application proposal deficiencies.

**Vision Extract**

In order to deliver Ashford's vision, a number of strategic objectives have been developed. The following is the relevant extract from the 2030 Ashford Local Plan Vision Statement:

“Ashford Borough will meet its housing and employment needs, and take account of the needs of investors, through the provision of new high-quality development forming attractive places, with the necessary supporting infrastructure and services, and in sustainable and accessible locations that take account of the Borough's environmental constraints.”

Plus:

“Tenterden will continue to serve the south western part of the Borough as a principal rural service centre with a strong offering of shops and services, conserving and enhancing its historic centre and accommodating development of a suitable scale, design and character.”

Our Ashford Local Plan has planned positively for housing development and infrastructure to meet community needs and setting out the strategic priorities for the borough. This application is not plan led and is not supported by the community.

## SP1 Extract

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

### Makes best use of brownfield sites

- a) On the 16<sup>th</sup> December 2020, Robert Jenrick Secretary (then) State MHCLG statement said building more homes in our cities and urban centres will mean making the best use of brownfield land, of which many cities and urban centres continue to have large quantities, and to protect our countryside as much as possible.
- b) This site is not a brownfield site, but a virgin pristine medieval green open space loved and valued by the local community.

### Conserve and enhance the natural environment, designated landscape character areas

- a) To put the application in context, the proposal consists of two sites. Limes Land which is privately owned and the playing fields which are owned by Homewood School – one is a football pitch and the other believed to be an abandoned cricket pitch.
- b) Since the mid nineteenth century, Limes Land has been known as an open parkland pasture situated East of Woodchurch Road settlement and North of Appledore Road settlement. The social benefits have been considerable over the decades for both surrounding settlements, by the wider town community and further afield.
- c) Adjoining the site is the Conservation Area to the South, High Weald AONB to the East; Biodiversity Opportunity site with overlapping Local Wildlife site to the North. This site makes a significant biodiversity contribution to the rural character surrounding the local community. Together with the adjoining fields, provides a significant contribution to the visual quality, tranquil attributes and an important contribution to the rural landscape setting for the community and the town at large.

- d) Within the hierarchy of designated sites there are no statutory ones. However, there is a local Ashford Local Plan designation. It is part of the Woodchurch Undulating Farmlands designation with a reference of LCA 23. It has typical Wealden Countryside features of undulating landscape, varied field pattern, numerous ponds with water courses lined by mature trees. Together with ancient hedgerows which provide a strong sense of enclosure. The condition is rated as “good”. There are no detracting features.
- e) The recommendation of LCA 23 and adopted by the 2030 ALP, is to:
- i. Conserve and reinforce the rural and enclosed landscape which provides the immediate setting of the High Weald AONB
  - ii. Conserve and appropriately manage woodland
  - iii. Conserve and appropriately manage strong matrix of hedgerows and hedgerow trees
  - iv. Plant new hedgerow oaks to reinforce and provide continuation of this key feature
  - v. Conserve intimate small-scale field pattern
  - vi. Conserve and reinforce strong sense of enclosure
  - vii. Conserve field ponds and slow flowing streams
- f) ALP Para 9.43 says that the LCA SPD sets out clearly the key characteristics. All proposals coming forward should have regard to this SPD, and to the guidance on landscape characteristics that it provides, so as to ensure that new development does not compromise or damage landscape character. This is reinforced by policy ENV3a. It appears this application has ignored LCA 23 throughout all the submitted Wates documents.
- g) The Local Plan says that residential development outside town ‘confines or major developments in an AONB setting will only be granted in exceptional circumstances. There are no exceptional circumstances.
- h) The recent Ashford SHELAA report says: "This site is relatively peripheral to the town centre. Development here could have a significant impact on the existing rural character for this part of Tenterden and the AONB.
- i) The site has high landscape value assessment as shown by local objectors and the Tenterden Neighbourhood Plan Group by who have extensive local knowledge of the site and town.
- j) This application would be incongruous, intrusive and damaging to the character of the settlement and the surrounding landscape.
- k) The proposal would fundamentally result in an irreversible and obvious loss of an undeveloped and truly wild part of the countryside. Consequently, the proposal would have a significant harm upon the landscape character and appearance of the area. Introducing a manicured country park will not compensate for loss of the existing sanctuary for wildlife and biodiversity that has evolved over hundreds of years.
- l) This application does not target development at sustainable locations within the borough with appropriate existing infrastructure. In reality, the application mutates the rural town of Tenterden into an urban sprawl.

### Promote green infrastructure network

- a) The application is located outside the town’s settlement boundary and seriously encroaches into Tenterden’s Weald landscape blessed with rich biodiversity.

- b) This proposal is for a non-allocated site and development would result in coalescence of the settlement between Woodchurch Road with Appledore Road removing existing green infrastructure.
- c) It is essential to maintain this green lung, its distinct characteristics and attractiveness for the two settlements. This non-allocated site would be a wanton erosion of the countryside and destroy tranquillity and protected wildlife by removing an important green corridor to adjoining designated sites.
- d) The Ashford, Tenterden and Rural Sites Planning Inspector's Report of 2010, Paragraph 2.98, says, "this site forms a wedge of countryside characteristic of the urban form of Tenterden as a small market town in a strongly rural setting, which would be eroded by development".
- e) The application does not promote connected green infrastructure network that has to play an essential role with improved access to nature. A critical local green space and lung would be lost as well as a distinctive place with rolling landscape being destroyed.

### Plays a role in managing flooding

- a) To avoid duplicating facts on this topic, please read my objection based on ALP policy ENV6.
- b) Some key highlights:
  - i. Over the past two decades, many hydrologists and climate change scientists have raised the "red flag" how the stationarity approach is not working anymore. In 2008, an international group of scientists announced in the journal Science that "stationarity is dead," and that it was time we accept we are living on a non-stationary planet. We have changed the planet so much with carbon emissions and other human activity that the recent past of flooding statistics is no longer a guide to the future.
  - ii. We have to be honest and recognise that scientific evidence is showing that climate change is having a major detrimental impact on surface water flooding for this site.
  - iii. The agent's flooding predictions in support of their application are out of sync with current scientific knowledge and should be discarded.
  - iv. There has been no sound hydrologic baseline assessment of water coming into the site from Woodchurch Road at many entry points; the times of heavy rainfall together with estimated quantity over a typical 12-month period; the maximum realistic soil absorption; and volume and frequency of outflow into Appledore Road and beyond. It is not possible for the agent to argue that surface water flooding is not a serious problem for this site. Where are the measured and estimated volumes of water and flow rate across the 12 months? Without it, an objective assessment cannot be made.
  - v. "Flood Re" and the "TCPA" are in consultation with the Government to include in the planning bill the legal right for communities to provide their local expertise and have their voices heard in planning decisions that affect flood risk in their areas. New homes, they said, must be built in the right places and be of the right quality to meet the challenges of climate change.
  - vi. The geology of this site is impermeable due to the clay substate. We are concerned that the site's natural hydrology would be damaged by extensive disruption and alteration to the complex historic water system on the site, predominantly draining to the Tilder Gill behind Shrubcote. The surface water runoff relies on the existing ditches and outflow via culverts into the surface water sewerage network into Appledore Road. It is likely to overload the currently inadequate sewer system. It is considered flooding will worsen with new hard landscaping across so much of the site.

## Delivers net gains in biodiversity

- a) To avoid duplicating facts on this topic, please read my objection based on ALP policy ENV1.
- b) Some key highlights:
  - i. Limes Land has not been cultivated for hundreds of years; the site has developed its own unique rich biodiversity of flora and fauna.
  - ii. This application masterplan has the same spatial footprint as before (application AS/19/01788).
  - iii. EPR's description of the site as consisting in the main of 'low grade agricultural fields' conceals its true status as an increasing rare survival of a medieval Wealden field system, with the wide variety of grass and herb species one would expect from such a special environment and hedgerows dated to be hundreds of years old.
  - iv. EPR's description of the site as mainly consisting of 'semi-improved grassland' conflicts with the KCC Historic Environment Record Officer's record of it as unimproved grassland, and therefore as a DEFRA Priority Habitat. It is also notable that areas of acid grass, heath and neutral grassland (all present on the site) are increasingly rare in Kent, with only approximately 500 hectares remaining in the whole of the county.
  - v. Considerable numbers of protected and rare species have been ignored and not documented by this application. These species will be lost or severely reduced, and in some cases would be an infringement of various wildlife protection parliamentary acts, such as species protected by Schedule 6 of the Wildlife & Countryside Act 1981, the Conservation of Habitats and Species Regulations 2010. In addition, The Natural Environment and Rural Communities Act 2006 Section 40 places a duty on all public authorities in England and Wales to have regard, in the exercise of their functions, to the purpose of conserving biodiversity.
  - vi. Development on this site would cause substantial and permanent harm to the ecology of this rare medieval field system. There is no likelihood of the 'legibility of the medieval field boundaries' being preserved in view of the number of houses to be built.
  - vii. There is concern that the nearby committed development of 100 dwellings on the ecologically sensitive site known as Tilden Gill on the other side of Appledore Road, and the four houses recently completed in the onetime orchard immediately to the South at Hales Place. Added to the Wates proposal for a further 145 dwellings, will inevitably disrupt the nesting and foraging activities of species moving from one site to another, with a cumulatively negative impact on the environment should be taken into account.
  - viii. A site introducing biodiversity loss is in direct conflict with the NPPF and ALP.
  - ix. Finally, few years ago Tenterden Town Clerk requested that the council conduct an independent survey a to produce an independent baseline. This was refused.

## Conserve and enhance non designated heritage assets

- a) The NPPF has specific safeguards to protect culture and heritage. As a historic market town, it is not surprising that heritage is very important to the community the large thriving tourist economy, which should be preserved.
- b) The NPPF states that planning should conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and

future generations. Definition of a heritage asset includes place, area or landscape. The term "Significant" applies to its physical presence as well as its setting.

- c) NPPF Para 194 and 195 states "When considering the impact of a proposed development on the significance of a heritage asset, "great weight" should be given to the asset's conservation. As Limes Land heritage assets are irreplaceable, potential harm or loss would result.
- d) Kent Design Guide spells out the importance of a well-integrated design with its surroundings. The layout and appearance of buildings should be based on an appraisal of the character of the site and the adjoining land and buildings. It states many modern developments fail to do this. This has been poorly executed by Wates.
- e) The topography of the site is significant as in the middle is a ridge sloping North East and South West. Limes Land is a rich heritage site with exceptional countryside and amazing unimpeded views from the ridge. It is one of the highest points in Tenterden with unimpeded views across the countryside to St Mildred's Church and to Kench Hill. The proposed layout and design will, at a stroke, obliterate the incredible views from the existing homes on Woodchurch Road and Appledore Road, plus the views from the PROW.
- f) This site is renowned for its Medieval Ridge and Furrow ploughed field, Gallows Green and the Drove. Limes Land is typical of the Wealden pastoral landscape separated by hedgerows and drainage ditches. This ancient mosaic field structure, in combination with unimproved or semi-improved neutral and acid grassland, affirms the site historical importance locally, regionally and nationally.
- g) It has to be noted that Schedule 4 of The Hedgerows Regulations 1997 does not allow ancient hedges over 20 metres in length or which join other hedgerows adjoin agricultural land to be removed without planning permission. No permission has been sought.
- h) Appledore Road is a historically important tree lined avenue leading to the town. It is proposed to remove established trees and destroy this historic and distinctive streetscape along Appledore Road. Significant visual harm would occur with the introduction of 'urban' traffic calming measures, bollards and signage, completely at odds with its character.
- i) This application proposal would have significant impact and harm. The significance lies in the value of a heritage asset to this and future generations. The effect of an application on the significance of a designated heritage asset should be taken into account in determining the application. Such criteria frequently include:
  - i. Age
  - ii. Rarity
  - iii. Representativeness
  - iv. Aesthetic appeal
  - v. Landscape Value
  - vi. Historic association
  - vii. Archaeological interest
- j) ALP Para 9.34 The presence and pattern of historic landscape features highlights the importance of protecting heritage landscape features. Limes Land is a medieval site which is well known for its "ridge and furrow" ploughing which can be found in the South West corner together with ancient mosaic boundaries of hedge rows and trees are important features in defining the character of the landscape. KCC Heritage have added: "Surviving ridge and furrow is not common in Kent and is a landscape heritage asset meriting sympathetic and appropriate consideration, including preservation in situ." These features and their setting must be protected.
- k) Gallows Green, southern part of Limes Land is recorded to be the historic site where many hangings took place. KCC Heritage have added: "Whether the actual gallows site was within or

adjacent to the proposed development site, it merits sympathetic consideration and appropriate mitigation. It may also be worthwhile considering whether there is a related burial ground or paupers grave nearby.” The point to note is the historic value to the community.

- l) KCC Heritage have stated: A track towards the southern end of the development site. identifiable on 19th century maps as a wide routeway narrowing to a footpath and field boundary. They suggest it may be a drove way for funnelling livestock from the fields through to town, perhaps for market or transport. Drove ways are a key component of the historic landscape surrounding medieval towns, linking the countryside to the market place or seasonal grazing areas. The link of livestock, especially sheep, to the Medieval and post Medieval market town of Tenterden is strong given its origins as part of the development of the cloth industry from the 16th and 17<sup>th</sup> centuries. This track/drove way is an archaeological feature; a tangible and visible part of the setting and significance of the Medieval and Post Medieval Tenterden town.
- m) Finally, the development would adversely impact Tenterden’s heritage of being known as “Jewel of the Weald”. Our tourist economy is based on the town’s high street and countryside heritage.
- n) Reg 14 Tenterden Neighbourhood Plan has highlighted the sites non designated heritage locations which were obtained from the KCC website and supported by local knowledge Tenterden Neighbourhood Plan policies TEN NP7 and TEN NP16 are relevant. This proposal does not preserve or enhance the heritage assets of the Borough. The policy continues states that development will not be permitted where it will cause loss or substantial harm to the significance of heritage assets or their settings unless it can be demonstrated that substantial public benefits will be delivered that outweigh the harm or loss. Tenterden Neighbourhood Plan has reached Regulation 14 stage.

### Creates sustainable highest quality design

- a) To avoid repetition within this document, please read my objection based on ALP policy SP6. In addition, I have submitted separate objection letters on: the impact of climate change on design; and Placemaking to avoid repetition within this document.
- b) Some key highlights:
  - i. Quality design is very important for all developments, but unfortunately the agent is not following good design principles for this site. They are proposing substantial housing masterplan that is not commensurate with the local vernacular of Appledore Road and Woodchurch Road settlements, nor the edge of town countryside.
  - ii. Residential development should be of a design density that is appropriate to the existing positive character of the neighbourhood. This application housing masterplan is an incongruous urban design for a rural countryside setting.
  - iii. This application fails to produce a complete and objective baseline of the immediate neighbouring vernacular. The proposed masterplan has been designed to meet the developer’s goals, not the need and identity of the area. It principally fails on local character; nature (biodiversity, habitats; rarity of species); movement (true distances to anchor points, access to employment, access to shopping centres); build form (density, style, height, mass, building line set back); street types; views from the public realm; impingement of privacy on existing residents.
  - iv. ALP Para 6.44 states windfall schemes should be integrated properly within an existing settlement, all development proposals will need to show how they can complement the existing settlement character in terms of their layout, design, scale and appearance. In reality the proposed scheme will corrupt the immediate residential and countryside aspects.

## Promote non-car-based transport

- a) Transport is the largest and fastest-growing emitter of greenhouse gases by sector. Chapter 14 of the NPPF addresses this, with paragraph 152 stating that the planning system should 'shape places in ways that contribute to radical reductions in greenhouse gas emissions and paragraph 149 stating that plans should take 'a proactive approach to mitigating and adapting to climate change' in line with the objectives and provisions of the Climate Change Act 2008. This reference to the Climate Change Act makes the objective of net zero carbon dioxide emissions by 2050 and the interim targets of the act clearly relevant to planning authorities, to shape policies and direct decisions that help reduce carbon dioxide emissions.
- b) The NPPF explains why housing should be collocated with sustainable transport. Paragraph 66 states, 'Strategic policy-making authorities should establish a housing requirement figure for their whole area which reflects the overall strategy for the pattern and scale of development.' This refers back to the requirement in paragraph 20, which says the 'overall strategy' should provide for issues such as transport infrastructure and climate change mitigation. Paragraph 73 also notes that when planning for larger scale development, strategic policy-making authorities should identify where housing needs can be sustainably met by considering opportunities from existing or planned investment in infrastructure. It can be concluded that the Local Plan could not provide the necessary infrastructure for any significant scale sites on the edge of town such as Tenterden. For this planning decision, the Agent's proposal does not take into account the lack of existing and planned transport infrastructure investments.
- c) NPPF 105 says that the planning system should actively manage patterns of growth in support of these sustainable transport objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. The emphasis is on the word "genuine". For Tenterden there is no "genuine" choice, but residents will be permanently car dependent.
- d) The NPPF states that planning policies should align strategies and investments for sustainable transport with development patterns, managing growth so that:
  - i. The potential impacts of development on transport networks can be addressed.
  - ii. Opportunities to promote walking, cycling and public transport use are identified and pursued
  - iii. The environment impacts of traffic and transport infrastructure can be identified, assessed and considered to mitigate any adverse effects
- e) Within the Infrastructure Delivery Plan there is no sustainable strategic transport proposals for Tenterden.
- f) Robert Jenrick, (then) Secretary of State for the Ministry of Housing, Communities and Local Government issued a ministerial statement on the 16th December 2020 saying building homes around our transport hubs will help to tackle climate change by offering greater access to more sustainable forms of transport and reducing unnecessary journeys.
- g) Tenterden is not a transport hub for commuting and other travel, with the closest railway station at Headcorn 9.4 miles away from the site. Most of the residents go by car, due to time of day, convenience and duration, resulting in unsustainable travel. Tenterden has very few job vacancies, so economically active adults travel to work outside the town. There are buses that service Tenterden, but they are infrequent and expensive so majority of commuters and shoppers rely on the car.
- h) Housing that is poorly located locks residents into long and polluting car journeys on congested roads, leads to socio-economic marginalisation and degrades our natural environment. Poorly located and designed new development seriously hinders healthy lifestyles for the new residents and the existing population. Truly sustainable development requires the planning decision to

follow government guidelines and policies to orientate development so that new homes and jobs are close to shops, services, and public transport nodes and existing places are made more sustainable.

- i) Effective place making focuses on where quality transport infrastructure and services already exist rather than on new infrastructure to support remote locations which potentially will be prohibitively expensive.
- j) To achieve sustainable economic growth, it has to have connectivity between housing and labour markets and realising economies of scale. This will reduce emission by shaping settlement patterns to shrink the need to travel by car and maximising accessibility to low-carbon modes of transport. The Agent's proposal does not support this aim. Its proposal will expand the need to travel and maximise high carbon modes of transport.
- k) The proposal's transport assessment is superficial and is meaningless when it comes to true sustainable transport.
- l) To mentioning access to bus stops when there is no sustainable and affordable bus transport is not relevant. As buses run between once per day to 1 every two hours, quality and inexpensive public transport does not exist for Tenterden.
- m) To mentioning cycle routes which are only suitable for leisure and exercise is disingenuous. Cycling is not fit for purpose for residents who have to commute to places of work and have to journey outside of Tenterden.
- n) 2011 Census shows that 20% of the residents work locally and of those 48.7% travel by car with only 1.7% by bicycle and 2.2% using public transport. That illustrates very strongly that the agent's proposals for sustainable travel is a fallacy. It must be remembered, that 80% of the residents travel further afield, mainly to Ashford.
- o) With poor accessibility to jobs, insufficient local amenity, transport dominated by the car, these proposals are neither fit for purpose for today, nor for the future. Private transport is and will continue to be the main mode of travelling due to convenience, cost, and speed.

#### Provide a range of employment opportunities to meet needs of local business

- a) This proposal does not grow or innovate an enduring local economy, a key element of NPPF Para 8.
- b) Tenterden being the second largest town with 6% of the borough population is irrelevant. The planning decision process revolves around sustainable to the environment, sustainable to the social welfare and sustainable to our prime economy of tourism. Tourism is our life blood and has to be protected by ensuring sustainable cohesion to protect our economy and employment.
- c) ALP Para 2.01 says that the key driver for employment in the borough is the impact of HS1 and the critical transport investment in transport infrastructure. The location is Ashford not Tenterden. The focus is on the Commercial Quarter and the other big 8 projects. ALP para 2.109 continues to say due to Ashford's sustainable location and infrastructure, housing development will be concentrated within the town centre, ideally on brownfield sites. Other prime locations will be by the motorway network to support business operational needs. In other words, businesses wishing to expand or create a foothold will not be looking at Tenterden.
- d) KCC growth and infrastructure framework shows that Tenterden is not an employment centre. All the borough employment clusters are around the Ashford town centre. There is little unemployment in Tenterden, but there is also little opportunity to increase the employment potential. The new homeowners will have to find employment in Ashford or other major employment centres. It is essential that Tenterden keeps an equilibrium of economic, social and

environmental sustainability in line with current and future housing stock. This site would destroy the sustainable equilibrium.

- e) New houses in Tenterden were slow to sell before the Covid virus, and this will only slow down even further on the approved developments, as economically active adults will not see the attraction of living in Tenterden and commuting to employment centres.
- f) Deductions that can be safely agreed are:
  - It appears logical that employers who wish to set up new offices, warehouses and light industry in this part of Kent will naturally gravitate to Ashford Town Centre. Especially as it has an excellent travel network and Local Plan Policies designed to support up-and-coming new businesses and allow expansion of existing businesses.
  - Tenterden has inherent disadvantages for any serious economic growth.
- g) The bottom line is that employment in Tenterden is not a key driver in the construction of a substantial number of houses in the Tenterden catchment area. All the above points show that housing should be in and around Ashford.
- h) Any development on this site should be viewed within the wider context of other ongoing residential development in the town and surrounding area. A development of 145 dwellings added to the hundreds of new homes already planned for the town, would increase the local population by a very significant amount. This is disproportionate in terms of scale and unsustainable in terms of existing local infrastructure provision, local employment opportunities and road capacity. The cumulative impact would be intolerable and non-absorbable.

### Development is resilient to and mitigates against effects of climate change

- a) A separate objection has been submitted on the impact of climate change on design and placemaking.

### Conclusion

This application fails policy SP1 in so many ways it has to be rejected. The following is not meant to be inclusive but illustrative:

1. Does not conserve and reinforce the Borough's natural environment including designated landscapes such as Limes Land LCA 23 of Ashford's SPD. This is confirmed in the SLR document.
2. It would be incompatible, intrusive and damaging to the character of the settlement and the surrounding landscape.
3. Does not focus development at sustainable locations with appropriate existing infrastructure. In fact, mutates the rural town of Tenterden into an urban sprawl.
4. Local Plan says that residential development outside town 'confines' or major developments in an AONB setting only be granted in exceptional circumstances. There are no exceptional circumstances.
5. The recent Ashford SHELAA report highlights this site is peripheral to the town centre. Development here could have a significant impact on the existing rural character for this part of Tenterden and the AONB.

6. Removes existing connected green infrastructure network to adjoining sites with access to nature.
7. A critical green space and lung would be lost between local designated sites, as well as a distinctive place with rolling landscape being destroyed.
8. It is located outside the town's settlement boundary and seriously encroaches into Tenterden's Weald landscape blessed with rich biodiversity.
9. Does not grow or innovate the local economy.
10. Does not provide access to an authentic choice of sustainable transport.

*John Crawford*  
Tenterden Councillor

**Appeal Ref: APP/E2205/W/21/3284479 for Ashford Application: 21/00790/AS**

**Land between Woodchurch Road and Appledore Road, Tenterden, Kent**

**Objection: - Cllr John Crawford (Tenterden Town Council)**

**Topic: - Non-Compliance with SP2 The Strategic Approach to Housing Delivery**

Date: 18<sup>th</sup> November 2021

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Introduction

SP2 Strategic Approach to Housing Delivery is develop a housing target for the borough to ensure they are needed, affordable, in the right place, sustainable, have the necessary infrastructure to support and are deliverable. This letter is not meant to be comprehensive, but to give an illustration of the major proposal deficiencies.

Vision Extract

In order to deliver the vision, a number of strategic objectives have been developed. The following is the relevant extract form the 2030 Ashford Local Plan Vision Statement:

“Ashford Borough will meet its housing and employment needs, and take account of the needs of investors, through the provision of new high-quality development forming attractive places, with the necessary supporting infrastructure and services, and in sustainable and accessible locations that take account of the Borough’s environmental constraints.”

Plus:

“Tenterden will continue to serve the south western part of the Borough as a principal rural service centre with a strong offer of shops and services, conserving and enhancing its historic centre and accommodating development of a suitable scale, design and character.”

SP2 Extract

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

11. Housing targets met through a combination of site allocations and suitable windfall proposals

12. Windfall development consistent with sustainability
13. Majority of housing will be at Ashford
14. Suitable locations with access to places of employment
15. Access to transport hubs

### Housing targets met through combination of site allocations and suitable windfall proposals

- a) During the Ashford plan making stage, it was determined what are suitable and relevant planning policies, infrastructure and affordable housing to support the growth at the planning application stage. This is based on the evidence of need.
- b) Policy SP2 has an agreed set of allocated sites for development up to 2030, plus windfall sites. The scale of the proposal is contrary to the adopted spatial strategy agreed by the inspectors.
- c) SP2 is quite clear that the housing target for the Borough will be met through committed schemes, site allocations and suitable windfall proposals. The majority of new housing should be at and around Ashford as it is the most sustainable location for housing development in the Borough.
- d) The Local Plan spells out in no uncertain terms the level of house building that would be acceptable for Tenterden. It has to be small scale to allow organic growth.
- e) Ashford stated that the Wates proposed site is not required for inclusion in the 2030 Local Plan. It is not an allocated site and there is no justification for this application to be submitted.
- f) The ALP Glossary of terms states windfall sites are those which have not been specifically identified as available in the Local Plan process. They normally comprise previously-developed sites that have unexpectedly become available.
- g) The original Ashford BC Tenterden and Rural Sites DPD 2010 Assessment states: "The site is relatively peripheral to the town centre. Development here could have a significant impact on the existing rural character of this part of Tenterden and the AONB. Access to the site is limited with potentially a major impact on the character of Appledore Road."

Conclusion: would result in a style of development unsuited and out of keeping with the prevailing character of the area. A major impact on the character of the Appledore Road."

- h) Ashford 2030 Local Plan "TS3" Assessment supports the original assessments and states: "Limes Land was listed as a formal site submission for the 2030 Local Plan but was again ruled out: stating "this site, wraps around a larger existing housing development, has few physical constraints to development, but any proposals should be mindful of the setting and views from the two listed buildings in close proximity and impact upon the wider landscape. The site, while joined to existing development, would be beyond the existing built-up part of the settlement. The site is not considered suitable for development."
- i) Ashford SHELAA report appendix 5 says: "The site is relatively peripheral to the town centre. Development here could have a significant impact on the existing rural character of this part of Tenterden and the AONB. Access to the site is limited with potentially a major impact on the character of Appledore Road.
- j) ALP Para 6.36 states in line with the NPPF and supporting PPG, it is important that suitable development opportunities for housing within [a] the built-up confines of particular settlements are allowed to come forward, [b] the scale and quantity of housing development proposed should not be out of proportion to the size of the settlement concerned and [c] the level of services present. This scheme fails on each of these points.

- k) The cumulative effects of windfall schemes on local services and facilities, accessibility, infrastructure provision, suitability of sites and environmental sustainability have to be taken into account.

It is considered this speculative proposal is not sustainable when all factors are considered.

- l) This is a proposed and unneeded significant scale housing development on an unallocated greenfield site outside the built-up confines of the town of Tenterden in the countryside. Paragraph 6.51 of the Local Plan defines the meaning of "built up confine of a settlement" and this site resides outside according to the definition.
- m) The identity will be forever damaged by taking away its prized amenity land and green space. For Tenterden only small-scale developments that are absorbable can be accommodated within the character of the town over and above allocated sites in the local plan.
- n) This is a very significant residential proposals for Tenterden and should only be considered through the official local planning process.
- o) There is no identified need or benefit for significant additional housing in Tenterden. In fact, in our opinion, it will be severely detrimental. This site:
- i. Should be refused planning permission as the amount of evidence regarding unsuitability and unsustainability is overwhelming.
  - ii. Is beyond the agreed site allocations of the original 2010 Tenterden and Rural DPD. Therefore, there is no justification for this application.
  - iii. The proposed development site has not been allocated as a site for housing development in the proposed Local Plan. In fact, it was rejected during the assessment process<sup>1</sup>. The Local Plan did allocate the Tent 1, Pope House Farm sites and recognised that Tilden Gill development had been given approval through the Appeal process. This was considered more than sufficient for the size and location of Tenterden and will fulfil the needs during this planned period.

### Windfall development consistent with sustainability

- a) ALP Para 2.42 states "the countryside is not a sustainable location for large scale development". Para 2.59 continues to say "development located outside an AONB but which would have a significant adverse effect on the setting of the AONB will also be resisted".
- b) The ALP is quite specific that the combined master planned southern extension to the town and the permitted extension to housing at Tilden Gill Road on the Shrubcote estate can fulfil the town's development needs over the Plan period without adversely affecting the character of the town. The Wates proposal is not part of the planned approach.
- c) Though Tenterden is the second largest town with 6% of the borough population, the key decision-making process revolves around sustainable and absorbability. Is it sustainable to the environment, sustainable to the social welfare and long-term sustainability to the economy? The answer is no and would be detrimental in all aspects and will particularly damage our prime tourism income and create unemployment?
- d) Development at Tenterden is constrained by the High Weald AONB which surrounds it on three sides, and a high quality, well-preserved Conservation Area in its heart that gives Tenterden its distinctive character. Tenterden has been the focus of relatively small-scale 'organic' growth,

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<sup>1</sup> <https://www.ashford.gov.uk/planning-and-building-control/planning-policy/adopted-development-plan-documents/adopted-local-plan-to-2030/local-plan-2030-examination/examination-documents/>

however it was agreed to add sustainable development by the high street and allocated a significant development area to the south of the town centre (TENT1) to meet future needs. The first phase is nearing completion.

- e) 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. No additional significant development is required.
- f) The agent should realise it is "not size that is important" with Tenterden being the second largest town in the borough. The decision should be based on the criteria of its the location. That is to say in the right place.
- g) Since February 2019 over 100 windfall dwellings have been permitted, equivalent to 10% of the required windfalls over a 11-year period. As a parish, we are punching well above our weight in providing windfall sites that are small in scale, but can be sustainably integrated into our community. This unabsorbable and unsustainable application would seriously harm our treasured "jewel of the weald".

#### Majority of housing will be at Ashford

- a) The Ashford Local Plan and the SHELLA documents both say that no additional significant development should take place in Tenterden.
- b) Ashford as the borough's principal settlement, represents the most sustainable location within the borough and therefore where most development should be located. Ashford is home to about half of the borough's population and where a large proportion of local jobs are located and plans for future economic growth concentrated. There are a wide and full range of local services available within the town centre and the various neighbourhoods that make up the wider urban area. The town caters for its own residents' needs and those living in a wider rural hinterland. The town has expanded significantly in recent years and plays an important role in the sub-regional economy of East Kent.
- c) ALP Para 2.38 says, historically, larger scale residential development in the Borough has been targeted towards the town of Ashford. All recent iterations of previous Local Plans, County Structure Plans and the South East Regional Plan gave clear and distinctive spatial guidance that focused growth towards Ashford and its immediate surroundings whilst applying a policy of limited growth to Tenterden and the main villages in the borough.
- d) ALP Para 2.65 and 2.66 - Plan's distribution strategy which identifies new housing land allocations to deliver around 4,872 dwellings in and around Ashford and 1,017 dwellings in the rural parts of the borough. Any significant divergence from this broad approach, i.e., transferring major housing growth from Ashford to the rural parts of the Borough should be avoided. Not doing so would result in an unsustainable model of development.

#### Suitable locations with access to places of employment

- a) ALP Para 2.01 says that the key driver for employment in the borough is the impact of HS1 and the critical transport investment in transport infrastructure. The location is Ashford not Tenterden. The focus is on the Commercial Quarter and the other big 8 projects. ALP para 2.109 continues

to say due to Ashford's sustainable location and infrastructure, housing development will be concentrated within the town centre, ideally on brownfield sites. Other prime locations will be by the motorway network to support business operational needs. In other words, businesses wishing to expand or create a foothold will not be looking at Tenterden.

- b) KCC growth and infrastructure framework shows that Tenterden is not an employment centre. All the borough employment clusters are around the Ashford town centre. There is little unemployment in Tenterden, but there is also little opportunity to increase the employment potential. The new homeowners will have to find employment in Ashford or other major employment centres. It is essential that Tenterden keeps an equilibrium of economic, social and environmental sustainability in line with current and future housing stock. This site would destroy the sustainable equilibrium.
- c) With the current housing approvals, there is a real danger that unemployment would rise with the lack of local employment, due to families who regrettably cannot afford public transport.
- d) The bottom line is that employment in Tenterden is not a key driver in the construction of a substantial number of houses in the Tenterden catchment area.
- e) Any development on this site should be viewed within the wider context of other ongoing residential development in the town and surrounding area. A development of 145 dwellings added to the hundreds of new homes already planned for the town, would increase the local population by a very significant amount. This is disproportionate in terms of scale and unsustainable local employment opportunities. The cumulative impact would be intolerable and non-absorbable.

### Access to transport hubs

- a) Transport is one of the largest contributors to carbon emissions. Therefore, it is important that residents can live, work and play without generating unnecessary emissions. It is important that we deliver carbon-conscious places.
- b) ALP Para 5.20 states there has to be genuine choice of transport besides the use of a private car. However, for this location, there are significant transport issues which cannot be resolved and therefore the site is unsustainable.
- c) NPPF underpins that view and states that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. The agent's proposal does not provide a genuine choice of transport.
- d) Chapter 11 of the NPPF states that when considering appropriate decisions, it should take into account "the scope to promote sustainable travel modes that limit future car use."
- e) Chapter 14 of the NPPF paragraph 148 states that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" and paragraph 149 stating that plans should take "a proactive approach to mitigating and adapting to climate change" in line with the objectives and provisions of the Climate Change Act 2008, which is clearly relevant to planning authorities.
- f) To achieve sustainable economic growth, it has to have connectivity between housing and labour markets and realising economies of scale. This will reduce emission by shaping settlement patterns to shrink the need to travel by car and maximising accessibility to low-carbon modes of transport. The Agent's proposal does not support this aim. Its proposal will expand the need to travel and maximise high carbon modes of transport.
- g) Tenterden is not a transport hub for commuting and other travel, with the closest railway station at Headcorn 9.4 miles away from the site. Most of the residents go by car, due to time of day,

convenience, cost and duration, resulting in unsustainable travel. Tenterden has very few job vacancies, so economically active adults travel to work outside the town. There are buses that service Tenterden, but they are infrequent and expensive so majority of commuters and shoppers rely on the car.

- h) Ashford is the only commuter and major employment hub in reasonably close proximity to Tenterden. There is no acceptable or quality transport service in Tenterden to employment centres such as Ashford. Therefore, the only option is the increase of car usage, which is already at an unacceptable level and highly unsustainable. Ashford's economic initiatives are around its town centre and M20 road network. It will have only limited benefits to residents of Tenterden due to poor A28 road network, poor public transport and distance to commute to the final employment destination.
- i) Effective place making focuses on where quality transport infrastructure and services already exist rather than on new infrastructure to support remote locations which potentially will be prohibitively expensive in this case.
- j) NPPF Planning Guidance is very clear. It says to facilitate access to high quality public transport. Tenterden does not have high quality transport. It has very limited transport to a small number of locations with typical expensive rural fares. All Wates can do is state there is a local bus stop, but that in itself does not provide high quality public transport.
- k) Building homes around our transport hubs will help to tackle climate change by offering greater access to more sustainable forms of transport and reducing unnecessary journeys. Tenterden is not a transports hub.

## Conclusion

- a) It is very clear what is acceptable housing growth within the Ashford Borough and Tenterden. It is based on housing needs, sustainability, plus the location of new and expanded infrastructure.
- b) The ALP spatial guidance focuses on growth towards Ashford and its immediate surroundings, whilst applying a policy of limited growth to Tenterden and the main villages in the borough.
- c) The ALP's aim is to conserve and enhance Tenterden's historic centre and accommodate development of a suitable scale, design and character.
- d) The Inspector's report on Ashford's Local Plan explicitly addressed housing growth in Tenterden, saying "it is not essential for the growth strategy to be changed to favour Tenterden in order to arrest potentially serious economic or social consequences." In other words, ABC does not need to encourage or promote further housing growth in Tenterden for reasons of sustainability.
- e) This site is agricultural and is not designated for development in the ALP for the area. The proposed development is not in accordance with the development plan
- f) Ashford, the nearest employment centre from Tenterden with major shopping facilities, is approximately 12 miles away. The road network is typically rural and is not designed for high volume of traffic and heavy goods.

**The proposed application fails this strategic policy on so many fronts and should be rejected.**

*John Crawford*  
Tenterden Councillor

## **Appeal Ref: APP/E2205/W/21/3284479 for Ashford Application: 21/00790/AS**

Land between Woodchurch Road and Appledore Road, Tenterden, Kent

**Objection: - Cllr John Crawford (Tenterden Town Council)**

**Topic: - Non-Compliance with SP6 Promoting High Quality Design**

Date: 19<sup>th</sup> November 2021

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### Introduction

A key council priority is delivering development that is of high design quality and is sustainable.

The National Planning Policy Framework Para 126 is unequivocal in the “great importance” the Government attaches to design as “a key aspect of sustainable development....indivisible from good planning”.

To avoid duplication in this SP6 objection letter, please refer to the Climate Change objection letter.

### Vision Extract

In order to deliver the vision, a number of strategic objectives have been developed. The following is the relevant extract from the 2030 Ashford Local Plan Vision Statement:

“A positive approach to adapting to and mitigating against, the effects of climate change will be secured by promoting sustainable transport, sustainable energy technologies, and encouraging sustainable building design; avoiding development in areas at greatest risk of flooding; protecting and enhancing green networks; carefully considering the location, layouts and design of new housing; promoting sustainable drainage and challenging water efficiency standards.”

### SP6 Extract

Primary objections revolve around:

1. Character, distinctiveness and sense of place
2. Ease of movement
3. Legibility
4. Public safety and crime
5. Quality of public spaces and their future management
6. Flexibility and liveability
7. Efficient use of natural resources

## Design and Quality Central Stage

- a) Standards of design and quality of new development is now central stage by putting emphasis on approving good design as well as refusing poor quality schemes.
- b) This application fails within the poor-quality scheme category for many reasons. Permission should be refused for development as it fails to improve the character and quality of an area and the way it functions.
- c) The NPPG clarifies within Paragraph 031 (Reference ID: 14-031-20140306): “A Design and Access Statement must: (a) explain the design principles and concepts that have been applied to the proposed development; and (b) demonstrate the steps taken to appraise the context of the proposed development, and how the design of the development takes that context into account.
- d) It appears the developer did not follow the Natural England Landscape Character Assessment methodology as a poor baseline assessment was the outcome.
- e) The proposed masterplan must not be just an urban extension with minimal consideration of its countryside location.
- f) Beauty and place-making is now a strategic focus in the NPPF. The masterplan does not create a beautiful place commensurate with the immediate countryside and AONB setting, nor placemaking by building on a wonderful and naturally beautiful wild countryside. The development is in the wrong place.
- g) It is no longer tenable for designs to focus on just keeping housing warm. There are plenty of renown climate change academic articles that stipulate that passive construction has to be adopted to allow dwellings to keep cool in the summer and keep warm in the winter. There appears to be active interest in the “Passivhaus Principles” that have been awarded architecture prizes and is probably one of many principles that should be followed.
- h) Where are the sustainability qualities? These buildings should directly address climate change concerns.

## Character, distinctiveness and sense of place

- a) New development must be suitable for modern lifestyles, able to address and adapt to future trends, and be resilient to economic and anticipated and unanticipated environmental, social, cultural, and health shocks.
- b) The heavily promoted MHCLG “design code” is one of the tools to ensure the sustainability of new development. Not just the aesthetic, but the practical aspects such as the avoidance of:
  - i. increasing the extinguishing of rare species and habitat;
  - ii. utilisation of existing technology for energy efficient homes for both heating and cooling;
  - iii. how to travel sustainable to places of work in a realistic manner with reliable, frequent and travel routes that fits in with economically active adults needs - it is critical to understand actual journey to work patterns to create stress free and sustainable journeys.
- c) This has not be done.
- d) A housing design audit for England (Place Alliance, 2020) concluded after auditing over 140 housing developments across England since 2007, 75% of new housing development should not have gone ahead due to ‘mediocre’ or ‘poor’ design. That is to say, one in five of these developments should have been refused planning permission outright, as their poor design was contrary to advice given in the National Planning Policy Framework. A further 54% should not have been granted permission without significant improvements to their design having been made first. Often poorly accessible, dominated by the car, with more attention given to housing numbers than placemaking, resulted in new developments are neither fit for purpose today, or for the future.
- e) This speculative application should not be added to the failed list of statistics and therefore should be refused outright.
- f) ALP Para 2.174 highlights new development needs to reflect the local context, particularly where this has a special character, landscape, historic assets and features of interest, whether built or

natural. Para 2.175 continues to say new proposals should be sensitive in terms of scale, height, layout and massing to the surrounding buildings. This proposal does not take this into account on so many levels.

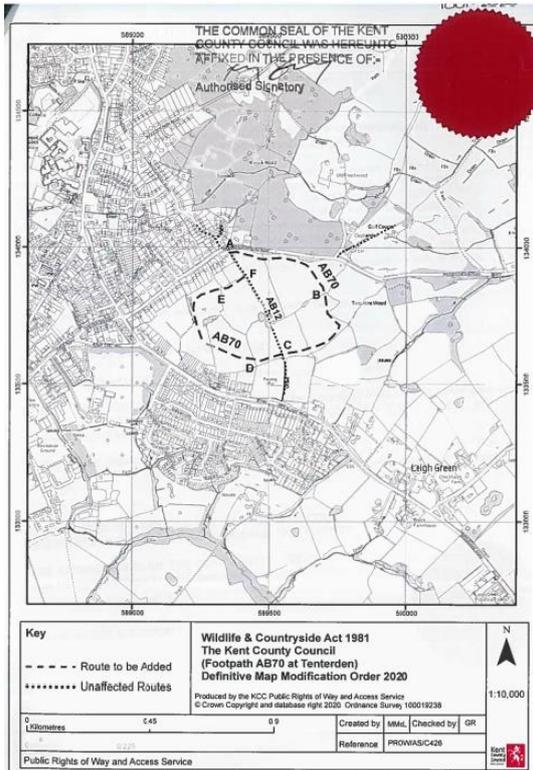
- g) The proposed masterplan has been designed to meet the developer's goals, not the need and identity of the area.
- h) It principally fails on local character; nature (biodiversity, habitats; rarity of species). The site is outside the built-up confine of the town, in the countryside and stretches from the conservation area to the West by Hales Place and connects with the AONB to the East and wildlife site and biodiverse opportunity site to the north.
- i) The direction of travel for national design codes is to undertake an unbiased analysis to understand the site location before producing a design vision. This application fails to produce a baseline of the immediate neighbouring vernacular.
- j) Wates masterplan is over-bearing, out-of-scale, out of character in terms of its appearance compared with existing housing stock in Appledore Road and Woodchurch Road. The density is an over development of 27 dwellings per hectare on a plot of 5.4 ha. The proposal is more akin with an urban town, not a rural setting with the feeling of space and tranquillity.
- k) Development on the slope will be very pronounced to residents on Woodchurch Road and in particular Appledore Road. It will have a serious impact on residential amenity value with loss of privacy where new residents would be able to look straight into Appledore Road properties due to the site's prominent elevated position.
- l) The construction of houses and flats would gravely affect the Appledore Road residents and be completely out of keeping with the design of the neighbouring community dwellings.
- m) This proposed vernacular does not blend in with the existing local vernacular. In fact, it completely conflicts with both height and bulk. It is crude and over bearing in comparison with the local vernacular of dwellings around Limes Land which is a rural site situated on the edge of town.
- n) The illustrative masterplan shows no respect whatsoever to the local character.
- o) The site connects with both the Tenterden Conservation Area and the High Weald Area of Outstanding Natural Beauty and is an area of historic parkland pasture. It is designated LCA and adjoins the designed local wildlife site and the Biodiversity Opportunity Area to the North.
- p) Any vernacular design has to take into account these undisputed facts of historic landscape, ancient hedgerows, rare and protected habitats. At the end of day, the impact of the design is ill thought out for this remarkable and extraordinary site. It is disgraceful.
- q) The masterplan clearly does not understand the existing situation, including:
  - i. The landscape character and how places or developments sit within the landscape,
  - ii. How natural features are retained or incorporated into it; patterns of built form, including local precedents for routes and spaces and the built form around them,
  - iii. The architecture prevalent in the area, including the local vernacular and other precedents that contribute to local character,
  - iv. The LCA 23 identified by Jacob has NOT been taken into account of typical Wealden countryside with a recommendation of "conserve", the highest rating. It is one of the most precious in the parish.
  - v. Bringing together all of the features, qualities and details that give Limes Land its unique character and appearance of wild "pasture like park" evolved over many hundreds of years. It has been created by the interaction of the natural environment and human activities with rare acid grassland (only a few hundred acres still surviving in Kent); rolling hillside; ancient hedgerows; medieval ridge and furrow system, iconic views North, South and East; numerous ponds surrounded by clusters of trees, mature veteran and ancient trees; typical Wealden field boundaries; and watercourses.
  - vi. The predominant and strong bond and feeling towards the green site by the community where people return for the sense of belonging to nature; peace and tranquillity. Ideal for mental and physical activity.
- r) All these to inform the form, scale, appearance, details and materials of new development.
- s) There is no rationale or planning reason why the Wates proposal density of 27 ha should be any greater than the immediate neighbours. Residential development should be of a density that is appropriate to the identified positive character of the neighbourhood. The built footprint of any

development, should be sympathetic and in scale with the existing build features on Appledore Road and Woodchurch Road. It has to be remembered that this proposed site is outside the confines of the built-up area of the town.

- i. The east side of Woodchurch Road has a dwelling density of approximately 10 dph and the north side of Appledore Road has a dwelling density of approximately 14 dph. This is confirmed by SLR.
  - ii. Tilden Gill, a new approved site very nearby has a dwelling density of 19 dph.
  - iii. A number of sites in the Ashford local plan close to the countryside have low 20 dph.
- t) In truth, it is an urban design suitable for an area such as Ashford. The density is unacceptably high and would harm the local vernacular, landscape, public views, local character, existing amenity and become a blot on the landscape
  - u) KCC Heritage have highlighted the northern patch of the ridge and furrow is to be entirely developed over. Wates should retain and integrate into the masterplan.
  - v) The drainage strategy appears to impact on the Heritage Asset ridge & furrow feature in the south-west of the site. A negative impact on this asset is totally unacceptable.
  - w) One or more ponds for the proposed sports pitch may require levelling which should not be allowed as they are of historic importance.
  - x) It appears no provision has been made to plant new trees on streets to combat climate change, or to take into account the important contribution to the character and quality of the urban proposed site. The masterplan is deficient with the NPPF and the national Design Code. The NPPF continues to say that measures have to be put in place for the long-term maintenance of newly-planted tree. I could not see any obligation by the developer.
  - y) The Design and Access document does not appear to state how the existing protected and rare wildlife will be protected with an artificial country park. The simple reason is that it cannot be achieved. There are no mitigating actions to preserve them – those species that are fortunate to survive will be driven away and have to compete with other wildlife in other parts of the countryside, maybe miles away.

### Ease of movement

- a) The connections between the residential development and the 'Country Park' are poor. It is essential that the layout and pedestrian movement of both sites should be integrated.
- b) With regard to the existing PROW AB12, ENV5 Protecting Important Rural Features bullet point (d) has to be recognised. ALP Para 9.55 says that where features are important to the character, development should have regard to the need to protect and where possible enhance. The proposed pavilion is unsympathetic in mass and would obliterate the views to the North which would have material harm to the enjoyment and visual impact of the vista.
- c) The application presents a very poor landscape and visual impact assessment to create a meaningful and accurate baseline of features. There appears to be no Landscape and Visual Impact assessment for the PROW and the proposed pavilion.
- d) It appears Wates are in breach of NPPF para 98, as it says: "Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks".
- e) They have gone out of their way to thwart legitimate and legal opportunities to add links to existing rights of way such as the PROW AB70 shown on the map below.



- f) KCC PROW Department have stated that once the new PROW is adopted, it must be incorporated into the masterplan. Before this application goes any further, Wates must resubmit a new master plan as most of their layout are based on the orientation of their design.

### Legibility

- a) Legibility (and sense of place) is often undermined by lack of reference to context, as it is in this case
- b) Under NPPF Para 174, the landscape value is considered to be considerable and therefore none of those circumstances supports Wates Proposal.
- c) LPA Para 9.29 says development fits within the landscape and can be determined by its relationship with the natural topography of the area. Particular landform features that contribute to the character of the landscape in that area (and their setting) should be protected.
- d) The landscape has a breath-taking relationship with the topology and the iconic high ridge on Limes land. It is one of the highest points in Tenterden and affords an outstanding unimpeded view and line of sight across countryside to St Mildred's Church, which forms a prominent landmark feature on the outskirts of Tenterden. It also creates views into the site from the adjoining houses on Woodchurch Road, Appledore Road and from the PROW.
- e) Views into and from a site will be a relevant factor in assessing the impact of a proposal. Developments should be planned around natural patterns of drainage and minimise the need to divert or block these. Wates proposal does not comply as it significantly alters the landscape iconic views and alters the complex nature of waterways.
- f) LPA Para 9.30 says trees and woodlands often constitute valuable features in a landscape by giving it definition and legibility and offers protection. This site is bordered by hedges, mature trees and watercourses, which constitute valuable features in a landscape by giving it definition and legibility. These features should be retained and protected. The site's trees constitute valuable features in a landscape by giving definition and legibility. The trees are of different species including a number of healthy oak trees, ash trees, sweet chestnut, horse chestnut, sycamore and hawthorn, willow, holly, plus hawthorn where old hedge rows have matured and

also beside watercourses. This is typical of the Kent countryside, which define the prevailing configuration of field boundaries and create a mosaic pattern of fields that demonstrates Limes Land as a distinctive site. These are all relevant factor in assessing the impact of a development on the character of the landscape. Wates proposal does not comply. The masterplan is not landscape led.

- g) LPA Para 9.32 says the size and definition of field boundaries may be a significant factor in giving a landscape its character. There is no likelihood of the 'legibility of the medieval field boundaries' being preserved in view of the number of houses to be built. Wates development proposals should retain existing hedgerows and maintain the prevailing pattern of field boundaries.
- h) The site currently affords a tranquil and traditional Wealden Countryside view which will be lost for ever.
- i) LPA Para 9.35 the landscape character can also be defined in part by the local character of individual or groups of buildings. Where such buildings play an important role in the identification of landscape character, new development should take account their scale, design and detailing.
- j) The proposal does not take into account the immediate scale, design of the adjoining houses in Appledore Road and Woodchurch Road.
- k) KCC Heritage consultee has stated that the existing ponds are part of the archaeological landscape and it would integrate into the masterplan rather than introducing new ponds and channels.
- l) It is not clear which riparian landowners are responsible for:
  - i. Maintaining the watercourse and for clearing debris that could cause an obstruction by being washed downstream.
  - ii. Keeping structures such as culverts, weirs and gates clear of debris.
  - iii. Not using the watercourse for the disposal of any form of garden or other waste.
- m) The changes of the complex watercourses will probably have a negative impact on wildlife habitat (including many protected species) and is likely to overload the currently inadequate sewer system which suffers regular localised flooding and pollution.
- n) Southern Water position, states no new surface water flows will be accepted, however existing connections can be maintained.
- o) KCC Flooding consultee has stated that house footprints are shown over the top or in close proximity to the retained watercourses. This needs to be reviewed as it would not be accepted as a maintenance buffer of 5 to 8 m is required. It is understood under the terms of the Water Resources Act 1991, and the Land Drainage Byelaws 1981, the prior written consent of the Environment Agency is required for any proposed works or structures, within 8 metres.

### Public safety and crime

- a) ALP Para 2.182 says section 17 of the Crime and Disorder Act 1998 places a duty on councils to do all they reasonably can to reduce crime and disorder locally and improve people's quality of life as a result. This can be achieved through appropriately designed development that should be based on a clear distinction between public and private spaces. This clarity in design thinking will help create a safe environment by reducing the potential for anti-social behaviour and crime.
- b) KCC Police consultee has written a polite but critical set of comments. The masterplan cannot be considered a safe place, as the developer has not opened any discussion with the Kent Police, which is unacceptable. The Police have highlighted a number of serious design issues that are unresolved in designing out crime. Not a professional approach to good design making.

### Quality of public spaces and their future management

- a) ALP Para 2.185 says the quality of the public realm depends on how well it is maintained. Too often private management arrangements put in place by developers have not been robust and residents have suffered as a result. Properly funded, long-term management and maintenance

arrangements are needed to make sure that the quality of place is protected in future. The basis for such arrangements will need to be clear when planning applications are made.

### Flexibility and liveability

- a) ALP Para 2.189 says developments should be adaptable and designed to reduce vulnerability to the effects of climate change. This may involve a range of features – for example, on site sustainable drainage to help deal with intense rainfall events, and tree planting on the northern sides of streets and in public spaces to provide shade in summer and reduce ‘heat island’ effects. Practice will inevitably change and further guidance will be produced when needed.

### Efficient use of natural resources

- a) ALP Para 2.192 says efficient use of natural resources: Buildings and landscapes should be designed to make efficient use of natural resources during construction, operation and maintenance. This will contribute to climate change mitigation and adaptation, and reduce the ecological footprint of Ashford’s growth.
- b) Sunlight and energy efficiency should be considered as an integral part of the layout through passive solar design and natural ventilation systems. Developments should also consider whole-life performance and costs. This has not been done.
- c) As per Culture consultee comments:
  - i. SUDS proposed 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.
  - ii. SUDS cannot be considered as part of useable public open space.
  - iii. 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.
  - iv. Regarding the open space on site and impact to the landscape, 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 is not considered a suitable replacement.

### Conclusion

NPPF Para 134 says that development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design.

*John Crawford*  
Tenterden Councillor

## **Appeal Ref: APP/E2205/W/21/3284479 for Ashford Application: 21/00790/AS**

**Land between Woodchurch Road and Appledore Road, Tenterden, Kent**

**Objection: - Cllr John Crawford (Tenterden Town Council)**

**Topic: - Non-Compliance with ENV1 Biodiversity**

Date: 22<sup>nd</sup> November 2021

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### **Introduction**

Ashford Borough enjoys an attractively diverse natural environment, has a green infrastructure network which supports significant areas of biodiversity interest, delivers a wide range of environmental and quality of life benefits for local communities. It comprises a wide variety of landscapes and different geologies. This application site is blessed with rich biodiversity.

### **ENV1 Extracts**

ALP Policy ENV1 Biodiversity is very specific on the protection of the natural environment.

It says: "Proposals should safeguard features of nature conservation interest and should include measures to retain, conserve and enhance habitats, including BAP (Priority) habitats, and networks of ecological interest, including ancient woodland, water features, ditches, dykes and hedgerows, as well as corridors and stepping stones for wildlife.

Development should avoid significant harm to locally identified biodiversity assets (including Local Wildlife Sites, Local Nature Reserves and the Ashford Green Corridor) as well as priority and locally important habitats and protected species."

### **NPPF**

- a) NPPF Section 15 "Conserving and enhancing the natural environment" and in particular NPPF Para 174 recognises and accepts application proposals should enhance and improve the natural environment. The main objective is to take into account the biodiversity, geodiversity intrinsic character and beauty of the site.
- b) In addition, valued landscapes should be protected and enhanced as they are inherently linked with biodiversity.
- c) Each of the criterion, tests whether any harm will be caused and where there will be an adverse impact. It is understood that the conclusions carry substantial weight and importance in the planning decision.
- d) July 2021 NPPF places greater importance on climate change and biodiversity.
- e) These polices have a greater definition on sustainable development in pursuance of the 17 global goals of the United Nations. This government has made pledges to the UN on biodiversity and climate change, which has to be honoured and will be reflected in the new Environment Bill.

### **Baseline**

This document provides a genuine and reliable baseline of the site's location and character founded on local knowledge of councillors, residents who live around the site and high-

quality evidence collected for the Tenterden Neighbourhood Plan. Views have been supplemented by sources from ABC and KCC official files; Kent & Medway Biological Records Centre; the Wildlife & Countryside Act 1981; the Conservation of Habitats and Species Regulations 2010; together with the MHCLG and DEFRA Portals.

### Understanding Biodiversity

- a) Flora and fauna are the building blocks of biodiversity, which are underpinned by geodiversity.
- b) To put Biodiversity and ecology into context and per NPPF para 174, DEFRA stated this is the variety of all life on Earth and includes all species of animals and plants.
- c) To put the term ecology into context, it relates to the relation of living organisms to one another and to their physical surroundings. It relates to the symbiotic relation for life with its surrounding to live, survive and reproduce.
- d) To put the term ecological network into context, they represent the interactions that occur between species with movement between connecting zones. The interactions include competition, symbiosis and predation, and network properties of particular interest including stability and structure.
- e) Biodiversity provides crucial resources like fresh air and clean water for our daily lives. It is basically our life support system and must be looked after properly.
- f) Biodiversity and geodiversity have a key role in respect of climate change adaptation and mitigation with crucial influence on the well-being of the people in Tenterden and further afield.
- g) Understanding the natural processes that shape our landscapes and ecosystems has an important role to play in their sustainable management.
- h) The surface water flow from the Woodchurch Road feeds the network of watercourses with fresh water supplies that zigzag across the land. These watercourses then support the ponds and their individual ecosystems to support life plus allow wildlife to drink and bathe.
- i) A resilient and diverse natural environment is the essential foundation for a greener, more robust, healthier existence.
- j) The existing ecological network is known to start from the large 26 acre Hales Place in the conservation area, into Limes Land and then onto the connecting biodiversity opportunity and local wildlife sites to the North, and the AONB to the East. Placing manmade structures of houses, road, pavilions and car parks in the path of the network will disrupt migration, roaming, breeding and feeding routes.
- k) Biodiversity net gain aim is to ensure any development leaves biodiversity in a better state than before. Biodiversity is all-inclusive of all ecosystems and their interconnectivity with geology of the land which supports the flora and fauna. This objection letter will show this is not possible in this application.

### Relevance of Geodiversity

- a) To put Geodiversity into context as per NPPF para 179, it is the variety of minerals, soils, water and the natural processes which form and alter landforms. It is the foundation of our natural environment, supports our biodiversity and ecosystems, and provides the raw materials for flora and fauna.
- b) Biodiversity cannot be disconnected from geodiversity which underpins it. In the natural world, geodiversity and biodiversity are intricately interlinked.
- c) The prime interface between geodiversity and biodiversity is soil and its chemical composition. The existing plants and animals are influenced by the acidity or alkalinity of the rock and soil together with its characteristics to hold water.
- d) The aim is to minimise the harmful impact of geodiversity.
- e) Any disruption to the geodiversity will unbalance the delicate ecosystems and will significantly reduce the richness and variety.

- f) The Limes Land site will have different geophysical characteristics which will be influenced by moisture retention of the soil, plus orientation to the sun and wind. Thus, any particular spot will be predominately suitable for specific types of habitats and the wildlife it will support.
- g) The geodiversity of Limes Land has created a unique landscape character. It is the key to driving and supporting the distinct ecosystems and biodiversity.
- h) The geodiversity of the landform is obvious to see, with three slopes on the south, north and east of the ridge high point. The landscape of the site is rural and is divided into distinctive fields.
- i) Geodiversity is much like biodiversity: once lost it cannot be recovered, mitigated for, or compensated for. Losses through poor development applications or lack of awareness are the largest threat to geodiversity and therefore biodiversity.

### Wates Flawed Baseline

- a) This application fails to produce a baseline of the immediate neighbouring vernacular. The proposed masterplan has been designed to meet the developer's goals, not the need and identity of the area. It fails to identify the holistic view of biodiversity, habitats, rarity of species and symbiotic landscape.
- b) It is disappointing that minimal attempt has been made to create a comprehensive and reality checked baseline for basics such as the sites rich and rare biodiversity of flora and fauna, geodiversity, landscape form, hydrology, contamination and many other themes.
- c) This application proposal is not a subtle change to the environment, but a massive urban step change disturbing the site's natural composition and rich wildlife.
- d) Environmentally it would be a disaster for the wild, natural rich biodiversity and expansive green lung, which is valued and is indispensable to the North and South Ward settlements.
- e) EPR goes to some length to explain their experience history, but are unable to write and publish a full assessment document for scrutiny. It has to be remembered; the employed consultant is only as good as their current job. So far, the reports issued for this site have been lacking in reliability and completeness.
- f) It is well known that the west site of Limes Land has high biodiversity value. The EPR report does not comment on the high and low value of biodiversity across the site, only agriculture grading, which is unacceptable.
- g) It should be mandatory that Kent & Medway Biological Records Centre and Kent Reptile & Amphibian Group is accessed and report for all species recorded on the site. Any amber and red listed species should be highlighted in the survey report. The records show there are 17 red listed birds, 15 on the amber list, 6 protected amphibian species and 3 protected reptiles. These should have been documented by EPR.
- h) There have been a number of false starts by EPR, where they have now recognised that the Biodiversity Metric 2.0 is a proxy tool for measuring biodiversity gain / loss, and now they have admitted the metric is a blunt instrument.
- i) Subsequently Ecological Solutions were employed by Wates, but stated in their paragraph 1.1.5 and 3.6 their assessment used the previous EPR analysis as the baseline from the original application 19/01788/AS. This is totally unacceptable.
- j) Ecological Solutions commenced a supplementary survey on site with refugia survey tins to identify cold blooded reptiles. With the elongated cold spring, these surveys would have been unsuccessful until warmer months in June. The actual report was published 31<sup>st</sup> August 2021.
- k) Ecological Solutions section 6 supplementary assessment states:
  - i. The hedgerows are clearly pre-Enclosure Act and are species-rich with a good mix of native trees.
  - ii. The fields on the south facing slope in the north-west part of the site have an old parkland quality with rush choked hollows (old ponds) fed by ditches and numerous old hedge banks and earthworks.
  - iii. The ditches had a few plants such as Gypsywort and Water-pepper which had avoided the ravages of the sheep. (There is no mention of flowers and other herbal species that surfaced once the sheep had been removed allowing the site to restore with as a meadow.)

- iv. Ecological solutions highlight the nationally scarce Diving Beetle *Hydaticus seminiger* was present as were the local Dytiscids *Rhantus grapii*, *Liopterus haemorrhoidhalis* and hydrophilids *Cercyon convexiusculus*. *Enochrus coarctatus* was also present in numbers: this is invariably associated with old water bodies especially ancient field ponds and is often (as in this instance) with Great Crested Newt *Triturus cristatus*.
  - v. There was a good mix of wetland Rove Beetles, including *Paederus riparius*, *Lathrobium terminatum*, *Myllaena dubia*, and *Erichsonius cinerascens*. Local wetland spiders included *Antistea elegans* and *Hypomna bituberculatum*.
  - vi. A recently felled Oak near the southern boundary yielded *Uleiota planatus*, *Silvanus unidentatus* and *Platypus cylindrus*. Saproxylic species which were once considered scarce and good indicators of ecological continuity.
  - vii. A range of local grass feeding species were present including Small Heath, and the diminutive Black and White Hopper *Delphacinus mesomelus* (for which the only other modern Kent record is from Dungeness).
- l) Despite, the developer down playing the rich biodiversity, the above examples are just a handful of the rare species and biodiversity on the site. There are many other protected and rare species recorded on the KCC website. These have been highlighted in this objection.

### Significant Harm to Biodiversity

- c) EPR state that there will be coherent ecological network in the Tenterden area that is more likely to be resilient to current and future pressures. This is not possible with the Wates proposal; in fact, the exact opposite will result.
- d) The site is located outside the town's settlement boundary and seriously encroaches into Tenterden's Weald landscape blessed with rich biodiversity.
- e) With the construction of 145 houses, roads, permeable pavements [on impermeable ground], car parks, pavilion and football pitches will disturb the site's natural composition and rich wildlife create. It will untold havoc with the already existing surface water issues.
- f) This application is not a subtle change of the environment, but will cause harm to the environment, evict existing wildlife and biodiversity, and cause a negative effect on the biophysical environment.
- g) Housing development at a stroke would destroy the precious environment in disregard of ENV1 Biodiversity. It specifically says: Development should avoid significant harm to locally identified biodiversity assets, priority and locally important habitats and protected species".
- h) The acres of ant hills on the site help to increase the diversity of plants species encouraging a much greater range of grasses, herbs and other flowering plants to thrive such as delicate Trailing St. John's-wort. These in turn attract other insects, mammals and birds such as the Green Woodpeckers. The masterplan will obliterate most if not all of these precious valuable and underrated anthills. This one ecosystem type will be virtually impossible to replicate and a major biodiversity loss will be the outcome.
- i) Though the site does not have national designation, the agent has failed to highlight that the site is designated within the Ashford Local Plan as Local Character Area 23, Woodchurch Undulating Farmlands under policy ENV3a. This designation states to conserve and reinforce the rural and enclosed landscape which provides the immediate setting of the High Weald AONB. By default, this excludes any development. In addition, there are a large number of non-statutory designations including parts of the site which have Woodland Priority Habitat, Water Lower Spatial Priority, Flood Risk Lower Spatial Priority and abuts Biodiversity Opportunity Area, Local Wildlife Site and nearby Ancient Woodland.
- j) On The western part of the site, where the houses would be built, the habitat actually represents a rare historical survival of 'unimproved neutral grassland' – which makes it a 'Priority Habitat of Principal Importance', protected by the ALP and NPPF. This fact and the others above mean this application does not comply with ENV1 Biodiversity.
- k) Natural England has designated much of the site as 'Good Quality Semi-Improved Grassland' and it has been confirmed that the site contains the rare unimproved grassland. This needs to be factored when calculating biodiversity loss.

## Damage Limes Land Flora Biodiversity

- a) The masterplan causes unnecessary and significant harm to the existing natural rich environment by removing swathes of trees and historic hedges. Totally unnecessary. The masterplan is not landscape led.
- b) The land has never been cultivated, but only used for grazing. The outstanding features are:
  - Large swathes of ancient hedgerows protected by the 1997 Hedgerow Act, to contain probably sheep, which were rotated to different parts of the site throughout the year.
  - These ancient hedgerows are critical for nesting and foraging, and used by bats for navigation.
  - There are many mature trees of different species including a number of oak trees, ash trees, sweet chestnut, horse chestnut, sycamore, hawthorn, willow, holly, plus hawthorn hedging where old hedge rows used to exist and also beside water courses.
  - It is unusual to find mature hawthorns as specimen trees, normally they are used for hedging. On this site, there are a large number.
  - EPR's description of hedgerows being 'over mature' are considered by the Bat Conservation Trust as ideal for providing bats with roosting, foraging and navigation routes.
  - Some decades ago, a number of the trees were designed TPOs. This is out of date and the majority of the mature trees should now be protected against any purposeful damage.
- c) It is worrying to see the classification of some trees are questionably downgraded to claim their lack of suitability for nesting, foraging, and the assessment of safety and longevity. Well articulated arguments by objectors with sound evidence, have been presented to show the developers assessments are incorrect.
- d) All mature trees and important saplings on this site should be retained. These established saplings will be nature's future carbon storage.
- e) It is an inconvenient truth that several ancient and veteran trees will be impaired and in many cases the root system damaged. It appears that tree root protection zones do not adhere to standard assessment methodologies.
- f) With the need to mitigate climate change, there are methodologies to calculate the value of the tree based on species and age. There is no need to remove such a large number of trees which would go against climate change principles and would materially harm the sensitivity and character of the site.
- g) No doubt, the cut down trees will be burnt by the developer and carbon released back into the atmosphere.
- h) Any disruption will cause significant harm to flora<sup>2</sup>, which will have an adverse impact on the wildlife it supports. For this reason, the Wates application should be rejected.

## Destruction of Limes Land Fauna Biodiversity

- a) Nature and wildlife have flourished unhindered for over a century. The site is extremely rich in fauna and its symbiotic relationship with the local flora. The following are the known examples - Field Fungus, Oak Bolete, Ruby Bolete, Shaggy Ink Cap, Crimson Wax Cap, Common Puffball, Parasol, Golden Spindles, White Spindle, St George Mushroom
- b) Some of the observed faunas are:
  - The observed butterflies are: Red Admiral, Small Copper, Orange Tip, Common Blue
  - Observed birds are: green woodpecker, great spotted woodpecker, sparrow hawks, house sparrow, sparrow, nuthatch, tawny owl / jays, starling, long tailed tit, great tit, green finch, pheasants, blue tit, hawk, buzzard, kestrel, black bird, chaffinch, cuckoo, dunnock, goldfinch, wren, robin, jackdaw, magpie, jay, mallard, pheasant, rook, wren, crow, treecreeper, wood pigeon and many more.

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<sup>2</sup> Para 9.30 of the Local Plan states: The pattern and composition of trees and woodlands - trees and woodlands often constitute valuable features in a landscape by giving it definition and legibility. These features should normally be retained and protected. Similarly, the nature of the woodland may be a relevant factor in assessing the impact of a development on the character of the landscape.

- In addition, protected barn owl, buzzards, red kite and nightingale bats foraging the area. The land also supports a number of varieties of breeding birds and small mammals.
  - There are observed protected polecats and other mammals on site
  - The more common observed mammals are: rabbit, fox and squirrel
  - Observed reptiles are lizard, grass snake, and adder. Kent Reptile and Amphibian Group consider that adders are sufficiently rare and threatened in Kent that 'good' or 'exceptional' populations should be considered for selection as Wildlife Sites.
  - In addition, protected slowworm and viviparous lizard.
  - Not forgetting the pond life, ponds are teeming with insects, frogs and dragonflies.
  - Badger social groups normally have one main sett that is in use all year round, and several other setts that are not always active and may not be used at all times of the year. Ideal badger habitat is a mixture of woodland and open country. Though Limes Land is ideal for Badgers, it appears the more obvious setts are currently inactive, but they will probably return for rich food source. These mammals are protected and so are the setts (burrows) they live in. Under the Protection Act of 1992<sup>3</sup>, in England and Wales it is an offence to: Wilfully kill, injure, or remove. These mammals forage on Limes land and adjoining gardens on Woodchurch Road. Wates proposals with 145 dwellings and various football pitches would remove vital food source.
- c) Shelter and Foraging is so critical for wildlife. The importance must not be underestimated. Key points are:
- The wide variety of trees provides the necessary shelter, nesting, protection, plus direct and indirect source of food that support a large variety of birds.
  - Oaks being extremely important for biodiversity and are renown for supporting an array of 'micro ecosystems' of vertebrates, invertebrates, plant and fungus.
  - Mature hawthorn trees are also important for the natural wildlife as the fourth most important tree in supporting insects as well as its contribution to the amenity value.
  - Grassland is perfect habitat for lizards, snakes and protected slowworms.
  - The Agricultural Land Classification 1997 commented that there were drainage problems, soil wetness, slow permeability and seasonal water logging consistent with Wetness Class III and IV, corresponding with our observations; these conditions are perfect for moss, fungi and amphibians. Any development would either destroy or severely harm the protected species.
2. Development over rare grasses and precious ant hills that take up a large acreage of the southern site will take place. It is not possible to move rare grasses and millions of ants to a different geodiverse location and then expect them to survive and thrive. Both plots need the same geophysical characteristics to flourish.
- d) The agent does not appear to explain how a manmade natural park can possible replicate different substrates with the unique niches each species requires of geology, soil, grasses, specific tree species and other vegetation, natural water courses, plus the anthills that are the vital ingredient which determines the character of the High Weald landscape. The reason is that it cannot be achieved.
- e) The Design and Access document does not appear to state how the existing protected and rare wildlife will be protected with an artificial country park. The simple reason is that it cannot be achieved. There are no mitigating actions to preserve them – those species that are fortunate to survive will be driven away and have to compete with wildlife in other parts of the countryside, maybe miles away.
- f) Whatever wildlife remains after development will be under constant threat by 400 plus humans occupying 145 houses. Equally devastating will be the circa 29 cats (1 cat per 5 households) who will think it is Christmas and go on a slaughtering spree of the remaining wildlife. Only the quick and cunning wildlife will survive.

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<sup>3</sup> <http://www.legislation.gov.uk/ukpga/1992/51/contents>

## Destruction of Protected Species

- a) A number of reptile species are protected under Schedule 5 of the Wildlife and Countryside Act 1981 against intentional death or injury. Wates have not recognised.
- b) The Polecats who live and forage on this site are also protected under this act.
- c) Under the Natural Environment and Rural Communities Act 2006<sup>4</sup>, the Ashford Council have a duty to conserving biodiversity. Under the Habitats Directive, the Council must prohibit deliberate disturbance of protected species (which include great crested newts, adders, polecats and other mammals) and the deterioration or destruction of their breeding sites, resting places and feeding grounds. This development would result in significant and irreparable harm to the ecology in this area and there is no benefit of any sufficient significance to override this harm.
- d) The Wates proposal fails to state how each of the endangered and rare species will be protected. Without that evidence, how can effective mitigation actions be put in place?
- e) Development would be catastrophic for indigenous wildlife, protected species and biodiversity. If any of the trees, hedgerows and land were disrupted, there would be an unrecoverable and adverse impact on the protected species and biodiversity.

## Green Lung

- a) This site is open Wealden countryside, with a sense of separation between the settlements with features that contribute to the uniqueness and individuality of the local area which provides considerable value of beauty, amenity, recreational and a very important green lung.
- b) Simon Clarke, the Minister for Regional Growth and Local Government, in a letter to councils, said: "The ability to step outside, take exercise and enjoy fresh air is important for so many of us at this difficult time. For many people, especially families with children and those who live in homes without a garden, access to public parks is a lifeline."
- c) Many of us have discovered pockets of green space right on our doorsteps – a chance to get out in the fresh air, exercise, and support our mental wellbeing, which has been an oasis in difficult times. People are now aware of the health and wellbeing benefits that access to green spaces delivers, and support for protecting and enhancing these after lockdown is impossible for planners to ignore. Going back to business as usual is not a sustainable or viable option.
- d) It was natural that the lockdown during the coronavirus pandemic would affect how one feel about our local green spaces. Daily exercise in nearby countryside and parks and other green spaces became a lifeline to many.
- e) A CPRE survey shows the many ways that people would like to see these local spaces, including their nearby countryside, made even better. Over half said they would like to see more wildlife including birds, butterflies and bees, and almost exactly the same amount of people said they want more trees, shrubs, hedgerows, plants and flowers in these areas. It seems we are all hoping for rich and diverse spaces in which to rest and play.
- f) It is not neat lawns many people are picturing, either – they would like to see fewer manicured spaces and more wildness, where nature has been allowed to take its course and encourage nesting and foraging of rare species.
- g) Protecting and enhancing green spaces should take an equal place in decision making.
- h) Green infrastructure is a natural capital asset that provides multiple benefits, at a range of scales. These benefits:
  - i. A neighbourhood caring for nature, with opportunities for recreation, exercise, social interaction, experiencing and enhanced wellbeing, outdoor peace and tranquillity. All of which can bring mental and physical health benefits to reduce socio-economic inequalities in the area to meet the needs of families and an ageing population.
  - ii. Enhanced biodiversity and landscapes, urban cooling, absorption of polluting gases, migration of wildlife and the management of flood risk.
- i) Green lungs are so critical for towns such as Tenterden where much available land is being built on. Aspects that must not be ignored are:

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<sup>4</sup> <http://www.legislation.gov.uk/ukpga/2006/16/contents>

- i. It is considered one of the most valued green lungs of the town and stretches from the conservation area to the West by Hales Place and connects with the AONB to the East and wildlife site and biodiverse opportunity site to the north.
- ii. With the development of Tent 1 & 2, plus Tilden Gill, natural local green spaces are being consumed into the built-up area.
- iii. With the increase of traffic that will be generated by Tent 1 and Tilden Gill, it is of importance to preserve existing green lungs and corridors between communities for health reasons. It is recognised that trees are very efficient at removing gaseous pollutants such as nitrogen oxides, ozone and particle emissions from cars.
- iv. Improving air quality is a known priority for central government.
- j) Previous planning inspectors over the years have said this site is a wildlife, countryside corridor and green lung. This should not be ignored and should be protected.
- k) "Green Lung" labels, variously known as 'strategic gaps', 'rural buffers' and 'green wedges' were first specifically referred to in planning guidance in 1997 [PGG7 The Countryside]. The review concluded that 'green gaps' would be a useful feature of local planning to: avoid coalescence and retain the separate identity of settlements; and to protect high quality landscapes on the urban fringe and provide access to the countryside.
- l) The Ashford and Tenterden and Rural Sites Planning Inspector's Report of 2010, Paragraph 2.98, says, "this site forms a wedge of countryside characteristic of the urban form of Tenterden as a small market town in a strongly rural setting, which would be eroded by development". It maintains the distinction between the countryside and built-up areas.
- m) This application would result in serious coalescence the Woodchurch Road settlement with Appledore Road settlement. Views from public footpaths would result in there being no appreciable sense of leaving one settlement before entering the other.
- n) It is essential to maintain this green gap between two settlements, its distinct characteristics and attractiveness. Otherwise, it would be a wanton erosion of the lung, countryside, wildness, tranquillity, and protected wildlife, which would be lost forever.
- o) The two settlements identity would be lost with this urban expansion.
- p) An Appeal Inspector S.R.G Baird agreed with similar coalescence arguments with an application in Warwickshire.

### Biodiversity Net Loss

- a) As long as the baseline is wrong, any attempts to create biodiversity net gain will be impossible. Kent Wildlife Trust has picked up on this very point and state that the development will lead to a net loss.
- b) Numerous objectors have expressed in eloquent and factual terms with evidence, it is not possible to achieve a positive gain for biodiversity.
- c) The NPPF requires development to conserve or enhance biodiversity. This application does not understand the baseline for the site and the irreversible harm it will cause to the habitat, biodiversity, geodiversity, watercourses and interlinking ecosystems. Serious biodiversity loss would occur.
- d) To conserve and enhance the Borough's natural environment to deliver net gains in biodiversity, it is not possible for a country park to maintain its own biodiversity and compensate a biodiversity loss of 10.37 ha wildlife built on by 145 dwellings, pavilion, car park and football pitches. This application will deliver a net loss substantiated by Kent Wildlife Trust and other consultees.
- e) When considering impact on biodiversity, the approach taken by the agent cannot show there will be a diversity net gain. They have attempted to use a very narrow view of biodiversity. KWT do not agree with EPR's conclusion and KWT have said there will be a biodiversity loss.
- f) It is well known that the DEFRA Biodiversity Metric 2.0 looks at the habitat features only and is a proxy for biodiversity loss and gain. It does not measure the variety of species, nor the actual protected and rare wildlife on the site that would be lost.
- g) Biodiversity encompasses the variety of lifeforms found at all scales of biological organisation, ranging from genes to species to ecosystems. It has to be remembered that biodiversity study has to assess the conditions and trends of biodiversity. It is necessary to measure the abundance of all organisms, their interactions among species that affect their dynamics and

function (predation, parasitism, competition, and facilitation such as pollination, for instance, and how strongly such interactions affect ecosystems) and their rarity.

- h) Unfortunately, EPR is not aware, nor recognises and acknowledges the rich biodiversity and protection of so many species found on the site.
- i) It appears EPR's technical note cherry picks aspects that will help with the application proposal. We do not understand why Wates / EPR have not declared the full extent of wildlife recorded in KMBRC. If they are not aware, it is suggested that EPR obtain a full record held by KMBRC, plus read the objective explanations detailing why biodiversity gains cannot be achieved as mentioned in previous consultee objection letters.
- j) The presence of a protected species is a material consideration when a planning authority is considering a development proposal that, if carried out, would be likely to result in harm to the species for whatever reason. In addition, during the construction phase, this application would cause significant harm during the prolonged 2 to 3 year building development with the removal of critical habitat for nesting, shelter and foraging for these protected species.
- k) It is recognised the UK has one of the worse track records for preserving biodiversity. Natural History Museum analysis reveals that the UK, with just half (53%) of its biodiversity remaining, is one of the most nature-depleted countries in the world. The report concludes that we have breached the "safe limit for humanity" for biodiversity loss and may not have enough nature to prevent ecological meltdown, according to new data.
- l) For net gain to work it "has to deliver real benefit for nature" and that a strip or two of wildflowers and a few orchard samplings is not going to do the job.
- m) At the end of the day, the proposal is just providing subjective opinions with no serious objective assessment or mitigation.
- n) In summary, there are no net gains, only net loss. It is clear the EPR do not understand the baseline of species together with their required shelter and foraging.

## Conclusion

- a) Ashford Borough Council NPPF and ALP Policies are not paper tigers, but have "real teeth" .
- b) Limes Land has not been cultivated for hundreds of years; the site has developed its own unique rich biodiversity.
- c) Biodiversity net gain is expressed as "development that leaves biodiversity in a better state than before". Biodiversity is all-inclusive of all ecosystems and their interconnectivity with geology of the land which supports the flora and fauna.
- d) This application is not a subtle change of the environment, but a massive urban step change development disturbing its natural composition and rich wildlife.
- e) Considerable numbers of protected and rare species have been ignored and never been documented in this application. These species will be lost or severely reduced, and in some cases would be an infringement of various wildlife protection acts.
- f) Central Government, supported by Kent Wildlife, are promoting sites for rewilding. With the removal of sheep, this site is now quickly restoring its herbal species. This will reinforce its unique habitat and rich biodiversity. Wildlife trusts are calling for new "wildbelt" designation as a robust and permanent designation that will protect land in the process of being managed to bring nature back, and speed up the creation of the Nature Recovery Network in England.
- g) This rural greenfield site is an excellent example of promoting the United Nations biodiversity goals. All independent assessments and official records show a rich ecological baseline.
- h) NPPF Para 174d says: "minimising impacts on and providing biodiversity net gains, including by establishing coherent ecological networks that are more resilient to current and future pressures". Unfortunately, the agent's biodiversity net gain calculations have been based on poor or misleading assumptions of the site's rich flora, fauna, watercourses and geophysics.
- i) In addition, NPPF Para 174 states to protect and enhance biodiversity. The application proposal fails to:
  - i. Contribute to and enhance the natural and local environment.
  - ii. Conserve wildlife heritage. Limes Land is both a natural and semi-natural green space. It is extremely rich in fauna and its symbiotic relationship with the local flora.

- iii. Protect and enhance valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
  - iv. Recognise the intrinsic character and beauty of the countryside, and the wider benefits of our natural capital and ecosystems.
  - v. Prevent new and existing development contributing to unacceptable risk of soil, air, water and noise pollution, plus land instability;
  - vi. Minimise impacts on and provide biodiversity net gains, including establishing coherent ecological networks that are more resilient to current and future pressures.
  - vii. The agent's biodiversity net gain calculations have been based on year 7 school curriculum assumptions and not put into context of the site's rich flora, fauna, watercourses and geophysics.
- j) EPR to propose appropriate mitigation after securing planning permission and considered in the Construction and Environmental Management Plan (CEMP) is unacceptable and should be rejected. The identified major issues cannot be mitigated through conditions

In conclusion, this proposal would be a disaster for the environment and the site has to be protected for future generations.

*John Crawford*

Tenterden Councillor

**Land between Woodchurch Road and Appledore Road, Tenterden, Kent**

**Objection: - Cllr John Crawford (Tenterden Town Council)**

**Topic: - Non-Compliance with ENV3A Landscape Character and Design**

Date: 22<sup>nd</sup> November 2021

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The Ashford Local Plan (ALP) Policy says: “Where development is considered appropriate in principle it will be required to be designed in a way which complements the particular type of landscape in which it is located.”

**ENV3a Extract**

The key criteria are:

1. Landform, topography and natural patterns of drainage
2. The pattern and composition of trees and woodlands
3. The type and composition of wildlife habitats
4. The pattern and composition of field boundaries
5. The pattern and distribution of settlements, roads and footpaths
6. The presence and pattern of historic landscape features
7. The setting, scale, layout, design and detailing of vernacular buildings and other traditional man-made features

**Site Location**

1. Wates agents statements are “light touch”, which bear little resemblance to the reality of the site.
2. Tenterden Parish is a rural town of historic character, the centre of which is designated an outstanding conservation area. The town is set within a landscape that is recognised as being of high quality. It is known as the “Jewel of the Weald”.
3. Since the mid nineteenth century, Limes Land has been known as an open parkland pasture situated East of Woodchurch Road and North of Appledore Road. This has been enjoyed by the community as an amenity land for numerous activities.
4. The proposal application is for two sites.
  - i. Limes Land which is privately owned, and
  - ii. Playing fields owned by Homewood School – one is a football pitch and the other believed to be an abandoned cricket pitch. They are believed to be designated as “open space”, which Tenterden Town Council (TTC) had hoped to lease the football pitches.
5. ALP Para 6.45 says: Many rural settlements include important green spaces or gaps within the built-up confines that contribute to the form and attractive character of the settlement and any harm or loss of these areas should be avoided. Limes Land is an important green space and gap between built up confines and they should not be considered as a suitable development site.

6. The proposed development would require the release of environmentally rich and valuable amenity land for housing entirely outside the framework of the ALP. As such the proposal is speculative and is unrelated to the needs of Tenterden.
7. If there was a very small shortfall of land for new housing within the Ashford Borough, this in itself is no basis on which a development of the proposed scale should be allowed.
8. There is natural continuity of green lung from the west side that adjoins the conservation area to the biodiverse opportunities and wildlife on the north.
9. Adjoining the site is ribbon residential development of Woodchurch Road on the western side and ribbon residential development on Appledore Road on the Southern side with the remaining boundaries predominantly comprising trees and hedgerows.
10. The site is outside the built-up confine of the town, in the countryside and stretches from the Conservation Area to the South, High Weald AONB to the East; Biodiversity Opportunity site with overlapping Local Wildlife site to the North. This site makes a significant contribution to the rural character surrounding the local community.

### **Proposed Development**

- a) The proposed development would detract from an historic landscape setting in obscuring fine views of the St Mildred's church tower, not least from the public footpath. Instead, the view would consist of housing roof tops and walls.
- b) Housing would seriously impede the natural wildness of the countryside and remove iconic views into and out of the appeal site. The scale of change to the view as a public visual amenity is relevant in this instance.
- c) The introduction of a housing estate on the appeal site would be harmful to the existing rural character and appearance of the area changing it from countryside to part of the urban area.
- d) The development would be contrary to paragraph 174b of the National Planning Policy Framework, which indicates that planning decisions should recognise the intrinsic character and beauty of the countryside.
- e) Planning officers and appeal inspectors of past applications have rejected the development of this site, saying it would damage the setting of the rural character.
- f) It contributes to the countryside's fundamental beauty and would be lost with any building development.
- g) Para 9.43 of the 2030 ALP says that the LCA SPD sets out clearly the key characteristics. All proposals coming forward should have regard to this SPD, and to the guidance on landscape characteristics that it provides, so as to ensure that new development does not compromise or damage landscape character but instead contributes towards enhancing the character of the LCA in which the site is located.
- h) It appears this application has ignored the LCA throughout all the submitted Wates documents.
- i) The site's positive contribution to the character and appearance would be largely lost by the proposed development, and would significantly urbanise the open green space and the wild nature of the site. This is in contravention of 2030 ALP para 9.43
- j) The development of 145 dwellings would urbanise and devastate this part of the Wealden countryside. It would be very prominent and overbearing to the surrounding settlements, and public rights of way, due to its elevated position. Given the hefty scale of the development, it would represent a significant shift of the built-up development well beyond the edge of the town.
- k) The high packed density (27 dwellings per ha on a plot of 5.4 ha) development of 145 dwellings would be unsympathetic with the local character, including the surrounding built environment.

## **ENV3A Site Assessment**

### 1. Landform, Topography and Natural Patterns of Drainage

#### **Designation**

- a) Ashford Landscape Character Assessment (Jacobs, 2009) identified a number of distinct landscape character areas to ensure the continued protection of the countryside and its special landscape features.
- b) Limes Land is part of Ashford Borough Council Landscape Character Area 23 Woodchurch Undulating Farmlands with guidelines "to conserve and reinforce the landscape".
- c) Within the hierarchy of designated sites there are no statutory ones. However, there is a local designation. It is part of the Woodchurch Undulating Farmlands designation with a reference of LCA 23. It has typical Wealden Countryside features of undulating landscape, varied field pattern, numerous ponds with water courses lined by mature trees. Together with ancient hedgerows which provide a strong sense of enclosure. The condition is rated as "good". There are no detracting features.
- d) The recommendation for LCA 23 and adopted by the 2030 ALP, is to:
  - viii. Conserve and reinforce the rural and enclosed landscape which provides the immediate setting of the High Weald AONB
  - ix. Conserve and appropriately manage woodland
  - x. Conserve and appropriately manage strong matrix of hedgerows and hedgerow trees
  - xi. Plant new hedgerow and oak trees to reinforce and provide continuation of this key feature
  - xii. Conserve intimate small-scale field pattern
  - xiii. Conserve and reinforce strong sense of enclosure
  - xiv. Conserve field ponds and slow flowing streams

#### **Character and Appearance**

- a) Limes Land supports some excellent areas of unimproved pasture. It is without doubt a very rich habitat mosaic, typical of the Wealden pastoral landscape and contains within its boundaries a very rich habitat.
- b) The Limes Land site has been recorded as a "park like pasture" as far back as 1887 when it belonged to Limes House, a desirable family residence with gardens, and four cottages. Since then, it has been used for sheep grazing for a large portion of the year.
- c) The site is in pristine condition with no clutter from a throwaway society by the walkers using the footpaths and certainly no damage due to antisocial behaviour. The health of the trees, bushes, grassland are all excellent health, with expected die back.
- d) The existing landforms are basically naturalistic in character and are not manmade with the exception of the well-known bomb crater south west of Woodchurch Road, which caused damage to adjoining houses in 1945.
- e) The site is typical Wealden landscape with geology of Tunbridge Wells sandstone and Wadhurst clay. Natural slopes in the Wadhurst Clay, are known for their instability and cause landslips.
- f) In 1915 there was a land slip due to a major earthquake in the channel - which also destroyed the south coast railway line near Folkestone. It is understood, this slip saw a drop along the Woodchurch Road leading downhill to the golf course - and on which the current road is built. The 'cliff' on the town side is up to 20 feet high in places. It appears various slips

can be seen on Limes Land itself. There have been numerous local earthquakes, the last we believe was in 2007,

- g) The Kent Landscape Information System maps show the majority of Limes Land is designated as having Neutral Grassland, Kent Biodiversity Strategy 2019 to 2044 report (in support of Government's 25 Year Environment Plan "A Green Future 2018"), wish to protect and increase this grassland. Limes Land also has important Acid Grassland and Heath, which is increasingly rare.
- h) Kent Biodiversity Strategy states that both heathland and acid grassland are some of the rarest and most threatened habitats in the county. These are priority habitats with opportunities for habitat creation and are limited and are therefore important that we maintain this extremely valuable site from housing development. Much of the grassland appears to have a high proportion of herbs and fine leaved native grasses in the sward. There are ancient grassland areas combined with the wet flushes, reeds, linked ponds, and outgrown hedgerows within and around this site. The lower fields resemble marshes during the wetter months, improving diversity for all species.
- i) There are very high numbers of large anthills which is quite unique on the south west side of Limes Land covering many acres and are often found in the Weald ancient meadows which is just one of the habitats that determines the character of the High Weald landscape. Ants as we know are tiny rototillers tunnelling, aerating the soil and redistributing nutrients. Ants are also part of the world recycling crew: acting as scavengers, collecting dead insects and turning them into fertilizer. Anthills support delicate plants such as Trailing St. John's-wort and attract Green Woodpeckers.
- j) Anthills and ancient "ridge and furrow" ploughing are valuable indicators of grassland of considerable wildlife value such as: Yellow Rattle, Ox-eye Daisy, Devil's-bit Scabious, Common Knapweed, Ragged Robin, Dyer's Green Weed, Orchids and fine-leaved grasses.
- k) There is an excellent ancient public footpath (right of way) that runs roughly from south to north from Appledore Road to Woodchurch Road. This is very popular and serves both communities. There are also a number of footpaths around the site that have been used for time immemorial. In theory, most paths become rights of way because the owner "dedicates" them to public use. The law assumes that if the public uses a path without interference for some period of time – set by statute at 20 years - then the owner had intended to dedicate it as a right of way. The Southern side of the site, the footpath is shown on a map dated 1870 by Capt H S Palmer.
- l) The landscape has a breath-taking relationship with the topology and the iconic high ridge on Limes land. It is one of the highest points in Tenterden and affords an outstanding view and line of sight across unimpeded countryside to St Mildred's Church, which forms a prominent landmark feature on the outskirts of the urban area of Tenterden. It also creates residential amenity value from the adjoining houses on Woodchurch Road, Appledore Road and from the public footpath, into the site.
- m) From the roughly north south footpath on the high ridge, the view across the countryside west towards the town and St Mildred's Church and the hills to the east has changed little in centuries, with hardly any houses visible above the tree line.
- n) The pockets of rural calm, serenity and tranquillity almost bring the countryside into the town, and this relationship between the surrounding landscape and the traditional town environment characterise this part of the adjoining AONB. The landscape character holds special significance to the community due to its iconic views, beauty, serenity, tranquillity, historical value, recreational value, and is local in character, which contributes to the attractiveness of the two adjoining settlements to the west and south.
- o) It is considered one of the few remaining green lungs of the town after the construction of a number of major housing developments.
- p) The site has high landscape value as per "Guidelines for Landscape and Visual Impact Assessment (GLVIA)" Appendix. Please see assessment summaries at the end of this letter.

## **Privacy and Visual Amenity**

- a) The NPPF and the ALP offers open space protection of public value, opportunities for recreation and visual amenity. Development proposals must demonstrate that the proposal would not cause harm to the residential visual amenity. In this context, residential visual amenity means: "the overall quality, experience and nature of views and outlook available to occupants of residential properties, including views from gardens and domestic curtilage". It covers a range of visual, aural, olfactory and other sensory components and would be seriously harmed by this development.
- b) It is important to understand the outstanding views both from residential gardens and the PROW. The views are both into and out of Limes Land. With regard to the site description above, the proposal to build 145 dwellings between the high ridge and Appledore Road and Woodchurch Road towards Kerch Hill and beyond gravely impacts the resident's visual amenity.
- c) Development on the slope will be very pronounced to residents on Woodchurch Road and in particular Appledore Road.
- d) It would seriously impede the visual amenity and resultant loss of privacy.
- e) The construction of houses and flats would gravely affect the Appledore Road residents and be completely out of keeping with the design of the neighbouring community dwellings.

## **Summary**

The application proposal would significantly harm the natural landscape topography of Limes Land. There has been no effort to understand the natural watercourse, pond treeline and hedge line features that should be part of the main attraction of any development. It is understood one of the ponds will be filled so houses can be built on top. If true, will potentially cause flooding issues with the complex watercourse on the site and potential subsidence of the dwellings.

The landform features would be significantly altered and they would no longer be seen as part of the iconic Wealden setting and would not comply with LCA 23. Views into and from a site will be permanently ruined.

The whole approach taken by the developer has been their desire to maximise commercial interest. Their masterplan has been led by the existing features of the landscape. There is no reason to remove and destroy major features, thus creating a blot on the landscape.

## **2. The Pattern and Composition of Trees and Woodlands**

### **Designation**

- a) The mature trees are of different species and generally of good health and are typical of the Kent countryside. They define the prevailing configuration of boundaries and creates a mosaic pattern of fields that establishes Limes Land as a distinctive site.
- b) The site is bordered by hedges, mature trees and watercourses, which constitute valuable features in a landscape by giving it definition and legibility. Some of the trees are designated as TPOs but are largely poorly served by tree protection notices. These mature trees support numerous and varied ecosystems as well as provide food and shelter for birdlife.

- c) There are five large natural ponds, one of them hidden by blackberry brambles. A network of watercourses feeding the various ponds with a spine of trees subdividing the land into numerous distinct sections. It is undulating in nature with numerous gullies and watercourses.
- d) The site is designated as BAP Priority habitat, Woodland Priority Habitat, Water Lower Spatial Priority and Flood Risk Lower Spatial Priority. We consider the increased population resulting from 145 dwellings in proximity to a public footpath leading directly to the nearby Ancient Woodland, Biodiversity Opportunity Area and Local Wildlife Site of Knock Wood would materially affect its ecological status.
- e) The ground level tree inspection was undertaken in May 2016 so is over 5 years old and therefore out of date. EPR has stated that not all trees had a ground level tree assessment as efforts were weighted towards those trees that will be affected by development. All trees should be subject to a full ground assessment and are subject to a full assessment by an independent Licensed Bat Ecologist, using climbing equipment, to fully assess and report. Bats use different parts of the tree for different reasons, depending on the time of year and temperature. In the summer bats might use the higher canopy sites to have their young in warmer temperatures. In winter, they might move deeper and lower into the tree to hibernate.
- f) Trees such as oak, beech and ash are particularly suitable for bats, but any woodland or tree has potential for a bat roost – especially if it has cavities in the trunk or branches, woodpecker holes, loose bark, cracks, splits and thick ivy. Despite a large number of trees on site being identified as having ivy, holes, cracks, loose bark, EPR believes that the majority of trees have a low to medium opportunity for bat roosts! This reiterates the requirement for a comprehensive survey by a specialist. Disturbance from noise, vibration and lighting will affect bats, therefore it is imperative that we can identify ALL roosts.
- g) Some veteran and larger trees will have their root systems compromised by development. All veteran trees should be fully protected, above and below ground, as outlined in the NPPF para 180c.
- h) ALP Para 9.30 says, "The pattern and composition of trees and woodlands - trees and woodlands often constitute valuable features in a landscape by giving it definition and legibility. These features should be retained and protected.
- i) The countryside view will be ruined by replacing it with a large estate of walls and roofs instead of lush pasture and trees to the towards the church. These existing pockets of rural calm and tranquillity bring the countryside close to the town, and this relationship between the surrounding landscape and the traditional town environment characterise this part of the adjoining AONB.
- j) Instead of a wonderful visual amenity view of the countryside, all the residents living on the south side of Woodchurch Road and the north side of Appledore Road, especially in the winter months when the boundary trees are bare, will see a carbuncle of houses, roof tops and tarmac. Residents of the new development will also be able to see into the gardens and rear rooms of the existing houses bordering the site.

## Summary

As mentioned above, the existing trees, hedges and woodlands create a configuration of valuable landscape features giving it definition and legibility. As per LCA 23, these features should be retained and protected.

All trees should be subject to an iTree assessment (or similar) to establish the environmental, ecological and financial value of the tree. The Tree Council recommend this assessment to fully value a tree in terms of biodiversity, habitat and environmental factors. This is essential for those in danger of being felled. Wates have failed to recognise the detrimental ecological, environmental effects and loss of carbon storage.

The proposed development gives scant regard to these features with an inflexible masterplan that does not give appropriate weight to the flora and fauna landscape.

### 3. Type and Composition of Wildlife Habitats

- a) This site importantly adjoins designated wildlife site and biodiverse opportunity site to the north.
- b) The countryside offers an intrinsic character, heritage and beauty with a diverse mix of rich landscape features and characteristics. It plays a key recreational role for residents and visitors alike, whilst supporting an array of wildlife, habitats and natural resources.
- c) Exists is a rare survival of unimproved neutral grassland in the western segment of the site are widely held to be of national and European significance, and protected as 'Section 41 Habitats of Principal Importance'
- d) Opposite the proposed application site on the other side of Appledore Road is Hales Place, a new development of houses which are currently being built. In preparation for this, the developer has cut down woodland, leaving only a few specimen trees. Winged wildlife and other mammals have had to seek new safe havens to survive, some of those would have migrated to Limes Land.
- e) There are a number of rare and declining species such as tree sparrow and adders using this land for nesting and for foraging, not forgetting polecats, and dormice. Any disruption will cause an untold and unwanted impact. There is no point having habitat for nesting and shelter, if they are unable to forage. With 145 houses, roads and numerous football pitches, this would obliterate the foraging habitat, thus wipe out the common, declining and rare wildlife that is dependent on the site for feeding. We know the site is rich in small mammals as birds of prey circle and hover over the land each day. I personally have seen the Kite / buzzard catch what looked like a mouse, quite possibly a dormouse as they populate the site.
- f) Please refer to my objection letter relating to ALP Policy ENV1 Biodiversity.

### **Summary**

It is deeply concerning that Tenterden parish is slowly being urbanised by major development encroaching into the High Weald countryside, this will have an irreversible and destructive impact on the nature environment and wildlife.

During any construction, there will be a significant negative impact on Bats and an identified loss of habitat. The vibration, noise and light will also negatively affect GCN and reptiles. This will breach the Wildlife and Countryside Act.

The NPPF Biodiversity and habitat section maintains the presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site, unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site. The evidence within the application clearly confirms that permanent damage will occur to the habitats of GCN, reptiles and bats. Due to inadequate and incomplete surveying, it is impossible to estimate the impact on the habitat of invertebrates, nor the holistic set of flora and fauna habitats.

The presence of wildlife is significant and contributes to the landscape.

#### 4. Pattern And Composition of Field Boundaries

- a) Boundaries have been discussed above and will not be repeated again in this section.
- b) The pattern and composition of field boundaries - the size and definition of field boundaries has a significant factor in giving a landscape its character. Development proposals should retain existing hedgerows and maintain the prevailing pattern of field boundaries and where appropriate the council shall seek the repair or replanting of damaged field boundaries.
- c) Half our hedgerows have been lost since the end of the Second World War – ripped up, removed or left in poor condition. This has been at a huge cost to our climate, to nature and to people's connection with wildlife. This has to stop as they have an amazing ability to capture and store carbon, keep our soils healthy and reduce flooding during extreme weather. They enhance the visual aspects of our landscapes, support lifelines for bats, hedgehogs, dormice and all the other wildlife we love so much, while linking existing, fragmented habitats.
- d) Hedgerows must not be cut down due to:
  - their importance to climate change mitigation,
  - the protection and enhancement of wildlife,
  - their protection under the 1997 Hedgerow Act.
- e) The pattern of fields provides a significant contribution to the visual quality, tranquil attributes and an important contribution to the rural landscape setting for the community and the town at large.

#### **Summary**

The size and definition of field boundaries is an integral part of the landscape character. Development on this site would cause substantial and permanent harm to the ecology of this rare medieval field system. There is no likelihood of the 'legibility of the medieval field boundaries' being preserved in view of the number of houses to be built.

Development proposals should retain existing hedgerows and maintain the prevailing pattern of field boundaries which are essential to the nesting and foraging of wildlife.

The development would transform a rural and agricultural landscape with clearly defined boundaries, hedgerows and ponds into an urban settlement that would be out of character with the surrounding area.

#### 5. The Pattern and Distribution of Settlements, Roads and Footpaths

##### **Community Usage**

- a) AB12 PRow currently crosses the site. An additional circular AB70 PRow around the site was to be certified by KCC as they had collected sufficient evidence. However, Wates submitted an objection, presumably as a delaying tactic until this appeal could be heard.
- b) The two settlements around this site are considerable in size. According to the KCC Ward Demographic and Employment Profile, the North Ward to the North West corner of the Limes Land has a population of 2,000 plus and the South Ward to the South of the Limes Land also has a population of 2,000 plus. To have a unique local green space oasis serving a population well over 4,000 is exceptionally significant and valuable.
- c) The site is currently used as amenity land and is of special importance to the community as a whole. It provides young, old, families, ramblers and dog walkers the opportunity to roam the whole section of this countryside and enjoy the freedom of the natural environment safely at their doorstep. Snow allowing, used for toboggan runs by children and adults.

- d) The Neighbourhood Plan community engagement exercise in May 2019, showed the site was supported as a local green space in Tenterden during the Covid crises, the footfall has increased very appreciably.

### **Summary**

As per the site description, the ribbon dwellings on the Appledore Road and Woodchurch Road do not detract from the beauty of the site. It is a gradual transition which is required from housing stock to countryside. The form and pattern of built development within the landscape provides the contrast with the natural countryside which together creates the overall character of the area.

## **6. The Presence and Pattern of Historic Landscape Features**

### **Heritage**

- a) As well the sites heritage and intrinsic beauty in appearance, it also has significant historic significance.
- b) A medieval ridge and furrow system is recorded with KCC Heritage and is the only known example in Tenterden. Part of the medieval practice was to rid the heavy clay of excessive moisture and improve drainage.
- c) Historic records also show the eighteenth-century town's gallows located on this site.
- d) This application proposal would have significant impact and harm. Significance lies in the value of a heritage asset to this and future generations. The effect of an application on the significance of a designated heritage asset should be taken into account in determining the application.

Such criteria frequently include:

- a. Age
  - b. Rarity
  - c. Representativeness
  - d. Aesthetic appeal
  - e. Landscape Value
  - f. Historic association
  - g. Archaeological interest
- e) NPPF Para 199 states "When considering the impact of a proposed development on the significance of a designated heritage asset, "great weight" should be given to the asset's conservation. As heritage assets are irreplaceable, any potential harm or loss should require clear and convincing justification.
  - f) Application does not comply with ALP ENV13 Conservation and Enhancement of Heritage Assets Policy.

### **Summary**

The heritage landscape features play an important role in defining the character of the landscape. These features and their setting should be protected from new development as they would adversely affect their integrity and amazing unspoilt views.

## 7. The Setting, Scale, Layout, Design and Detailing of Vernacular Buildings

- a) Please refer to objections submitted under SP6 Quality Design.
- b) Promoting High Quality Design ALP paragraph 2.174 says that new development proposals need to reflect their local context, particularly where this has a special character or features of interest, whether built or natural. That means the local vernacular of the adjoining settlements. The proposal does not take into account the immediate scale, design of the adjoining houses in Appledore.
- c) Appledore Road and Woodchurch Road There has been a poor attempt to design the housing to complement the immediate local vernacular and is out of place and keeping with the adjoining houses and rural countryside.
- d) Para 10 of the new National Model Design Code published January 2021 states: "The government understands that quality design does not look the same across different areas of the country, for instance, that by definition, local vernacular differs and design priorities differ for scale and types of development." This reinforces the need for this application to blend in with the existing local vernacular of its neighbours.
- e) It is amazing that an application on the edge of the town build confines with the countryside, can recommend a site of 5.4 ha to build 145 dwellings. This works out at 27 dwellings per hectare, twice the density of the adjoining houses on Woodchurch Road and Appledore Road and 50% denser than the nearby Tildengill development. It would be a travesty to create an unsightly and environmentally damaging carbuncle on the landscape, which in no way would blend in with the edge of town's vernacular that is relevant to the immediate settlement.
- f) The idea of a gradual transition has been very poorly executed and is unacceptable.

### **Summary**

The proposed new development does not take account of the exiting scale, design of adjoining houses with Limes Land from Appledore Road and Woodchurch Road.

As stated before, it is an urban design suitable for an area such as Ashford. The density is unacceptably high and would harm the local vernacular, landscape, public views, local character, existing amenity and become a blot on the landscape.

### **Conclusion**

It is considered the overall bulk and mass of the proposed development in combination with extensive hard-surfacing, numerous parking spaces, roads and pavilion would severely erode the verdant character and beauty of this spacious rural countryside and gap. Currently the site provides a soft transition edge to the settlements.

Considering ENV3a policy as a whole, this proposal is in direct contravention of the criteria. It also conflicts with the NPPF requirement for planning decisions to recognise the intrinsic character and beauty of the countryside.

The harm to the beauty of the countryside will significantly and demonstrably outweigh any benefits of additional housing.

*John Crawford*  
Tenterden Councillor

## **Appendix - GLVIA Landscape Value Assessment**

1. European Landscape Convention 2000 defines landscape as: “an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors”.
2. The key principle established by this definition is that it moves beyond the idea that landscape is only a matter of aesthetics and visual amenity and that a holistic assessment approach should be taken, based on the nature of the development proposal and the characteristics of the area in which it is proposed.
3. The following criteria considers the known facts about this site.

<b>GLVIA Landscape Value Assessment</b>
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<b>Criteria</b>	<b>Summary Assessment Description</b>	<b>Assessment Rating</b>
Condition Quality (Relates to the physical state of the landscape)	All landscape elements remain intact and are in very good order. No detracting elements are evident	Very High Quality
Scenic Quality (The effect that a landscape is likely to have on the senses)	Scenic quality is outstanding. It compares extremely well with the best of the adjoining the AONB. Its aesthetic value is amazing. It is designated as a landscape character area within Ashford borough.	Local in scenery and of very high quality
Rarity And Representativeness (Presence of rare features of wildlife)	Acid grassland is some of the rarest and most threatened habitats in the county. Neutral Grassland also present that the Kent Biodiversity Strategy wish to protect. Unimproved grassland has also been identified.	Very high value
Conservation Interests (The presence of features of wildlife, earth science or archaeological or historical and cultural interest)	There are adders, large number of bats, and other birds that are diminishing in numbers that are ecologically important. Also, there are recorded rare birds on the red list and well as protected animals such as dormice, polecat and badgers.	High Value
Recreation Value (Recreational activity where experience of the landscape is)	With the excellent ancient PROW footpath together with the footpaths around the site that have been used for decades that are considered to be rights of way by law as if the owner “dedicates” them to public use <sup>5</sup> .	Medium value

<sup>5</sup> Ramblers Access to The Countryside

important)	<p>The site is very popular with the local public, dog walkers, joggers and ramblers who roam across the whole section of this amenity land safely, with children playing hide and seek.</p> <p>This is extremely important for health and well-being in today's busy world.</p>	
Perceptual Aspects (Wildness and/or tranquillity)	<p>This site is typical of the Wealden pastoral landscape with its apparent remoteness, but next to two major settlements. For those seeking tranquilly this is a haven away from the town's traffic noise and hustle &amp; bustle.</p>	Very high value

***The Overall judgement of landscape value is considered to be high in its present form and should be protected from any development. The ratings are based on the evidence documented above.***

**Land between Woodchurch Road and Appledore Road, Tenterden, Kent**

**Objection: Cllr John Crawford**

**Topic: ENV6 Flooding and ENV9 Sustainable Drainage**

Date: 15<sup>th</sup> November 2021

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### 1. Ashford Local Plan (ALP)

Policies ENV6 and ENV9 are so interconnected, this objection will consider both as a whole.

#### Policy ENV6 Flooding

Development should only be permitted where there would not be an:

- a) unacceptable risk of flooding on the site itself
- b) increase to flood risk elsewhere

NPPF 159 says “Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.”

NPPF 161 says: “All plans should apply a sequential, risk-based approach to the location of development – taking into account all sources of flood risk and the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property.”

NPPF 161d says: “where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to relocate development, including housing, to more sustainable locations.”

When assessing this site, surface water contribution and climate change to flooding has to be taken into account, not just rivers and seas. This objection refers to:

- a) Existing flooding
- b) Future flooding
- c) Increasing flood risk elsewhere

#### Policy ENV9 Sustainable Drainage

This policy is very specific that SuDs should be future proofed to reduce risk of flooding and take into account climate change, appropriate pollution controls, urbanisation of a green field site, protection of habitat wildlife and lifetime maintenance arrangements have been made.

## **2. Flood Risk Assessment**

The right information is crucial to good decision-making, particularly where formal assessments are required. As shown by numerous objectors, there is no sound comprehensive hydrology baseline for this site, therefore the right information is not available to conduct a professional impact assessment.

Our eyes need to be open to the frequency and intensity of floods that we are witnessing in Europe, Asia and in London this year. The message is now striking home that we no longer live in the past by being able to predict flooding by historic statistics.

Central Government on the 27<sup>th</sup> October 2021 commissioned its Infrastructure Commission (NIC) advisory body to produce a study on "on the effective management of surface water flooding in England". The aim is to reduce risk of water flooding.

The terms of reference say: "Surface water flooding is the most common flood risk in England. With more intense rainfall, climate change and population growth we are at greater risk of surface water flooding, with significant incidents occurring this year".

Degradation of soils and the ecosystem due to unsustainable development, together with hard surfaces makes it near impossible for land to absorb the waters from heavy rains. This site is renowned to be impermeable. Absorption will be very minimal. The combination of inferior place making with erratic and increasingly intense rainfall, is a recipe for disaster.

Wates must take surface water flooding seriously and not just quote houses will be in zone 1.

## **3. Site Profile**

There is current history of Woodchurch Road and Appledore Road flooding. The key points are:

- a) Tenterden is renowned for its natural springs. It is believed there are a number of underground water tributaries and subterranean channels on the site. These will require thorough investigation.
- b) Environment Agency Map indicates serious risk of flooding on Appledore Road. Other flooding is recorded in Woodchurch Road.
- c) Limes Land has a history of serious Surface Water Flooding, which has been under recorded. The site has well-known annual surface water flooding in the winter months.
- d) An Agricultural Land Classification Map and Report (April 1997) was produced for the Ashford Development Plan on Site 53 Appledore Road, Tenterden. This has not been referenced by Wates.
- e) The land is of low permeability and remains constantly water logged except during long dry spells. SuDs using swales requiring infiltration will not work due to the clay substrate.
- f) Surface water from both the road and properties North of Woodchurch Road drain into Limes Land. The volume overwhelms the fields, as they cannot absorb the vast water flow and become flooded during the winter months. This is fairly obvious when examining the vegetation, in particular the considerable amount of marsh grass and reeds showing very poor water drainage, clearly unsuitable for development.
- g) Some of the lower-level housing on Appledore Road is subject to reoccurring flooding from Limes Land surface water.
- h) There are numerous documented problems with foul water disposal for houses bordering the site, resulting from an already overloaded local sewerage system.

- i) SWS have stated they will not accept any new surface water flows from the development site into their existing surface water network in Appledore Road.
- j) There are grave concerns that the proposal would increase flood risk off-site in particular on the "Tilder Gill" which takes all surface water from Tent 1A, proposed Tent 1B and Tilden Gill currently under development. No investigation has been undertaken on the cumulative impact of these three developments on the "gill". This application will make the situation seriously worse.

#### 4. **Gleying**

Finding from the Agricultural Land Classification Map and Report (April 1997).

- a) The assessment showed high quantity of gleyng. Essentially the process of water logging. The consequence is that the site is, in essence, impermeable to water.
- b) Gleying is also very common in archaeological deposits as burial results in deposits being submerged within the watertable, and organic deposits can speed the development of anaerobic conditions. As Gallows Green was positioned on this site, maybe there are some unknown burial locations (a point raised by a statutory consultee in relation to Gallows Green).
- c) In addition, slowly permeable layer (SPL) was measured on this site. The report shows the SPL is considerably thick.
- d) In summary, it states a large portion of the site is classified soil wetness as Class III and Class IV:
  - i. Class III - The soil profile is wet within 70 cm depth for 91-180 days in most years or, if there is no slowly permeable layer within 80 cm depth, it is wet within 70 cm for more than 180 days, but only wet within 40 cm depth for between 31 and 90 days in most years.
  - ii. Class IV - The soil profile is wet within 70 cm depth for more than 180 days but not within 40 cm depth for more than 210 days in most years or, if there is no slowly permeable layer within 80 cm depth, it is wet within 40 cm depth for 91-210 days in most years.

#### 5. **Existing Flooding**

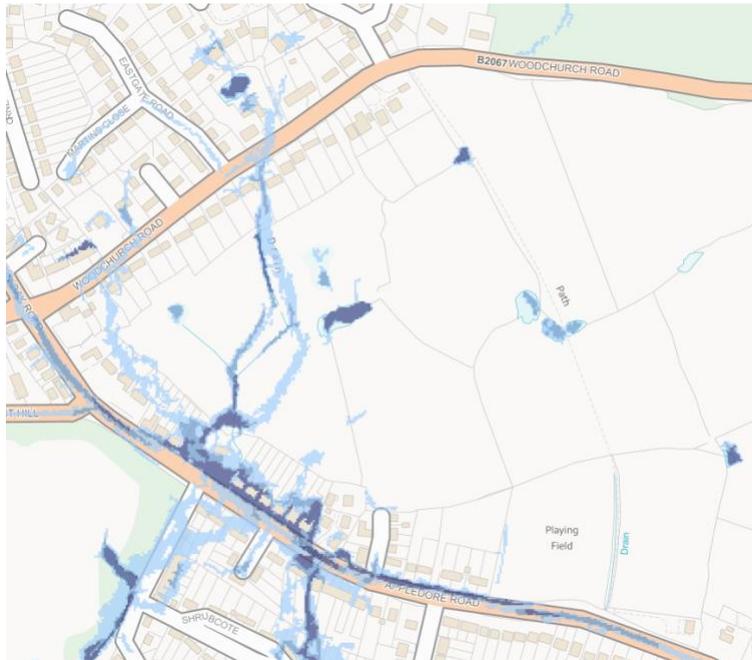
This site is designated as flood zone 1, meaning in theory it has less than 0.1% (1:1000) chance of flooding in any year. However, in reality, during parts of the wet season, the southerly site does flood every year, which does not correspond with 1:1000 year chance.

As Wates will know, river and watercourse are only part of the equation to flooding. Equally important is surface water.

The Government website shows known surface water flooding for the South Western part of Limes Land as shown on the map below. This to be expected due to the slope of the land and the dramatic changes in rain fall caused by climate change. The historic UK Flooding Map<sup>6</sup> below shows the partial surface flooding risk. Proper analysis must be conducted to understand the impact of climate change and surface water flooding with this site. To produce historic statistics over the last 100 years no longer cuts the mustard.

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<sup>6</sup> <https://flood-warning-information.service.gov.uk/long-term-flood-risk/map>



### Flood risk



High



Medium



Low



Very low

Please note the “high” flood risk assessment is from the government website. It appears this finding has not been spelt out by Wates.

The overland flow typically flows towards the nearest watercourse. This runoff causes localised flooding before discharging to the watercourse. The watercourse in turn cannot take the volume of water and overflows to the surrounding area.

During the wet season it can be seen the flow is so heavy that the site cannot cope with the volume of water and the site is totally water logged creating a layer of surface water on top of the terrain. The following are some examples of flooding on Limes Land during the autumn of 2020. The depth of water would submerge wellington boots.





Wates have made a very nonspecific and generalised statement (below) with poor reference to Limes Land and its surrounding. To use the word “believe” is an abdication of professional duty. It is their responsibility to show one way or another.

#### **7.4 Flooding from the land (overland pluvial flood risk)**

If intense rain is unable to soak into the ground or be carried through manmade drainage systems, for a variety of reasons, it can run off over the surface causing localised floods before reaching a river or other watercourse.

Generally, where there is impermeable surfacing or where the ground infiltration capacity is exceeded, surface water runoff can occur. Excess surface water flows from the site are believed to drain naturally to the local water features, either by overland flow or through infiltration.

The principal issue, is there has been no comprehensive assessment of the flow of water out of Limes Land as Wates do not understand the volume, duration and frequency of surface water entering and precipitation from the sky into Limes Land.

Below is the current subjective view from Wates. Not helpful and not quantifiable. If Wates undertook a site survey during the season, they would have found that large portions of the year the water table contributes to the surface water flooding.

#### **7.5 Flooding from groundwater**

Groundwater flooding tends to occur after much longer periods of sustained high rainfall. Higher rainfall means more water will infiltrate into the ground and cause the water table to rise above normal levels. Groundwater tends to flow from areas where the ground level is high, to areas where the ground level is low. In low-lying areas the water table is usually at shallower depths anyway, but during very wet periods, with all the additional groundwater flowing towards these areas, the water table can rise up to the surface causing groundwater flooding.

This generalised statement avoids specifics for the site. It has to be emphasised they have to produce a specific statement on measured and quantified evidence – not subjective views with no substance. It is their responsibility to present the real-life facts for the site, not hypothesis.

## 6. Future Flooding

### Climate Change Impact

This planning proposal has taken a cursory look at the impact of climate change into its calculations for surface water flooding, as per NPPF 152.

With the statistics used, it appears that Wates only consider flooding a rare occurrence, whereas most people intuitively recognise there is no longer a correlation of historic data to actual events today. This has now been proven by climate scientists. As has been stated in previous objections, historic data approach is no longer a reliable method to predict 2021 and beyond.

During previous winters, frequent flooding has occurred both in and around the site. With the disruption to underground streams and springs where development will take place, it is inevitable that surface water flows will increase, particularly as the ground is impermeable.

### Stationarity

Over the past two decades, many hydrologists have raised the alarm about how a stationarity approach is not working anymore. Climate change scientists have said that “stationarity is dead” and it was time we accept we are living on a non-stationary planet. We have changed the planet so much with carbon emissions and other human activity that the past is no longer a good guide to the future. This is particularly true for South East England with dryer summers and wetter winters with more extreme downpours, leading to flooding.

The most recent reputable scientific journal<sup>7</sup> on climate change states that:

*“Floods and other dangerous weather extremes are only getting more intense and more frequent as our climate warms. Historically, we have always been able to predict these extremes by looking at how often they occurred in the past. But a new study published in Science Advances reveals just how many of those forecasts actually fall short. In just a decade, the findings suggest, the climate has shifted so drastically that the frequency of past extreme events is no longer a reliable predictor.”*

Climate change and flooding has not been enthusiastically embraced by Wates.

For developers to quote past historic data to justify an argument is no longer valid or creditable. It is time they understood they can no longer use underhand statistics to justify their desired results and must start understanding the impact of non-stationarity. Therefore, to quote past flooding statistics has no relevance for the future. Wates flooding predictions in support of their application are out of sync with current scientific thinking and should be discarded.

This reinforces previous objectors’ views that historic data as an indicator for future weather pattern predictions is discredited. Using historic data is no longer a reliable and scientific approach for adoption to predict flooding. With increasing global temperatures, the correlation divergence had and will continue to increase. This has to be recognised by Wates as an inconvenient truth.

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<sup>7</sup> <https://www.sciencedaily.com/releases/2020/03/200318143722.htm>

The mechanics of rain fall, watercourses and ground permeability are key to whether a proposed development can or cannot be sustainable.

Stationarity has been recognised and embraced by The Thames Estuary 2100 Project, to ensure there are no dire London flooding consequences by using the wrong model.

### Protecting Communities and Natural Habitats

Mitigating risks presented by climate change is key to future proofing our existing communities by not degrading:

- i. Health and wellbeing,
- ii. Easy access to essential services,
- iii. Easy access to employment opportunities,
- iv. Air quality,
- v. Quality green space

It is critical to understand what is the maximum rainfall capacity of SuDs and outflows. This can only be achieved by identifying and accurately measuring the baseline. Changes in water catchment, such as field drainage and channelisation of water courses over impermeable ground adds significantly to the flooding problem.

Degradation of soils and the ecosystem due to unsustainable development, together with hard surfaces makes it increasingly difficult for land to absorb the waters from heavy rains. This site is renown to be impermeable, so absorption will be very minimal. Areas where drainage capacity cannot cope with current levels of precipitation will be at greatest risk, such as this site.

Though human lives will not be lost, the harm to the environment and property will increase significantly with this development.

An additional concern with climate change is the risk of subsidence and heave which is strongly dependent on local soil type, and varies considerably with location. The British Geological Survey identifies those areas that are currently most at risk. The most susceptible land is found mainly in the southeast of the UK, such as this site which is predominately heavy clay. It is sensible to assume this site will experience the most significant decreases in summer precipitation, will also be at highest risk of subsidence and heave.

Methods for managing land stability should take into account the potential for subsidence, heave, erosion, and landslip. During longer, hotter summers shrinkable clay soils are likely to dry out, making buildings and service pipes vulnerable to cracking. Wetter winters will contribute to risks of 'heave' where ground swells. Shrinking and swelling of the ground is one of the most damaging geohazards in Britain today. According to the British Geological Survey this has cost the economy an estimated £3 billion over the past decade. To counter this effect, existing buildings will have to be underpinned and new builds incorporating improved foundation design.

**The combination of exceptionally poor place making and erratic and increasingly intense rainfall, is a recipe for disaster.**

## 7. Required Baseline

Where is the agent's rigorous baseline? Without it, an objective assessment cannot be made. The following extract typifies the knowledge of the agent from one of their submitted documents.

There has been no sound hydrologic baseline assessment of water coming into the site from Woodchurch road, times of heavy rainfall together with estimated quantity over a typical 12-month period, showing maximum realistic soil absorption and outflow into Appledore Road and beyond. With this in mind, it is not possible for the agent to argue that surface water flooding is not a serious problem for this site.

No comprehensive investigation has been carried out on the flow of water from Woodchurch Road, its adjoining ponds that flow under the road and through culverts into Limes Land. Nor has there been an objective and quantifiable assessment of water volume flows along the many ditches across a 12-month period. All the assessments have been subjective and reliant on out of date and irrelevant past historic statistics. As Wates will know, the land is impermeable and is not able to infiltrate into the ground due to the Wealden Clay structure, so there are no opportunities for soakaways.

The agent must orchestrate a sound baseline. It must take into account with more intense storms and rains due to climate change. It is essential new development proposals deal with surface water runoff. The existing SuDs proposal is considered not to be up to the job as it underestimates the seasonal heavy winter rains.

I am concerned about the extensive disruption and alteration to the complex natural water system on the site, predominantly draining in Appledore Road and then to Tilder Gill behind Shrubcote, a wildlife designed area.

For a successful desktop survey of known surface water flooding to be successful, the following is the minimum that should be undertaken to create a hydrology baseline:

1. Geology map showing level of permeability
2. Previous site surveys held by LPAs such as the Agricultural Land Classification Map and Report (April 1997)
3. Topographical map for drainage direction including impediments
4. Site and surrounding areas of natural springs
5. All past flooding maps found on official websites
6. Water courses; ditches; ponds; and lying water in depressions within the site
7. Water courses and surface water culverts together with volumes and intensity into the site. We know there are large number ponds / springs on the North side of Woodchurch Road that drain under / over the road and into Limes Land.
8. Water courses and surface water culverts out of the site together with volumes and intensity showing the impact elsewhere
9. Intensity; volume and duration of precipitation over recent 12-month periods. Agencies such as the Met Office can provide.
10. Current and future impact of climate change (ignore historic flooding statistics which are no longer valid)

In essence this would then allow an analysis of: culvert capacity analysis; catchment and watershed analysis; flow estimate; rainfall run off modelling; etc. The analysis has to be explained in textual form for the layman to understand and challenge.

Some examples where Wates have not undertaken any extensive investigation of the existing drainage and waterways above ground and underground:

- a) On the most westerly part of the site, the illustration shows a drain coming through Old Coach House but does not state where the water originates to produce a massive flow of water.
- b) The pond to the east of the inlet, it states that the origin of water feeding the pond is unknown.
- c) Water from Limes Land drains appearing from underground and runs down the track between 49 and 51 Appledore Road which causes problems with drainage flooding on this section of Appledore Road.

“Flood Re” and the “TCPA” are in consultation with the Government to include in the planning bill the legal right for communities to provide their local expertise and have their voices heard in planning decisions that affect flood risk in their areas. New homes, they said, must be built in the right places and be of the right quality to meet the challenges of climate change.

The following statement shows that Wates has not assessed the impact of climate change and wishes to ignore the potential impact.

#### 7.5.1 **Climate change**

Climate change could increase the risk of groundwater flooding as a result of increased precipitation filtering into the groundwater body. If winter rainfall becomes more frequent and heavier, groundwater levels may increase. Higher winter recharge may however be balanced by lower recharge during the predicted hotter and drier summers. This is less likely to cause a significant change to flood risk than from other sources, since groundwater flow is not as confined. It is probable that any locally perched aquifers may be more affected, but these are likely to be isolated. The change in flood risk is likely to be low.

The Wates’ flooding predictions in support of their application are out of sync with current scientific knowledge and should be discarded.

This government has made pledges to the UN on biodiversity and climate change, which it has to honour and will be reflected in the revised NPPF and Environment Bill. Without a doubt the July 2021 version of the NPPF creates more meaningful and relevant targets to reach for the application. This version shows the direction of travel in adhering to climate and change and the protection of biodiversity.

It is time to walk the talk and not put our heads in the sand. Time for developers to comply with our environmental laws, NPPF guidance and ALP policies. Developers have to recognise these are not “paper tigers”.

## **8. Building On Existing Watercourse**

Wates also need to explain the impact of filling the watercourse in field F3 with top soil so dwellings can be built on top? There is no indication if the water source is via underground waterway or if it is a spring.

Either way a potential recipe for housing subsidence and by creating the existing watercourse to find the next weakest point for flowing. The water comes from somewhere and not to undertake a though investigation is dereliction of duty. This needs to be known to determine the size of the flood risk and if the SuDs proposal will work.

## 9. Increased Flooding Elsewhere

The sewage network in Appledore Road and Woodchurch Road is at full hydraulic capacity and regularly overflow leading to localised flooding of homes and gardens. Impermeable roads, paths, driveways, patios, buildings and a carpark would acerbate flooding locally.

It is important to note, "Tilder Gill" is part of the designated wildlife site and ancient woodland. As a matter of urgency, this major issue should be analysed with focus on harmful pollution from soil erosion, contaminates, erosion of the gill and crop damage occurring downstream. It is totally unreasonable to expect the "gill" to accept additional flows that cause environmental and economic damage.

Sir James Bevan KCMG, Chief Executive, Environment Agency, at the CIWEM Surface Water Management Conference on the 17 October 2018 said: Climate change will bring more extreme rainfall, therefore depending on where development occurs will potentially increase the risk of surface water flooding. So, if there is somewhere you do not want water to be, like people's houses you had better make sure that you have the right measures to stop it going where it wants to go.

### Key NPPF Policies:

- a) Para 152 refers to taking account of climate change over the longer term, including factors such as flood risk.
- b) Paragraph 159 states inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk.
- c) Paragraph 164 states, when determining planning applications, local planning authorities should ensure flood risk is not increased elsewhere.

### Key ALP Policies:

As mentioned throughout this objection, this proposed development will increase the flooding frequency, and quite probably intensity, due to the non-permeable soil of Limes Land and the concreting over of the site making surface water runoff with 145 housing foundations acting as dams, together with pavements and roads.

- a) The 2030 Ashford Local Plan Vision states development should:
  - i. Take a positive approach to adapting to and mitigating against the effects of climate change will be secured by promoting sustainable transport, sustainable energy technologies, and encouraging sustainable building design;
  - ii. avoid areas at greatest risk of flooding.
- b) ENV6 continues to say, development will only be permitted where it would not be at an unacceptable risk of flooding on the site itself, and there would be no increase to flood risk elsewhere.

## **Conclusions**

Application does not comply with ALP.

1. Climate change as per scholar research documents state that historic records over the last century of past flooding are no longer reliable for predicting the future. A different model now has to be adopted showing how climate change is creating dry and wet seasons by identifying the step change of weather patterns of the last 10 years compared to before.
2. It has been shown that this site suffers yearly from unacceptable surface water flooding risk of flooding and with impact of climate change there will be an increase flood risk elsewhere
3. Changing climate with more intense storms and rains means it is essential that the new development plans deal with surface water runoff.
4. There has been no comprehensive objective assessment of the flow of water out of Limes Land and into Appledore Road, which will be added to the surface water flow from the Redrow development and Tent 1A development into Tilder Gill. This already has an accumulative affect causing flooding downstream between Tenterden Garden Centre on Reading Street and Smallhythe Place on Smallhythe Road, believed to be part of Dumborne Farm. This application will make the situation seriously worse.
5. The existing SuDs proposal is considered not to be up to the job as it underestimates the seasonal heavy winter rains and absorbability of the ground.
6. Flood Risk Assessment Level 3 Detailed Study should have been carried out due to the severe flooding issues.
7. A Drainage Strategy showing how the impact of the development would be reduced through Site Design and SuDs Techniques should have been produced. There appears to be minimal liaison with SuDs approving bodies.
8. The disposal of surface water from this development has to follow the hierarchy within Part H3 of Building Regulations. As an infiltration system using swales will not work due to the geology, other solutions must be considered.
9. Wates have not ensured long term maintenance arrangements of the SUDS facilities. It is critical that the effectiveness of these systems is maintained in perpetuity.
10. Flooding is likely to overload the currently inadequate sewer system, particularly along Appledore Road. Southern Water Services have raised issues on this subject and have stated there is insufficient surface water network capacity. They are quite specific that the design of drainage must ensure no groundwater or land drainage enters the public sewers.
  - a. There are known serious surface water issues, which would be difficult to mitigate due to the geological fault allowing spring water above Eastgate Hill to flood homes on Woodchurch Road and then flow onto Limes Land.
  - b. It is understood there are also underground tributaries, future housing development would disrupt natural springs, and watercourses exacerbate the flooding onto Appledore Road homes.
11. SWS have stated they will not accept any new surface water flows from the development site into their existing surface water network in Appledore Road.
12. NPPF Para 153 refers to taking a proactive approach to climate change, including factors such as flood risk. Wates have failed to do this.
13. ALP paragraph 9.79 says: "New development must ensure that there are no direct or indirect adverse effects on the quality of water sources in the borough. Appropriate mitigation measures need to be put in place to minimise the impact of increased urbanisation on the water environment. Without such measures, there will be a significant risk of groundwater pollution and flooding." No mitigation measures could be found in the proposal
14. Probably in contravention of Water Resources Act 1991, and the Land Drainage Byelaws 1981. Prior written consent of the Environment Agency is required for any proposed works or structures such as:
  - a. Buildings within 8 metres of watercourses
  - b. Building dwellings (field F3) on top of a watercourse
15. It is not possible that water discharge from new roadways, pavements, drives and hard standings for 145 dwellings would be limited to that of the "pre-development" run-off.

Frequent flooding, transformation of weather patterns due to climate change and extremely poor drainage makes this site unsuitable for development and potentially unsafe.

*John Crawford*  
Tenterden Councillor

## **Appeal Ref: APP/E2205/W/21/3284479 for Ashford Application: 21/00790/AS**

**Land between Woodchurch Road and Appledore Road, Tenterden, Kent**

**Objection: - Cllr John Crawford**

**Topic: ENV8 Water Quality, Supply and Treatment**

**Date: 23<sup>rd</sup> November 2021**

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### **Policy ENV8 - Water Quality, Supply and Treatment**

This policy states that proposals for new development must be able to demonstrate there are, or will be, adequate water supply and wastewater treatment facilities in place to serve the whole development, or where development is being carried out in phases, the whole of the phase for which approval is being sought. Improvements in these facilities, the timing of their provision and funding sources will be key to the delivery of development.

As this is for a significant windfall site, water supply requirements for this side of Tenterden will be greater than was planned for the 2030 Ashford Local Plan (ALP).

It is therefore the duty of Wates to determine the practicality for delivering sufficient water supply with the 3-year housing development commencement window.

There are a number of major water and sewage services infrastructure issues, where conditions would not be appropriate. The documents lodged under the original application 19/01788/AS highlighted a number of issues listed below. The current application does not appear to alter any of those concerns:

- a) The Southern Water utility company have not stated there is sufficient water supply capacity and pressure for additional development this side of town.
- b) Southern Water to supply a large development will require a system wide review of capacity. It appears this is outstanding and would need to be undertaken to consider feasibility, cost and timescale.
- c) Spare capacity has first to service the development on Tilden Gill
- d) Southern Water have said it may be possible for some initial dwellings to connect, pending network reinforcement, however there is no guarantee.
- e) Southern Water have said there is insufficient water pressure for dwellings higher than one story.
- f) Impact of excess surface water on the surface water sewers is an issue.
- g) Localised flooding around the Appledore Road has resulted in past sewage system overload. This development would require a major enhancement to the system, which appears to be old and not subject to any recent improvement.
- h) Southern Water Services have stated the sewage system does not have the capacity for the Wates proposal.

## Conclusion

1. ALP Paragraph 9.73 says: "The Council considers it critical that adequate water supply and wastewater treatment facilities are in place to serve development." Southern Water say this facility is not in place.

The proposal does not comply with the ALP and is undeliverable without key water supply.

2. ALP Paragraph 9.79 says: "New development must ensure there are no direct or indirect adverse effects on the quality of water sources in the borough. Appropriate mitigation measures need to be put in place to minimise the impact of increased urbanisation on the water environment. Without such measures, there will be a significant risk of groundwater pollution and flooding."

No mitigation statements can be found in the proposal.

3. As the utility company would have to initiate a major provision assessment, there is no guarantee that foul drainage capacity and adequate water supply capacity and pressure, will be provided at all, or in the required timescale. There has to be a question mark regarding the availability of funding.

Therefore, this proposal is undeliverable.

**The proposal does not comply with the ALP. The identified issues will have significant impact on delivery of this site and will probably make it undeliverable.**

*John Crawford*

Tenterden Councillor

## **Appeal Ref: APP/E2205/W/21/3284479 for Ashford Application: 21/00790/AS**

**Land between Woodchurch Road and Appledore Road, Tenterden, Kent**

**Objector: - Cllr John Crawford**

**Topic: ENV13 Conservation and Enhancement of Heritage Assets**

**Date: 24<sup>th</sup> November 2021**

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### **Ashford Local Plan (ALP) Policy ENV13 Extract**

1. Proposals which preserve or enhance the heritage assets of the Borough, sustaining and enhancing their significance and the contribution they make to local character and distinctiveness, will be supported.
2. Development will not be permitted where it will cause loss or substantial harm to the significance of heritage assets or their settings.

### **Assessment**

- a) This site is immediately next door to the local community of North and South Ward. Across the generations of local residents, it has renown as a unique valued heritage asset as part of the landscape character, and to enjoy as amenity land.
- b) In 2017, the Department for Digital, Culture Media & Sport published a Heritage Statement setting out the government's direction and priorities for England's heritage in the coming years. It states:
  - i. Heritage gives places their character and individuality.
  - ii. It creates a focus for community pride, a sense of shared history, and a sense of belonging.
  - iii. Traditional farmed
  - iv. Wooded landscapes,
  - v. Our beautiful coastlines and historic villages are widely appreciated.
  - vi. Historic places that are well-maintained
  - vii. Add greatly to cultural life, community resilience and our individual and collective wellbeing.
- c) This site definitely ticks the boxes for (i), (ii), (iv), (vii).
- d) In addition, NPPF Paragraph 189 saying: "Heritage assets range from sites and buildings of local historic value to those of the highest significance."
- e) The aim is to conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations. Definition of a heritage asset covers both natural landscape and manmade structures.
- f) ALP Paragraph 9.122 says: The Ashford Heritage Strategy (2017), prepared by the Council, sets out a positive strategy for the conservation and enjoyment of the Borough's rich historic

environment, assessing the significance of its broad portfolio of heritage assets, the contribution they make to the environment of the Borough and their potential to contribute to the delivery of other sustainable development objectives of the Local Plan.

- g) According to records, Limes Land has always been a very attractive heritage pasture like park since before 1887.
- h) The historic landscape character of Limes Land is acknowledged as one exhibiting considerable time depth and coherence with no historic boundary loss and the survival of medieval landscape features, including hedgerows; veteran trees; ponds and trackways.
- i) The topography of the site is significant and contributes to the historic local character and distinctiveness.
- j) The whole site is considered a local historic asset due to its untouched undulating landscape with gullies sloping towards the houses on Appledore Road, there are several natural ponds with countless very mature trees. The land has never been cultivated or sprayed, that has resulted in nature and wildlife flourishing unhindered as far back as 1887.
- k) PROW 12 is considered to be an ancient historic footpath
- l) This ancient mosaic, in combination with unimproved or semi-improved neutral and acid grassland, renders the site historically important locally, regionally and nationally.
- m) There are numerous ancient hedgerows that are centuries old. They are an important reservoir of biodiversity in the farmed landscape as well as being of, cultural historical and landscape importance. Hedges act as wildlife corridors, linking habitats of high biodiversity value such as woodland and wetland, thus enabling bats, small mammals and insects to move around under cover from predators.
- n) In the centre is a ridge sloping North East and South West. It is one of the highest points in Tenterden with an unimpeded view across the countryside to St Mildred's Church and to Woodchurch village. The unembedded iconic views and considered by the community as a valuable heritage asset.
- o) Limes Land has a number of registered heritage / historic assets. These can be found on the KCC website:
  - i. Gallows Green. Part of Limes Land is recorded to be the historic site where many hangings took place with the last one on the 27th August 1785, when two burglars were hanged in front of a large crowd of about 1,000 people
  - ii. The Drove
  - iii. Ridge and Farrow. It is a medieval site well known for its "ridge and furrow" ploughing which can be found in the South West corner together with ancient mosaic boundaries of hedge rows and trees.
- p) Appledore Road is a historically important tree lined avenue leading to the town. It is proposed to remove some established trees that form part of the distinctive landscape and historical feature along Appledore Road, further visual harm would occur with the introduction of unsightly bollards and signage which would degrade the setting significantly.

## Summary

- a) Limes Land is considered a historic untouched site for centuries and is a natural heritage site.
- b) The site itself has a number of heritage assets recorded on the KCC website
- c) Any development would cause significant harm to the local heritage.

*John Crawford,*  
Tenterden Councillor

**Appeal Ref: APP/E2205/W/21/3284479 for Ashford Application: 21/00790/AS**

Land between Woodchurch Road and Appledore Road, Tenterden, Kent

**Objector:** - Cllr John Crawford

**Topic:** - Non-Compliance with HOU5 Residential Windfall Development in the Countryside

**Date:** 23<sup>rd</sup> November 2021

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**NPPF and the Ashford Local Plan**

NPPF paragraph 15 states: The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings.

This application is developer led and does not have the support of local people.

**Strategic Vision**

Ashford strategic vision provides the direction of the Local Plan. It set the parameters for the intended development for the borough from 2019 until 2030.

The vision sets out the intended character of the plan area, based on current trends and trajectory of key data such as that related to population and economy. Strategic policies will flow from the vision, establishing the way in which the plan area will deal with the identified critical issues. Together, these are clear, realistic, locally distinctive and spatial in planning terms.

In the Strategic Vision Statement, it says: Tenterden will continue to serve the south western part of the Borough as a principal rural service centre with a strong offering of shops and services, conserving and enhancing its historic centre and accommodating development of a suitable scale, design and character.

The critical phrase is suitable scale. That does not mean large scale development, but small windfalls that are absorbable within the confines of the town's infrastructure capacity and not having a negative impact on social cohesion, environment and its economy (which is principally tourism, hospitality and agriculture).

The local planning process has considered the characteristics and features of Tenterden, as a residential area and has reached a coherent and logical conclusion.

## **Local Plan Strategic Polices and Context with Tenterden**

ALP Paragraph 2.38 of the strategic polices section states: Historically, larger scale residential development in the Borough has been targeted towards the town of Ashford. All recent iterations of previous Local Plans, County Structure Plans and the South East Regional Plan gave clear and distinctive spatial guidance that focused growth towards Ashford and its immediate surroundings whilst applying a policy of limited growth to Tenterden and the main villages in the borough.

The strategic direction is quite specific for Tenterden without any possible misinterpretation. Only limited growth to be applied to Tenterden. Currently there are three major developments in the town. Tent 1A - 250 dwellings, Tent 1B - 225 dwellings and Tilden Gill - 100 dwellings.

ALP Paragraph 2.50 states: Development at Tenterden is constrained by the High Weald AONB which surrounds it on three sides, and a high quality, well-preserved Conservation Area in its heart that gives Tenterden its distinctive character.

ALP Paragraph 2.51 continues to say: 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.

Nothing has changed in the recent past to suggest that Tenterden's landscape and historic character are no longer of high quality. Therefore, no additional major development should occur in the planned period.

## **Policy HOU5 - Residential Windfall Development in the Countryside**

As well as the need to put HOU5 in context with the strategic polices above, it is also important to understand the text specifically for HOU5 so the policy is correctly interpreted.

NPPF Paragraph 7 states: The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.

This development would compromise the ability of future generations to meet their own needs.

**Policy Criteria** has six principal criterion. None of these are met with this application.

- a) Criterion A requires the scale of any development pursuant to policy HOU5 to be: 'proportionate to the size of the settlement and the level, type and quality of day to day service provision currently available and commensurate with the ability of those services to absorb the level of

development in combination with any planned allocations in this Local Plan and committed development in liaison with service providers’.

Scale is the major factor for Tenterden. The Local Plan spells out in no uncertain terms what scale of houses would be acceptable for Tenterden. They have to be small scale to allow organic growth.

For the next five years and beyond, Tenterden has the challenge of absorbing a significant increase in population as a result of the existing planned housing development (Tent 1 and Tilden Gill), without considering any other significant housing developments such as Wates.

An oversupply of major housing developments by speculative developers in Tenterden's rural location would be an unforgivable misjudgement, it would have an intolerable and adverse impact on local amenities, services and infrastructure. These developments would be unabsorbable.

- b) Criterion B requires any development pursuant to policy HOU5 to be: ‘within easy walking distance of basic day to day services in the nearest settlement, and/or has access to sustainable methods of transport to access a range of services’

Previous Appeal inspectors have confirmed there is no strategic approach to transport infrastructure, or strategic transport schemes for Tenterden to produce sustainable travel to centres of employment.

Tenterden can be considered to have reached full employment with very few unemployed and very few job vacancies. Commuters are car dependent, which results in heavy congestion. New residents moving to Tent 1 and Tilden Gill sites will have to commute to employment centres such as Ashford, Maidstone, Tunbridge Wells and London.

With commuting to Ashford, Maidstone and Tunbridge Wells for work, it is not possible to obtain sustainable travel due to many factors. With this proposed site, jobs and houses will not be collocated and the reducing public transport makes this proposal unsustainable. New residents will gridlock roads with extra cars.

Headcorn railway station is 9.4 miles away from the site and most of the residents go by car due to time of day, convenience and duration, resulting in unsustainable travel.

There is a bus to Ashford that takes approximately 45 minutes, to Maidstone approximately 1 hour and to Tunbridge Wells approximately 1 hour 40 minutes. All expensive options and limited in their frequency. Public transport costs in comparison to private car costs have gone up dramatically over the past decade. With the inconvenience of bus timetable, destination points and costs, Tenterden residents will naturally go for the private car. It is a well-known fact that bus transportation usage is in a long term decline. When and where there is a bus, naturally there will be extra commuting time to walk to the bus stop and then from the bus destination point to the

place of work. With the increase of working population against today's demographics, the percentage of commuters going by car will increase and will not be sustainable.

Residents cannot be expected to cycle to Ashford.

Despite Tenterden being known as a rural service centre, goods and services available to the town's communities are limited and therefore a major shopping will still take place in Ashford, Maidstone, or Tunbridge Wells. Private transport is and will continue to be the main mode of travelling due to convenience, cost and speed.

- c) Criterion C requires any development pursuant to policy HOU5 to be: 'able to be safely accessed from the local road network and the traffic generated can be accommodated on the local and wider road network without adversely affecting the character of the surrounding area'.

Kent Highways have advised that the existing roads into and away from Tenterden will not be improved during the local plan period and beyond. The road infrastructure will remain around the principal employment and transport centres such as Ashford and Maidstone. Therefore, the capacity will remain the same for immediate roads within and surrounding Tenterden. Major developments, will bring in a huge influx of additional cars and will overload the road and parking system. The tourist industry that Tenterden relies upon will become under threat.

Together with SP1 and TRA7, Criterion C will not be met as the proposed application will create a significant increase of car movements, in particular for commuting as the transport system is not fit for purpose for residents working at major employment centres. The residents will be near 100% reliant on the car. There are today numerous traffic congestion pinch points from the proposed site towards Tenterden and Ashford. There are already long queues backing to previous junctions which then cause additional queues and congestion of adjoining roads.

- d) Criterion D requires any development pursuant to policy HOU5 to be: 'located where it is possible to maximise the use of public transport, cycling and walking to access services'.

There is no strategic transport for Tenterden and the existing service is inadequate to poor, certainly of no use for commuting which would lead to an increase in car usage. Provided residents do not have any bulky or heavy item, yes, they could go to the shops for a loaf of bread. Anything over and above that, residents will go by car to the High Street. With a large percentage of parents with young children working, they tend to drive to the school and then travel on to their place of work.

The agent's transport report has overlooked the Local Plan which says in paragraph 2.66: "transferring major housing growth from Ashford to the rural parts of the borough should be avoided. Doing so would result to an unsustainable model of development by"

- being poorly served by sustainable modes of transport, leading to significantly more trips being made by private car,
- not making best use of infrastructure that has been delivered or is about to be delivered at Ashford, including HS1 and strategic road improvements,

- being more removed from the local jobs market which is focused at Ashford,
  - being located near to services and facilities that may only meet local needs, as opposed to the range of key services and facilities at Ashford,
- e) Criterion E requires any development pursuant to policy HOU5 to: 'conserve and enhance the natural environment and preserve or enhance any heritage assets in the locality'.

This application at a stroke would destroy the precious environment in disregard of ENV1 Biodiversity. The policy specifically says: Development should avoid significant harm to locally identified biodiversity assets, including Local Wildlife Sites, Local Nature Reserves and the Ashford Green Corridor as well as priority and locally important habitats and protected species. This site has many priority habitats and protected species – these are listed in other objection letters.

The setting of an indispensable green lung, with rich habitat, high landscape value and a setting in an AONB must be preserved for the town today and for generations into the future.

Throughout the NPPF, policies around landscape have to be considered. Para 174 states that decisions should contribute to and enhance the natural and local environment by:

- Protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
- Recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.

NPPF Paragraph 176 states: "Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas. The scale and extent of development within these designated areas should be limited.

The Planning Practice Guidance states: "One of the core principles in the National Planning Policy Framework is that planning should recognise the intrinsic character and beauty of the countryside." It also suggest that character assessment should be carried out which Ashford have done with their 2011 Landscape Character SPD.

The proposal for residential development cannot demonstrate it is well designed and sited in a way that can: sit sympathetically within the wider landscape be consistent with any prevailing character and built form; and does not harm neighbouring uses or the amenity of nearby residents.

A major development of 145 houses with 2½ story dwellings will at a stroke demolish and change the landscape forever. The bulk would be overbearing for a town such as

Tenterden with a housing density of 27 HA and obliterating views into and away from the iconic ridge that everyone loves and enjoys.

The residential amenity value will disappear overnight for residents in Woodchurch Road, Appledore Road and those who use the site as amenity land. This parcel of tranquillity will be lost forever together with the last few remaining green lungs that prevent a rural town becoming urbanised.

It is an inconvenient truth for the application that Ashford's Landscape Character SPD adopted April 2011 and Jacob's assessment highlights the special character of Limes Land as part of the "Woodchurch Undulating Farmlands" character area.

- f) Criterion F requires any development pursuant to policy HOU5 and any associated infrastructure, to be "of a high-quality design".
- it does not sit sympathetically within the wider landscape,
  - it does not preserve or enhance the setting of the nearest settlement,
  - it does not include an appropriately sized and designed landscape buffer to the open countryside,
  - it is not consistent with local character and built form, including scale, bulk and the materials used,
  - it does adversely impact on the neighbouring uses or a good standard of amenity for nearby residents,
  - it does not conserve biodiversity interests on the site and /or adjoining area
  - It does not provide any climate change net zero mitigation

This development would result in coalescence of the settlement at Woodchurch Road / Knockwood with Appledore Road / Shrubcote settlement. A recent Appeal at Hamble, Hampshire Application Ref: O/13/73479 agreed that a gap between settlements was required and building application was refused.

A settlement's identity can be as much as a result of its setting, within the surrounding countryside, as with the quality of its buildings. As well as protecting the setting of Tenterden from inappropriate development and urban sprawl, gaps are an important landscape function to provide green infrastructure and wildlife benefits close to settlements. They are a very relevant consideration in a Landscape and Visual Impact Assessment as a constituent part of what makes Landscape Character.

Landscapes around settlements have a special role to play in maintaining the distinction between town and country, in preventing coalescence between adjacent built-up areas and in providing a rural setting to the built-up area. The location of the site adjoins "High Weald AONB" to the East, the "conservation area" to the West, "wildlife site", and "biodiverse opportunity site" to the North. It is uniquely placed outside the town confines and nestles between two established settlements, whilst underpinning its essentially rural setting within the Kent countryside. It is a unique "countryside island" lost from the hustle and bustle of the town centre".

This unplanned proposal would be a wanton erosion of the countryside and destroy quality, character and attractiveness of the individual settlements by removing an important green corridor. Green lungs, open countryside and amenity land are vital between established settlements / communities.

The Ashford BC Tenterden and Rural Sites DPD Inspector's Report 2010, Para 2.98, says, "the site forms a wedge of countryside characteristic of the urban form of Tenterden as a small market town in a strongly rural setting, which would be eroded by development".

It is considered one of the few remaining green lungs of the town and stretches from the conservation area to the West by Hales Place and connects with the AONB to the East, wildlife site and biodiverse opportunity site to the north. It is essential to maintain this green lung, its distinct characteristics and attractiveness for the two settlements.

### **Policy HOU5 in context with Government Policy**

To repeat the over quoted NPPF paragraph 8, it says: building in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure; One major topic that has to be taken into consideration is central governments mantra of "building in the right place". This does not mean building for the benefit of developers' commercial interest, but understanding local needs and opportunities.

Local needs are fundamental to central government publications. In order to promote productivity growth, housing should be provided where it will "enable people to live and own homes close to where they work." In addition, the government's productivity policy for rural areas is "to ensure that any village in England has the freedom to expand housing in an incremental way, subject to local approval". In this context, "rural town" equates with "rural village".

The two main messages coming from central government are productivity and housing. Central government is promoting that houses should be:

- Collocated with the employment market
- Built by strategic infrastructure projects. M20 junction 10a is one of those. This is critical to the success of our modern industrial strategy.

Central government wish houses to be collocated by current job markets and new opportunities. The by-product is to improve productivity and boost the country's GDP. In addition, the government want houses to be built by major infrastructure projects such as the M20 junction 10a for exactly the same reason. Growing businesses need a skilled workforce living nearby, and employees should be able to move easily to where jobs are without being forced into long commutes.

KCC growth and infrastructure framework<sup>8</sup> shows that Tenterden is not an employment centre. All the borough employment clusters are around the Ashford town centre. There is

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<sup>8</sup> [https://www.kent.gov.uk/\\_data/assets/pdf\\_file/0012/50124/Growth-and-Infrastructure-Framework-GIF.pdf](https://www.kent.gov.uk/_data/assets/pdf_file/0012/50124/Growth-and-Infrastructure-Framework-GIF.pdf)

little unemployment in Tenterden, but there is also little opportunity to increase the employment potential. The new homeowners will have to find employment in Ashford or other major employment centres.

Economic initiatives are based around Ashford's town centre such as the Big 8 projects and other initiatives. This will necessitate new housing stock within the immediate Ashford location. Some residents in Tenterden will no doubt be attracted to work there, but with poor road infrastructure, distance and lack of transport strategy this is not environmentally sustainable.

It is essential that Tenterden keeps an equilibrium of economic, social and environmental sustainability in line with current and future housing stock. This site would destroy the sustainable equilibrium.

The bottom line is that employment in Tenterden is not a key driver in the construction of any substantial number of houses in the Tenterden catchment area. All the above bullet points show that housing should be in and around Ashford.

### **Conclusion**

HOU5 in the context of the ALP Vision, SP1 and SP2, this site does not meet the placemaking spatial direction.

HOU5 policy criteria is not met by this application.

John Crawford  
Tenterden Council

**Land between Woodchurch Road and Appledore Road, Tenterden, Kent**

**Objection: - Cllr John Crawford**

**Topic: Misapply use of TRICS®**

**Date: 16<sup>th</sup> November 2021**

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Ashford Local Plan (ALP) Policies

The ALP key policies around sustainable transport are predominantly TRA7 and TRA8. To avoid duplication of arguments, this TRICS objection covers both ALP policies as a whole in relation to trips and their impact.

TRA7 The Road Network and Development - Policy Extract

The key criteria are:

1. Developments generate traffic movements that are well related to the primary and secondary road network.
2. Demonstrate that traffic movements to and from the development can be accommodated, resolved, or mitigated.
3. New accesses onto the road network will not be permitted if a clear risk of road traffic accidents or significant traffic delays would be likely to result.

TRA8 Travel Plans, Assessments and Statements - Policy Extract

1. Travel plans are realistic to mitigate negative transport impacts of development in order to ensure that sustainable development is delivered.
2. Public transport and other non-car based modes of travel can be promoted and achieved.

TRICS® Aim

- a) TRICS is a computerised database of land use and trip generation information.
- b) TRICS is an incomplete interactive database and data analysis system comprising a number of transport survey records of individual developments across a wide range of land use categories.
- c) When a developer wishes to calculate potential traffic and transport generation for a future development, they refer to TRICS® to ascertain if it is possible to produce a meaningful prediction.

- d) By its nature, TRICS computer system is only as good as the information it holds, assessments it can make and the filtering of sites used by the developer. It is an imprecise methodology.
- e) It is my understanding that the key to a successful TRICS analysis is to select towns and associated developments with a very close profile to the proposed development and location.
- f) This system, when used correctly, is a useful tool to paint a possible scenario of traffic movements for new sites based on correct site assumptions and using a “rear-view mirror” of what has happened in the past.
- g) It has to be remembered that it is only a tool and has to be used in conjunction with a number of other factors based on realities and other pertinent facts.
- h) Like most computer tools depending on how it is used, it can produce the desired results to support a particular claim. This type of computer systems if misused can fall into the "lies, damned lies, and statistics" category describing the persuasive power of numbers, particularly the use of statistics to bolster weak arguments.

#### Use of TRICS®

- a) First, the developer has to assess the location of the proposed site. The choices provided are: town centre; edge of town centre , suburban area, edge of town, neighbourhood centre and free standing. The ranked comparison of TRICS location types showed the Edge of Town category with the most of trip rates, and the Town Centre category the least trip rates.
- b) For Limes Land /Homewood School pitches, the site location is edge of town so it is expected to have the highest trip rates.
- c) Second, care should also be taken to ensure that data fields used in site selection filtering are relevant to each individual case. For example, using average levels of car ownership within a 5-mile radius of a development as a criterion in the filtering process would be more appropriate for a land use sub-category such as a food superstore than it would be for a residential development.
- d) The other important field selections would be population of the town and number of dwellings being proposed.
- e) Finally, to select the survey sites which share similar characteristics to the proposed development site in terms of size and location
- f) Wates have selected:
  - i. Houses Privately Owned;
  - ii. Survey sites within England only (excluding greater London);
  - iii. Residential developments between 50 and 500 units in size;
  - iv. Sites in Suburban Areas and Edge of Town locations;
- g) On the next page is the primary data for Tenterden and the Wates selected comparison sites to produce trip rates.
- h) I have added three columns to show: sustainable bus transport; sustainable train transport and road network.

<b>Town</b>	<b>Urban Rural Classification</b>	<b>Dwellings</b>	<b>Population</b>	<b>Sustainable Bus Transport</b>	<b>Sustainable Train Transport</b>	<b>Road Network</b>
<i>Tenterden</i>	<i>Rural</i>	<i>145</i>	<i>8,000</i>	<i>Limited</i>	<i>Non-Existent</i>	<i>Rural "A" Road</i>
Norwich	Suburban	98	213,000	Excellent	Excellent	Excellent
Horsham	Edge of Town	151	142,000	Excellent	Excellent	Excellent
Willesborough	Suburban	51	7,800 out of 117,000	Excellent	Excellent	Excellent
Hearne Bay	Suburban	363	38,500	Very Good	Good	Good
Bishop Auckland	Suburban	50	25,000	Good	Good	Major
Camber	Edge of town	134	1,700 to 13,000 Major holiday accommodation	Good	Non-Existent	Rural "A" Road
Honiton	Suburban	116	12,000	Good	Good	Major
Honiton	Suburban	70	12,000	Good	Good	Major
Polegate	Edge of Town	212	8,500	Good	Good	Urban "A" Roads
Liphook	Suburban	62	8,500	Good	Good	Major

- i) The Tenterden profile is of a rural classification with limited and infrequent bus transportation, non-existent train transportation with a rural A28 road to Ashford 12 miles away. The proposed development site is outside the settlement area of the town.
- j) By analysing the table data, it can be seen immediately which sites have negative correlation with Tenterden:
  - i. Norwich and Horsham have populations of hundreds of thousands compared to Tenterden's population of 8,000.
  - ii. Norwich, Willesborough, Hearne Bay, Honiton and Liphook are all suburban locations and cannot be used as comparison sites for this site application which is classified as edge of town.
  - iii. Willesborough, Bishop Auckland, Liphook and the smaller site in Honiton are too small in dwelling size.
  - iv. That leaves:
    - Horsham is a transport hub with quality train and bus services.
    - Camber is a major self-catering and B&B holiday town next to the beach with a Pontins and caravan site as all entertainment are within walking distance. Car movements would practically be zero.
    - Polegate is the closest in dwelling number, but one would expect small car movements at this site with the location's good bus and train service, plus with urban "A" road" connections to attract employment into the area – so this site is not applicable.
    - So, in essence there are no truly comparable sites selected by Wates for this site application
    - There is no "like for like" transport profiles of the sites selected by Wates to that of Tenterden.
    - It has to be remembered that Tenterden with its poor public transport will have maximum car movements.
- k) How Wates can use TRICS measurements for these very divergent selected town profile sites to simulate traffic movements on Limes Land on the edge of town of Tenterden is very difficult to understand? I suggest they cannot.
- l) It appears TRICS has a limited number of sites for comparative purposes and there are none that closely match the Limes Land profile and is quite misleading.
- m) Other factors that affect trip rates which have been glossed over by Wates are:
  - i. Need to take account of car ownership levels. The 2011 census shows there were 1.42 vehicles per household in Ashford borough with 1.52 vehicles per household in Rural areas. 42% of the households have two or more cars. Tenterden being a rural area, it would be a safe to assume there are 1.5 vehicles per household.
  - ii. The current elderly population is the first to have grown up during a time of mass car ownership and will want to continue to use the car for as long as possible. This is a fair assumption for Tenterden.
  - iii. Unacceptable distance to supermarkets for carrying shopping. Both Waitrose and Tesco's are too far and would require car trips.
  - iv. Of the economically active adults, 20% work in Tenterden due to a limited employment market and the rest commute to Ashford and other employment centres.
  - v. 2011 Census shows of the 20% of the residents who work locally, of those half travel by car and only 1.7% by bicycle. With regard to cycling, very few people

actually cycle into town or anywhere else, as the roads are too narrow and dangerous. Cycling is not a sustainable transport method for residents who have to commute to places of work and any form of shopping in the high street.

- vi. It has to be remembered, that 80% of the residents travel further afield, mainly to Ashford.
  - vii. Department of Transport survey shows:
    - since 1985, bus journeys in Great Britain have dropped from 4.5 billion trips per year to well under 3 billion trips per year (outside London) – well over a third less in forty years with no sight of abating. The cost of passenger transport by road (which includes buses, coaches and taxis) has increased by 131% since 1997. It is not surprising that besides very limited bus destinations and frequency, the average passenger is being squeezed out financially.
    - each person made an average of 986 trips across private and public transport in 2018, with around a quarter of all trips made for leisure purposes. That equates to 2.7 movements per person from the home to a designated location every day, of those were over 60% by car. 26% of those were for leisure purposes that includes trips to visit friends, sports, holidays and day trips. Wates have not attempted to correlate these figures with TRICS output.
    - across Great Britain, 68% of workers typically travelled to work by car, though this varied by region with London having a substantially lower proportion of people and the rural areas such as Tenterden being much higher. Naturally the extensive car movements resulted in heavy congestion in and around the Tenterden. The survey also shows the average time taken to travel to work in 2018 was 29 minutes, showing that walking or cycling is not a viable means of commuting.
  - viii. TRICS cannot model gridlock of traffic flows on roads such as Oaks Road, Eastgate Hill, Beacon Oak Road, Golden Square and Woodchurch Road that have permanent “on street” parking. This has major consequences on car queuing and congestion, where two-way traffic is already seriously impeded.
  - ix. It is difficult to see how Wates have factored in correctly the additional traffic to be generated by the Tilden Gill development and the additional car queuing by the proposed calming measures on Appledore Road.
  - x. With the additional traffic on Appledore Road in recent years coinciding with developments at Tilden Gill in Shrubcote, together with the extra movements from the proposed site will create increased traffic flow congestion and exit difficulties for Shrubcote residents.
  - xi. TRICS cannot model halting of traffic flows at pedestrian crossings in the high street and school crossings found at Homewood School on Recreational Ground Road and the A28.
  - xii. That illustrates very strongly the fallacy of Wates proposal for car movements, good traffic flows and sustainable travel.
- n) It is important to create a sound traffic baseline to replace the hotchpotch of unreliable evidence presented. It is important to show:
- i. The type of traffic movements and distribution across the parish and through the parish by their scale, timing and location, together with inherent obstacles including on street parking that delays movements.
  - ii. State the existing congestion and gridlock pinch points during the tourist season and school term.

- iii. Capacity of popular town car parks which will vary by low and high tourist season, plus school holidays.
- iv. The aim is to understand the road network efficiency and safety based on how it is normally used today. With this information, then an objective assessment can be carried out.

### Summary

- a) I have read the voluminous Wates documents and I have come to the conclusion their Transport assessment is superficial and meaningless when it comes to true sustainable transport.
- b) The extra traffic generated by this proposed site over and above the new traffic from the approved sites of Tilden Gill will significantly increase traffic on this "B" road. In conjunction with Tent 1, an irresolvable issue of gridlock at Homewood School and St Michael's Church of England Primary School will occur during the Tenterden rush hour.
- c) TRA7 policy must be adhered to as there will be insufficient private transport capacity to contend with new traffic from commuters who will have to travel to Ashford as the main employment location.
- d) As Wates are unable to find a TRICS site or simulations that would have the same profile of Limes Land and Tenterden traffic, their proposal is an attempt to compare "apples and oranges". The results are totally meaningless and the results are skewed.
- e) Therefore, Wates cannot show that ALP policies TRA7 and TRA8 will be satisfied.

*John Crawford*

Tenterden Councillor

**Land between Woodchurch Road and Appledore Road, Tenterden, Kent**

**Objection: - Cllr John Crawford**

**Topic: TRA7 and TRA8 Sustainable Transport**

Date: 17<sup>th</sup> November 2021

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### **Ashford Local Plan (ALP) Policies**

The ALP key policies around sustainable transport are predominantly TRA7 and TRA8. To avoid duplication of arguments, this objection covers both ALP policies as a whole.

### **TRA7 The Road Network and Development - Policy Extract**

The key criteria are:

4. Developments generate traffic movements that are well related to the primary and secondary road network.
5. Demonstrate that traffic movements to and from the development can be accommodated, resolved, or mitigated.
6. New accesses onto the road network will not be permitted if a clear risk of road traffic accidents or significant traffic delays would be likely to result.

### **TRA8 Travel Plans, Assessments and Statements - Policy Extract**

The key criteria are:

3. Travel plans are realistic to mitigate negative transport impacts of development in order to ensure that sustainable development is delivered.
4. Public transport and other non-car based modes of travel can be promoted and achieved.

### **Infrastructure Delivery Plan (IDP)**

The key points of the plan are:

- a) The 2030 Local Plan paragraph 1.27 states that the IDP is required to be delivered to support the planned development up to 2030.
- b) Infrastructure expenditure is aimed at Ashford town and its surrounding areas, as this is where the greatest opportunity for sustainable housing exists.
- c) IDP Page 10 declares the only improvement for the A28 between Tenterden and Ashford there will be the 'Tank' roundabout, 'Matalan' roundabout, Loudon Way junction and other intermediate side roads/accesses.
- d) It is well known there are "no" KCC or Ashford funds available now or in the immediate future to solve the critical traffic congestion of arterial roads into and out of Tenterden. Therefore, the roads within and around Tenterden will become more and more congested and gridlocked during rush hour.
- e) IDP page 22 highlights National Cycle Route 18 linking Ashford to Tenterden. As Ashford borough grows, there is an opportunity to provide a more comprehensive network of cycle routes and create more attractive cycle routes, with greater access to green

spaces and open countryside. Ideal for the experienced cyclist for leisure and exercise, but not viable for commuting to work or shopping.

- f) Cycling is considered dangerous in Tenterden due to on-street parking and heavy congestion of traffic flows on the roads off Beacon Oak Road and Appledore Road. It is very rare to see a cyclist in Tenterden except those in a lycra who are riding for exercise or training for competition.
- g) The Kent Growth and Infrastructure Framework shows there are no plans to improve the road network to or from Tenterden for the foreseeable future. As the road network is already under pressure it will not be able to accommodate any large unplanned housing growth.
- h) Bottom line with the 2030 Local Plan and KCC, show there are no improvement plans for car or bus transport for Tenterden commuting, thus making the town unsustainable for employees that have to work outside the parish. It is a known fact that there is very little employment in Tenterden so the vast majority of new residents will have to commute by car to Tunbridge Wells, Tonbridge, Ashford and other major employment centres.

### **Immediate Site Traffic Profile**

- f) Appledore Road is a significant historic tree lined artery road into Tenterden from Leigh Green, Appledore, Rye and towns in between. It carries extensive traffic volumes especially at peak times with resulting congestion and delays at all the immediate junctions and pinch points from East Hill and Beacon Oak Road.
- g) It is difficult to see how Wates have assessed correctly the additional traffic that will be generated by the Tilden Gill development and the additional car queuing by the proposed calming measures on Appledore Road.
- h) The cumulative development with Tilden Gill in Shrubcote would generate significant traffic movements with negative consequences to the primary and secondary road network. The road network does not have adequate capacity to accommodate this unplanned development. Traffic pressure from this site will be compounded by new traffic from Tilden Gill resulting in:
  - i. Increased and permanent congestion on existing roads with on street parking (i.e., Golden Square, Oaks Road and East Hill) will cause long tail backs to road intersections.
  - ii. Significantly increase traffic on The Appledore Road / Beacon Oak Road and Woodchurch Road "B" roads. There are already tail backs past the new Beacon Oak roundabout during rush hour.
  - iii. Increased rush hour gridlock on the High Street
  - iv. Increased school run gridlock at Homewood School Secondary School (Homewood is one of the largest secondary schools in the country) and St Michael's Church of England Primary School.
  - v. Increased vehicular movement by new residents to town for shopping, dropping off children at school. This will add a significant strain on existing road use as evidenced by present resident population in and off the Appledore Road who use their vehicles extensively. As a result, there will be the heightened impact of traffic pollution in the town which against Central Government policy.
- i) There is concern about the impact to Appledore Road traffic flows; likely build-up of congestion onto the A28.
- j) Visual harm would occur with the introduction of unsightly bollards and signage required by the 'choker' measure which would degrade the historic setting significantly which forms the entrance into Tenterden .
- k) Appledore Road is historically an important tree lined avenue leading to the town. It is proposed to remove an established tree that form part of the distinctive and historical landscape features along Appledore Road to allow access to the site, which is unacceptable.

## **Tenterden Traffic Profile**

- a) Tenterden is not a transport hub for commuting and other forms of travel. The closest railway station at Headcorn 9.4 miles away from the site. Most residents travel by car, due to time of day, convenience, price and journey time, resulting in unsustainable travel.
- b) The only truck route through Tenterden is the A28 from Margate to Canterbury, Ashford and onwards to Hastings. The B2080 from Appledore to Tenterden is the most renowned historic route with the tree lined avenue with the picturesque and scenic countryside. Visitors associate the historic avenue with the entrance to the historic town.
- c) All main roads and thoroughfares are reaching capacity with rush hour gridlocks. There is no ability to improve the road network to allow increased traffic movements.
- d) Tent 1A has been nearly completed and has tail backs from the Leisure Centre to the High Street during rush hour. Tail backs now occur beyond the Beacon Oak Roundabout from the High Street.
- e) The High Street is becoming more gridlocked by the day. With no viable alternative routes, additional traffic movements for shopping, school runs and commuting will cause untold havoc. The Town has yet to experience the full impact of the Tent 1 development on the highway infrastructure, all main and secondary roads will be “at capacity”.
- f) Many appeal inspectors have ruled that since there are no alternatives through routes, then vehicles from the development have to pass through congested secondary roads, contributing a severe impact.
- g) It is well known that during the rush hour there are already considerable bottlenecks causing congestion at Homewood School and St Michael's Church of England Primary School making commuting very difficult particularly to Ashford.
- h) Signalisation for Recreation Ground Road with the High Street and Ashford Road will be over capacity in 12 months' time. Tweaks in cycle times have been recommended, but is really only plastering over the problem.
- i) The last “one day” junction survey was the 15th May 2018 which is now considerably out of date, as it does not count the cars coming out of Tent 1A and the extra traffic at Beacon Oak Road and the High Street / Recreational Ground Road (due to a massive increase of delivery vans and new housing coming on stream).
- j) If the planning application had been lodged 16 days later, Wates would have had to resubmit new traffic figures to comply with regulations and reality of existing traffic flow. Decisions should not be made on four year old data that displays no resemblance to today. Wates is hiding behind a technicality not to produce a new traffic flow count which would be in touch with the reality.
- k) Policy TRA7 states that developments that would generate significant traffic movements must be well related to the primary and secondary road network. That is to say, new accesses and onto the road network will not be permitted beyond which local road could reasonably accommodate in terms of capacity and road safety. Therefore, this application should be refused.

## **Outlying Traffic Profile**

- a) Warehorne Parish Council have stated that:
  - i. Traffic using the A28 to access Ashford and motorway connecting the B2067 from Tenterden to Hamstreet via the villages of Warehorne and Kenardington is creating a 'rat run'.
  - ii. This is already causing problems with the number of both minor and major accidents increasing. The virtually blind crossroads of the B2067, Church Road and School Lane in Warehorne where children need to cross daily in order to catch the school buses. With more traffic using the road the danger will increase dramatically.
  - iii. There will also be an increased number of rail commuters travelling to Hamstreet Station; parking at the station is already a problem and any increase will magnify

the problem. A new housing estate has been approved on Warehorne Road and controversially new traffic lights are being installed at the bridge, this will cause congestion and increased numbers of vehicles will aggravate the situation. The health of children walking to the local primary school in Hamstreet will be impaired by the air pollution caused by extra vehicles, particularly at 'pinch points' along Warehorne Road.

- iv. Currently patients from Hamstreet and surrounding villages including Warehorne are able to access emergency weekend treatment at Tenterden surgery and vice versa, this is becoming more difficult due to the number of new patients joining each practice. If this service is forced to stop, patients will have to attend the local A & E department at the William Harvey Hospital in Ashford where the average waiting time is more than 4 hours.
- b) Orlestone Parish Council are extremely concerned about various issues that will affect the village of Hamstreet should this application be granted.
- i. The traffic through Hamstreet will increase considerably. It is likely that some construction traffic will go through Hamstreet while the building works are being undertaken. This application in conjunction with the two proposed developments that have recently received outline planning permission in Hamstreet (one opposite Hamstreet Primary Academy and the other in Warehorne Road) will result in large vehicles using the roads through Hamstreet, causing congestion and pollution.
  - ii. If the application is approved there will be increased traffic movement through Hamstreet from the new residents living in the new development. This will result in further congestion in and around Hamstreet. This added traffic coupled with the additional traffic from the two new proposed developments in Hamstreet will result in the roads in Hamstreet village becoming extremely busy and dangerous.
  - iii. At the moment there are more people using the train station in Hamstreet than live in Hamstreet. They use the trains to commute to Ashford and London. These people park throughout the village, their cars lining many of the side roads near the train station. If this application is approved even more people will be using Hamstreet Train Station. Will anything be done to help the village cope with the increased number of cars parking in Hamstreet?
  - iv. At the moment Hamstreet Doctors Surgery works with Tenterden's Doctors Surgery and during the weekends they provide a pop in service when the other is closed. If this application is approved, members of Orlestone Parish Council are concerned that neither will be able to cope with the increase of inhabitants wishing to access this service.

## Walking

- a) The site is on the outskirts of town where walking typically is not suitable as a means of transport (National Design Guide - January 2021) where acceptable distance should be no more than 800m. Only on the most southerly emergency access point of the site, can the entrance of the recreational group be met within that criterion. All other distances from dwellings on the site to main town anchor points are greater than 800m.
- b) With the actual distances (table below) from the emergency and primary access points to the site.

Destination	Appledore Road Emergency Access	Appledore Road Primary Access
Tenterden Recreation Ground	630m	1025m
Saint Mildred's Church	940m	1335m
The White Lion Pub and Hotel	890m	1285m
Tenterden Museum	1180m	1575m
Tenterden Library	1180m	1575m
Waitrose Supermarket	900m	1295m

Tenterden Post Office	1180m	1575m
Tesco Supermarket	1280m	1675m
Tenterden C of E Junior School	980m	1375m
Tenterden Infant School	930m	1325m
Homewood School and Sixth Form Centre	815m	1210m
Ivy Court Surgery	880m	1275m
Boots Pharmacy	800m	1195m
Tenterden Town Centre	880m	1275m
Tenterden High Street bus stop	880m	1275m

- c) Paragraph 6.58 of the Local Plan states that: Basic day to day services such as a grocery shop, public house, play / community facilities and a primary school should be within a generally accepted easy walking distance of 800 metres in order to be considered sustainable.
- d) Enabling people to live, work and play without generating unnecessary emissions will be a big step towards delivering carbon-conscious places. The best places will be in major urban areas that have a viable transport hub. Tenterden is not one of them.
- e) Wates should have quoted distances midpoint of the site due to the large site, thereby giving a true perspective of distances.

### **Parking**

- a) To suggest that the residents would be able to use sustainable travel of walking for shopping is disingenuous.
- b) It goes without saying, whenever residents go food shopping for bulky items, they will always take the car to the town centre. If any new additional and substantial development takes place such as the Wates proposal, the entrances to the car parks will become grid locked due to non-availability of parking spaces. This already happens with Tesco and Waitrose car park.
- c) Besides residents going for a coffee in the High Street, no resident on the proposed site is going to carry any goods / produce of weight. They will attempt to go by car and will be forced to pay for an expensive car park ticket for the privilege, if they can find a space.
- d) Today, there are two good supermarkets with town centre car parking facilities for shoppers. These, together with the council run car parks and the one-hour parking regime on the High Street are reaching saturation point.
- e) During the business day, there are no parking spaces along the High Street nor adjoining roads, as residents and visitors park to avoid the expensive car park fees. It is obvious no survey has not been carried out, as they are not aware of the critical issue of parking, nor the congestion and gridlock of the traffic.
- f) If any new additional and substantial development takes place such as the Wates proposal, the entrances to the car parks will become gridlocked due to non-availability of parking spaces. This already happens with Tesco car park.
- g) Parking for the new residents of approved and allocated development sites such as Tent 1B and Tilden Gill is needed now. This development will take it over the tipping point and will make the town unsustainable from the parking point of view.
- h) This application proposal will create another circa 220 cars on the site. Where will they park when going shopping? The simple answer is that the roads will become more congested and potentially gridlocked as they search and seek out parking spaces burning more fuel and emitting ever increasing amounts of pollution and climate changing gases.

### **Impact on Tourism**

- a) It has to be remembered that Tenterden is renowned for tourism, a valuable and important economic service industry for the town, which the council quite rightly wishes

to promote. Where will they park? If they cannot park, they will stop visiting this beautiful market town and Tenterden will lose major income for the High Street.

- b) There is a negative threat to the town's tourist economy if Tenterden becomes a logistic travel nightmare for visitors. The goose that lays the golden egg should not be shot.
- c) This will then have alarming adverse consequence on tourists and visitors alike when visiting our beautiful historic market town.
- d) The bottom line is that parking is not sustainable for supporting tourism and visitors whilst accommodating new residents.

### **Wates Transport Assessment**

- a) Wates' Transport assessment is superficial and meaningless when it comes to true sustainable transport in the town of Tenterden. Their document has lost grasp of reality.
- b) Only 2.2% of the residents' travel by bus.
- c) Mentioning access to bus stops when there is no sustainable and affordable bus transport is not relevant.
- a) Commuting from Tenterden takes approximately 45 minutes to Maidstone, approximately 1 hour and to Tunbridge Wells approximately 1 hour 40 minutes. All expensive options and limited in their frequency.
- d) Otherwise, the other bus services are once a day to every two hours. This cannot be classified by any rational person as being sustainable transport.
- e) The frequency and duration of public transport is wholly unsuitable and unachievable for commuting to an employee's place of work. For those working across seven days a week and shift work, this would be impractical.
- f) Rural sites are very difficult to serve without relevant and commercially sustainable public transport options.
- g) Public services are less likely to be competitive compared with journey times by car, trip demands are likely to be split among multiple destinations, and the costs of operating services to even the most popular destinations will reflect the long distances involved. This is particularly true for Tenterden where bus transportation is infrequent, costly and very limited (to destinations).
- h) Mentioning cycle routes which are only suitable for leisure and exercise is disingenuous, when they are not fit for purpose for residents who have to commute to places of work and have to journey outside Tenterden.

### **Creation of Unsustainable Transport**

- a) Previous Appeal Inspectors have raised concern about the lack of strategic transport infrastructure for sustainable travel.
- b) The available transport infrastructure available to Tenterden residents is not sustainable for housing proposals on the outskirts of town such as the proposal by Wates.
- c) Quality of life, economic and social, depends on private transport and easy access to jobs, shopping, and services.
- d) New developments frequently fail to achieve sustainability because of their remote locations, and the attitude of developers involved in their delivery.
- e) The frequency and duration are unsuitable for commuting to an employee's place of work seven days a week and allowing for shift work.
- f) The revised National Planning Policy Framework of February 2019 (NPPF) has moved national policy in the right direction regarding sustainable transport, but must be put into practice if we want future developments to provide healthy and positive places for people to live.
- g) Integrating true sustainable transport into new developments is key to achieving that outcome.
- h) Development proposals should recognise that the level of accessibility to existing or potential transport services and the opportunity to include new services in large development areas are key determining factors.

- i) Tenterden has poor road network, limited unsustainable bus network and no rail network.

### **Housing Collocated with Sustainable Transport.**

The NPPF explains why housing should be collocated with sustainable transport.

- b) NPPF Paragraph 66 states, 'Strategic policy-making authorities should establish a housing requirement figure for their whole area which reflects the overall strategy for the pattern and scale of development.' This refers back to the requirement in paragraph 20, which says the 'overall strategy' should provide for issues such as transport infrastructure and climate change mitigation. Paragraph 73 also notes when planning for larger scale development, strategic policy-making authorities should identify where housing needs can be sustainably met by considering opportunities from existing or planned investment in infrastructure.
- c) Chapter 9 of the NPPF, paragraphs 104 to 106 clarify that transport issues should be considered from the earliest stages of plan-making and development proposals, with active involvement from local highways authorities, other transport infrastructure providers and operators, and neighbouring councils. The NPPF states that planning policies should align strategies and investments for sustainable transport with development patterns, managing growth so the potential impacts of development on transport networks should be addressed.
- d) The environment impacts of traffic and transport infrastructure must be identified, assessed and considered to mitigate any adverse effects.
- e) Paragraph 105 says, significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.
- f) Chapter 11 of the NPPF contains several paragraphs that steer towards development in locations and at densities that support accessibility by public and active transport. Paragraph 118c emphasises the 'brownfield first' stance by stating that planning policies and decisions should 'give substantial weight to the value of using suitable brownfield land within the borough for homes and other identified needs.
- g) Paragraph 112 states that when considering appropriate densities, planning policies and decisions should take into account 'the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for future improvement and the scope to promote sustainable travel modes that limit future car use'.
- h) HM Treasury9 " Fixing the foundations: Creating a More Prosperous Nation" highlighted:
  - i. In order to promote productivity growth, housing should be provided where it will "enable people to live and own homes close to where they work.
  - ii. The benefits of firms locating where they can be most efficient and create jobs, and enabling people to live and own homes close to where they work. The Ashford Plan to large degree is attempting to locate housing with job growth in the town, stating limited housing growth in Tenterden as there are minimal opportunities to grow the job market.
  - iii. The need for commuter hubs so that sustainable transport can be effective and attract large scale funding. Ashford is the obvious commuter hub with the excellent rail network and buses. Tenterden can never be a sustainable commuter hub due to the existing infrastructure that will never receive the type of funding required to make it sustainable.
  - iv. These statements are nothing earth shattering, but just common sense in designating sustainable locations.
- i) The Chartered Institute of Highways and Transport are quite specific that better transport supports greater social equity by ensuring people can access jobs, services, and leisure opportunities without the need for cars. They go on to say "to achieve sustainable economic growth has to have connectivity between housing and labour markets and

realising economies of agglomeration.” This will reduce emission by shaping settlement patterns to shrink the need to travel by car and maximising accessibility to low-carbon modes of transport.

- j) There is very limited potential for business growth in Tenterden due to its location and poor road infrastructure. Tenterden can be considered to have reached full employment with very few local job vacancies, so economically active adults travel to work outside the town.
- k) New residents moving to Tent 1 and Tilden Gill sites will have to commute to employment centres such as Ashford, Maidstone, Tunbridge Wells and London as there is limited employment opportunities in Tenterden. With this proposed site, jobs and houses will not be collocated and the reducing public transport makes this proposal unsustainable. New residents will gridlock roads with extra cars.
- l) Ashford economic initiatives in and around the town centre will have only limited benefits to residents of Tenterden due to poor road network, poor public transport and distance.
- m) Public transport costs in comparison to private car costs have gone up dramatically over the past decade. With the inconvenience of bus timetable, destination points and costs, Tenterden residents will naturally go by private car. It is a well-known fact that bus transportation usage is in a long-term decline.
- n) When and where there is a bus, naturally there will be extra commuting time to walk to the bus stop and then from the bus destination point to the place of work. With the increase of working population against today's demographics, the percentage of commuters going by car will surge and will not be sustainable.
- o) Appeal inspectors have stated where there is no strategic approach to transport infrastructure, it is not acceptable to just make a financial contribution to an undefined scheme.
- p) Wates proposal does not provide a genuine choice of transport to employment and thus should not be permitted. Their proposal will expand the need to travel and maximise high carbon modes of transport.
- q) Truly sustainable development requires the planning decision to follow government guidelines and policies to orientate development so new homes and jobs are close to shops, services, and public transport nodes and existing places are made more sustainable.
- r) Effective place making requires development to be focused in the most accessible locations where most journeys can be made on foot or via cycle or public transport. Development needs to be focused where transport infrastructure and services already exist rather than on new infrastructure to support remote locations which potentially will be prohibitively expensive. Otherwise, unsustainable transport will easily lead to people having to make long journeys to meet even basic day-to-day needs, and the distances and nature of these journeys risks making driving essential for all but the most confident and committed.
- s) Transport and movement directly affect all socio-economic activities to a greater or lesser extent. Movement creates its own very significant social, economic, and environmental impacts.
- t) It is well known more people now make long journeys by car, as a result of which congestion currently costs the UK over £8 billion per year in lost productivity and is projected to rise.
- u) Approving peripheral or remote sites is highly likely to result in an exceptionally car-dependent pattern of development. This is particularly true for Tenterden. Therefore, this application should be refused.

### **Air Pollution**

- a) Transport is the largest and fastest-growing emitter of greenhouse gases by sector. Chapter 14 of the NPPF addresses this.
- b) Paragraph 148 states that the planning system should 'shape places in ways that contribute to radical reductions in greenhouse gas emissions.

- c) Paragraph 152 stating that plans should take 'a proactive approach to mitigating and adapting to climate change' in line with the objectives and provisions of the Climate Change Act 2008.
- d) The reference to the Climate Change Act makes the objective of net zero carbon dioxide emissions by 2050 and the interim targets of the act clearly relevant to planning authorities, they should shape policies that help reduce carbon dioxide emissions. The Wates proposal does not support this aim. In fact, it does the opposite.
- e) Ashford have stated that they will be carbon neutral by 2030 which will necessitate the need for residents to use true sustainable transport. This will direct house building to where this critical infrastructure can be found for the benefit of Ashford and the world as a whole.
- f) Any increases in traffic movements will undoubtedly increase pollution levels through increased traffic numbers and increased congestion. Any stop / go interruption of traffic severe slowing of traffic speed (to between 10 and 15 km/hour) will substantially increase the level of emissions from motor vehicles. A reduction from an average speed of 50 km/hour to 10k/hour doubles CO2 emissions from petrol and diesel cars (Based on Euro 4 data) and NOx by at least 50%. This is particularly true for the following roads: Junction of Beacon Oak Road with A28, whole of East Hill, whole of Oaks Road, and the junction with A28, whole of Golden Green, the High Street, and A28 towards Homewood School.
- g) These journeys contribute to the UK's carbon footprint; transport is the largest emitter of greenhouse gases by sector. Transport- related emissions are still rising, eclipsing the gains made by increased fuel efficiency.
- h) Poorly located and designed new development seriously hinders healthy lifestyles for the new residents and the existing population.
- i) In summary, additional development risks exacerbating congestion, poor air quality and greenhouse gas emissions. Housing that is poorly located such as the Wates proposal, are inaccessible to sustainable transport modes lock residents into long and expensive journeys on congested roads leads to socio- economic marginalisation and degrades our natural environment.

## **Conclusion**

- a) Tenterden is not a transport hub for commuting and shopping. Most of the residents go by car, due to time of day, convenience and duration, resulting in unsustainable travel.
- b) The NPPF Planning Guidance is very clear. It says to facilitate access to high quality public transport. Tenterden does not have high quality transport. It has very limited transport to a small number of locations with typical expensive rural fares. All Wates can do is state there is a local bus stop, but in itself does not provide high quality public transport.
- c) 20% of adults work in Tenterden and the remainder work mainly in Ashford. Only 1.7% cycle to work in Tenterden and 48.7% drive to work in Tenterden. For all work locations 2.2% use the bus. All other commuting is by car. This is not sustainable transport. So, to attempt to build a case for sustainable transport is a fallacy. Reality will have to be recognised by the developer.
- d) The car is, and always will be, the main form of transport in our rural location. When looking at the social and economic dimensions, transport is not sustainable due to the poor quality of public transport. For this town, there are and always will be significant transport issues which cannot be resolved and there this windfall site is unsustainable.
- e) Building homes should be around or near transport hubs to tackle climate change by offering greater access to more sustainable forms of transport and reducing unnecessary journeys. Transport is one of the largest contributors of carbon emissions. Therefore, it is important that residents can live, work and play without generating unnecessary emissions. It is important that we deliver carbon-conscious places.
- f) Effective place making must focus on where quality transport infrastructure and services already exist rather than on a hope of new infrastructure to support remote locations,

which potentially will be prohibitively expensive. Otherwise, unsustainable transport will necessitate people having to make long journeys to meet even basic day-to-day needs.

- g) The submitted one day junction survey of three years ago is in contempt of principled traffic assessment. It has no bearing of today's traffic due to the selling of Tent1A houses and more reliance on the private car.

*John Crawford*

Tenterden Councillor

## **Appeal Ref: APP/E2205/W/21/3284479 for Ashford Application: 21/00790/AS**

Land between Woodchurch Road and Appledore Road, Tenterden, Kent

Objection: Cllr John Crawford  
Topic: Placemaking and Sustainability  
Date: November 2021

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### **Place Making and Sustainability**

#### **Introduction**

I wish to lodge my objection to the Wates proposal to build 145 dwellings as I believe Wates has disregarded the criteria for correct placemaking.

Wates 100+ documents proposal says very little about the three pillars of sustainability and placemaking. In essence, this application has serious sustainability implications for the community as a whole, but specifically for the site and immediate adjoining settlement and countryside.

The site is well known within the parish. I have examined the proposal plans against relevant laws, policies and regulations and find considerable infringement issues with the application.

This objection sets the scene in documenting the correct sustainability profile, which is very different from the Wates documentation. I would highly recommend the inspector reads the application objections posted on the Ashford Portal, as most are very relevant and well written. They have referenced renown and reliable sources; which Wates has ignored or were unaware.

The current and future challenges facing our economy, society and environment is climate emergency and the recent experience of living through the Covid-19 pandemic. These raise fundamental questions about the nature and function of our housing development, and how they can support environmentally sustainable and healthy lifestyles. Any planning decision should be forward looking.

Though the NPPF focuses on sustainability, it is also useful to ask the question, what is the enduring development model for house building? The following are aspects will dictate placemaking for significant development windfalls:

- A. Adhering to the Pillars of Sustainability
- B. Ashford Development Plan
- C. Strategic investment for sustainable
- D. Tenterden's Housing Needs
- E. Ashford Borough Profile
- F. Tenterden Town's profile
- G. Tenterden's Sustainability Economic Profile
- H. Tenterden's Sustainability Social Profile
- I. Tenterden's Sustainability Environmental Profile
- J. Housing development placemaking commensurate to the current and future economic needs
- K. Is it Deliverable?

If any proposed placemaking site fails the enduring model benchmark, it should be refused permission.

## **A. Adhering to the Pillars of Sustainability**

1. Sustainability is often defined as meeting the needs of the present without compromising the ability of future generations to meet theirs.
2. It has three main pillars: economic, environmental, and social. These three pillars are informally referred to as profits, planet and people.
3. The Ashford Local Plan (ALP) policies are consistent with the NPPF and National Planning Practice Guidance (PPG) and as such go to the heart of what sustainable development is and how good place making can be achieved.
4. NPPF Paragraph 7 states house building must follow an economic, social and environment sustainability criteria. The economic dimension states "making sure that land is available in the right place and at the right time to support growth and innovation, as well as the need to ensure the right infrastructure is available".
5. NPPF Paragraph 11 is very clear there is a presumption in "favour" of sustainable development. However, it is very strict what sustainable development means. There are other criteria that take precedence such as NPPF Para 182 - where significant effect on habitats sites takes primacy.
6. NPPF paragraph 15 says "The planning system should be genuinely plan-led [not developer led] to set economic, social and environmental priorities". This allows local people to shape their surroundings. Significant size windfalls unacceptably bypasses local involvement.

## **B. Ashford Development Plan**

7. The ALP was developed in accordance with the NPPF, which has a golden thread of sustainability throughout. Planning policies and decisions play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character and needs of each area.
8. Material consideration is one of the key components of ensuring sustainability, which will vary from location to location. This will ensure houses are built in the right place and not the wrong place.
9. The ALP considers an overarching number of drivers and policies to decide on a plan led location and number of allocated sites. In other words, the allocated sites are purposefully planned new settlements within the borough. It ensures there is joined up thinking and delivery of both houses and required infrastructure (i.e., Infrastructure Delivery Plan).
10. Whereas, speculative development does not take these into account, only what is beneficial for the developer.
11. It would be fair to say, the most enduring places built are those in compliance with the LPA's clear vision outlining their long- term stake into the future. Ashford has such a vision and stake.
12. The most enduring places have been built in response to a clear vision set by the LPA who have a long- term stake in the future. Ashford has such a vision and stake.
13. A generalisation, but developers would much prefer a "developer led" approach to allocating sites for development as this maximises their commercial interests, rather than the "plan led" approach based on community needs.
14. The planning backdrop is dominated by the pursuit of huge windfall gains by landowners and developers. This means the wrong sites are often selected, with inadequate provision for infrastructure, and often at great environmental loss, while landowners and land promoters capture exceptional profits gains at community expense and lifestyle.
15. Developers have been granted asymmetric powers. They use their right to re-submit planning applications and their rights of appeal (which objectors do not possess) to grind down local people's resistance.

### **C. Strategic Investment for Sustainable Infrastructure**

16. The ALP is supported by an Infrastructure Delivery Plan which is an iterative document and sets out the infrastructure required to be delivered to support the planned development up to 2030. This windfall development proposals clearly do not benefit from the planned infrastructure delivery.

### **D. Tenterden Housing Needs**

17. The principal economies of the town are agriculture, tourism and high street hospitality. These are not intensive nor significant employers of staff, but will grow organically over time, provided we adhere to plan led development.
18. The ALP acknowledges Tenterden is only a sustainable location provided carefully planning of development takes place, and in the right numbers. This decision was supported by the Local Plan inspector.
19. The Tenterden Town Council recognises the importance of small-scale windfalls in the right place utilising brownfield sites as first preference.
20. New development should be based on recognising communities' goals, identifying suitable land to meet them, and ensuring sites are prepared with the necessary infrastructure. At present, the local plan does a very good job in achieving.
21. The current allocated sites and the small-scale trend of windfalls is sufficient for Tenterden's needs.
22. Any oversupply of houses would mean unnecessarily eradicating precious greenfield areas and forcing economic active adults to become car dependent for travelling to employment centres.

**Significant scale developments over and above the agreed sustainable Local Plan allocated sites would be detrimental to the community, the economy and the environment (both climate change and biodiversity)**

### **E. Ashford Borough Profile**

23. The town of Ashford will continue to be the main focus for development with the regeneration of the town centre and the creation of attractive and vibrant new communities on the periphery of the town.
24. A regenerated Ashford Town Centre will expand significantly its leisure, cultural, educational and residential offer. A new Commercial Office Quarter next to the railway station will be a major economic impetus for the area, helping to substantially increase employment, trigger more spending in the town centre economy, and improve wage rates and skills levels.
25. The town centre's heritage will be conserved and enhanced alongside high quality new public realm reflecting the various different character areas.
26. 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.
27. Tenterden will continue to serve the south western part of the Borough as a principal rural service centre with a strong offer of shops and services, conserving and enhancing its historic centre and accommodating development of a suitable scale, design and character.
28. ALP says the key driver for employment in the borough is the impact of HS1 and the critical transport investment in transport infrastructure. The location is Ashford not Tenterden. The focus is on the Commercial Quarter and the other big 8 projects. ALP continues to say due to Ashford's sustainable location and infrastructure, housing development will be concentrated within the town centre, ideally on brownfield sites.

Other prime locations will be by the motorway network to support business operational needs.

29. Ashford's economic initiatives are around its town centre and M20 road network. It will have only limited benefits to residents of Tenterden due to poor quality A28 road network, poor quality public transport and distance to commute to the final employment destination.
30. Placemaking requires a positive approach to adapting to and mitigating against the effects of climate change by promoting quality sustainable transport, sustainable energy technologies, and encouraging sustainable building design; avoiding development in areas at greatest risk of flooding; promoting sustainable drainage and challenging water efficiency standards; protecting and enhancing biodiverse rich environments; protect green networks.
31. All these must be used as input to carefully considering the location, layouts and design of new housing.

## **F. Tenterden Market Town Profile**

32. Tenterden is an idyllic market town in the borough of Ashford and has significant conservation, historical and culture importance. It stands on the edge of the remnant forest the Weald, overlooking the valley of the River Rother. In 1449 Tenterden was incorporated into the historic Cinque Ports Confederation.
33. The town's character:
  - a. Well-defined pattern of development around the historic core area, including many listed buildings. Has exceptional conservation and historical importance,
  - b. Historic assets and attractions
  - c. Hospitality for eating and drinking in aesthetic pleasing surrounding
  - d. Beautiful countryside setting with quality and treasured green field sites
  - e. Amazing PROW network for walking in the countryside
34. The town's economy revolves around agricultural, tourism and hospitality, with very little employment potential for growth. KCC growth and infrastructure framework<sup>10</sup> confirms Tenterden is not an employment centre. All the borough employment clusters are around the Ashford town centre.
35. Tenterden has historic rural routes radiating to Rolvenden and Hastings (A28), Wittersham and Rye (B2082), Appledore (B2080), Woodchurch and Hamstreet (B2067) and Ashford (A28).
36. Tenterden has no mainline railway station, with the nearest being Headcorn (9 miles) and Ashford International (12 miles).
37. Many of the road artery routes into Tenterden are tree lined avenues adding to the beauty of the famous historic town known as the "Jewel of the Weald". It offers the best of all worlds: fascinating history; a wealth of architecture; beautiful green spaces; and excellent shopping. All within everyone's idea of a typical country town and surrounded by Kent's tranquil countryside.
38. Tourists and visitors explore and experience the delights of Tenterden's broad tree-lined High Street offering a selection of unique shopping facilities bordering quaint lanes. It is a fascinating town to shop at a relaxed pace, browsing in a range of quirky independent stores and experience shopping as it used to be. It is just the place to find that special gift, local craft or antique.
39. The Georgian and Victorian buildings share the streets with tall Victorian houses and tiny cottages; brick and stucco blend easily alongside traditional Kent tile and weatherboard, creating a timeless air.
40. This ancient bewitching heritage town of Kent is a magnet for local visitors and foreign tourists to savour the local attractions such as: the Kent & East Sussex

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<sup>10</sup> <sup>10</sup> [https://www.kent.gov.uk/data/assets/pdf\\_file/0012/50124/Growth-and-Infrastructure-Framework-GIF.pdf](https://www.kent.gov.uk/data/assets/pdf_file/0012/50124/Growth-and-Infrastructure-Framework-GIF.pdf)

Railway line to Bodiam; Chapel Down vineyard (which produces some highly acclaimed wines); 16th-century Smallhythe Place (which now holds both a museum and a theatre); and Tenterden and District Museum at the heart of the town. The list of attractions is endless, make this a tourist town.

41. In March 2018, British Airways' travellers club ran a blog article titled 'Eight of the UK's Most Charming Small Towns' in which it placed Tenterden at the number one spot.
42. It is critical to preserve the attractions of our historic town as a tourist destination by making it a pleasant travelling journey. Traffic congestion and lack of parking would be demotivators to tourism. The more significant developments the town has, the more car dependant traffic would be generated, which in turn discourage tourists to visit and harm our economy.

#### Sustainability

43. Local Plans are key to delivering sustainable development in a way which reflects the vision, aspirations and sustainability of local communities.
44. Wates' application is in direct conflict with the Local Plan Vision regarding placemaking of significant windfall development in Tenterden.
45. As stated in accompanying objection letters, this proposal is not in the right place as it is not sustainable, not absorbable, not needed and does not create enduring economic growth within the local Tenterden economy.
46. Sustainable development relies on a careful balance between economic, social and environmental factors and the NPPF gives guidance on how to achieve this.

#### **G. Tenterden Economic Profile**

47. It is a key tourist attraction, drawing regular visitors further afield and from abroad.
48. Our prosperous tourism is the valuable industry to the economy of the town and is reliant on individuals to visit the town .
49. Development on publicly accessible greenfield sites and increasing road traffic will act as a deterrent and will disincentivise potential visitors supporting our tourism economy.
50. The golden goose must not be killed by making the town unattractive to visitors through the negative consequences of over development. This would seriously dent the local economy, particularly the hospitality sector. The priority is to retain the qualities that make Tenterden special and keep the economy thriving.
51. Communities evolved organically as local economies grew or shrank depending of the presence and location of commutable employment. This evolution is still true today, but with climate change and sustainable transport, it is now more critical than ever local employment is a driver when considering new housing development.
52. History tells us successful towns and cities are those which have strong growing economies as well as being great places to live. New community development must be cognisant of the changes taking place in industry, so provision is made for the right spaces and places, suitable for today's and tomorrow's industries and working practices. Tenterden is not the right place for unplanned development.

#### Sustainability

53. Tenterden is poorly serviced by quality road network and there is no local rail service, so employers do not see Tenterden as a viable destination. Consequently, there will be limited demand for new homes by the economically active population in comparison to Ashford. These facts have not been acknowledged by Wates.
54. With the tight job market, any future job growth will be in very small numbers. It is recognised towns and villages such as Tenterden need to remain economically sustainable. This will be achieved via small and carefully located organic housing

growth, together with preserving the attractions of our historic town as a tourist destination, to allow jobs to grow organically with the changing opportunities within the parish.

55. Studies have shown when workers are forced to live further from their workplace, their productivity declines, creating many challenges for business owners. At the 2021 Conservative Party Conference, the Prime Minister said: "the only way to ensure true resilience and long-term prosperity is to raise the overall productivity of the country". This adds weight why jobs and houses should be relocated.
56. Younger families do not move to Tenterden in droves, as there is no employment of significance in Tenterden. The key message is to collocate houses where there is existing or future potential for jobs.
57. Any significant housing development in our rural town, would be a major mistake with limited job opportunities creating car dependent commuting of long distances to employment centres. This is not sustainable and would cause substantial harm.
58. There is no acceptable or quality transport service in Tenterden to employment centres such as Ashford. Therefore, the only option is the increase of car usage, already reaching an unacceptable level and highly unsustainable.
59. NPPF 8a, economic growth and innovation are synonymous with productivity where jobs and housing are collocated.
60. The NPPF is keen to promote productivity growth, so housing should be provided where it will "enable people to live and own homes close to where they work." As economically active adults will have to travel to Ashford and other employment centres, productivity growth will not be achieved living in Tenterden. The government's productivity policy for rural areas is "to ensure any rural town or village in England has the freedom to expand housing in an incremental way, subject to local approval".
61. Interestingly, Wates do not attempt to say the application complies with SP3 Strategic Approach to Economic Development. The reason is because it does not.
62. The key phrase for spatial strategy is to build houses in the right place, which for significant windfalls is not Tenterden. Not complying would cause serious sustainability and absorbability issues.
63. Deductions which can be safely agreed are:
  - i. It appears logically employers who wish to set up new offices, warehouses and light industry in this part of Kent will naturally gravitate to Ashford Town Centre. Especially as it has an excellent travel network to support up-and-coming new businesses and allow expansion of existing businesses.
  - ii. Businesses wishing to expand or create a foothold in Kent will therefore not be looking at Tenterden.
  - iii. Tenterden has inherent disadvantages for any serious economic growth.
  - iv. There is concern continuous growth of online shopping, particularly by the young, is no doubt exacerbating the churn of shops within the high street and subsequent reduction of economic trade. Over the recent past shops not in the prime section of the High Street have closed. Therefore, tourism becomes more important to preserve as we have direct influence over its success.
  - v. Exponential population growth in Tenterden proposed by Wates, would exacerbate an already congested road network. Together with serious lack of parking would reduce Tenterden's appeal as a tourist destination.

**The bottom line is Tenterden is not a key driver in the construction of a substantial number of houses in the Tenterden catchment area. All the above points show housing should be in and around Ashford.**

#### **H. Tenterden Social Profile**

64. There has been no mention by Wates how social sustainability will meet the needs of the present, without compromising the ability of existing communities and future

generations to meet their own needs. The right houses in the right places are critical for creating sustainable and successful places that promote wellbeing and understanding what people need from the places they live and work.

65. Yes, we have a brand-new surgery building, but it is medical professionals who treat patients and not building. Unfortunately, we cannot attract them to live in the “sticks” when an urban centre such as Ashford has so much more to offer to professionals.
66. The achievement of sustainable development through planning should be based on the responsible use of a sound evidence base and developed through an open and democratic system. We all know at the public consultations for the development of Limes Land and Homewood School Land, the residents overwhelmingly rejected the proposals. But Wates does not highlight this fact. It appears Wates did not want to face the residents again, so no consultation took place for this application. It would have to be assumed only landowners and commercial partners were consulted.
67. Wates is offering land to develop the country park; pavilion with car park; formal sports pitches and children's play areas. However, there is no formal needs analysis, who would use the facilities, when and how often, what community usage contract would be put in place and most important who will pay for the facility build and future maintenance?
68. The draft Heads of Terms for the S106 details ‘provision of land’, as opposed to providing the facility in its entirety. Without putting too fine a point on it, the Wates sports document is very poorly thought out and incomplete when requesting “full planning permission” approval.
69. The following statement in the sports proposal documents could be construed as an attempt to seduce the community:

6.2.104 The Sports Facilities Supporting Statement concludes that:

*The proposed development of up to 145 units at an average occupancy of 2.4 residents per dwelling would generate demand for approximately 1.60 hectares of open space. However, as summarised in Table 7.1 the proposed provision will exceed this, providing an attractive and extensive area of sports facilities and open space to meet the needs of Tenterden residents now and in the future.*

70. One of the golden rules of developer contributions is a planning permission cannot be bought or sold. There is a definite distinction and meaning between desirable contributions and material contributions. Material contributions are relevant and acceptable to a planning application, whereas desirable is not. Wates openly admits the proposal is not material. A development of 145 homes can only be required to mitigate the impact from these 145 homes. S106 is not the means by which any perceived borough deficiencies in provision or infrastructure can be ‘topped up’.
71. Wates sole unsubstantiated social legitimacy revolves around football pitches, if used. It would overwhelm the town with visiting clubs from within Kent and surrounding counties causing frustration for the community with additional traffic and bottlenecks. If Tenterden Council was allowed to lease the Homewood Pitch as originally intended, there would be no need for Wates to use “smoke and mirrors” by promoting replacement pitches.
72. It has to be noted the holistic infrastructure servicing the town is limited, though it does have a good range of shops. An example of limited infrastructure is South East Water, for new development in Tenterden, would be required to lay new mains. When it comes to critical social infrastructure such as doctor's surgery and general health care such as physiotherapists, we do have severe constraints for population growth.
73. The community value the sense of place of Limes Land, which provides a predominant strong bond and feeling towards the green site. It is a place where people return for the sense of belonging to nature; peace and tranquillity. Ideal for mental and physical activity.
74. We are blessed residents of the two settlements of North and South Ward have Limes Land as amenity land for informal recreation and exercise, particularly during

the coronavirus crisis. This allowed local residents to adhere to government guidelines of social distancing during their daily exercise of walking, running and so on. Equally important for residents suffering from depression and anxiety particularly during this challenging time, is the ability to seek tranquillity, peace and being at one with nature away from the hustle and bustle of housing and roads, which this site gives in abundance.

75. In fact, exercise in green spaces is important for people's mental, and physical health. Staying healthy has alleviated pressure on the NHS.
76. Since 1968, there have been an increasing number of global virus outbreaks, such as SARS and Covid. These pandemics unfortunately are becoming regular and more widespread with globalisation. Access to natural wild green space between residential settlements such as this site, is critical in maintaining social distancing during crisis so viruses do not spread from person to person.
77. In fact, the Tenterden Neighbourhood Plan which is at Reg 14, is the only game in town to improve the health and wellbeing of Tenterden.

**The bottom line is this proposed development has a negative contribute to social sustainability.**

#### **I. Tenterden Environmental Profile**

78. This site is very quintessential, it brings together all of the features, qualities and details give Limes Land its unique character and appearance of wild “pasture like park” which has evolved over many hundreds of years. It has been created by the interaction of the natural environment and human activities with medieval ridge and furrow system; rare acid grassland (only a few hundred acres still surviving in Kent); rolling hillside; ancient hedgerows; iconic views North, South, East and West; numerous ponds surrounded by clusters of trees; watercourses; mature ancient and veteran trees; and very rich habitat mosaic field boundaries typical of the Wealden pastoral landscape.
79. Please read Tenterden Neighbourhood Objection, which provides a good narrative based on evidence highlighting its rich biodiversity and distinctive landscape
80. The site is designated within the ALP as Local Character Area 23, Woodchurch Undulating Farmlands under policy ENV3a. This designation states to conserve and reinforce the rural and enclosed landscape which provides the immediate setting of the High Weald AONB. By default, this excludes any development. Wates has failed to highlight this fact.
81. There are also a large number of non-statutory designations including parts of the site. These are believed to be Woodland Priority Habitat, Water Lower Spatial Priority, Flood Risk Lower Spatial Priority and abuts Biodiversity Opportunity Area, Local Wildlife Site and nearby Ancient Woodland.
82. Central Government, supported by Kent Wildlife, are promoting sites for rewilding. With the removal of sheep on this site it is quickly restoring its herbal species and now has a wonderful opportunity to improve. This will reinforce its unique habitat and rich biodiversity. This rural greenfield site is an excellent example of promoting the United Nations biodiversity and climate change goals. All independent assessments and official records show a rich ecological baseline for preserving.
83. The conservation of wildlife and cultural heritage are important considerations. NPPF Para 174 states to protect and enhance biodiversity. Limes Land is both a natural and semi-natural green space. It is extremely rich in fauna and its symbiotic relationship with the local flora.
84. NPPF Para 174a in particular states: protecting and enhancing valued landscapes is key. Recent Appeals such as APP/X2410/W/17/3190236 shows why sites like this application have to be protected. There have been plenty more appeals that show protecting the valued landscape carries great weight. When using the well-defined

methodology by the Landscape Institute with their GLVIA 2013 guidelines, it shows a very high value for Limes Land.

85. The introduction of housing development on the site would be harmful to the existing rural character and appearance of the area changing it from countryside to part of the urban area. It would seriously impede the natural wildness of the countryside and remove iconic views into and out of the site. The development would be contrary to paragraph 176 of the National Planning Policy Framework which indicates planning decisions should recognise the intrinsic character and beauty of the countryside. Planning officers and appeal inspectors of past applications have rejected the development of this site, all saying it would damage the setting of the rural character.
86. This application is not a subtle change of the environment, but a massive urban step change of 145 houses disturbing its natural composition, rich wildlife and symbiotic relationship with its surroundings. As numerous objectors including statutory consultees have expressed in eloquent and factual terms, it is not possible to achieve a positive gain for biodiversity.
87. DEFRA state biodiversity is the variety of all life on Earth and includes all species of animals and plants. Biodiversity net gain is expressed as "development leaves biodiversity in a better state than before". Limes Land has not been cultivated for hundreds of years; the site has developed its own unique rich biodiversity, which would be very hard if not impossible to relocate.
88. Considerable numbers of protected and rare species have been ignored and have never been documented in this application. These species will be lost or severely reduced, and in some cases would be an infringement of various wildlife protection acts. NPPF Para 174d "minimising impacts on and providing biodiversity net gains, including by establishing coherent ecological networks are more resilient to current and future pressures", needs to be put into context of the site's rich flora, fauna, watercourses and geophysics.
89. There will be significant biodiversity net loss will result with this proposed development. The application lacks any substantial evidence biodiversity loss mitigation would be successful. Most of the statements provided by Wates are opinions. No evidence could be found that each of the rare and protected species documented in the KRAG and KMBRC records could be mitigated or loss. A very serious omission. In practical terms, biodiversity gain cannot be achieved as it is not realistic to expect 8.66ha country park to compensate a biodiversity loss of 10.37ha wildlife built on by 250 dwellings, pavilion, car park and football pitches.
90. NPPF Para 174 to 188 "Conserving and Enhancing the Natural Environment" supports maintaining Limes Land in its entirety as a green space. NPPF Para 179 states to minimise impact of geodiversity. The geodiversity of Limes Land has created a unique landscape character. It is the key to driving and supporting the distinct ecosystems and biodiversity. Any disruption to the geodiversity will unbalance the delicate ecosystems and will significantly reduce the richness and variety. The existing plants and animals are influenced by the acidity or alkalinity of the rock and soil together with its characteristics to hold water.
91. The geodiversity of the landform is obvious to see, with three slopes on the south, north and east of the ridge high point. The landscape of the site is rural and is divided into distinctive fields. The surface water flow from the Woodchurch Road feeds the network of watercourses that weave across the land. These watercourses then support the ponds and their individual ecosystems to support life.
92. Geodiversity loss is much like biodiversity: it cannot be mitigated or compensated. Losses through poor development applications or lack of awareness are the largest threat to geodiversity.
93. On the western part of the site, where proposed houses would be built, the habitat actually represents a rare historical survival of 'unimproved neutral grassland', which makes it a 'Priority Habitat of Principal Importance', protected by the ALP and NPPF.

This fact and the others above mean this application does not comply with ENV1 Biodiversity.

94. There is further concern that the nearby committed development of 100 dwellings on the site known as Tilden Gill, and the four houses recently completed in the onetime orchard immediately to the South at Hales Place, together with the Wates proposal for a further 145 dwellings, will inevitably disrupt the nesting and foraging activities of species moving from one site to another. Cumulatively negative impact on the environment has not been analysed.
95. It is not possible for this development to create a biodiversity gain. A net loss of biodiversity has been confirmed by Kent Wildlife Trust.

**Development on this site would cause substantial and material harm to the ecology of this rare medieval field system, resulting in biodiversity loss. In addition, legibility of the medieval field boundaries would be lost. There is no likelihood of the high-quality environmental profile being preserved in view of the number of houses to be built.**

#### **J. Placemaking - Location, location, location**

96. Location, location, location is key to the three pillars of sustainability and to mitigate climate change.
97. Places fundamentally shape the quality of people's lives. They have to address core challenges to provide innovative and growing economy where jobs and homes are in close proximity with a quality public transportation system. We require sustainable places that promote a sense of community and enhance the health and wellbeing of those that live, work, play and preserve the environment.
98. Place making has to be enduring and therefore must mitigate contributors to climate change and destruction of biodiversity.
99. Spatial planning is recognised as one of the biggest opportunities that Local Authorities have to deliver net zero, yet it continues to be undermined by developers for commercial reasons, rather than building sustainable homes in the right location.
100. The emphasis on housing numbers over all other considerations has dominated house planning over decades and has produced a range of undesirable outcomes.
101. The system must be "plan led" to deliver quality housing in the right location, as well as addressing climate change and prevent degradation of biodiversity.
102. The need for embedding resilience, better managed social care and delivering economic productivity and innovation cannot be overstated. There is urgent need for a change of decision-making emphasis. A shift from pure numerical measures towards enduring qualitative measures for correct place making is essential for preserving our planet.
103. Transport, particularly private transport is the biggest contributor to greenhouse gases.
104. There is no point building a big development site in the countryside where there is minimal employment which forces economically active adults to drive by private transport to employment centres, due to infrequent and expensive public transport.
105. The best place to build is where there is good transport infrastructure that will support working patterns of employees.
106. It is critical to lock in long term travel behaviour using public transport and remove the need to consider the private car. This means new development must be located in sustainable locations close to employment centres to minimise private transport demands.
107. Yet Wates proposal will lock in private car dependent travel to employment centres.

## **K. Is It Deliverable?**

108. It is considered that this site is not deliverable on the site due to the following reasons:
- a) It appears that Wates have already attempted to sell the site before the application was submitted. Quite possible they will try again, if permission is granted with an unknown delivery date. One has to conclude that Wates has no affinity to be responsible for developing this site, if approval is permitted.
  - b) School land and property: protection, transfer and disposal government disposal guidance say: "The requirement for the Secretary of State's (SoS) consent applies to all maintained schools and academies where it is proposed to dispose of publicly funded land. One needs to apply to or notify the Education Funding Agency ("EFA") of any intended transaction to dispose of any playing field land. One should not assume that approval will be granted. The SoS states that schools should not take any step to transfer their interest to another party or start works before receiving the SoS decision in writing.
  - c) No evidence could be found that Homewood School has notified the Education Funding Agency, nor that the application to sale the football pitch on Appledore Road has been approved.
  - d) Regarding the construction of a "country park", NO evidence could be found that that Natural England will give accreditation under the 1968 Countryside Act. In fact, no evidence could be found that Natural England has been approached.
  - e) No agreement has been reached on the future ownership for the country park, football pitches, etc
  - f) As stated by High Weald AONB, a "Management Plan" for the Country Park (and other areas of open space) should be a requirement of any planning permission. For such major intrusive proposal, it is essential that one is provided before planning permission should be considered.
  - g) Wates is not compliant with the Wildlife & Countryside Act 1981 and the Conservation of Habitats and Species Regulations 2010. In addition, The Natural Environment and Rural Communities Act 2006 Section 40 places a duty on all public authorities in England and Wales to have regard, in the exercise of their functions, to the purpose of conserving biodiversity.
  - h) No evidence has been present on secured perpetuity funding for building the pavilion, football pitch, car park and so on.
  - i) Under the Natural Environment and Rural Communities Act 2006, has implications for decision making in regard to conserving biodiversity. Under the Habitats Directive, it prohibits deliberate disturbance of protected species (such as polecats and other mammals) and the deterioration or destruction of their breeding sites, resting places and feeding grounds. This development would result in significant and irreparable harm to the ecology in this area and there is no benefit of sufficient significance to override this harm.
  - j) With the successful breeding of moles on the site, the football pitch will not be usable due to constant mole digging of horizontal tunnels and vertical holes. Quite possibly not complying with health and safety regulations.
  - k) It appears that SWS will not accept any new surface water flows from the development site into their existing surface water network in Appledore Road. This is contravention of ENV9.
  - l) It appears that SEW does not guarantee water pressure to the upper floors of properties & flats.
  - m) It appears that SEW have not stated if there is sufficient capacity in the water supply. This is in contravention of ENV8.
  - n) It appears that no guarantee commitment has been made for upgrading sewage, water, gas and electric upgrades

- o) As the building works are within 8 metres of the various watercourse, it is understood that the applicant needs to obtain written consent from the Environment Agency. No evidence could be found this has been actioned.
- p) The developer has not provide evidence that new residents will be able to obtain house insurance being so close to watercourses and lower levels of the site that will flood.

#### **L. Written Ministerial Statement**

- 109. Robert Jenrick MP issued on 16th December 2020, a written MHCLG ministerial statement, which is of material consideration and sits alongside the National Planning Policy Framework. In essence he says that building homes should be around our transport hubs and to avoid greenfield sites.
- 110. This will help deliver the government's ambition to tackle climate change by offering greater access to more sustainable forms of transport and reducing unnecessary journeys.

#### **M. Placemaking and Sustainability Conclusion**

- 111. Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. It is important to note that the 2030 ALP is up to date and enforceable.
- 112. The revised National Planning Policy Framework sets a requirement for planning to deliver sustainable development with a key objective being to protect and enhance the natural environment and move towards a low-carbon economy through mitigation.
- 113. Ashford have made the correct call in refusing this proposal, by legitimately and correctly using their duties and powers. The site is not supported by Ashford's up to date development plan.
- 114. Planning decision making takes into account: promoting the vitality of our main rural areas; recognising the intrinsic character and beauty of the countryside; and supporting thriving rural communities within it.
- 115. There is no overarching need for this large development proposal in Tenterden. The upcoming housing stock via the allocated sites and small windfall sites will satisfy housing needs well into the future.
- 116. The proposed 2021 NPPF Para 11a says: "all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects; plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change.
- 117. This speculative windfall application proposal fails Para 11a criteria as:
  - a) There is no identified need for additional housing in this location
  - b) It does not build the right homes in the right places. This is critical to the success of our modern industrial strategy. Growing businesses need a skilled workforce living nearby, and employees should be able to move easily to where jobs are without being forced into long commutes.
  - c) There is a lack of new employment opportunities
  - d) Is not aligned to infrastructure growth, in particular sustainable transportation;
  - e) A major development of 145 dwellings, over and above the allocated sites, will be unabsorbable within the town's infrastructure.
  - f) Unsustainable transport with increased emissions goes in the opposite direction of "travel" for achieving the challenge of climate change.
  - g) It makes the new residents car dependent for commuting and significant shopping

- h) Amenities such as health care have reached capacity
  - i) It will harm a valuable community site of existing open wild picturesque and beautiful green space
  - j) It creates unreparable damage of character and appearance
  - k) It creates irreparable harm to the ecosystem, rare wildlife and habitat and wildness of Limes Land, resulting in biodiversity loss
  - l) It is an unsustainable masterplan design and construction. Design of new builds must be enforced to mitigate now the negative impact on climate change and prevent retro fitting with associated expensive cost.
  - m) It has too many dependencies making the site not deliverable
  - n) It is unabsorbable within the fabric of the town
118. NPPF Para 15 states place making must be genuinely plan led and by implication not developer led.
119. Wates have not shown that Limes Land is suitable for development as there is no substantive evidence presented that the site is economically, socially and environmentally sustainable. Whichever way one looks at sustainability, this application fails on all counts. Wates have failed to present any significant benefits which is key throughout the NPPF. I would suggest the reason why none has been presented is that any evidence would not stand up to meticulous scrutiny.
120. Place making is essential to achieve this goal:
- a) protect access to green and ideally blue infrastructure
  - b) Protects rich biodiversity and intrinsically beautiful Wealden countryside
  - c) that provides easy access to employment for new residents, thereby reducing private transport through good quality public transport, good road and rail network,
  - d) available critical mass of health and care services,
  - e) that has robust utility services.
121. It has to be recognised spatial planning is the biggest opportunity local authorities have to deliver net-zero.
122. It is essential that Tenterden keeps an equilibrium of the three pillars of sustainability in line with current and future housing stock.

**Housing is a multidimensional topic, but the nature of the housing market is intrinsically connected to local economies.**

**Housing that is poorly located locks residents into long and expensive journeys on congested roads, leads to socio-economic marginalisation, degrades our natural environment and seriously hinders healthy lifestyles for the new residents and the existing population.**

**Placemaking benefits must be directed towards the community and the planet and not the commercial interest of the developer. Legislation, Ministerial Statement, Local Plan and the NPPF directs this application to be refused.**

**This site would ruthlessly harm the sustainable equilibrium.**

*John Crawford*  
Tenterden Councillor

## **Appeal Ref: APP/E2205/W/21/3284479 for Ashford Application: 21/00790/AS**

Land between Woodchurch Road and Appledore Road, Tenterden, Kent

Objection: Cllr John Crawford

Topic: Climate Change and Masterplan Design

Date: 19<sup>th</sup> November 2021

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### **Climate Change and Masterplan Design**

#### **Climate Change**

123. The July 2021 version of the NPPF has started to be more prescriptive. Para 153, footnote 53 is very specific the plan must be in line with the “objectives and provisions” of the Climate Change Act 2008. This takes into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures.
124. The Climate Change Act 2008 sets a legal framework and creates a powerful duty for development to mitigate climate change. The target for the UK is to cut greenhouse gas emissions to 80% below 1990 levels by 2050. It sets legally-binding targets, creates new powers, changes the institutional framework, establishes systems to ensure accountability and addresses resilience to climate change. This has a direct bearing on developers.
125. Ashford Borough Council’s aim is to become carbon neutral by 2030, and 80% by 2025. By actively seeking to address climate change, the borough will improve the well-being and prosperity of all residents.
126. Tenterden Town Council have also declared a climate emergency.
127. It is important we look at every aspect to mitigate climate change for all development proposals.
128. To reach net zero, or not, we have basically three choices:
  - i. Mitigation
  - ii. Adaption
  - iii. Suffering
129. The more mitigation we do, the less adaption will be required and less suffering there will be by individuals. Wates should not ignore this fact.
130. Wates 11 documents on design, use phrases such as: carbon sequestration, efficient energy; and so on. Unfortunately, I could not see any substantive mitigation commitments on the following headings below.

#### **Masterplan Design**

131. Wates masterplan and construction proposals are not economically, environmentally or socially sustainable. Their proposal is to continue adopting poor masterplan techniques and housing designs to load future retro fitting and running costs onto the new residents.
132. Good design must consider the following if it is to be considered climate change friendly.
  - i. Building form, orientation and window proportions
  - ii. Define building fabric performance (e.g. U-values)
  - iii. Construction methods by carry out embodied carbon assessment
  - iv. Airtightness strategy
  - v. Incorporate Mechanical Ventilation with Heat Recovery (MVHR)
  - vi. Energy efficiency through low carbon heating options e.g. heat pumps
  - vii. Roof design to maximise renewables i.e. solar panels

### **Building Form, Orientation and Window Proportions**

133. A building's form, orientation and window proportions are all aspects that should not add extra construction cost. When optimised within the design can significantly improve the building's efficiency.
134. The orientation and design of dwellings must take the passive opportunity to allow useful solar gains and prevent significant overshadowing in winter. This is essential to health and wellbeing of the occupants, otherwise it is socially unsustainable and unacceptable. The masterplan should prioritise south facing dwellings with solar shading and dual aspect.
135. Appropriate solar shading should be provided. South facades should have horizontal shading over the window and the west façade should ideally have movable vertical shading e.g. shutters.
136. Overshadowing of buildings should be avoided as it reduces the heat gain from the sun in winter.
137. Getting the right glazing-to-wall ratio on each façade is a key feature of energy efficient design. Minimise heat loss to the north (smaller windows) while providing sufficient solar heat gain from the south (larger windows).

There is no obvious statement by Wates these mitigations above will be adopted.

### **Building Fabric Performance**

138. Homes must be designed with 'fabric-first' principles.
139. A 'fabric first' approach to building design involves maximising the performance of the components and materials that make up the building fabric itself, such as:
  - a. Sufficient thickness for all insulated walls, roofs and floor.
  - b. Low embodied carbon materials, which includes carbon emissions associated with the extraction and processing of materials, energy use in the factories.
140. This will reduce operational costs and improve energy efficiency.

There is no obvious statement by Wates this mitigation above will be adopted.

### **Construction Methods**

141. There are many different construction methods that could be utilised for building low energy residential dwellings: brick and block, timber frame, steel frame, structurally insulated panels, insulated concrete formwork, to name a few.
142. Limit the embodied carbon or emissions associated with the manufacture, transport, construction, repair, maintenance, replacement and deconstruction of building elements. This can be achieved by making informed design decisions based on quantified carbon reductions.

There is no obvious statement by Wates these mitigations above will be adopted.

### **Airtightness strategy**

143. Airtightness significantly improves energy efficiency and comfort, often for a relatively modest cost.
144. Quality controlled air flow through good airtightness is key to managing ventilation in new dwellings outlining where, when and how air flows through a building. This starts with very good airtightness, to limit any uncontrolled infiltration.

There is no obvious statement by Wates these mitigations above will be adopted.

## **Mechanical Ventilation with Heat Recovery (MVHR)**

145. Quality controlled air flow through good airtightness is key to managing ventilation in new dwellings outlining where, when and how air flows through a building. This starts with very good airtightness, to limit any uncontrolled infiltration.
146. To maintain good air quality, and to reduce heat losses within a home the use of an MVHR should be considered. Not only does this unit supply air into living spaces, and extract air from kitchen and bathroom spaces, it uses very little energy.
147. Consider dual aspect homes to allow cross ventilation.

There is no obvious statement by Wates these mitigations above will be adopted.

## **Energy efficiency**

148. With the total disregard of energy efficiency by adopting gas boilers and not climate change friendly technologies, this will add cost to the resident and becomes economically and environmentally unsustainable.
149. The retrofit of the dwellings will be expensive, making the dwellings again economically unsustainable.
150. Design out overheating from the start as this is a known risk and can be reduced through good design.
151. Ensure glazing areas are appropriate for the different sides of the house Avoid fixed panes and maximise opening areas of windows.
152. There are lots of different types of heat pumps, broadly in two categories, individual heat pumps and communal heat pumps. This further sub divided into ground heat pumps and air heat pumps.

There is no obvious statement by Wates these mitigations above will be adopted.

## **Roof Design and Solar Panels**

153. Solar PV panels are a simple, mature and reliable renewable energy technology. The majority of new homes have sufficient space on site to generate as much energy as they need on an annual basis. They are a particularly good match for heat pumps, where much of the solar electricity can be used to provide heating and hot water.

There is no obvious statement by Wates this mitigation above will be adopted.

## **Conclusion**

The old way of building used by Wates is no longer “fit for purpose” for a UK climate emergency.

To ensure there is embedded resilience requires Wates to enthusiastically start future proof thinking and implement. It is critical that the orientation and design do not become obsolete during this generation or the next. Today there is too much resistance by developers to recognise their responsibilities,

Very little, if any of the required key mitigation actions are being undertaken and pledged by Wates in their 11 design documents. This is totally unsatisfactory and will be unsustainable for economic, environmental and social pillars.

On Wates Portal, it says for COP 26: “Last year we led our sector in committing to ambitious net-zero carbon targets in our sustainability strategy, in which we acknowledged that in order to meet our targets we would need to ‘change our habits’ on emissions, on waste, and on our impact on the natural world”.

It is time for Wates to “walk” their “talk”.

By Wates locking in the cost of climate change mitigation for the new residents, this is not considered good for society to pass retrofitting cost to the community. In a number of instances such as housing orientation and principal design, residents will never be able to mitigate. This will lock in energy inefficiency for the life of the building.

The total package of masterplan and design documents are unacceptable. This is not sustainable development and the application should be refused.

*John Crawford,*  
Tenterden Councillor

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