

## **Objection to Policy C4S(008) – The Lodge**

On behalf of Mr and Mrs A Barr of Barty Farm, Roundwell, Bearsted, please find below a detailed objection to the proposed allocation of land at The Lodge for a Gypsy and Traveller Site Allocation reference C4S(008). As well as residing at Barty Farm, the objector farms the land surrounding the allocation.

A strong objection is raised to the allocation on a number of grounds, these objections are considered against the national planning guidance provided both by the National Planning Policy Framework (NPPF) and by the Planning Policy for Traveller Sites (December 2024) (PPTS).

In considering this matter strong regard must be given to the approach to all development required by the NPPF. The NPPF requires all new development to achieve sustainable development in terms of three overarching objectives; economic, social and environmental. Against these requirements the site should not be regarded as a sustainable location and the submitted draft site allocation is considered to have a number of significant deficiencies against each of these objectives.

In terms of the economic objective, it is not considered that this land is in the right place to support the kind of growth required. Secondly, the site is considered to fail to provide the appropriate level of suitable access to the services and facilities required to support the allocation and thirdly the environmental impact of developing this site to meet the requirements of the proposed allocation would result in significant harm to the natural resources of the area.

In terms of national guidance set out in the Planning Policy for Traveller Sites (December 2024) (PPTS) it is a requirement of site provision that the local planning authority is required to both enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure; and to have due regard to the protection of local amenity and local environment. Assessing the allocation against these requirements it is considered that the site fails to adequately achieve these requirements.

Furthermore, alongside the NPPF, the PPTS also requires Local Planning Authorities to ensure that traveller sites are sustainable, economically, socially and environmentally. In addressing this matter the PPTS further requires that the policies put forward by the Local Planning Authority achieve the following:

- a) promote peaceful and integrated co-existence between the site and the local community;
- b) promote, in collaboration with commissioners of health services, access to appropriate health services;
- c) ensure that children can attend school on a regular basis;

d) provide a settled base that reduces both the need for long-distance travelling and possible environmental damage caused by unauthorised encampment;

e) provide for proper consideration of the effect of local environmental quality (such as noise and air quality) on the health and well-being of any travellers that may locate there or on others as a result of new development;

f) avoid placing undue pressure on local infrastructure and services;

g) do not locate sites in areas at high risk of flooding, including functional floodplains, given the particular vulnerability of caravans; and

h) reflect the extent to which traditional lifestyles (whereby some travellers live and work from the same location thereby omitting many travel to work journeys) can contribute to sustainability.

In addition, when assessing the suitability of sites in rural or semi-rural settings, local planning authorities should ensure that the scale of such sites does not dominate the nearest settled community.

Considering the draft allocation C4S(008) against this national guidance it is clear that the allocation has a number of significant deficiencies.

Firstly, in terms of accessing the site at The Lodge is accessible solely from Water Lane, this is a narrow single carriageway unclassified road. It provides no direct access to public transport. Along its length is significant evidence of damage to verges, banks and hedges as a result of cars overrunning the edge of the carriage way. The provision of residential accommodation on this site would significantly increase the number of vehicles using Water Lane, which in turn would significantly increase the amount of environmental damage being caused by vehicles. The road is also restricted to the south by a tunnel under the railway that limits the size and height of vehicles that can reasonably access the site from the direction of Bearsted, which would be the likely direction for arriving and departing the site. Water Lane is also restricted to a lesser extent by railway and motorway bridges to the north.

Access is not therefore regarded as suitable for intensified residential use, including for a significant increase in commercial vehicles and private vehicle movements that the allocation would inevitably cause. The access via Water Lane is not suitable for moving touring caravans in and out of the site let alone larger static caravans which would need to be delivered and replaced from time to time.

Water Lane to the south would be the recognised route for future residents to be able to access services and facilities and to link with the wider road network suitable for access further afield. In addition to its width, the roadway offers no refuge for pedestrians. It is also unlit, which would increase the risk to pedestrians, at night and whilst using the tunnel. The route is not safe for children for walking to and from

school. The nearest services accessible via this route would be in the centre of Bearsted, near the Green. This is a distance of over 1200 metres, far in excess of the generally accepted 800 m walking distance up to which it would reasonably be expected that a person would be willing and able to walk as set out in the Active Travel England Standing Advice Note: Active Travel and Sustainable Development June 2024.

Specific facilities are the following distances from the site as identified by Google Maps;

- The Oak on the Green PH – 1.12 km / 16 min walk
- Holy Cross Church – 1.6 km / 23 min walk
- Shops at The Parade, The Green – 1.3 km / 19 min walk
- Railway Station 1.6 km / 21 min walk
- Thurnham C of E School 2.25 km / 33 min walk
- Roseacre Junior School 2.2km / 32 min walk

As a result of both the nature of Water Lane and the distances involved in reaching basic everyday local facilities it is highly likely that future residential would be dissuaded from walking and would be wholly reliant on private vehicles to access any services. On this basis alone the site should be regarded as unsustainable for further development. As already stated above Water Lane is not suitable for increased vehicle movements.

In terms of access into the site, vehicular access is presently provided along a driveway shared with Bridge Farm. However, it is proposed in the site submission that a new access is provided to serve the allocation at the northernmost part of the submitted site.

Firstly, the landowner does not have control over the land fronting the highway to either side of the proposed new access point and would not therefore be able to provide the appropriate visibility splays required on the road in either direction. Water Lane is subject to the national speed limit road and it would be expected that the new access to serve the site would be provided with visibility splays suitable for 60 mph. No evidence has been provided to demonstrate that it is possible to provide the necessary visibility splays in either direction or that the land required to achieve their provision is within in the site promoter's control.

Secondly, the new site access road is shown as running along the northern boundary. This northern boundary has already been subject to significant removal of boundary planting, and as a result this has opened up views into the site from the north. The allocation does not include land further to the north of the site boundary along which the access would be formed that could be used to provide viable screening of the access road or the site itself. The width of the corridor to serve the site would not contain sufficient space for the both the access track and the landscaping required to soften its visual impact. It should be noted that land to the north is within the National Landscape. The impact of the new access road would be to

provide a stark, unscreened and intrusive feature detracting from the visual quality of the surrounding landscape.

The proposed site immediately adjoins two areas of woodland subject to Tree Preservation Order No.14 of 2017. These areas cover the woodland hedge fronting Water Lane to the south of the site access and the tress adjacent to the railway to the immediately south of the main body of the proposed site. In addition, there are three individually identified oak trees subject to the same TPO immediately adjacent to the north side of the site access. Two of these are on this objector's land. All three trees would have to be retained and would significantly restrict the safe use of the proposed site access which is currently an occasional field access.

The works to form the access including its visibility splays, would therefore be directly in conflict with the protection of these protected trees as well as the other hedging and trees fronting Water Lane. In addition, the close siting of caravans to the trees alongside the railway embankment would inevitably lead to conflict with the proposed occupation of caravans and result in pressure for further felling to occur.

The impact of the new entrance, its associated visibility splays, the new roadway to the rear of the site, plus the proposed siting of an undetermined number of caravans will all have significant impact on the visual character of the area. No landscape impact assessment has been undertaken to demonstrate that the proposed site would have an acceptable visual impact including on views out of the National Landscape. Therefore, a detailed landscape visual impact assessment must be provided to demonstrate that the site is acceptable in landscape terms before it can be considered further for allocation.

In addition, no assessment has been provided to demonstrate that the siting of residential caravans on this land, would not be adversely impacted by noise from either the railway that immediately abuts the allocation or motorway to the north. It is essential to ensure that as an allocated site the future occupiers would not be adversely impacted by noise, this would represent a further breach of both the social and environmental requirements for achieving sustainable development and result in significant ongoing harm to the amenity of future residents. It should be noted that whereas new built development can be constructed with varying levels of sound insulation, this is less likely to be possible to achieve within a caravan.

No indication of the number of intended pitches is provided within the landowner's submission. In this respect it is not clear whether the allocation would dominate the surrounding settled community, particularly the occupiers of Bridge Farm, and other properties in the immediate area. But on the basis there are only two houses, it is anticipated that the allocation would result in the proposal dominating the surrounding settled community.

Any allocation would need to be accompanied by significant screen planting to limit visual impact on the character and appearance of the surrounding countryside. Even

then no assessment has been provided to demonstrate that the extent and form of screen planting required to ensure the visual impact of the allocation was not going to be detrimental to the surrounding area and what this would subsequently mean in terms of the number of traveller pitches that could be provided. The allocation cannot therefore be considered without greater consideration of the number of pitches and how their visual impact would be ameliorated.

In terms of services, the site submission suggests all services are provided to the site, however this is not the case. The site is not on mains drainage, existing drainage is to a private closed system which would need to be replaced. The local drainage is such that a soakaway system would not be feasible for the scale of development likely and only connection to mains drainage would likely provide a satisfactory foul water drainage solution in this location. No assessment of the ability to provide safe and effective foul water drainage has been provided in support of the proposed allocation.

The site does not have mains gas supply. There is a main gas pipeline near to the site, but this does not facilitate domestic supply to the local area. Electricity is supplied to the two nearby houses via the overhead line from Barty Farm. In order to facilitate more intensive residential use the electricity supply would need to be significantly upgraded, this could not be achieved via the existing supply route and would require a new electricity supply to be provided underground along the length of Water Lane.

It is therefore apparent that the allocation lacks the level of provision of the services required to ensure its delivery. No utilities report has been provided in support of the allocation. It has not therefore been demonstrated that the existing local services can accommodate or be reasonably upgraded to accommodate the scale of development expected. The provision of the necessary services would require significant infrastructure investment. It has not been demonstrated that these can be provided without prohibitive cost and it is therefore apparent that it has not been demonstrated whether the site is viable. If the site is not viable it cannot therefore be reasonably be expected to be deliverable. On this basis without further evidence to support its delivery the allocation is clearly unsound.

Water Lane as its name suggests is subject to regular surface water flooding during heavy rainfall. The government flood mapping identifies Water Lane at risk of surface water flooding from a point close to the south of the proposed site entrance its entire length to the junction with Roundwell. Reference to the flood mapping indicates that there is a 3.3% / 1 in 30 chance of flooding each year. The extent of flooding in Water Lane can be seen in the photographs below. The surface water run-off from the Downs makes this road generally unsuitable for pedestrian access when it is raining and regularly unpassable to pedestrians when there has been heavy rain as indicated in the pictures.



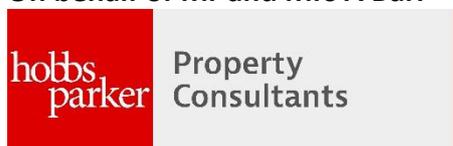
**Water Lane in flood**

The area of the allocation identified for the siting of caravans is also at risk of surface water flooding, although the risk identified is lower, at 0.1% / 1 in 1000 chance of flooding per year, however despite this lower level of risk there is still clearly a surface water drainage issue affecting the area where the caravans would be intended to be sited and which the provision of hard surfacing to facilitate this would exacerbate. It would be wholly inappropriate to site caravans within this area as the occupants would face poor ground conditions which would detract from their amenity and overall quality of life.

In terms of overall delivery, it is questioned whether the site is genuinely available for the form of development being put forward. It is understood that the landowner has unsuccessfully tried to pursue speculative development on the site, they have also attempted to dispose of the land to others including offering it at an unrealistic price to the objector. It is of concern that putting the land forward as a G&T allocation is a further attempt to encourage local residents to support other forms of redevelopment or encourage its sale.

As a consequence of the matters which have been set out in the comments above it is clear that the allocation C4S(008) is unsound. The submission that the council is assessing lacks the necessary evidence to allow the council to consider whether the site is acceptable in terms of ecology and trees, drainage, flooding, highway matters or landscape visual impact. No evidence has been provided to demonstrate the site can be adequately serviced or is viable. On this basis it cannot be held that the allocation is sound or that it would have reasonable chance of contributing towards the provision of G&T pitches. It is held that the allocation will cause significant harm to the amenity and character of the surrounding area and result in a highly unsustainable form of development. For these reasons the allocation should not be taken any further forward and should be removed from the DPD.

**On behalf of Mr and Mrs A Barr**



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