Head of Development Management and Strategic Sites P

Planning Committee

Wednesday the 14th November 2018 at 7.00pm

ASHFORD BOROUGH COUNCIL

Update Report for the Committee

The following notes and attached papers will be referred to at the meeting and will provide updated information to the Committee to reflect changes in circumstances and officer advice since the reports on the agenda were prepared

3. **Minutes** – To approve the Minutes of the Meeting of this Committee held on the 17th October 2018

4. Requests for Deferral/Withdrawal – none.

5. Site Visit - 17/01589/AS - Land adj and rear of 5 and 7, Kings Avenue, Ashford, Kent - Full Planning Application for Construction of Seven 2 bedroom apartments and a 2 bay car port

6. TPO/18/00008 – Confirmation of Tree Preservation Order No. 8, 2018 - Land East of Lantern House, St Stephens Walk, Ashford

7. Schedule of Applications

(a) 18/01196/AS - The Surgery, Ivy Court, Recreation Ground Road, Tenterden, Kent ,TN30 6RB - Alteration and extension to the existing GP Surgery with associated parking

3 additional comments in support of the application received raising the following additional points:

- This should be supported and should have been proposed before additional housing in the area were given the go-ahead.
- The design and construction are sensible considering the timescales, site constraints, other new buildings in the vicinity and the need to use the premises during the works.
- There are considerable benefits which need to be weighed up against the visual harm.
- Without the expansion where are patients to be accommodated.
- There is no other way to expand the surgery other than increase the height.
- Nearby Waitrose is 3 storeys in height
- There would only be harm to the view of the church from one vantage point

- Substantial commercial development has already taken place within this part of the Conservation Area which is not of a particularly high heritage value.

- The bulk and massing would be balanced against the remaining large open spaces and mature trees nearby.

- There should only be a modest level of benefit as the harm is less than substantial. The benefit would far outweigh the harm.

- Surgery has recently won an outstanding rating from the CQC.

- The NPPF favours such development

- The surgery covers a far wider area than Tenterden

- The proposed changes to the building are imaginative and of a high standard.

(b) 15/00856/AS - Land at Pound Lane, Magpie Hall Road, Bond Lane and Ashford Road, Kingsnorth, Kent - Outline application for a development comprising of up to 550 dwellings in a mix of size, type and tenure. Provision of local recycling facilities. Provision of areas of formal and informal open space. Installation of utilities, infrastructure to serve the development including flood attenuation, surface water attenuation, water supply, gas supply, electricity supply (including sub-station, telecommunications infrastructure and renewable energy). Transport infrastructure including highway improvements in the vicinity of Ashford Road/Magpie Hall Road/Steeds Lane, Pound Lane and Bond Lane, plus an internal network of roads and junctions, footpaths and cycle routes. New planting and landscaping both within the proposed development and on its boundaries as well as ecological enhancement works. Associated groundworks

The description of the development has been amended to make clear that all matters are reserved except for means of access, height and density. In addition, the applicant has confirmed that a convenience store not exceeding 280 sqm will be added to the proposals within Area 2 immediately to the west of Ashford Road.

For the avoidance of doubt the Wastewater Treatment Works no longer forms part of the application and the development will connect to the SWS foul sewerage system.

The description is therefore amended as follows:

"Outline application for a development comprising of up to 550 dwellings in a mix of size, type and tenure, with all matters reserved except for means of access, height and density. Provision of a convenience store and local recycling facilities. Provision of areas of formal and informal open space. Installation of utilities, infrastructure to serve the development including flood attenuation, surface water

attenuation, water supply, gas supply, electricity supply (including sub-station, telecommunications infrastructure and renewable energy). Transport infrastructure including highway improvements in the vicinity of Ashford Road/Magpie Hall Road/Steeds Lane, Pound Lane and Bond Lane, plus an internal network of roads and junctions, footpaths and cycle routes. New planting and landscaping both within the proposed development and on its boundaries as well as ecological enhancement works. Associated groundworks."

Further comments from Kingsnorth Parish Council:

Kingsnorth Parish discussed this application at their parish council meeting last night and have the following comments to make which we would like you to consider and share with members of the planning committee.

Kingsnorth Parish council is aware that this site is included in the submitted Local Plan, is needed to meet ABC's required five year land supply and that the application is recommended for approval subject to conditions as set out in the report.

The comments below are intended to be constructive and to make this development the best it can be for both the people moving into it and the existing community.

KPC don't like the name, Kingsnorth Green, we already have a Kingsnorth Village Green so they should change it and possibly engage the community in that process.

This is farmland and some nod to that former usage should be included in the design and landscaping.

The siting of the open spaces is not always clear and needs to be firmed up and once done given protected status so no further development can take place.

Connectivity with the existing village needs to be built in and all weather surface paths provided and funded by the developer on key routes that KPC would like to be consulted on.

There were lots of highway related concerns and the references to linking with other new developments like Court Lodge and Chilmington Green without the detail to inform any decision making from a Parish Council perspective, KPC strongly requests key stakeholders have a presentation on how these highways, water management systems and green spaces all link together and some clearer guidelines on phasing on all the schemes as it is the cumulative implications of development that are a major concern to residents.

By looking at all the schemes we could think more creatively about how we protect and manage our green spaces and fund key pieces of infrastructure.

KPC has grave concerns over the implications this development and the other large development sites in the parish will have on the existing roads many of which have no footpath and would like to see a contribution from developers towards

widening where possible and the provision of footpaths at least on one side of the road or an alternative safe pedestrian route with an all-weather surface, possibly lit, included in the conditions attached to the application.

Clarity over the proposed route across Pound Lane is requested as a matter of urgency as again this links several developments.

KPC requests that traffic lights are installed at the crossroads Church Hill, Ashford Road prior to any construction taking place and that no construction traffic uses Church Hill.

There is a presumption that Kent Wildlife Trust or a management company will manage the informal open spaces in Court Lodge and we assume something similar for this application. KPC would like to be directly involved in these discussions and where appropriate be considered as the most suitable organisation to take on the management of these open spaces and recreational facilities as this will provide a mechanism for protection and income in the future.

Sports England suggest that the development should provide either directly or indirectly sports facilities, KPC would be requesting a contribution for our proposed sports facility in the Entrance Park to Park Farm.

8 further letters of objection, making the following points:

- Lack of infrastructure to meet developments in Ashford
- Are all these houses in Ashford necessary
- The area is prone to flooding
- Impact on wildlife
- Loss of green fields as an amenity for existing residents
- Increase in traffic particularly at the Church Hill/Pound Lane/Ashford Road junction.
- Development will eventually join up with Chilmington Green
- House prices will be devalued
- Impact on the character of Pound Lane
- Loss of trees and hedges
- Closing Pound Lane would have a detrimental impact on the Queens Head PH, but traffic lights at the junction would be welcome
- The new access to Pound Lane is not required as the housing market will be depressed as a result of Brexit

- Impact on protected species and other wildlife in Pound Lane due to the access

- Impact of additional traffic will impact on safety in an already busy area

- Impact on health due to noise, light pollution and fumes

- Development would be out of character with the rural character of the area

Letter from the agent for the adjoining site at Court Lodge making reference to the S106 contributions and asking that the Court Lodge development should be considered as being the recipient of some of the monies. The letter also requests that the S106 should designate the land for the link roads between Areas 1 and 2 and adjoining Court Lodge as highway land with a call mechanism to be exercised by the Highway Authority. They ask to be involved in the drafting of this as the adjoining landowner.

In response to this, Kent County Council Highways has stated that the application is in outline so the exact location of the road is not known at this stage. Instead, they recommend an additional condition requiring that prior to the submission of any reserved matters application in Sites S4 and S5, details of the proposed roads from Ashford Road to the Court Lodge development shall be submitted and approved in consultation with the Local Highways Authority.

(**HDM&SS**: The heads of terms will be discussed with the relevant parties and a condition relating to the roads will be added).

Highways England:

Collision Data: Although we do not necessarily agree with the methodology of assessment, we are content that crash data has been obtained and analysed, including the M20 Junction 10.

Impact Assessment: No objection subject to a condition stating that no more than 200 dwellings of the development hereby permitted shall be occupied until the Bellamy Gurner improvement to the A2070, Waterbrook Avenue/ The Boulevard roundabout shown on Bellamy Roberts drawing No's 3651/RM/002A, 3651/RM/003A and 3652/RM/002A (or such other scheme that substantially accords with the principles of the scheme, as may be approved in writing by the local planning authority and Highways England and KCC Highways) have been completed and opened to all traffic.

Reason: To ensure that the A2070 Trunk Road continues to be an effective part of the national system of routes for through traffic in accordance with Section 10 of the Highways Act 1980 and to satisfy the reasonable requirement of road safety.

The contribution amount in respect of M20 J10A is payable as follows:

- 50% of the total contribution to be payable prior to the commencement of the development (including any associated servicing or infrastructure specifically related to the development of the site).

- 25% of the total contribution to be payable prior to the completion of one-third of the development 'units' (x number of houses/floorspace, etc).

- the remaining 25% to be payable prior to the completion of three-quarters of the development 'units'. HE has also requested that the contributions for M20 J10A should be as follows:

(**HDM&SS**: A condition will be added and the contribution added to Table 1 under Section 21.

Site notices for the amended plans were erected on site on 5th November 2018.

Notices were served on the owners on 8th November 2018.

Amendments to the report

Page 112 Para 17 – Affordable housing is 30%.

Policy HG5 of the Ashford Borough Local Plan 2000 – Sites not on the Proposals Map – should be included in the Policy section.

Para 148 – Final sentence to read "The applicant has confirmed that the on-site Wastewater Treatment Works that was originally proposed is deleted and that the development will connect to the main foul sewerage system".

For the avoidance of doubt, the wording of the policies in the appendix on pages 291 – 234 is superseded by the modifications which are shown in full on pages 232-234 of the main report.

Additional conditions as follows:

50. Restricting occupation to 200 dwellings until the improvements to the A2070 Waterbrook Avenue/ The Boulevard roundabout have been completed.

51. Prior to the submission of reserved matters applications in Areas 1 and 2, details of the proposed roads from Ashford Road to the Court Lodge development shall be submitted and approved in consultation with the Local Highways Authority.

S106

In Section 6 of Table 1, Informal/Natural on-site provision to include an element of public art to be agreed.

Section 21 of Table 1 to be amended to include the payment structure requested by Highways England.

Additional Head of Term to be added to include the provision of the convenience store.

Recommendation amended to combine (B) and (C) as (B) as follows:

Subject to the expiry of the site notice for the amended plans and Subject to the expiry of the necessary notices to landowners and in the opinion of the HDSS&D and JDCM no further issues of significance being raised

Recommendation (C) becomes recommendation (D).

(c) 18/00652/AS - Land south of Park Farm East, Hamstreet Bypass, Kingsnorth, Kent - Full planning application for 353 dwellings, new accesses from Finn Farm Road, Cheeseman's Green Lane and Brockman's Lane and creation of a T-junction between Finn Farm Road and Rutledge Avenue. Creation of a new access serving 1,3,5,7 and 9 Finn Farm Road. On-site highway works together with associated parking, infrastructure, drainage, open space, landscaping and earthworks

As per paragraph 29, the applicants have now submitted a refined layout. In accordance with Recommendation (A) I will progress concluding acceptability through appropriate discussions with Kent Highways & Transportation.

Insertions
'including an element of public art to be agreed' to be inserted into (A) the Informal / natural Green Space Head of Term No.9. forming part of Table 1 & (B) inserted into the proposed hard landscaping condition 10.

(d) 17/01917/AS - Thruxted Mill, Penny Pot Lane, Godmersham, Canterbury, Kent CT4 7EY - The demolition of the existing structures and hardstanding on the site and the erection of up to 20 dwellings with improved vehicular access and extensive areas of planting and landscaping. (All matters reserved except for access from Penny Pot Lane and quantum of development).

3 further neighbour letters of representation received raising the following:

- The committee report makes no mention of the site's involvement in the BSE scandal in the 1990's. The potential harm to human health requires very specific testing and advice from DEFRA and has this been requested?
- Have any such sites nationally been developed for human habitation?
- Surrounding roads will be heavily affected and the additional traffic from the development would be a disaster to this rural lane. Construction traffic alone will damage the lane and makes a large development here woefully inappropriate.
- The proposal would increase the number of properties on Penny Pot Lane from 10 to 30 increasing traffic flows particularly during the construction phase. Road changes are restricted as it is bordered in places by ancient woodland.
- Increased strain on local infrastructure for schools and GP surgeries. No public transport in the vicinity of the site.

- The cost of the properties are likely to be beyond the reach of young families living in the area. The site is not necessary to meet housing delivery targets.

- Various organisations who are consultees have either objected or withdrawn support (i.e. CPRE, AONB Unit, KWT, KCC Ecological Advise Service, UK Power Network, Woodland Trust). Kent police state they were not consulted.

(**HDM&SS**: The objections are assessed in the report and have either been addressed, can be addressed through the imposition of conditions or relate to details that are for consideration at the reserved matters stage rather than in respect of this outline application).

1 objector has requested their comments be appended in full as they are unable to speak at committee. The points they raise are summarised above and the letter attached in full in annex 1 at the end of the update report.

1 letter received from solicitors representing a local resident raising the following:

- The Environmental Impact Assessment Regulations 2017 has not been applied and given the sensitivity of the development and characteristics of the impacts and EIA is likely to be required. A screening opinion does not appear to have been undertaken by the Council. The application falls within Schedule 10(b) of the EIA regulations and is located in a sensitive area as defined by these regulations. To determine the application in the absence of this would be premature and unlawful.

(HDM&SS: The application has been screened by officers in respect of the need for an EIA. Officers are of the opinion that an EIA is not required for this development.)

- Supporting surveys have raised concerns over the development.

(**HDM&SS**: These concerns have been addressed in the report, through proposed conditions and can be addressed at the reserved matters stage)

- Comments received from the Kent AONB Unit and the Council's Culture & Environment (open space) officer have been misrepresented as both object.

(HDM&SS): The AONB unit do not object to redevelopment in principle but has raised concerns over the indicative layout shown. This is not however for consideration at this stage and the quantum of development is up to 20 units and does not commit the Council to accepting 20 units at the reserved matters stage. Likewise the concerns with the scheme raised by the Culture & Environment Team are matters to be resolved under the reserved matters applications rather than at the outline stage.

- An unredacted viability assessment has not been made available to view and this is key to the decision recommended.

(HDM&SS): A redacted version of the viability statement removing commercially sensitive information had been provided by the applicant and is available to view on the Council's website. Likewise a redacted version of Bespoke Property Services assessment of this viability appraisal is publically available to view.

(e) 17/01646/AS - Former Goods Yard, Bramble Lane, Wye, Kent - Development of 14no. dwellings with associated access and parking

1 additional comment received objecting to the proposal but not raising any new material planning matters.

(f) 18/00572/AS - Delcroft, Woodchurch Road, Shadoxhurst, Ashford, Kent TN26 1LE - Outline planning application with all matters reserved for the construction of up to 12 residential dwellings alongside associated parking, access and landscaping works. Includes demolition of existing bungalow called Delcroft

Second Consultation (up to 12 units scheme)

Shadoxhurst Parish Council OBJECTS to the proposal.

Since the Parish Council wrote in raising objections to the 14-unit scheme, it has received some 90 community objections to this scheme. It requests that the Borough Council considers the strength of feeling in the local community. It draws parallels with recent planning refusals at Farley Close (17/01888/AS) and Tally Ho Road (18/00483/AS) where non-compliance with the Local Plan and policies were citied.

The PC, together with a significant number of residents raises the following objections:

Suitability of Site This site was originally assessed by ABC as DLP work Site WS70 as "unsuitable for development". Nothing in the present application demonstrates justification to change ABC's original assessment.

The scheme relies on the demolition of an existing single-storey property at the frontage to Woodchurch Rd to access the proposed "backland or infill" insertion of 2-storey houses; completely out-of-character with the locality. Furthermore, we believe that 14, now 12, units are well in excess of the accepted criteria for this type of development.

Access and Road Safety

Whilst KCC Highways have no outstanding Objections, there is significant Community concern regarding both the additional junction onto Woodchurch Rd, close to the adjacent sharp bend and junction by the village hall, as well as vehicular and pedestrian access within the site.

Compliance with Local Plan and Policies

The applicant's "Planning Statement" as issued by DHA April 2018 made assumptions related to the nascent Local Plan which were flawed at the time and which are now seriously out-of-date following later Planning Inspector's post-hearing advice on LP Review published in June 2018. Reconsideration with applicable Plans & Policies seriously changes the case supporting this development.

Equally, the "Planning Statement" relies on Housing Supply statistics from 2017; Ashford's Housing topic paper SD08 – June 2018, together with the relevant observations in the LP Examination Inspector's post-Hearing Advice – 29th June 2018 – both tend to neutralise the claimed benefits of this development towards housing supply.

The Planning Inspectors removed five sites from the Local Plan and reduced other site allocations as they saw that the 5-year Housing land supply was being met, without the need for those houses. This site:

- was not allocated in the Local Plan; the sites amended should be considered first;

- is being 'developer led'; it should be 'local plan led'

The application is inappropriate and does not warrant being granted.

Affordable Housing

The scheme has recently been reduced from 14 units to 12; the original proposal did not meet the current ABC requirements for Affordable Housing and the revised plans (posted 16th October) do not show details of compliance either. The Application relies upon CS12 whilst HOU8 (40% affordable) is applicable.

(HDM&SS Comment: The 'up to 12 unit scheme' makes provision for 40% affordable housing in line with Emerging Policy HOU1).

Village Characteristics and Amenities

Building Materials. Many previous planning approvals in the village have rightly required that brick & tile construction materials match the prevalent village style; the currently illustrated designs are far from this standard.

(HDM&SS Comment: This is an outline planning application where design and appearance is a reserved matters.).

Transport Links In November 2017, KCC announced county-wide cuts to bus services and from June 2018 the Ashford – Tenterden Service 2A is reduced from hourly to 2-hourly; a fact known well before the present Application was written claiming an hourly service.

The representativeness of the traffic survey carried out is query as it took place in school holidays.

Utilities & Services. All utilities are already stretched, or in the case of mobile phone signals non-existent. There is no shop, no doctor, no school within walking distance; with the minimal bus service, car usage will be essential to access all these, including all commuting. The Local Plan gives no recognition to need for services to match growth and certainly in Shadoxhurst the recently completed/approved growth has seen no corresponding upgrade of services & utilities; this is a major concern for the Community in considering new development schemes.

Rural Integrity. This is an aspect which generates the greatest strength of Objection in the village. Residents' individual objections relate notably to:

- the disproportionate growth of the current village,
- reduction of greenspace and the movement of village boundaries towards Chilmington / Greater Ashford,
- a further reduction in the grazing land and uninterrupted rural vista northward from existing housing,
- replacement of existing bungalow in a single-property depth building line with "backland" development with an access encroaching closely on the existing single storey properties and their amenity; both those immediately adjacent and those in Lonefield & Woodchurch Road
- the Development is not Sustainable and will further diminish the character of the village, notably replacing a sector of single-storey with high-pitch 2-storey units and adding yet another significant access road on a very crowded stretch of road. There is a strong view that should development take place here at all, it must be limited to single storey only.

Scale and Size Whilst the developers have reduced the scheme from 14 to 12 units, our perspective is that there should be no houses on this field. The Community was much heartened by the recent decisions on the Farley Close North and Tally Ho Rd schemes. These perfectly reinforce our arguments for a Refusal Overdevelopment of a small village. Shadoxhurst is a community of some 500 houses. In the last 5 years, 21 houses have been completed at Maytree Place and Oak View. Since then:

- 45 new-build houses are currently being constructed on six sites in Shadoxhurst.
- There are current applications for 30 more being decided by ABC for probable completion in 2019.
- The growth of any village community needs to be slow and steady; matched, as stated above, by services & utilities, this is not happening with our village. The cumulative effects of such major growth on our community must be fully considered.

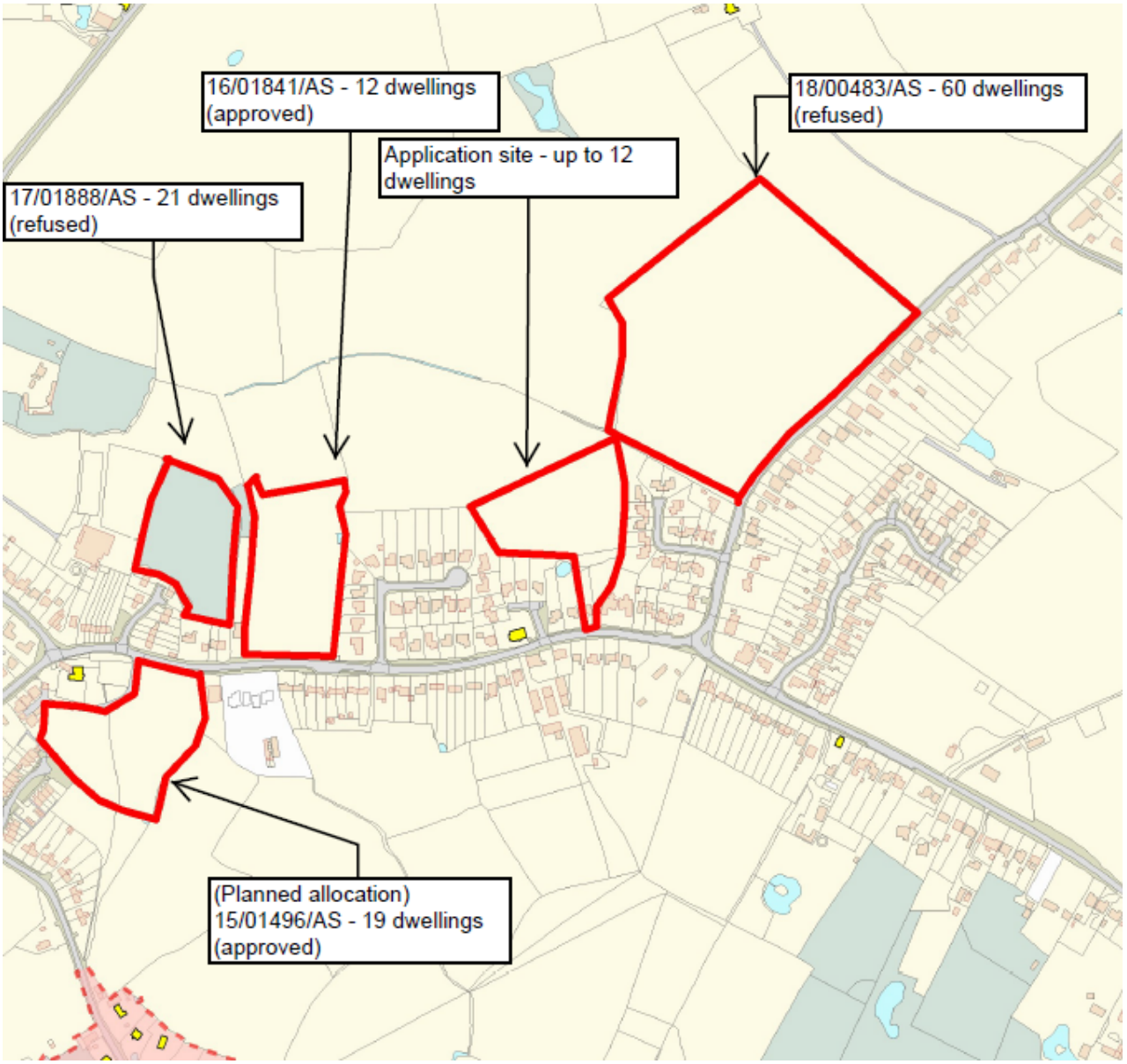
Village Confines. It is clear from the drawings submitted that the most northerly four dwellings push the building line further north beyond the existing acceptable line that would nominally traverse from 17 Lonefield to 12a Park Farm Close as 'infill'.

Separation of Settlements. Adherence to Policy SP7 in the ABC Local Plan is vital to Shadoxhurst, indeed we argue that ahead of the majority of Ashford's Parishes, with the planned growth of Chilmington Green and Kingsnorth extending towards us, we are at the greatest risk of losing our rural village identity. It is paramount therefore that our village must retain the maximum buffer and separation as at present. This development will 'chip away' and reduce this buffer and open the way for the rest of the same field and adjoining fields to be developed.

Social Factors. Whilst these may not be given much weight, there is considerable stress placed on people who chose to live in a village community with rural outlooks as the very reasons for moving there. Eroding these with no effective remedy other than accept the replacement of fields with houses and get on with it, is likely to drive people out of the village. The Council needs to consider the effects and impact on people in at least 15 bungalows and houses on destroying their rural amenities.

The Parish Council has made reference to a number of similar planning applications in the village.

To help provide context, I have included a Plan below which shows planned allocations and committed development in the village along with recent proposals that have been refused.



Shadoxhurst Parish Council has provided a further letter of objection raising concerns about drainage issues in the village. It requests that the current sewerage problems (detailed below) regarding the fracturing last night of a sewage main are highlighted to Members of the Planning Committee.

The Parish Council has previously raised concerns regarding construction activity over and around the existing High Pressure Sewerage Main return line crossing the site at land between the Hollies and Park Farm Close (16/01841/AS) and currently being built by Jarvis Homes. These concerns were largely ignored and, as was predicted, yesterday the line was fractured during building operations. This has resulted in a constant fleet of tankers removing village sewerage last night and today. There is much disruption and damage to properties adjacent to the badly sited pumping station with flooding on the road and now a second set of traffic lights (which are not coordinated with the existing ones).

In addition, the PC understands that surveying errors crept into the Jarvis Homes site and the drainage pipes laid for the 12 houses was found to be too deep. Currently for three weeks there have been traffic control lights while Jarvis Homes dig up the road to relay the Southern Water gravity fed main that flows to the pumping station behind Mace Terrace to a lower depth. This is a live main taking most of the Village's sewerage. The

High Pressure Main then pumps it all up towards Stubbs Cross and the pumping station there.

The PC repeats its original concerns that a 40+ year old line in the ground conditions (clay soil, high water table, etc) and long term traffic movement engenders a high risk of future ruptures (during and/or after construction). It requests an urgent independent Risk Analysis on this line and examination of solutions for its replacement in the context of this with Building Control.

The suitability and viability of the foul sewerage disposal, including the pumping station, are problems which extend beyond this site and pertinent to the consideration of the application currently under consideration at Delcroft.

The PC considers that until the Utilities are properly resolved in Shadoxhurst, there should be a moratorium on future decisions to construct additional housing pushing well beyond the sewerage capacity in the village. More and more housing added to an aging system without a proper risk analysis is folly.

The Planning view is probably that it is for the Developers to ensure that the system can cope and put it right if it can't. However ABC must take responsibility for the increasing growth and under HOU5 a) which states:

"*the scale of development proposed is proportionate to the size of 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……."* This includes utility provision and Southern Water admit that we are at capacity in Shadoxhurst.

Neighbours - 49 letters of objection have now been received raising similar issues to those listed within the committee report and above.

Amendments to Table 1
Heading – Delete 'Land north of Farley Close' and replace with 'Delcroft'

Library Bookstock Trigger Point – All the contribution upon occupation of 50% of the dwellings.

Monitoring fee needs to be included in Table 1 as follows:

Monitoring Fee Contribution towards the Council's costs of monitoring compliance with the agreement or undertaking.	£1,000 per annum until development is completed	First payment upon commencement of development and on the anniversary thereof in subsequent years	**Necessary** in order to ensure the planning obligations are complied with. **Directly related** as only costs arising in connection with the monitoring of the development and these planning obligations are covered. **Fairly and reasonably related in scale and kind** considering the extent of the development and the

			obligations to be monitored.

Further email correspondence received relating to utility infrastructure including the sewage infrastructure/capacity, potable water supply and power. This correspondence follows the fracturing of the high pressure sewage main on the site adjacent the Hollies and Park Farm Close. It is alleged that the local infrastructure cannot sustain any more house building.

Annex 1

(d) 17/01917/AS - Thruxted Mill, Penny Pot Lane, Godmersham, Canterbury, Kent CT4 7EY - The demolition of the existing structures and hardstanding on the site and the erection of up to 20 dwellings with improved vehicular access and extensive areas of planting and landscaping. (All matters reserved except for access from Penny Pot Lane and quantum of development).

"OBJECTIONS TO PLANNING APPLICATION - Being a resident living within 300 metres of the proposed Development, I would like the following to be taken into account when considering the Outline Application for Planning Permission. I have summarised the objections to assist the Committee as follows:

1. **Road / Access** – The current residential properties in Penny Pot Lane number 10. The development would increase the number of properties to 30. Although it is accepted that the Lane is not for residents only, the amount of traffic in the Lane will increase by 3 times not accounting for visitors and deliveries, or construction traffic.

   This is a single track road with adhoc passing spaces and will not cope with the increased traffic. The proposal allows for 64 parking spaces so the developers must envisage that amount of vehicles using the development at any one time.

   Changes or improvements to the road system are restricted by the fact it is bordered in places by Ancient Woodland.

2. **Local Infrastructure** – The NHS comments in the application predict at least 47 occupants requiring a contribution to local services of £16,920. While the developers may have the resources to make this contribution at the outset, it does not allow for the ongoing strain on the local GP Surgery.

   The KCC Education Authority have commented that they can "demonstrate a forecast lack of provision caused by this development which will require school expansion".

   There is no public transport in the Lane.

3. **Housing for Local People –** The average cost of a 2 bedroom property in the area is £240,000. The likely cost of the larger units will be substantially more. These cost are beyond the reach of young families living in the area.

   The Authority have already identified appropriate sites for development to allow the Authority to meet National targets for housing. This site is not necessary to meet those targets.

4. **Objections** – Having reviewed the application and comments, various organisations who are "consultees" and whose opinion should therefore be

considered seriously, have now raised objections or withdrawn support for the proposal. These include CPRE, ANOB Partnership, Kent Wildlife Trust, KCC Ecological Advice Service, UK power Network, Woodland Trust, Kent Downs ANOB Unit. Kent Police have indicated that they have not been consulted and would require conditions on the granting of permission.

There is significant opposition to the development form local resident."

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