

**Woodchurch Parish Council Comments on
Planning Application 21/01284/AS**

Outline planning application with all matters reserved except for access into the site - For the erection of up to 40 dwellings (including affordable housing), structural planting and landscaping, informal public open space and children's play area, surface water flood mitigation, vehicular access point and associated ancillary works

Objection

The Woodchurch Parish Council (PC) object to the above outline planning proposal.

We note that the current outline planning application has all matters reserved, except for access. In the absence of detailed planning information (which we understand will be the subject to a later stage application for ABC approval), the Woodchurch Parish Council's objection consequently focuses on those elements associated access, as summarised as follows:

- Significant land take in excess of the Policy S40 site
- The large number of dwellings (40) proposed and associated access roads
- Departure from the ribbon development layout that currently exists along the western edge of Frond Road
- The use of a single access road to enter the proposed development area
- The dangers of the single access road, aligned on a blind bend along Front Road
- The dangers of a steeply graded access road
- Access road adoption within the proposed development and the potential cost implications to future residents
- Concerns with development access to Woodchurch village's foul water drainage system and plans to address its current inadequate capacity
- Access road runoff and storm water flood mitigation
- As this is a major potential development for Woodchurch, the requirement for additional design information and further community consultation between villagers, the developer, Southern Water, ABC and other associated parties.

Each of the above bullet points are justified within the following paragraphs:

1. The proposed 2.25ha development area extends to the west, significantly beyond the environs of the 0.6ha site, as presented in Policy S40 (ref: ABC's Ashford Local Plan 2030, adopted 2019). This is a potential overdevelopment of dwellings and roads by some 375%.
2. Some 40 dwellings are proposed, suggesting an average net density for the residential development as 30 dwellings per hectare (dph) (ref: Para 5.3, Design & Access Statement, CSA Environmental, 29/03/21). Policy S40 (Clause 4.385), states that a low density is preferred (<14dph) in order to respect the rural setting. A dense, urban type residential layout with associated access roads, consequently does not respect Woodchurch's rural setting within that location.
3. Along the western periphery of Upper Road, ribbon development predominates. The previous application (17/01912/AS) on the S40 site respected this concept and proposed 10 dwellings with three new shared access drives. However, the developer at that time,

Southern Space Limited, did not progress their approved development and the planning consent was “finally disposed of” by ABC on 3rd July 2020. The current applicants, Gladman Developments Ltd., proposal is not consistent with the current linear building line within that part of Woodchurch, and suggests only one access road for the whole of their proposed new development, which is considered inappropriate by the WPC and village residents.

4. The proposed location of the single access road is centred on an existing field gate (overgrown) and on a blind bend. Policy S40, Para 4.388, states that *“the main vehicular access will be provided on Front Road as shown on the policy map, however, access to properties fronting the road may be achieved individually if this does not require significant hedge loss”*. The policy map does not indicate an access road location. A single access concept at the proposed location is considered dangerous with respect to village road safety.
5. The preliminary design of the single access road (Ref: Figure 5.4: Design & Access Statement, CSA Environmental, 29/03/21), confirms that the site is elevated above the adjacent invert of Front Road (by approx. 1.0m to 1.5m). The arrangement is consequently considered to be potentially problematical with respect to its location (on a blind bend), cut/fill design, sightline and longitudinal profile. Its frequent use by the residents of up to 40 dwellings, especially during wet and slippery conditions, could potentially be dangerous to both drivers and pedestrians alike.
6. It is not clear if the access roads will be adopted by KCC Highways. If not, their maintenance costs will add an increased financial burden on residents, especially those in the proposed 16 no., Social, Affordable or Intermediate Rent dwellings.
7. While the foul water reticulation design is accepted to be a reserved matter, its access and consequent interface with Woodchurch’s existing sewerage system together with its capability to safely manage increased flows, is acknowledged to be a problem that requires urgent resolution.

The 17/01913/As Planning Committee report (Ref ABC – Report of Head of Development Management and Strategic Site Planning Committee, dated 12th December 2018), stated that for only 10 houses that *“there is an increased risk of flooding unless any required network reinforcement is provided by Southern Water.....Southern Water and the developer will need to work together in order to review if the delivery of the network reinforcement aligns with the proposed occupation of the development, as it will take time in design and delivery”*. ABC’s Development Control Manager in their earlier letter to the Developer Services at Southern Water (Ref ABC letter PLAN-021483 dated 08/02/18) also stated that for 10 dwellings *“Southern Water currently cannot accommodate the needs of this application without the development providing additional local infrastructure. The proposed development would increase flows into the wastewater sewerage system and as a result increase the risk of flooding in and around the existing area, contrary to paragraph 109 of the National Planning Policy Framework”*. No proposals, designs or suitable additional network reinforcement information has been presented for the Woodchurch Village to date, by either the developer or Southern Water.

The Woodchurch PC consequently request that the current outline planning application is not approved due to the lack of this reassurance.

8. The preliminary development layout design suggests that where appropriate, runoff water from properties and the access roads will ultimately report to a “Sustainable Drainage” basin to be located within the SE low point of the site. It is currently unclear as to how this will scheme will work. The Woodchurch PC consequently have a number of concerns that we would like to see addressed:

- a. How will efficient access road drainage be achieved without local flooding onto Front Road, especially in those areas that do not drain to the basin;
- b. Basin drainage (other than evaporation from the pond) during periods of high rainfall i.e.
 - i. In the absence of an intrusive geotechnical investigation and lab analysis, an assumption that excess water will drain into the ground is erroneous as it is known that low permeability clays are evident within that area.
 - ii. No emergency spillway is indicated, as such local flooding will potentially occur.
 - iii. The developer’s ABC planning application form states “Yes” in reply to the Section 11 question, Assessment of Flood Risk, “*Is your proposal within 20 metres of a watercourse (e.g., river, stream or beck)?*”. This reply is misleading as no river, stream or beck is known to be within 20 m of the proposed site to safely facilitate the free discharge of excess waters from the proposed basin.

9. In response to ABC’s pre-application letter (Ref ABC Planning and Development, Ref 19/00293/INF dated 20th October 2020), the Woodchurch PC wish to thank Gladman Developments Ltd., for initiating community involvement. However, due to the pandemic being at its height, only a limited community engagement was undertaken at that time in the form of a short leaflet drop (requesting specific input on the developer’s preliminary proposals), and the setting up a comment’s website portal. No significant project details were presented to the community. The Woodchurch PC consequently undertook an independent consultation which ended on the 16th November 2020. The survey was delivered to over 800 houses within the Woodchurch village area, of which 122 responses were received. The results of the survey were published in full in the December 2020 Community Newsletter. The survey asked the village residents for their views in four key area:

- a. Their view on the Gladman proposal as outlined in the Gladman Web site at that time:

Strongly Support	1 %
Somewhat Support	12 %
No Preference	0 %
More info required	8 %
Somewhat Object	11 %
Strongly Object	68 %

- b. The types of additional housing that the village feels it needs:

Housing Association	25 %
Flats or apartments	8 %
1 bed houses	19 %
2-3 bed houses	38 %
4 bed houses	6 %
5-6 bed houses	4 %

c. The maximum number of additional houses that should be permitted on this plot:

Up to 10	72 %
11 to 20	16 %
21 to 30	9 %
31 to 50	3 %

d. In their own words to give their reasons for responding to the questions in the way that they did. These responses were both summarised and grouped in the survey results publication, as well as the individual responses being published in full.

10. With the easing of restrictions, the community can now potentially meet in open forum (while ensuring accord with the appropriate Government health advice). It is consequently suggested that as the development proposal has the potential to significantly impact Woodchurch, a village meeting between Gladman's, Southern Water, ABC Planning, Woodchurch PC and the local Community is organised.

Woodchurch Parish Council.

20th August 2021.