

Submission from Boughton Aluph and Eastwell Parish Council on Planning Application 17/00999/AS (Amended) on Land North West of El Ashere, Wye Road, Kempes Corner, Boughton Aluph – a development of 3no. dwellings, new accesses along with associated parking and ancillary buildings

Following the submission of an amended planning application for the above site, Boughton Aluph and Eastwell Parish Council wish to make further comment, in particular in relation to design and setting. Our previous comments on this development remain. A copy of our original submission of 15 August 2017 is at *Annex A* and we request that its contents be taken into consideration for the revised scheme. This earlier submission was endorsed in the objection comment put forward by the Kent branch of the CPRE.

Setting

1. The central tenet of the National Planning Policy Framework (NPPF) is that development is sustainable, and that planning should enhance not detract from a setting. We believe that the buildings proposed in this application will detract from the special character and sense of place of the historic hamlet of Kempes Corner. In line with the NPPF, the vision of our emerging Neighbourhood Plan is to plan for the future by enhancing the sense of place within our parish. This application does not contribute to this goal.
2. In the revised scheme, the development is scaled back and re-configured as 3 dwellings located at the centre of a greenfield site. The houses now face onto Wye Road, with 2 access points. Similar sized parcels of land are located on either side of the proposed plot and a space runs across the back potentially providing access to build further houses. Although it may be outside of the purview of this application, the Land Registry shows that the land surrounding the red line area is in the same ownership. This suggests that planning applications of a similar size could follow on one or more sides of the current site if Ashford Borough Council were to approve this application and set a precedent.
3. Residents have told us of their quite understandable fear that this smaller scale application might be a ploy to circumvent the assessment of a larger and more contentious planning application. By choosing to build in the centre of available land, it is not unreasonable to assume that there might be further development at some future point, thereby allowing the landowner to realise the ambition of their original planning application.
4. Over many years the hamlet has grown in a circular fashion around the Kempes Corner crossroads. The extent of its spread is delineated on Wye Road by Green Hedges and a new bungalow built recently in the garden of El Ashere. A row of almost identical houses extending towards Boughton Lees would create a linear extension out of keeping with the proportions and balance of this community and would appear to be in contravention of policy SP7 in Ashford Borough Council's emerging Local Plan. There is significant concern that, potentially, this will over time lead to significant linear development towards Boughton Lees in a style unsympathetic to the local built environment. This would be disproportionate and out of keeping with the special character of an established hamlet comprising 22 distinctive individually-styled rural properties which include a high proportion of listed buildings.
5. Further comments related to sustainability. The hedges to the north, west and east of the site are long established and are characteristic of the locality. All have ditches running through them or about a ditch and are important biodiversity and wildlife corridors. In relation to drainage and the potential for water contamination there appear to be no further indications of how this might be managed. We note that two recent supporting documents referring to storm water run-off for the 3 dwellings suggest this might be contained by water butts, without an indication of what happens when they are full. The application

now has 4 parking spaces for each property, a potential total of 12 vehicles across a road frontage of approximately 45m. This is disproportionate. The lack of pavements, amenities and public transport creates a total reliance on cars for all journeys and make the site unsustainable.

6. In the Neighbourhood Plan household survey 2016, 91% of respondents opposed development on greenfield sites.

Design

7. The housing style in the revised application is substantially unchanged and does not address the concerns raised by the Parish Council in our submission of 15 August. The Design Statement is unaltered. We refer you to our addendum to our original submission which refers, in particular, to design style in relation to the scale and mixed dwellings of the hamlet and its rural setting.
8. We believe that the development fails to meet the NPPF on the grounds that new development should be sustainable in a variety of aspects including the appropriateness of design to setting. Although the number of dwellings has been reduced and repositioned, in terms of scale and volume the house design remains essentially the same with only minor additions to the sides and detailing. Our view is that this is oppressive pattern book styling, a repeated shape handed to one or other side, which is more suited to an urban or suburban estate and out of keeping in this rural setting where all other houses are of an individual design and shape. This “sameness” lacks aspiration and innovation and, if approved, will result in a significant deterioration in the hamlet’s character and sense of place.
9. 90% of respondents to the Neighbourhood Plan household survey 2016, thought that new houses should fit in visually with existing streetscapes. As it stands, in its design, the proposed development lacks thoughtfulness and respect for its setting. Good design need not simply echo elements of local style features. It can be modern and more ecologically sustainable and still be sympathetic to and enhance not detract from the locality. Item 64 of the NPPF states that “Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.” We believe this is grounds to reject this application.
10. In the Neighbourhood Plan household survey 2016, 52% of respondents felt that 2-3 bed housing should be first priority for new builds over the next 15 years providing opportunities for local people to downsize and for first time buyers in preference to 4-5 bedroom properties.

11. In summary, this planning application:

- **does not enhance its immediate setting;**
- **is not sensitive to the defining characteristics of the area; and**
- **bears no relation to parish residents’ views of local needs.**

Context

12. Context is important and, aside from the deficiencies of the application and problems related to the site, it is the view of the Parish Council that these new houses are not needed. In its Local Plan 2030 Ashford Borough Council has already identified sufficient housing to meet need in the Borough over the next 13 years and housing targets imposed by central government. The 375 new dwellings planned on the strategic site at Eureka Park will more than meet parish’s local housing needs identified by Neighbourhood Plan household survey 2016 and the ACRE survey housing needs survey 2015.

13. This site was considered and rejected by the Parish Council for land allocation in our emerging Neighbourhood Plan. In consultation with residents, the Neighbourhood Plan Steering Committee is exploring the possibility of developing planning policy for new homes on an alternative brownfield site in the parish. This will deliver c.18 houses which will exceed the figure for anticipated windfall development over the next 13 years cited in the Local Plan.
14. The new homes to be built at Eureka Park will have a significant impact on the social balance of our community (as was the case when Goat Lees was developed in the late 1990s more than doubling the parish population). In addition, planning applications have been put forward to Ashford Borough Council for another 100 dwellings at two locations off Sandyhurst Lane. Above and beyond this there are c.2,000 new homes planned or proposed close to our parish boundary at Kennington and Hothfield. The local infrastructure including our roads, our schools and our medical facilities are already under pressure and will struggle to accommodate this influx of new residents, vehicles etc.

Boughton Aluph & Eastwell Parish Council

3 November 2017

17/00999/AS: Proposed development of 6no. dwellings, new access along with associated parking & ancillary buildings on land north west of El Ashere, Wye Road, Kempes Corner, Boughton Aluph

1. The Parish Council assessed this site for land allocation in our emerging Neighbourhood Plan. It was decided that development on this site would not be supported.
2. The overwhelming feedback from parish residents to a household survey conducted to provide evidence for our Neighbourhood Plan was the importance of protecting and preserving the special rural nature and character of our parish. This application is not consistent with that objective.
3. Our objections are based on the core principle within both the NPPF and ABC's core strategy that there is a "presumption in favour of sustainable development". We suggest this development is not sustainable on a number of grounds: location; layout, proportion and design; drainage; amenities, services and transport. These are all aspects of sustainability raised within SP1 of the draft Local Plan.

Location

4. This is a greenfield site (previously part of a horticultural nursery) within the Boughton Lees Horticultural Valley. The land is designated as a Landscape Character Area in Ashford Borough Council's Supplementary Planning Document (April 2011). Ashford Borough Council's adopted policy for landscape assessment (Jacobs, 2009) classifies the area of the Wye Road site as "restore and create". The elevated position of the site means that it is highly visible from some distance.
5. The proposed development does not fit with the strategic vision set out in Ashford Borough Council's draft Local Plan 2030 that "new development should be of a scale appropriate to the individual characteristics of the settlement." Also the aim to conserve and enhance "the identity and attractive character of the Borough's rural area" in recognition that "the attractiveness of the Borough's countryside is an important aspect of the economic potential of the Borough, especially of the rural economy, and a significant income generator.
6. The site is outside the built confines of Kempes Corner, a hamlet of 22 buildings, 5 of which are listed. It would be an extension of the natural boundary of the hamlet. Policy SP7 of the draft Local Plan "Separation of Settlements" indicates that "proposals for built development on non-allocated sites outside the built up confines of settlements" shall not be permitted" where the "significant erosion of a gap between settlements or gap between settlements" results "in the loss of individual identity or character". The gap between the village of Boughton Lees and hamlet of Kempes Corner is particularly vulnerable to this type of coalescence.
7. The application describes the land as a "redundant paddock" which ignores its potential value as productive land. As greenfield agricultural land the soil classification is a material consideration. Most of the site is classified as 'very good' soil, and the southern edge is 'excellent' soil. NPPF para 112 provides guidance to Local Planning Authorities on safeguarding the 'best and most versatile agricultural land'.

Layout, Proportion and Design

8. Relative to the scatter of dwellings at Kempes Corner, six is a disproportionate increase. A quick calculation suggests a proposed housing density of the proposed development is about 15/hectare. This

contrasts with the very rural 5.3/hectare for the 11 existing dwellings on either side of Wye Road. Hence the layout is considered to be incongruous and unsympathetic to its setting.

9. The Parish Council is of the view that the development outlined in the application would be disproportionate, highly visible and out of character with existing dwellings at Kempes Corner which are interspersed by views. The proposed brick, pattern book housing design is out of keeping with individually designed immediate housing, and the estate style out of keeping with other hamlets in parish. In this context this is an overbearing development; it is more appropriate to a suburban area. Valued local rural views will be changed or lost. In total, the setting, scale, layout and design of the development will be out of keeping with the locality.

Drainage

10. There has been a long-term problem with water management on this site with water often leaking onto road and freezing in winter. The adjacent grass verge is prone to saturation during the winter months. The highly unusual Kent County Council road sign warning of ice on the road on the adjacent Wye Road is evidence of this localised problem. Even if the hard landscape surfaces were all permeable, the rain run-off from the six roofs would add a significant loading to any sustainable drainage system. Flash flooding from thunderstorms will tend to run-off rather than percolate through permeable driveways. There is already a tendency during the winter for Wye Road to carry excess surface water. Extra run off (especially as the climate continues to change) would exacerbate this and could create a highway safety issue. KCC Highways have advised that the drainage ditch fronting the site will require land drainage consent from KCC before any works can be started.
11. Wye Road has no mains drainage, so the site would require a large septic tank and somewhere to discharge. Potentially the combined effluent discharge from six x four bedroom dwellings, with 18 WCs and rainwater could be a risk to highway safety and residential amenity. A sustainable drainage system will depend on the infiltration rate and the ability of the soil to handle the overflow all year round. The proposed dual soakaways for surface water and effluent from sewage treatment units may work during the summer, but are open to question during the winter months when the soil will be saturated. A percolation test conducted during the winter months will be required to find out if the drainage will work on this site.
12. The General Binding Rules for small sewage discharges in England add to the physical constraints. The maximum effluent discharge per residential system is two m³ per day, and “this must not cause pollution of surface water or groundwater.” The rainwater attenuator tank could fit under the shared access drive, but it has to drain somewhere, and that location is not even an option for the foul drainage system. It is questionable whether there is sufficient land within the red line to provide an adequate drainage scheme.

Amenities, Services and Transport

13. The lack of amenities and public transport and the total reliance on cars for all journeys make the site unsustainable.
14. There are poor public transport links and no local amenities and services within walking distance of the development site. Ashford Borough Council’s draft Local Plan 2030 seeks to direct new development towards the most sustainable villages where services are more extensive and well established and public transport connectivity is greatest, consistent with the thrust of the National Planning Policy Framework.

The nearest access to public transport are the bus stops on the south side of the A28. Wye Road is a narrow rural lane and over-used “rat run” to M20. There are no footpaths. Kempes Corner is recognised locally as a dangerous place to cross, especially for children and elderly non-car drivers. This is supported by road traffic accident data from KCC Highways. Residents of the new development would be car dependent.

15. It appears questionable whether the access arrangements to the development will meet Ashford Borough Council’s standards. KCC Highways have advised that the applicant has not demonstrated that adequate visibility splays can be provided to access the site. Providing the visibility splays may require the removal of mature hedgerows. There is no turning head or swept path analysis to show how larger vehicles such as a septic waste tanker, refuse truck, delivery lorry, furniture van etc will be able to turn around and leave safely in a forward gear.
16. Finally, although this may be outside of the purview of this application, the Land Registry shows that the land on either side of the red line area is in the same ownership. This suggests that planning applications of a similar size could follow on either side of the site, if Ashford Borough Council approves this precedent. Potentially this could lead to significant linear development of a style unsympathetic to the local built environment and landscape.

Addendum

17. The applicant references a number of policies in support of their application. Below, we comment on these in turn:

a) Adopted LDF Core Strategy Policy CS1

We contend that the development does not meet the needs of item C – “Protection for the countryside, landscape and villages from adverse impacts of growth ...” and item D – “New places – buildings and the spaces around them – that are of high quality design ... respect the site context and create a positive and distinctive character and strong sense of place and security.”

b) Policy CS9 Character, Distinctiveness and Sense of Place

We feel that the intent of 9.9 “All development proposals need to demonstrate that the design has been conceived through a full assessment of the context of the area, particularly where this has a special character or features of interest, whether built or natural” is not reflected in this development. We note that 9.19 comments that “Bland developments that fail to provide a sense of place should be avoided”.

c) Tenterden and Rural Sites DPD Policy TRS1

This addresses “*Minor development or infilling within the built-up confines*” of a number of specific villages. It does not actually address smaller settlements such as Kempes Corner. In this case, the proposed development is not within the built up confines of the hamlet.

We consider item B “The site is of sufficient size to accommodate the proposed dwellings ... in a layout appropriate to the area and to a scale, design and appearance that would complement and enhance the surrounding area” does not reflect the nature of this application.