

Woodchurch Parish Council

Main Changes - Site S62 (Appledore Road) and additional comments on S40 (Front Road)

General Introduction

Woodchurch Parish Council has reported to Ashford Borough Council on several occasions since 2014, that affordable, low cost or smaller footprint housing is a priority need given the demographic statistics of the village (as defined in the 2011 Census), future demographic trends, the evidence of the Local Needs waiting list and the trend of the past 10 years which has seen a disproportionate number of large market homes receive piecemeal planning approval.

This has led, by stealth, to a tenure imbalance which Woodchurch residents consider to be detrimental to the future sustainability of the village, its infrastructure and its rural spirit of place. The Parish Council agrees with the residents' views.

Following the first tranche of housing submissions in 2015, the Parish Council presented Ashford Borough Council with a comprehensive risk assessment for the village which argued against the options and identified the key risks to the village of building homes on unsuitable sites.

The Parish Council is pleased that the Borough Council listened to those arguments and has agreed with our residents' concerns. The land parcels, as submitted for development in 2014/15, have now been excluded from the Future Plan, with the exception of the Front Road site (Ref S40 - see below)

However, having seemingly agreed with our risk assessment, the full Parish Council was surprised to be presented with a late submission (Site S62) to develop an indicative 30 homes on land on the outskirts of the village in Appledore Road. The Parish Council considers the reasons for including this late submission are unsound:

- 1) There has been no meaningful consultation. One informal meeting between Borough Council Officers and a minority of Parish Councillors was convened at short notice at a time to suit the Borough Council. The 4 Councillors that attended had no delegated powers to comment on this Main Change. There has been no consultation with the residents of Bridge Close and the surrounding roads who will be most affected by the Main Change.**
- 2) Where is the evidence? The Parish Council, residents and village interest groups (notably the Woodchurch Village Association) have not been presented with any new evidence for the S62 policy. By contrast, the Parish Council presents strong demographic evidence for development that will meet the needs of the village now and in the future.**
- 3) The village and Parish Council have not been presented with a sustainability appraisal for this site. There is no evidence that the village needs an additional complement of market homes on this site when a) demand for such homes can be satisfied by the scale and type of developments approved in other settlements within a short distance of Woodchurch and b) the scale and cost of infrastructure improvements, especially those required by the water and sewerage authorities, will be a major barrier to delivering homes on the site over the next 5 years.**

In the Parish council's view, the proposal to include S62 in the Local Plan fails the "positively prepared", "justified" and "effective" tests of soundness and it stands by its opposition for the reasons identified in Appendix 1.

Woodchurch Parish Council accepts that land to satisfy future housing needs has to be found. However, it feels it has been presented since 2014 with a series of options, all of which present strategic, environmental and practical disadvantages which grossly outweigh the benefits to the Woodchurch community.

Woodchurch Parish Council argued several years ago that a site on Susan's Hill could, prima facie, provide land for a Housing Association development, which would go some way to give the village the type of housing it needs and reinforce the Council's aspiration for appropriate housing for people with links to the village. The argument was rejected.

Whilst one Councillor has emphasised that this site bears the same disadvantages as others in terms of its agricultural status, increase in traffic movement, dangerous access/egress etc, the majority of the elected local Councillors consider it to be the least-worst option for housing development in the village.

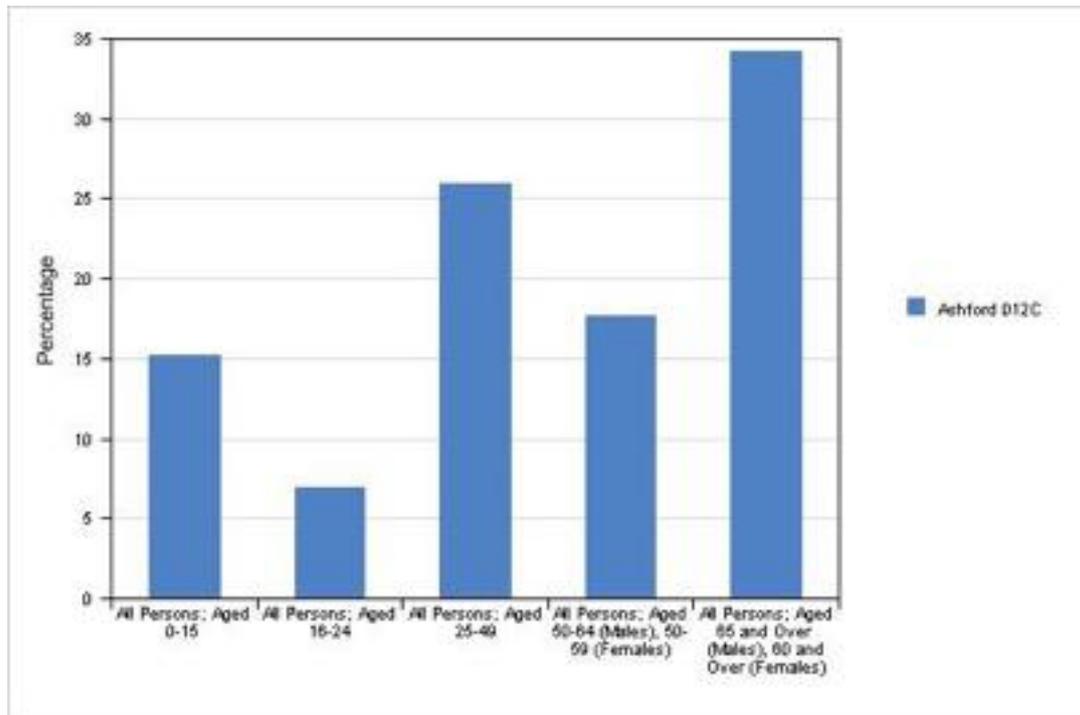
The Parish Council urges the Borough Council to exclude the S62 site, and invites it to discuss an acceptable, alternative development of proportionate scale on the Susan's Hill site which meets the needs of the village and satisfies the high demand (See 1. e below) from those with a declared, local connection.

Support for that approach was re-confirmed at the Parish Council meeting on the 21st August 2017.

Arguments for prioritising land for affordable, low cost or smaller footprint housing in Woodchurch

1) Demographics

- a) The 2011 census demographic statistics for Woodchurch (below) indicated that the over 65 age group represented over a third of the village's population (34%). This is predicted to rise to a minimum of 42% by 2030. By contrast, those aged 16-24 represented just 7%.



- b) The Weald South Electoral ward is home to the largest number of residents over 65 years in the Ashford Borough area by some margin with Woodchurch defined as the Parish with the single highest number. Moreover, Ashford Borough has the highest life expectancy once you reach the age of 65 of all Kent CCGs at 20.7 years for the period 2009-2013 (Source: Ashford CCG)

Top 5 highest wards

- 1 Weald South (1448)
- 2 Saxon Shore (1194)
- 3 Weald Central (1139)
- 4 North Willesborough (1069)
- 5 Beaver (1009)

- c) The predicted trends for males aged 65+ and 85+ show a gradual increase in numbers over the next 24 years and a massive percentage increase of 83.5% and 250% respectively. In the Parish Council's view this means planning now for the future in order to cope with the housing needs and demands of the older population; approximately one quarter of the Ashford CCG male population will be aged over 65 by 2037 whereas the population of 16-64s (working age) will only make up just over half of the total population (55.4%). (Source Ashford CCG)

- d) The CCG also reports "the projected female population for Ashford CCG follows the same pattern as males with the exception of a couple of small differences; the 65+ population has already overtaken the number of 5-19 year olds whereas with males this is not due to happen until 2021. A similar overlap occurs between the 0-4s and 85+ in the year 2033 whereas males are not expected to until after 2037 based on current trends"

e) Local Needs Housing – Ashford Borough Council confirms that the number of applicants to the housing register who have indicated that they have a local connection to Woodchurch is currently 21. The vast majority (70%) have need for 1 and 2 bedroom accommodation (see below) which cannot be satisfied given the existing housing stock and dearth of smaller accommodation.

| | | |
|------------|---|----|
| 1 bed need | - | 11 |
| 2 bed need | - | 5 |
| 3 bed need | - | 2 |
| 4 bed need | - | 3 |

Taken together, these statistics demonstrate a considerable need both now and in the future for affordable or smaller housing for local people clustering around young people (singles, couples and family) and older people. The two sites together (S40 and S62) will create a maximum of only 12 affordable homes compared with 26 potentially large market homes.

The Parish Council will support high quality housing of up to two bedrooms to satisfy the expected future demand from its local ageing population and/or to address the imbalance for its young and its key workers. It does not support the piecemeal growth of large market homes which

- exacerbate the existing tenure imbalance
- put disproportionately greater strain on the local infrastructure
- erode the rural sense of place
- will result in an under supply of the type of homes needed to satisfy future demand.

Comments on the Front Road site (S40)

This site was included in the former plan as ref: WOOD1. The original policy for the site included a reference to a mix of homes. Since that time 3 Planning Applications have been submitted and rejected - all three for 8-10 large (4-5 bed) market homes. In one submission the developer arbitrarily reduced the site footprint purely to circumvent the requirement for an affordable housing component.

Whilst the Parish Council is generally supportive of development on this site, it was never its intention to allow it to be populated by large market homes. The Parish Council is eager to point out that the Planning Inspector previously recommended to ABC that it should be clearer when defining what should be built despite Policy 6.151 for the WOOD1 site clearly saying *“A mix of terraced and semi-detached properties here would create an interesting contrast with the frontage development to the south of the site but would mark the change of prevailing dwelling type seen further north along both sides of Front Road, within the Conservation Area”*

The Parish Council is disappointed to see that the Inspector’s comments have not been taken on board and that policy S40 has been written in such a loose way that it will invite developers to submit applications for up to 8 homes, which from previous experience, will be large market homes. The village does not need large market homes and we would therefore urge the Borough Council to review the wording of the policy to bring it more in line with the Inspector’s report.

Moreover, the last Planning application on this site did not take a covenanted access strip running through the middle of the site in to consideration such that the planned 8 homes were crammed into two blocks of four dwellings on either side of the strip with a space between them typically of around just 2m.

The Borough Council should in our view reduce the target to a maximum of 6 market homes or, preferably, to achieve targets and provide the right type of accommodation for the village, increase the target to 8 homes which offer a mix of smaller, terraced and semi-detached properties - as recommended by the Planning Inspector.

General comments on the Appledore Road site (S62)

Generally, the Parish Council disagrees that the S62 footprint is capable of providing 30 homes without appropriate levels of car parking and leisure/community space. The current Bridge Close/Brattle settlement contains just 2 small grassy areas. Neither have the benefit of children's play equipment or other facilities which means that children have to make the long and potentially dangerous trip to the Village Green to enjoy the amenities there which include a leisure/sports area including play equipment and open air gymnasium. Equally, there are no community buildings or facilities in the current Brattle/Bridge Close settlement.

The Parish Council would like to remind Ashford Borough Council of the risks it identified to the local community by building an unsuitable number and type of homes on unsuitable land. The reasons it considers S62 to be unsuitable are contained in **Appendix A**

Conclusions

The Parish Council

- a) feels the Borough Council is unable to prove that the proposal to include S62 has been positively prepared, justifiable and effective.**
- b) supports the residents' view that the S62 site is not suitable for a indicative development of 30 homes for the reasons stated and recommends that it is excluded from the Future Plan**
- c) feels that the site options presented are a short-term expediency driven by the need to achieve arbitrary targets and not by the current and longer term housing needs as identified by current and future demographic trends.**
- d) feels that the wording of Policy S40 remains too loose which will lead to planning applications coming forward for crammed developments and the type of homes that are not a priority for the village given the existing tenure imbalance**
- e) would, prima facie, support the development of a site on Susan's Hill and invites the Borough Council to discuss this further**

Appendix A

Main Change - Site S62 - Appledore Road, Woodchurch

Identified Risk 1 - Exacerbating the current tenure imbalance

Most homes built or planned over the last 10 years in Woodchurch have been large residential/market homes. Even with an affordable component of 40% on S62 the tenure imbalance will not be addressed. Moreover, in a typical year prior to 2017, successful planning applications will have accounted for an average of 3 new homes a year, the vast majority of which have been large homes which add to the imbalance. In 2017, following a shift in Government policy, the Parish Council has noted a substantial increase in applications coming forward, seeking approval to convert un-used agricultural buildings to multi-residential use. There seems to be no recognition of the impact of this policy shift in the housing trajectory.

Identified Risk 2 - Developments which do not respect the existing quality and character of the landscape

Every land submission received has impacted on our landscape and S62 is no exception. S62 is agricultural land which sits at the south-eastern edge of the village on the edge of Shirley Moor which is classified as a Special Landscape Area. Settlements do not feature in the landscape characteristics of the moor. This site will complete the creation of a large settlement in excess of 100 homes (including the current Brattle and Bridge Close sites) which will detract from the spirit of place of the moor.

Especially given the current Ashford housing trajectory of 13969 homes by 2030 against a target of 13200, the Parish Council cannot see any benefit in building 30 new homes on agricultural land that will impact negatively on the natural surroundings and disrespect the quality and character of the open space and rural vistas in that part of the village.

Identified Risk 3 - Developments which create greater risks of pollution, road traffic accidents and public safety problems

The most obvious risk of pollution and road traffic accidents will be the increase in the number of cars and traffic movements which we would estimate at between 175 and 210 per day - all having to access/exit the site via the current junction at Bridge Close. S62 is remote and with limited public transport provision, residents there would be largely dependent on cars, not only for commuting but also to satisfy their educational, leisure and retail needs within the village itself. The egress from Bridge Close is best described as awkward given the deceptive bend in the road which can obscure oncoming vehicles from the east. An additional 200 traffic movements a day will not only transform that junction from awkward to highly dangerous but severely impact on the amenity of the current residents of Bridge Close.

Additionally, there is no continuous footpath planned from the village to this peripheral site. Residents who currently walk with their children to school in the village are forced to compete with an increased volume of traffic. The risk of collisions and serious injury will increase exponentially in the Parish Council's view, with such a large increase in traffic movement in that part of the village.

Identified Risk 4 - Overlooking the cumulative impact of this development on Woodchurch

- a) Developments in nearby towns and villages will impact on Woodchurch in the future in several ways. Large planned developments in Chilmington, Tenterden and on the Romney Marsh (Shepway) will mean that Appledore Road will be one of 3 key roads through the village Woodchurch that is likely to experience vastly greater traffic movement. Appledore Road is already a well-used route to the Romney Marsh towns, Rye, Hastings and mainline railway stations at Hamstreet and Appledore, as well as the route to one of the largest

visitor attractions in the area - the South East England Rare Breeds Centre. Woodchurch House, a large 80-bed residential home which is also accessed via Appledore Road has already created a significant increase in traffic in that part of the village and is planning to expand its client intake by around 20%. We believe this significant factor has been overlooked.

- b) If this development goes ahead, the Parish Council estimates that around 40% of its population will live in 2 large settlements, one at the northern tip of the village and one at the southern tip. Both are farthest away from the village's key community, leisure, retail and educational facilities. The Parish Council feels that community cohesion will be made more difficult if this site is agreed purely in the pursuit of arbitrary Government housing targets. These remote settlements are hard to engage with now and their residents' involvement in community is noticeably lower than those living closer to the village centre. We are reminded that the original land submissions in 2014/15 were put forward primarily because of their close proximity to the village's key facilities and yet, were still rejected as unsuitable space.
- c) The cumulative impact on the fragile water and sewerage systems in the village. Southern Water has already indicated that there is insufficient capacity in the sewers to accommodate the 8 homes planned for Front Road, let alone 30 additional homes in Appledore Road. The residents in Appledore Road have been the ones most badly affected by flooding in the past. Expensive infrastructure improvements are likely to be needed to provide new capacity in the network. It is difficult to see how the cost could be recovered without a substantial proportion of the homes being higher-end market homes.

Identified Risk 5 - Permitting developments beyond accepted boundaries or building lines

Site S62 is located on the periphery of the village, well beyond any accepted building boundaries and abutting open countryside. Whilst it may help to meet the housing and employment requirements of the Borough Council, it cannot claim to protect or enhance the local environment, including wildlife habitats, trees and woodland in that part of the village. Indeed, it is likely to result in the loss of a small copse. In the Parish Council's view, development which fails to take the opportunities available for improving the character and quality of an area cannot be considered quality development and should not be accepted.

Additionally the proposal would demonstrably harm the amenities enjoyed by local residents in Bridge Close, in particular safe and available parking, valuable green space, privacy and the right to enjoy a quiet and safe residential environment.