

**ADDITIONAL GROUP & PUBLIC COMMENTS ON PRE-APPLICATION DOCUMENTATION, INCLUDING  
DESIGN & ACCESS STATEMENT**

**6<sup>TH</sup> NOVEMBER 2023**

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Claire Gilbert, Deputy Town Clerk  
Tenterden Town Council  
By email only

05 November 2023

Dear Claire,

**Response to the Town Council's pre-application review for land between Woodchurch Road and Appledore Road**

TCLT very much appreciates being consulted on the Town Council's comments on the pre-application documentation provided by Vistry.

TCLT believes there is now an opportunity to turn the warm words of support we have received into concrete action. The problem of the affordability of housing for many local people is well recognised. Whilst Tenterden is not alone in having an overheated housing market, it now has a chance to try to address some of its ill effects.

TCLT believes the Town Council's comments are balanced and well made. In particular TCLT is pleased to support the Town Council's comments on quantum and mix of development. The Housing Needs Survey has clearly been taken to heart by the Town Council. We have a meeting with Ashford Borough Council later this month and we will take up with them the issues raised in Savills report sections 7.7 and 7.8 to which you refer. This is an important matter and must not be overlooked.

To respond to the Town Council's suggestion the TCLT become involved (with which we completely agree) to take things forward we attach an outline proposal which we shall put to Vistry when we see them shortly. We will be discussing it with Ashford Borough Council officers when we meet them and will be pleased to discuss it with the Town Council.

Yours sincerely,

Mark Ellender

Chair TCLT

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Tenterden, Kent TN30 6ES

Tenterden Community Land Trust Limited  
is a Community Benefit Society  
Registration No. 8246



## Outline proposal to Vistry Homes re affordable housing at Limes Land, Tenterden (and why and how Tenterden Community Land Trust (TCLT) should be involved)

Tenterden Community Land Trust Limited (TCLT) is a Community Benefit Society (registration number 8246) regulated by the Financial Conduct Authority. It is accepted by HMRC as being a charity, though not registered with the Charity Commission. It is not a Recognised Housing Provider.

### Why should TCLT be involved with Limes Land?

There is a need for local community housing in Tenterden, evidenced by the recent Housing Needs Survey. 74% of the respondents in need were not on the housing waiting list. Many do not qualify because of the restrictive criteria.

The inability to access affordable housing locally causes distress and resentment, especially when locals see new-builds selling at prices they cannot afford. Providing local community housing builds community cohesion.

For a developer who wishes to engage with the local community which strongly opposed the development, it would help to build a positive relationship with the community and demonstrate that development can bring a local benefit to it.

For the housing association the benefits are, firstly, to provide long term protection from the right to buy and second to create a model for engagement with local communities. Housing associations as a whole increasingly seem remote and impersonal, and ways in which they can recover their local roots can only help them and their tenants.

### How could TCLT be involved with Limes Land?

- 1 Vistry transfers to TCLT the freehold interest in all the lettable affordable housing to be built at Limes Land with an agreed housing association paying for it including the construction costs.
- 2 TCLT leases the units to the chosen housing association by way of a long head lease. Term to be discussed, but no less than 99 years (the shorter the period, the better) at a low but worth collecting ground rent, reviewable every decade.
- 3 The long head lease requires (say) 50% of the letting units to be let in line with TCLT's allocation criteria providing local homes for local people; the rest is available for occupants from the borough generally – at times the local tranche will in fact be higher or lower than 50%, depending on demand, but it gives TCLT some control and therefore gives local people a good starting point.
- 4 During the head lease, the housing association would be in control, subject to 3 above – receiving rents, managing tenancies, etc – so no different to how it would be if the units were transferred direct to them.
- 5 In perpetuity, the Right to Buy should not apply – but we should guard against a change in the legislation. The exact mechanism can be agreed with the housing association but (for instance) we could include a break option in the head lease, enabling TCLT to partially terminate it in respect of any of the properties if they ceased to be available to let.

NOTE: Any financial contribution expected from TCLT could only be funded by sufficiently increasing the ground rent to service a loan of the amount of the contribution.

03/10/2023

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**Vistry Pre-Application Report - Design and Access Statement October 2023**  
**Land Between Woodchurch Road and Appledore Road (Limes Land)**

Tenterden Wildlife have the following additional comments on the above document:

1. We believe the ecological information may be incomplete and have attached a couple of relevant documents on the subject. The first is an ecological report submitted by the Tenterden Neighbourhood Plan (TNP) Steering Committee in June of 2021, and the second a landscape/ecological response to the Judith Ashton appeal document, submitted by the TNP in November of the same year. We should add that the sighting of a dormouse during an Ecology Solutions bat survey is not included in either document, as it only emerged in evidence given by ES during the appeal itself.
2. In relation to the biodiversity of the site, and the interest in it demonstrated by the Tenterden community, Kent Wildlife Trust, CPRE, WKPS and others – and your invitation to ‘re-name’ the currently designated Country Park, I should add that there is already strong support for designating the green area beyond the football pitches (also featured as a Local Green Space in the current Tenterden Neighbourhood Plan) as a Wildlife Park – something which in our view would immediately render it more acceptable in this wildlife conscious parish, with the idea of a Country Park in what is essentially a country town surrounded by countryside, widely ridiculed at every stage of the highly unpopular Wates campaign.
3. We feel there is necessity for a well-planned reptile/amphibian translocation programme to be completed before any further action is taken on site.
4. We are particularly concerned about tree root protection areas in relation to previously planned drainage ‘swales’ – and in the light of continuing flooding, surface water drainage.
5. There are also very real problems associated with sewerage, again with a background of ongoing problems – while we all know that fresh water supplies are already a problem in this area.

**Siggi Nepp**

*Trustee*

tenterden-wildlife.org



## STATEMENT SUMMARY

In the view of the Neighbourhood Plan Steering Committee (NPSC) there is clear and substantial evidence of the ecological, historical and social importance of the application site to the Tenterden parish community, within the Woodchurch Undulating Farmlands Ashford Character Area and setting of the High Weald Area of Outstanding Natural Beauty, to more than justify its selection for statutory protection as Site D, identified as 'Limes Land', in the designated Local Green Spaces section of the Tenterden Neighbourhood Plan.

Detailed evidence, with further justification for the site's protection and preservation as a Local Green Space (LGS), are set out below.

### **Criteria for LGS selection – National Planning Policy Framework (NPS) 2019, para. 100:**

*'The Local Green Space designation should only be used where the green space is:*

- a) in reasonably close proximity to the community it serves;*
- b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and is*
- c) local in character and is not an extensive tract of land.'*

Consideration, in order of importance, of these 7 NPPS qualifying criteria for LGS designation, in relation to Application 21/00790/AS, is therefore the purpose of this Statement.

#### **LGS qualifying criterion 1: Close proximity to the community it serves**

The Limes Land site lies within 8 minutes' walk or less of the town centre, the Appledore and Woodchurch Road settlements, the Shrubcote estate and the new development at Tilden Gill.

#### **LGS qualifying criterion 2: Richness of its wildlife**

In advance of reviewing the applicant's 3 Ecological Assessment Reports, their Landscape and Ecological Plan, Arboricultural Implications Report and 7 Ground Appraisal Reports – with the permission of one of its joint landowners, the NP Biodiversity and Wildlife working group completed their own Phase 1 Habitat Survey of the application sites in December 2019; a study supplemented by pond dipping from the AB12 public footpath and more recently, in June 2021, by quadrat sampling to estimate the ratio of wildflower to grass species within the planned building area adjoining the public footpath. Information from these studies, and from comprehensive species records logged over a 3-year period with the Kent and Medway Biological Records Centre (KMBRC) by residents, field-walkers and a British Ornithological Trust (BTO) observer, has been used to supplement and challenge ecological and arboricultural data submitted by the applicant.

The first point to make in relation to the biodiversity of the site, is that wildlife-rich lowland grassland is a fast-vanishing natural resource of vital ecological importance, with the survival of up to 19 hectares of it on the site proposed for up to 145 houses in Application 21/00790/AS (occupying an equivalent area to the previous application). It is estimated that

97% of lowland unimproved grassland was lost in England and Wales between 1930 and 1984,<sup>1</sup> with further losses continuing through the following two decades,<sup>2</sup> while recent studies predict that in the future grassland may have an even more important role to play than forests in removing carbon from the atmosphere.<sup>3</sup>

1.Fuller 1987; 2. Natural England 2008; 3. John Muir, Institute of the Environment 2018

Typically characterised by multitudes of anthills, indicator plant species and ecosystems supporting large populations of protected reptiles, small mammals and invertebrates, remnants of unimproved neutral grassland evolved over centuries and now widely held to be of national and European significance, are protected as Habitats of Principal Importance under Section 41 of the 2006 Natural Environment and Rural Communities Act. Also as a Lowland Meadow Priority Habitat within the UK Biodiversity Action Plan.



Unimproved grassland with numerous anthills; December 2019 Biodiversity & Wildlife habitat survey

Soil samples taken in the December 2019 Biodiversity & Wildlife survey, revealed the Limes Land site to consist of neutral/mildly acid grassland (pH 6.00-6.75), with an instance of sheep sorrel suggesting a more typically acid grassland presence on the higher, sandier slopes. The existence of no less than 13 unimproved grassland indicator species<sup>4</sup> recorded by the applicant's ecologist, EPR,\* are indications of the site's unimproved grassland character (as opposed to semi-improved character, as stated by the applicant's ecologists).

\*Common milkwort, field woodrush, sweet vernal grass, meadow soft grass, crested dogstail, meadow foxtail, Yorkshire fog, yellow oat grass, common bent, pendulous sedge, hard/soft rush, bird's-foot trefoil, selfheal.

4. Rotheram & Ferkins, 1987



Limes Land grassland in summer

Further protection for such habitats is offered by NPPF 174 c): *'To protect and enhance biodiversity and geodiversity, plans should promote the conservation, restoration and enhancement of priority habitats.'* Also, in NPPF 175 c) *'Development resulting in the loss or deterioration of irreplaceable habitats... should be refused unless there are wholly exceptional reasons.'* In the same context, the Ashford Local Plan 9. ENV1 states: *'Proposals should...*

*conserve and enhance habitats, including BAP (Priority) habitats and networks of ecological interest.* Four separate statements from three statutory bodies in other words support the protection and enhancement of priority habitats (in this instance of unimproved neutral grassland), with the applicant's Ecological Impact Assessment further confirming: *'The loss of grassland within the west and south of the site cannot be avoided or mitigated, as this habitat will be lost to facilitate construction of the proposed development.'*

Four of the six British reptiles are present on the site (slow worm, adder, grass snake, viviparous lizard), with the rare white leucistic form of slow worm occurring in appreciable numbers. In earlier ecological studies, EPR confirmed *'the reptile population within the Zone of Impact (ZOI) to be potentially of County Importance'*; a finding inexplicably denied in their current Ecological Assessment by Ecology Solutions (who have yet to complete their own reptile survey) with: *'population sizes for all reptiles found on the site is low.'*



Slow worm assemblages including the rare leucistic form. EPR reptile mats, 2018 and 2020

Unusually, all 3 species of newt occur in the chain of ponds which cross the application site. Populations of great crested newt, protected as a UK Biodiversity Action Plan priority species and listed under Section 41 of the 2006 Natural Environment and Rural Communities Act, were again recorded by EPR as *'potentially of county importance'* – and in this context the applicant's intention to drain wetland, divert watercourses and dredge ancient ponds vital to the ecosystem under the heading of 'habitat clearance' must be of very serious concern.



Pond dipping from PRow AB12 has recorded newt efts from all 3 UK species

EPR surveys for mammal species limited to bats, hazel dormice, and badgers provide no reliable record for the purposes of the current application of the 21 mammals registered with the KMBRC for the site; failing to acknowledge the known presence of Section 41 and BAP priority species hedgehogs and European polecats – recording water shrews protected under Schedule 6 of the Wildlife and Countryside Act, but failing to survey for nationally endangered water voles.

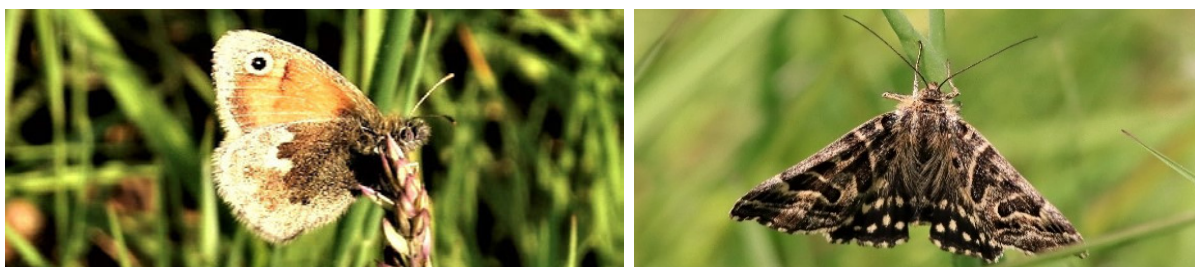


Rodent activity on site: Dec. 2019 Habitat Survey (dormouse and/or water vole presence indicated?)

At least 9 species of bat have been recorded on the site, including BAP and Section 41 protected barbastelle, noctule, soprano pipistrelle and brown long eared species – although further rare myotis species may well have been missed in EPR surveys for 2017 and 2018, which used insufficiently sophisticated flight recording equipment to locate them.

64 species of bird have been recorded by a resident BTO observer, with 17 'Red listed' as of highest conservation priority, 15 'Amber Listed' and 12 protected under Section 41 of the NERC Act – a record consistently misrepresented by EPR and ES by implying that, in contradiction of KMBRC records and BTO conservation priorities: '*A range of common and widespread breeding bird species (are present)*'.

Considering invertebrates, and despite the fact that EPR's invertebrate scoping survey was undertaken (unacceptably as a statistical record) on a single day in August 2019, 183 species have been recorded on site, including two Section 41 species: stag beetle and small heath butterfly. Small heath butterflies have also been recorded in significant numbers in June of 2021, along with the grassland species, Mother Shipton moth.



Small heath butterfly & Mother Shipton moth, photographed on site in June 2021

138 species of grass, flowering plants, mosses, lichens and fungi have been recorded on the site in periods when it was heavily overgrazing by sheep – with quadrat scoping work, undertaken on the AB12 footpath in June 2021, after the sheep had been removed, showing ratios of 6:3 or 5:3 flowering plant species to grasses, to question the veracity of the 'generally poor in herb species' statement of the applicant's ecologists.



0.5 m<sup>2</sup> QUADRAT SCOPING SURVEY EXAMPLES, near the AB12 PRoW



Q1 – *Flowering plants*: meadow buttercup, field wood-rush, slender speedwell, lady’s smock, clover, lesser stitchwort. *Grasses*: meadow fescue, Yorkshire fog, couch. Q2 – *Flowering plants*: bird’s- foot trefoil, thistle, clover, sorrel, lesser stitchwort. *Grasses*: crested dogstail, foxtail, meadow fescue.

The ecological importance of Limes Land in terms of the animal and plant species it sustains, is well illustrated in the summary chart below – with KMBRC records for the site identifying no less than 28 BAP Priority or Section 41 protected species.

<p><u>BAP Priority Habitats</u> Ponds Hedgerows Acid Grassland Neutral Grassland</p>	<p><u>BAP Priority Species – Birds</u> Common Cuckoo Herring Gull Lesser Redpoll Lesser Spotted Woodpecker Reed Bunting Spotted Flycatcher House Sparrow Tree Sparrow Willow Tit Bullfinch Starling Lapwing Song Thrush</p>
<p><u>BAP Priority Species - Mammals</u> Barbastelle Bat Hedgehog Polecat Noctule Bat Soprano Pipistrelle Bat Long Eared Bat</p>	<p><u>BAP Priority Species – Herptiles</u> Slow-worm (population of County Importance) Grass Snake Great Crested Newt (population of County Importance) Common Lizard</p>
<p><u>BAP Priority species - Vascular Plants</u> Tubular Water Dropwort</p>	<p><u>BAP Priority Species - Invertebrates</u> Stag Beetle</p>
<p><u>Section 41 Species</u> Small Heath Butterfly – abundant, Stag Beetle, Great Crested Newt – population of county importance, Lesser Redpoll, Cuckoo, Lesser Spotted Woodpecker, Reed Bunting, Herring Gull, Spotted Flycatcher, House Sparrow, Tree Sparrow, Willow Tit, Bullfinch, Starling, Song Thrush, Lapwing, Large Heath Butterfly, Hedgehog, Polecat, Barbastelle Bat, Soprano Pipistrelle Bat, Noctule Bat, Brown Long Eared bat, Slow-worm, Grass Snake, Adder and Common Lizard.</p>	

SPECIES PRESENT ON LIMES LAND (*residents' photographs*)



Top row: yellow brain fungus, early bumblebee, buzzard, roe deer, lesser stitchwort

Bottom row: hypogymnia lichen, stag beetle, funnel cap fungi, native polecat, lateralis soldier beetle

Additionally, 22 tree and shrub species have been recorded within the ZOI, including a number of magnificent ancient or veteran *quercus robur* oaks, each supporting more than 2,000 organisms and 3 of them dated by the Biodiversity & Wildlife group to between 200 and 350 years old – also, as many as 6 medieval hedgerows dated by Hooper methodology<sup>5</sup> to between 400 and 600 years; with areas of bramble scrub known to support breeding nightingales under further threat from development.

5. Pollard, Hooper & Moore, 1974



Ancient and veteran trees, photographed in the ZOI: December 2019 habitat survey.

From an ecological viewpoint, the removal of 47 trees from the site to accommodate the proposed development is to be deplored. Also of serious concern to the NPSC in relation to

the applicant's previous and current mitigation strategy for ancient and veteran trees (the former heavily criticised by the Woodland Trust) is that it simply proposes to 'build around them', taking little or no account of the damage they must sustain from removal of topsoil, compaction of subsoil with heavy earth-moving equipment, destruction of the mycorrhizal fungi which link and support them, or the disruption of their water sources. The NPSC takes further issue with the identification of veteran and ancient trees in the applicant's recent SJA Trees Arboricultural Report (they identify 2 veteran and 2 ancient trees within the ZOI, with Ancient Tree Forum/Woodland Trust criteria<sup>6</sup> indicating 7 veteran and 3 ancient specimens); also with their root protection area allowances, which fail to meet current recommendations<sup>7</sup> in no less than 14 separate instances. The applicant's ecological consultants further underplay the detrimental impacts on connectivity, nesting birds, roosting and foraging bats which an 'infilling development' between ancient hedgerows would inevitably involve.

6. Lonsdale 2013; 7. Woodland Trust 2021

The wetland system of natural springs, ponds and ditches that crosses the site beneath the sandstone scarp, represents a valuable ecosystem in itself. Despite Ecology Solution's contradictory statements in their Assessment Report that on the one hand it *'does not contain significant aquatic vegetative growth'* and is *'generally void of any notable aquatic growth'*, and on the other that *'ditches require dredging due to vegetation,'* both ponds and ditches do demonstrably contain a rich assemblage of aquatic and marginal herbal species, including the discovery by an EPR ecologist in 2020 of the BAP Priority Species, tubular water dropwort.



Aquatic plant assemblage – in ponds: fine-leaved water dropwort, celery-leaved buttercup, water crowfoot, water violet. In ditches: hemlock water dropwort, water figwort and pendulous sedge.

For all the above stated reasons, Natural England has identified and designated Limes Land as a Network Enhancement Zone under the National Habitat Network, confirming recognition of the diverse habitat and range of protected species it supports, in line with the Government's '25-year Plan to Improve the Environment'. It's further evident that in the absence of a development application, this uniquely important site would more than meet the criteria for designation as a Local Wildlife Site or Natural England Nature Reserve.



# Tenterden Nature Recovery Partnership

## **Comments on Wates Developments Ltd/Judith Ashton Assc appeal APP/E2205/W/21/3284479**

In reviewing the Appeal submitted by Judith Ashton Associates on behalf of Wates Developments Limited, the comments below confine themselves to the Landscape, Arboricultural and Biodiversity arguments set out by the Appellant in section 7.5 (pages 33-43) of their Statement of Case for planning permission.

### 1. **NEGATIVE EFFECTS ON THE VISUAL LANDSCAPE** Sections 7.5.6 – 7.5.18 of the Appeal

The Appeal defends statements in the Landscape and Visual Appraisal (LVA) study attached to the application on the basis that the main negative impact of development would be confined to the western area of the site, which they imply to be less ‘critical’ visually than its eastern aspect. This involves a clearly biased value judgement suggesting it is more acceptable to compromise views of a timeless pastoral scene containing a variety of traditional landscape elements (e.g. unimproved grassland, undisturbed ponds and wetland, ancient hedgerows, with numbers of notable or veteran trees), than to disturb a more recently worked area of semi-improved pasture offering from one point on the public footpath a wider prospect.



Views of the western area of the site from the AB12 public footpath.

In 7.5.12, having acknowledged that the ‘highest levels of visual impact’ resulting from the proposed development would be from the AB12 PRoW looking west, the Appellant maintains that walkers would experience ‘enhanced habitats’ (involving wildflower seeding and the addition of an orchard in the extreme north of the site) when looking east – whilst ignoring the negative visual impact from that direction, or indeed from almost anywhere on the footpath, of a levelled football field and brick-built pavilion with car parking in place of former meadowland.

In 7.5.13 in addition to the visual impact of the development on footpath walkers (especially relevant in the event of the historical circular AB70 PRoW being approved by the Secretary of State), the Appellant acknowledges a 'major/moderate' effect on residents whose houses fringe it. But fails to mention that as many as 46 properties would be so affected.

Concluding arguments in support of the development in terms of its effect on the existing landscape, in 7.5.16 the Appellant refers to statements in their LVA that: *'The development would conserve and enhance the natural environment by protecting and reinforcing the existing hedgerow network and mature trees and creating extensive areas of new habitat.'* Also that: *'It sits sympathetically... having minimal effect on surrounding landscape, and also enhances the setting by creating a new country park to the east.'*

The former argument is at odds with Kent Wildlife Trust's objection to the application of 11th June 2021, which states unequivocally that the plan: *'will lead to a measurable net loss in biodiversity, in contravention of paragraphs 170 and 175 of the National Planning Policy Framework'* – while for the latter argument, it's disingenuous of the Appellant to claim that the addition of up to 145 houses, a sports pavilion and a football pitch will either 'minimally affect' the surrounding landscape or 'enhance its setting'.

## 2. ARBORICULTURAL IMPLICATIONS

Sections 7.5.19 – 7.5.37. of the Appeal

7.5.19-7.5.22 relate to the removal of a mature horse chestnut tree from the iconic avenue of trees which line the north-eastern approach to Tenterden along the Appledore Road and contribute so much to the town's green character. Or, in the words of the Kent Highways Services Tree Policy, *'form part of a feature, e.g. avenue that contributes significantly to the local amenity'*. The Appellant justifies the tree's removal as a 'least arboriculturally harmful' option – presumably on the assumption that a new entry road transecting the avenue is *essential* – claiming by a similar process of reasoning that its loss would have a 'minimal' or 'minor' visual impact. No reference is made to the vital importance of mature trees (as opposed to replanted saplings which take 30 years to mature) as agents of carbon sequestration – nor to the damage to root and mycorrhizal networks this tree's removal and the construction of a new roadway would inflict on its neighbouring chestnut (T44 on the arboricultural plan) and mature oak (T39).

7.5.23 confirms the proposed removal of 46 trees to facilitate the development, 5 of them assessed as Category B (i.e. 'of moderate quality or value capable of making a significant contribution to the area for 20 or more years') – plus 7 more groups of trees – plus 7 further groups of trees/hedgerows, many of the latter grown to a significant height and dated by Hooper methodology to 400-600 years old. The Appellant claims that such significant destruction amounts to 'less than 10%' of the trees on or adjacent to the site – a figure that's appreciably reduced by including trees on the Appledore Road, and presented as a virtue at a time when established trees rooted in undisturbed soil have never been more valued for their ability to absorb and store atmospheric CO<sub>2</sub>.

7.5.25 refers to the 'necessary' pruning of retained trees (i.e. those adjacent to housing), which again must threaten their ability to sequester carbon, or indeed survival long-term.

In 7.5.26 and 7.5.27 the Appellant implies that an 'ancient and veteran tree management plan' and the retention 'for the most part' of ancient hedgerows, will ensure the area can be developed 'without any adverse impact on the trees and landscape features within the

appeal site'. A claim based on the false assumption that the removal of topsoil, compaction of subsoil with heavy earth-moving equipment, destruction of vital mycorrhizal fungal networks and bacterial systems between the trees and hedges and the disruption of their water sources would not adversely affect their survival.

In 7.5.28–7.5.39 the Appellant devotes a great deal of space to criticising ABC's tree officer for on further consideration recording threats to numbers of trees overlooked in their previous application, and to lecturing him on the difference between veteran buffer zones and root protection areas. In their detailed defences of the current plan as it affects 2 trees in particular; an ancient field maple adjacent to the sports pitch in the proposed 'country park' (T381) and a veteran oak to the west of the site surrounded on all sides by housing (T312), the Appellant argues for 'morphing' or distortion of veteran buffer zones for both – ostensibly to reflect a 'guestimate' of where roots are likely to have developed, but in fact to avoid buildings in the one case and soil levelling/re-turfing in the other. In relation to the ancient field maple's affected RPA, they maintain to their own advantage but not the tree's that the species is 'good at tolerating root disturbance'.

From the Appellant's original Arboricultural Implications Report, it seems clear that many trees have been undervalued, with as many as 5 veteran and 1 ancient tree within the building zone misidentified against Ancient Tree Forum/Woodland Trust criteria, and as many as 14 RPAs miscalculated. When the developer's arboricultural plan is superimposed on their drainage plan, it's further obvious that proposed excavations of ponds and of *swales* (managed water run-offs) would cut right through the RPAs of at least 6 important English oak and maple trees (i.e. T87, T88, T89, T163, T164 and T313) in another clear miscalculation.

### 3. NEGATIVE EFFECT ON BIODIVERSITY Sections 7.5.40 – 7.5.53 of the Appeal

In these sections of the Appeal, the Appellant attempts to establish – against a great deal of well authenticated evidence to the contrary – that their development would not only 'avoid or minimise' potentially adverse effects on biodiversity, but would actually provide opportunities for Biodiversity Net Gain.

Against the statement in 7.5.41 that the site benefits from no statutory or non-statutory designation – in view of the unusually rich assemblage of protected species it's proven to support, there is every reason to believe it would more than qualify for designation as a Local Wildlife Site, Lowland Meadow Priority Habitat, possibly even as an SSSI, in the absence of an active planning application.

7.5.42 and 7.5.43 seek to 'mitigate through on-site measures' the additional pressures a major housing development and recreational 'county park' would place on the Local Wildlife Site and Ancient Woodland of Knock Wood, which adjoins the site to the north. How such measures could hope to control an influx of as many as 300 new residents is *not* explained.

7.5.44 and 7.5.45 state as fact that meadowland within the site is 'semi-improved grassland of varying quality, all of which is considered to be herb species-poor and as such of limited biodiversity value' – in contradiction of their ecologist EPR's earlier Ecological Assessment (ES), which recorded no less than 13 '*unimproved* grassland' vascular plant indicator species. The site is further characterised by waxcap fungi and

multitudes of anthills, both typical of unimproved grassland – which is now held to be of National and European significance and protected as a Habitat of Principal Importance under section 41 of the Natural Environment and Rural Communities Act. The distinction between semi-improved and *unimproved* grassland, which the Appellant attempts to confuse, is therefore of considerable importance.

Far from being of 'limited biodiversity value' or 'species-poor', in fact as many as 99 vascular plant species have been recorded for the site with the Kent and Medway Biological Records Centre (KMBRC), mostly during periods when it was heavily overgrazed with sheep. Its grassland actually supports large numbers of small mammals and reptiles, with KMBRC recorded assemblages of slow worms considered to be of county importance. As recently as spring 2021 the Appellant's new ecologist, Ecology Solutions, recorded 252 slow worms, 124 viviparous lizards and 6 grass snakes on the site, despite unusually cold and wet conditions.



Species-rich unimproved grassland and slow worm assemblage on site

7.5.46 In expressing an intention to retain and enhance habitats of greatest ecological interest, the Appellant states categorically that their development will be 'mostly contained to areas of lesser quality grassland located within the west of the site' – against all the ecological evidence of the largely unimproved grassland in the western sector being of greater value in terms of biodiversity than the semi-improved meadows to the east.

In 7.5.47 and 7.5.48 the Appellant claims that losses of habitat due to development will be 'more than mitigated' by measures including the provision of a country park with species-rich meadows, dedicated biodiversity ponds, and the 'enhancement and retention of multiple high quality hedgerows and treelines' – as if unaware that all these habitats are already in abundant existence without additional buildings or roadways to disrupt and separate them – or that further ecological enhancement of the site can and will be undertaken as part of ongoing local Nature Recovery initiatives.

In her objection to the development on 11<sup>th</sup> June of 2021, Kent Wildlife Trust Wilder Towns Manager, Nicky Britton-Williams, has drawn attention to discrepancies in the application's Defra Biodiversity Metric calculation, particularly in relation to their assessment of grassland (as in 7.5.46 above) – to conclude in the face of the Appellant's prediction of a net biodiversity gain 'in excess of the requirements of the Environment Bill', that the application should be refused on grounds of a '*significant measurable LOSS to biodiversity*'.

In 7.5.49–7.5.5 the Appellant's list of 'protected and notable species' omits a very significant number of animals. EPR surveys of the site for mammals were limited to bats,

hazel dormice and badgers, providing no reliable record of the 21 species logged with KMBRC, including 2 mammals protected under Section 41 of the NERC Act or as BAP Priority terrestrial species. At least 9 species of bat have been registered, including 4 BAP and Section 41 species. Also recorded for the site are 6 BAP Priority or Section 41 reptiles and amphibians (including assemblages of great crested newts of county importance) – plus 64 bird species, 17 of them ‘Red listed’ as of highest conservation priority, 15 ‘Amber listed’ and 12 protected under Section 41 – also 183 invertebrates including 2 Section 41 species.

In other words, the site supports – and sections 7.5.49-7.5.51 of the Appeal conceal – a quite unusually rich variety of ‘protected and notable’ animal species.



Protected species present : European polecat, spotted flycatcher, great crested newt, small heath butterfly.  
(Tenterden residents' photographs)

In 7.5.52 and 7.5.53 the Appellant summarises on the basis of their ES that, rather than proving ecologically destructive, the development will provide a mechanism whereby the nature conservation value of the site can be enhanced long-term – adding that the ‘harm’ asserted by local planning authorities in their rejection of the plan is ‘unjustified’.

The Tenterden Nature Partnership submits to the contrary that the Appellant has consistently misrepresented the true value of the site in terms of its contribution to the landscape and biodiversity of the town and parish. Considering the current climate crisis and acknowledged need for drastically reducing emissions, it should be noted that the Appellant has made no mention of the appreciable amounts of CO<sub>2</sub> which this development, involving the removal of large numbers of trees and shrubs, the disruption of ancient meadowland and wetland, and the dredging of ponds and ditches which have stored carbon over millennia, would release into the atmosphere. Nor of the effect of such ecological destruction on the site’s ability to sequester carbon in the immediate future. Nor of its immediate effect on a delicately balanced ecosystem proven to support a variety of already threatened species.

More than 530 objections to this second application for a major development on this ecologically important local site have been submitted. The people of Tenterden recognise its vital role in nature recovery, as a surviving area of wildlife-rich unimproved lowland grassland – more than 97% of which is believed to have been lost to our landscape over recent decades.

The Tenterden Nature Recovery Partnership (TNRP) is a voluntary group of Tenterden residents, working with the Kent Wildlife Trust and principles set out in Kent Nature Partnership’s Biodiversity Strategy 2020-2045, with the declared primary objective of halting the decline and reversing the current trend of habitat and species loss, to ensure that the parish of Tenterden is in a favourable, resilient condition with key habitats and species flourishing.



## Climate Change Input into Pre-Application Meeting

### **Creating a Checklist to Mitigate Impact on Climate Change**

- A. Promote sustainable development: It is essential for developers and local planning authorities (LPAs) to ensure that new homes are constructed in a sustainable and environmentally responsible manner. This entails reducing carbon emissions, enhancing energy efficiency, using renewable energy, quality living conditions and sensitive to the environment. By setting specific, measurable targets, developers, LPAs, and the broader community can work together to ensure that new housing developments meet the highest environmental standards and help fight climate change.
- B. Enhance transparency and accountability: A measurable checklist fosters transparency and ensures accountability. It empowers developers and LPAs to demonstrate their commitment to sustainability to the community.
- C. Set ambitious yet achievable targets: The checklist below includes ideal targets, many of which are easily achievable, while others will require more consideration. The LPA and developer to review each item on the checklist and set challenging, innovative, and achievable targets that demonstrate their commitment to sustainability and their green credentials.

### **Some Key Measures for New Builds Satisfying Climate Change Legislation and Needs**

Ideally, each measure on this checklist should have a target measurement to determine the developers' success in minimising climate change.

### **Design Resilience**

1. Design homes to be resilient to extreme weather events, such as flooding or heatwaves.
  - Design resilience objectives for new dwellings should be set to ensure that buildings are able to withstand the impacts of climate change, such as more extreme weather events of greater intensity of heat and rainfall. This will help to protect the safety and well-being of occupants, and reduce the costs of damage and repair.  
Some key design resilience criteria for new dwellings should include:
    - Structural resilience: Buildings should be designed to withstand the increased wind speeds and rainfall intensities associated with climate change. This may involve using stronger building materials and construction methods, and designing buildings to be more aerodynamic.
    - Flood resilience: Buildings should be designed to be resilient to flooding. This may involve using flood-resistant building materials and construction methods. Must be able to withstand a flood event in accordance with the latest climate change projections.
    - Heatwave resilience: Buildings should be designed to be resilient to heatwaves, which are becoming more frequent and severe due to climate change. This may involve using shading and insulation to keep buildings cool, and providing adequate ventilation. Must be able to cope with heatwave of at least 35 degrees Celsius for three consecutive days.

## Climate Change Input into Pre-Application Meeting

- Water resilience: Buildings should be designed to be water-efficient, and to be able to cope with water shortages due to climate change. This may involve using rainwater harvesting systems and water-saving fixtures.
- Energy resilience: Buildings should be designed to be energy-efficient, and to be able to generate their own renewable energy. This will help to reduce greenhouse gas emissions and make buildings more resilient to power outages.

### **Health and Wellbeing**

2. Buildings should be designed to promote the health and well-being of occupants, by providing access to natural light and fresh air, and by creating comfortable and productive spaces.

- Measurement: All new homes must have at least two hours of direct sunlight per day in the main living areas, and they must have a minimum air ventilation rate of 15 cubic meters per hour per person.

3. Incorporate effective ventilation systems for good indoor air quality.

- Measurement: All new homes must have a mechanical ventilation system that is capable of providing a minimum air ventilation rate of 15 cubic meters per hour per person.

4. Develop community allotments and other shared spaces where residents can grow their own food. Target: Develop at least one community allotment or other shared space for growing food per 50 homes.

### **Energy Efficiency**

5. Adopt Passivhaus holistic approach to sustainable building that promotes energy efficiency, renewable energy, sustainable building materials, healthy indoor air quality, and reduced carbon emissions.

- Measurement: All new homes must be designed and built to Passivhaus standards.

6. Adopt Passivhaus buildings designed to maximise natural light exposure.

- Measurement: This is achieved through careful site selection and building orientation. South-facing windows are ideal for passive solar heating, as they allow sunlight to enter and heat the building during the winter months. East- and west-facing windows are also beneficial, as they provide natural light in the morning and evening. Plant trees and other vegetation to provide shade and reduce heat island effects for each dwelling including community gardens and other shared spaces.

7. Reduce carbon emissions from new homes by at least 75% by 2025.

- Measurement: All new homes must have an energy performance rating (EPC) of A.

8. Require all new homes to be zero-carbon ready by 2025.

- Measurement: All new homes must be designed and built so that they can be easily converted to zero-carbon operation in the future, with minimal additional cost or disruption.

9. Mandate the use of renewable energy sources for new homes, such as solar panels and heat pumps to, maximise energy efficiency.

## Climate Change Input into Pre-Application Meeting

- Measurement: All new homes must have a renewable energy system installed that is capable of generating at least 50% of the home's annual energy needs. Solar panels and EV charging points as standard. Electric heat pumps rather than gas boilers as standard. No gas on the development. To future proof homes, all to have 3-phase electricity supply.
10. Install energy-efficient windows and doors.
- Measurement: All new windows and doors must have a U-value of 0.8 W/m<sup>2</sup>K or lower.
11. Improve energy efficiency standards for new homes by 20%.
- Measurement: The average energy performance rating (EPC) of new homes must be increased by 20% compared to current standards.
12. Where possible, incorporate renewable energy generation into the design of the estates.  
Target: Install renewable energy systems with a capacity to generate at least 20% of the estate's annual energy needs. Measurement: Measure the capacity of the renewable energy systems installed.

### **Sustainable Building Materials**

The building and construction sector accounts for 38% of global carbon dioxide emissions, according to the United Nations Environment Programme (UNEP). This includes emissions from the production of building materials, the construction process, and the operation of buildings. UNEP also estimates that embodied carbon in buildings, or the carbon emissions associated with the materials and construction processes, accounts for about 11% of global emissions.

13. Use recycled materials in at least 50% of the construction of new homes.
- Measurement: At least 50% of the building materials used in the construction of new homes must be recycled or reclaimed. Use sustainable building materials and minimise the use of UPVC and mass concrete.
14. Select building materials and paints with low VOC (Volatile Organic Compounds) emissions.
- Measurement: All new building materials and paints must have a VOC content of 50 grams per litre or lower.
15. Use sustainable building materials and construction methods.
- Measurement: All new homes must be constructed using sustainable building materials and methods, such as those certified by the Cradle to Cradle Products Innovation Institute.

### **Water Efficiency**

Kent is experiencing acute water shortages due to a number of factors, including over-extraction of groundwater, housing growth, lack of investment in water infrastructure, and increased water demand due to climate change. It is essential all new developments put in holistic set of water efficiency measures to reduce water demand.

16. Design homes to be water-efficient.

## Climate Change Input into Pre-Application Meeting

- Measurement: All new homes must have a water efficiency consumption of a maximum of 105 litres per person per day (lppd)
17. Install water-saving fixtures such as low-flow toilets and faucets.
- Measurement: All new toilets and faucets must have a water flow rate of no more than 1.28 gallons or less per flush.
18. Consider rainwater harvesting for landscaping and non-potable water use.
- Measurement: All new homes must be designed to incorporate a rainwater harvesting system that is capable of collecting and storing at least 50% of the annual rainfall and comply with BS 8515:2009.
19. Allotments should have underground cisterns (reservoirs) installed to store harvested rainwater.
- Measurement: Allotments must be able to rely on harvested rainwater for three months of the year. The rainwater must be filtered to remove sediment and debris, and stored in underground cisterns that can be pumped out by residents for the use growing vegetables.

### **Biodiversity**

20. Plan landscaping that supports local wildlife. Target: Plant at least 50% native plants in the landscaping.
- Measurement: Count the number of native plants planted.
21. Provide a wide range of habitats (new and existing) for biodiversity.
- Measurement including green spaces, wild areas, water, with wild flowers, tree planting and keeping of as much of the flora and fauna on the site as possible (especially hedges and trees).

### **Transportation**

22. Active travel plan (easy/ safe/ pleasant cycling and walking routes) that connects with the exiting town routes.
- Measurement. Present and consult on the active travel plan with the community.
23. Provide residents with access to public transportation within 0.5 miles of their home.
- Measurement: All new homes must be located within 0.5 miles radius of a public transportation stop. Measurement: Measure the distance of each home to the nearest public transportation stop.
24. Provide residents with access to sustainable transportation options, such as electric vehicle charging stations.
- Measurement: Install at least one electric vehicle charging station per dwelling.

### **Waste Reduction**

25. Minimise waste and pollution. Target: Reduce waste production by 10%. Measurement:
- Measure waste production before and after implementing measures to reduce waste.

## Climate Change Input into Pre-Application Meeting

### **Surface Water Flooding**

26. Design and implement SuDs (Sustainable Drainage Systems) to manage rainwater and surface water runoff.

- Measurement: Slow down the flow of rainwater using swales, detention basins, and rain gardens giving more time to soak into the ground or evaporate. Increasing the storage capacity for rainwater: Increase the amount of rainwater that can be stored on-site, which will reduce the amount of runoff that enters the sewer system. This is especially important during periods of heavy rainfall.

27. Minimise the amount of paving and hardscaping.

- Measurement: No more than 50% of the total surface area of the development should be paved or hardscaped. Measurement: Measure the total area of the development and the area of paved and hardscaped area.

### **Community Engagement**

28. Engage with the local community to discuss climate change measures to gain their support.

- Measurement: Hold regular public consultation meetings to discuss the housing development mitigation actions with Tenterden Town Council Climate Action Advisory Group and the local community and to address any concerns. Measurement: Hold at least four public consultation meetings in 2024 to get feedback on our climate change action plan and to answer any questions they have. Document the dates and times of the meetings.

**Fwd: Land Between Appledore Road and Woodchurch Road Planning Application  
21/00790/AS Reserved Matters URGENT**

Albert Poole [REDACTED]

Sat 04/11/2023 16:49

To: Town Clerk <townclerk@tenterdentowncouncil.gov.uk>

Cc: Deputy Town Clerk <dte@tenterdentowncouncil.gov.uk>

Dear Debbie

Following a recent response from Mark Davies of ABC regarding the nature of the Pre Application meeting I have sent the following comments regarding the Pre Application Report as it affects our properties.

Please can you circulate it to Councillors and specifically those attending the meeting. I would like these issues addressed.

Also, I remember that you stated that an officer would be present to take notes. Is this still the case?

Regards

Albert Poole

Begin forwarded message:

**From:** Albert Poole <[REDACTED]>

**Subject:** Land Between Appledore Road and Woodchurch Road Planning Application 21/00790/AS Reserved Matters URGENT

**Date:** 4 November 2023 at 16:43:48 GMT

**To:** Mark Davies <[mark.davies@ashford.gov.uk](mailto:mark.davies@ashford.gov.uk)>

Dera Mark

Thank you for the information regarding Flooding and Drainage Condition 25 referred to in Vistry Pre Application Report.

I note that there is to be a drainage report.

However, I have looked at the Pre Application Report by Savills and I wish to comment on a number of Paragraphs in relation to Rose Cottage and Marne House on the southern boundary, which you know are closest to the site. I know that this will be subject of the Pre Application Meeting.

**Layout**

Para 4.3 states:-

'The proposed development has been naturally divided into development parcels by retaining the existing hedgerows on-site and landscape features.'

The bizarrely called Tree Protection Plan shows a 30 metre removal of hedgerow north of the boundary of Rose Cottage including mature trees 309 and 310 to accommodate the main road around the site. This should be addressed. There are

other parts of this hedgerow which would create a more natural break in this hedgerow without loss of mature trees.

Para 4.4 states:-

'A green buffer has been retained around the edge of the proposed development in order to maintain a more open feel for existing nearby residents.'

This is clearly not the case for our properties with the Proposed Roadway, footpaths and parking spaces overlooking our rear garden private space.

### **Parking**

Para 4.8 states:-'Parking is provided on plot for the dwellings. As can be seen from the submitted plans, dwellings will typically have two off street parking spaces, with larger dwellings also having garages. The proposal also includes 45 visitor parking spaces across the site. More detail can be found on the submitted parking strategy plan.'

The visitor parking shows 2 spaces immediately adjacent to Marne House, overlooking my grandchildrens play space.

This cannot be acceptable. Also any construction of these spaces will impact on the root protection area of Protected Oak tree 313.

This has been continually underestimated by Wates and has been notified to Phil Cook.

### **Public Rights of Way**

Para 4.14 states:- 'As well as retaining the existing PRoW, the proposed development includes additional public accesses across the site. This will create a pedestrian friendly and easily accessible development site.'

This may well be pedestrian friendly, but given that part of the current proposed design shows a footpath overlooking the rear gardens of Marne House and Rose Cottage it is not resident friendly. During the footpath inquiry for AB70 KCC made it clear that any footpath through the proposed development would not be allowed past rear gardens if the Footpath was accepted. It is important to note the proposed mown path north of Rose Cottage is through the natural water course which floods in winter. This ditch has to be retained as separate to the SUDS system. This was agreed at the Planning Inquiry. This proposal is flawed and unnecessary.

The Planning Inspector in his decision referred to buffers thus:-

81. 'I am satisfied that the proposal would provide a wide enough buffer zone between the proposed dwellings and the rear of existing dwellings that would enable sufficient space for landscaping to be provided to ensure that the living conditions of existing residents would not be unacceptably compromised, given that the proposed details have not been finalised.'

Note this is a general comment on the proposal, but is caveated subject to reserved matters. The Pre Application layout shows large buffers around the site except those adjoining Road Cottage and Marne House.

There is sufficient land in the proposed development area to design this estate without causing significant intrusion on our privacy, security and amenity. This Pre Application meeting is an opportunity to rectify this situation.

I have to assume that the design of buffer adjoining Rose Cottage and Marne House is an inadvertent error by the design team in that they have failed to note the proximity of these features to our properties for privacy, amenity and security. The impact on the hedgerows and Protected Oak Tree has not been assessed. They have failed to recognised the relationship between the natural water courses/ditches, which leads me to believe that this area of the site has not been visited by the designers and should be.

I have major concerns that the level of scrutiny given to large sites is far less that afforded to individual planning applications. In this instance I believe there has been a serious omission in this design as it affects Rose Cottage and Marne House. I have raised these issues throughout the process going back to 2017 and will continue to press until some action is taken.

Apologies for the delay with these comments, but this is in response to the information you sent on Friday 3rd November.

Hopefully these issues can be addressed at the meeting.

Regards

Albert Poole



## Pre-Application Comments

John Crawford [REDACTED]

Sun 29/10/2023 11:04

To: Town Clerk <townclerk@tenterdentowncouncil.gov.uk>

Cc: Siggie Nepp [REDACTED]

Debbie,

Please find below some addition comments that I wish shared at the pre-application meeting.

Thnaks.

John

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### **Vistry Pre-Application Document**

#### **Layout**

A considerable number of dwellings have their gardens in the front of the house, which removes any privacy for relaxation, children to play, family events and hanging out the washing, without being seen by the adjoining neighbourhood. This does not make for a harmonious environment. To say the gardens meet technical compliance is misleading and should not be allowed. The aim must be to have the gardens at the back of the dwellings to provide the expected privacy.

On page 18 figure 3.2, the layout shows a footpath going right through the ancient southerly “ridge and farrow” which is totally unacceptable. Historic sites must be fully protected. Confirmation is required this will **not** happen.

#### **Existing Character**

Assuming the Wates planning statement to the Appeal of 5.41ha (13.37 acres) as the developable area has not changed, this creates a density of just over 26 dwelling per hectare. If Vistry wish to ensure the proposed density is commensurate to those build on Appledore Green (Redrow Development), then it is suggested the maximum should be changed to a maximum 102 dwelling development. This is density still considerably higher than those houses adjoining the site on Woodchurch Road and Appledore Road with the density of low teens.

#### **Development Character**

The mix of market and affordable housing should **not** be different in quality to avoid any stigma for those living in affordable homes.

Good news to see bungalows have been included, which will be popular with the elderly and the less mobile residents.

#### **Flooding Management**

There is a history of serious surface water flooding, which has been under recorded and not understood. The government surface water map [Learn more about this area's flood risk](#) shows some of the issues. Residents need to be convinced that the flood management system to be implemented will take into account the existing issues and the serious impact of climate change seen over the last 12 months on unprecedented flooding, as per Section 14 of the September 2023 NPPF.

**Learn more about this area's flood risk**

Check your risk of flooding and use flood risk maps

**Footpaths**

By the Tenterden Golf Course there is an existing PROW onto the Woodchurch Road. It would be advantageous to construct a footpath through the country park so there is a connection.

**Biodiversity**

No mention has been made how the loss of biodiversity will be recovered with a required net gain, as per Section 15 Conserving and Enhancing the Natural Environment September 2023 NPPF and other legislation. It is critical to put in place an ongoing measurement system to show the developer has discharged their responsibilities.

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Evening,

I would like to submit the following comments/concerns i have regarding the Land between Woodchurch Road and Appledore Road development and the boundary bordering my property. Please see the attached image which highlights the boundary being referred to and questions on various topics as follows:

### **Boundary Maintenance**

Who will be responsible for maintaining the boundary perimeter?

The current boundary is a mixture of tree and hedgerow growth which will need upkeep.

An increased natural fenced buffer would be preferred and would also help increase the security.

### **Security**

There is additional concern that the sports facilities being close to the boundary and increased public footfall with the country park will attract potential trespassers or other unwanted activity. Will there be security measures in place for the facility?

My bordering property is a working farm with livestock in the fields upon the boundary to the any trespass by people or animals can be damaging, we have had multiple incidents over the years with the border with the land as it currently is.

### **Light Pollution**

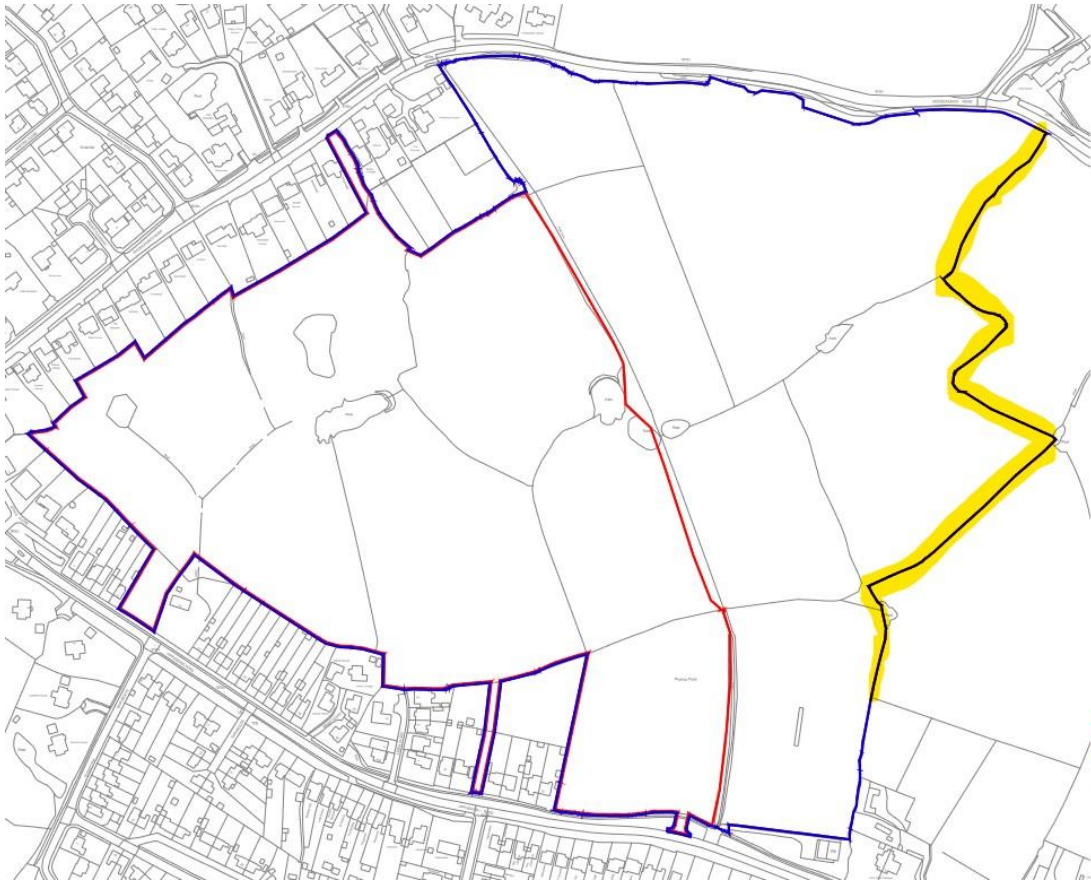
It is not clear from the plans if there will be any lighting for the sports fields/facilities which border our property.

Any lights facing towards our property are unwanted, floodlighting especially is disruptive to both residents and animals upon the farm.

I would like to be provided some details on who best to contact from 'Vistry' or a town council contact to discuss further.

Additionally a site visit by a representative for the development would be beneficial to discuss and point out concerns along the fence boundary itself.

Regards,  
Mr Michael Millen



Key  
P1 Site Boundary  
30.72Acs / 12.433ha  
Outline Site Boundary  
60.157Acs / 24.837ha  
shrs@verdc  
sh@pace.sharpens.com/str



04.07.23

Evening,

I would like to raise the following comments on the development.

It is highlighted in the plans that there are now going to be a percentage of affordable properties. More affordable housing in the local area is great news and very much needed. However my question/concerns are as follows:

Will it genuinely benefit the local needs? Will there be any priority to apply for the housing for people with a connection to the local area?

I am currently living locally with family myself with the aim to purchase a property in my home area but all recent developments in the Tenterden district have been very limited in affordability and so high in demand that cash buyers from outside the area quickly reserve them off plan. Starting families/younger people in the town are forced to look elsewhere.

Thanks,  
Mr Thomas Millen

## **John Crawford**

### **New Planning Condition for Country Park Management Plan**

Management plans for country parks play an important role in ensuring these valuable assets are managed sustainably and for the benefit of all users.

A country park management plan is a dynamic document that should be regularly reviewed and adapted to changing circumstances, emerging challenges, and new opportunities. It serves as a guide for park managers, local authorities, and the community to ensure that the country park is well-maintained and benefits both the environment and the people who use it.

This has to be produced by Vistry and consulted with the community who are the prime users as they are the ones who use the park and who will be affected by its management.

Thereafter for the LPA to approve.

In essence a management plan for a country park is a document that sets out how the park will be managed over a period of time. It typically includes the following:

- Detailed description of the park's physical, ecological, and cultural attributes.
- Maps and site plans
- A vision for the park, setting out what the park should be like in the future.
- Explanation of the legal and regulatory framework governing the country park, including any relevant laws and bylaws
- Objectives for the park, which are specific and measurable goals that will help to achieve the vision.
- Description of how the local community, visitors, and other stakeholders are engaged in park management decisions and planning
- Actions that will be taken to achieve the objectives.
- A timeline for implementation of the actions.
- A monitoring and evaluation framework to assess the progress of the plan and to make necessary adjustments.
- Protocols for ensuring visitor safety and well-being.
- Emergency response procedures.

Management plans for country parks should cover a wide range of issues, including:

- How it will comply with the 1968 Countryside Act
- Conservation and management of natural habitats and species
- Provision of recreational opportunities for visitors
- Education and interpretation of the park's natural and cultural heritage
- Management of visitor facilities and infrastructure
- Financial planning and budgeting
- Strategies for generating revenue, including grants, donations, and fees

Procedures for regularly consulting with the public and stakeholders and for reviewing and updating the management plan as needed to ensure that they remain relevant and effective.

Here are some examples of specific actions that might be included in a management plan for a country park:

- Restore degraded habitats due to the development of 141 dwellings.
- Plant native trees and shrubs to improve biodiversity.
- Create new walking trails and cycle paths.
- Build new visitor facilities, such as toilets and cafes.
- Organise educational events and activities for visitors.
- Monitor the populations of key species, such as birds and pollinators.
- Collect data on visitor numbers and preferences.

### **New Planning Condition for Football Management Plan**

A management plan for a new site for football pitches and a pavilion should be a comprehensive document outlining the goals, objectives, and strategies for the development, operation, and maintenance of the facility, including the safety and satisfaction of users.

It should be developed in consultation with the community, local stakeholders, and governing bodies to ensure that it meets the needs of all users and is aligned with local and regional planning policies.

This has to be produced in consultation and consulted with the community who are the prime users as they are the ones who use the football pitches and who will be affected by its management.

Thereafter for the LPA to approve.

The management plan should include the following key elements:

- Site description including its location size, topography, existing features, and any constraints
- A clear and concise statement of the vision and mission for the facility, including its purpose, values, and goals.
- An up to date assessment of the needs of the community and local stakeholders for football pitches and pavilion facilities, including demographics, participation rates, and demand for different types of facilities.
- A detailed design for the facility, including the layout of the pitches, pavilion, and other associated infrastructure.
- A plan for the operation and maintenance of the facility, including staffing, funding, and scheduling.
- A plan for engaging with the community and local stakeholders throughout the development, operation, and maintenance of the facility.

The management plan should also include specific objectives and strategies for the following areas:

- Pitch development plan should outline for the development and maintenance of the football pitches, including the type of surface, drainage system, and irrigation system.
- Pavilion development should outline the plan for the development and maintenance of the pavilion, including the size, layout, facilities, and amenities.

- Access and parking should provide detailed plans for providing access to the facility, including public transportation, parking, and pedestrian and cycle paths.
- Programming and events should outline the plans for programming and events at the facility, including football matches, tournaments, training sessions, and community events.
- Sustainability should outline the plans for making the facility sustainable, including energy efficiency, water conservation, and waste management.

Additional considerations for a management plan for a new site for football pitches and a pavilion:

- The management plan should identify the sources of funding for the development, operation, and maintenance of the facility. This may include government grants, and user fees.
- The management plan should identify potential partners such as local sports clubs who can help to develop the facility.
- The management plan should identify and mitigate any potential risks to the facility, such as vandalism, theft, and injuries.

By taking a comprehensive and strategic approach to management, local authorities and governing bodies can ensure that new football pitches and pavilions are developed and operated in a way that meets the needs of the community and provides a lasting legacy.

The management plan should be regularly reviewed and updated to ensure that it remains relevant and effective. This should be done in consultation with the community, local stakeholders, and governing bodies.