



Charing Neighbourhood Plan

Evidence Book 8

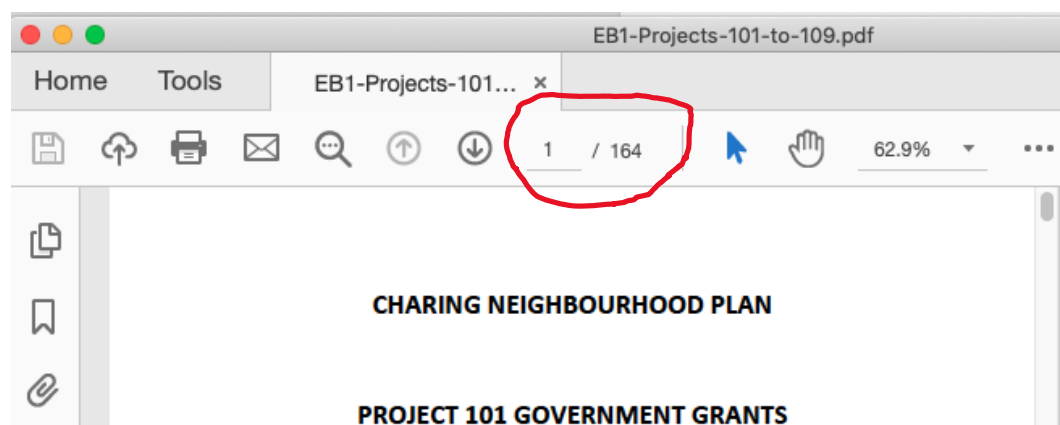
Projects 160 - 161

This is one of eight volumes of evidence gathered to form and support the Neighbourhood Plan.

Explanation of the page numbering in these online documents:

Each volume contains the evidence for particular projects mentioned in the Plan. These online evidence books are identical to the paper copies.

The contents lists each specific evidence document, and it's page number in this 'pdf' file.



This diagram shows the online plan viewed in Adobe Acrobat Reader which looks like this icon:



The page numbers referred to in the contents are the numbers on each page of the Evidence Book, as seen inside the red outline in the picture above.

These page numbers should appear on computer screens, tablets and mobile phones when viewing the Evidence Books, and they should show the page you are viewing as well as the total number of pages in the Evidence Book e.g. Pg 1 of 164.

On different Internet Browsers, such as :

Internet Explorer,

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the numbers may appear in slightly different places.

Some of the documents and reports in the Evidence Books have page numbers on the print copy for that specific piece of evidence, these are not the page numbers referred to in the contents of these online documents.

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Evidence book 8 contains the following information

- 1 A document prepared by residents of Poppy fields providing information on the planning process helpful to future developers, residents and Ashford Borough Council
- 2 Papers prepared as evidence in the appeal against planning permission for land west of Pluckley Road reference 16/00303/AS, namely:
 - Proof of evidence of Colin Burns regarding traffic and pedestrian issues
 - Proof of evidence of Lucy Simmons regarding living on Pluckley Road
 - Proof of evidence of Tom La Dell, Campaign to Protect Rural England, Kent
 - Proof of evidence of Jill Leyland regarding Charing and Future Development
 - Proof of evidence of Natalie Croome regarding a young persons view
 - Statement by Katie Miller, Planning Manager at the Kent Downs AONB Unit
 - Introduction to this failed planning application

Project 160: Issues with the planning process which may have environmental and other impacts in the locality.

The latest successful larger scale development in Charing, Poppyfields, has preserved the recommendations of the Parish Design Statement with character housing, large open spaces and ample provision for parking coupled with the provision of high speed broadband and fibre. The prestigious development is close to the village centre, train station and surgery with easy access to the A20.

The S55 planning proposal (on land to the west of Poppyfields) is built on an Environment Agency Source Protection Zone, an area where drinking water is collected for the village and wider area, the sewage, storm drains and Sustainable Drainage Systems (SuDS) infrastructure need to be very effective. The Poppyfields development experienced some drainage challenges which are now resolved with storm and foul drainage being fully adopted by Icosa as its drainage undertaker.

The S55 planning proposal has highlighted the need to protect the water supply on the land of the sites within S55. This was identified in Note 21 Hydrological Appraisal of Charing's Future Development and Public Water Supply, February 2018, Water Resources Associates) which is referred to elsewhere in the Neighbourhood Plan. The water from the North Downs runs through and under this land and then forms a natural store of water, which is used to supply Charing and other local areas with drinking water. If development goes ahead on the sites within S55, then there will be potentially four times more houses than there are on Poppyfields and the water supply could be impacted by this much larger number of houses without the correct precautions and investigations taking place.

Potential Impact on Residents:

As with many new housing developments in Kent much of the infrastructure and shared space on the development is intended to be privately owned by the residents (who through their property contracts are all members of a company, in this case Poppyfields Charing Residents Management Company (PCRMC)). This meant that the Residents would be responsible for maintaining the roads, lighting, open spaces and, prior to Icosa agreeing to adopt, the foul and surface water drainage. Responsibility for drainage means residents of future developments are responsible for repairs and potentially of any water supply.

Drainage Adoption for Poppyfields:

After consultation with many interested parties including the Charing Parish Council and the Poppyfields' residents a Sewage Undertaker called Icosa was approached by the Developer. Icosa work under the same regulations as the regional undertakers (such as Southern Water), within Ofwat regulations. They have a growing portfolio of developments in Kent and nationally, and they are regulated in such a way that they charge residents the same amounts as the regional water company in that area is charging.

Had the intention of decisions and conditions in the planning process being carried out at the right time, drainage adoption could have been resolved prior to a house being built. It seems there was a problem between the developers, the planning authority and Southern Water which meant that all of the houses were built prior to adoption being resolved.

Lessons learnt for future developments

For future developments both the Planning Authority and the Sewage Undertaker need to be ensuring these Conditions of planning are occurring, at the right time, (i.e. before any dwelling was occupied). In this case the Condition should have been discharged in 2014. It is worth noting that by December 2017 when the Discharge Application was made, ABC would have already been receiving Council Tax payments and the Water Authority receiving payments for Sewage disposal from all of the residents who were by then occupying their houses.

On Poppyfields, the NHBC were the nominated Building Control for the development, and so along with ABC and Southern Water, they also might have been expected to be ensuring that Planning Conditions were being inspected at the appropriate time in the build process, i.e. Condition 24 would be inspected and approved before a dwelling was occupied.

The Developer submitted a new Section 104 Application in December 2017 (Planning Application 12/00793/AS). This included a letter from Icosa stating they will own and operate the 'foul and surface water networks including the storage tanks.' 12/00793/CONF/AS. The storage tanks referred to were a large number of attenuation tanks that were installed by the Developer in November 2018 to store water in order to comply with SuDs requirements.

The attenuation tanks deal with potential surface water run off in the open space at the bottom of Poppyfields, the purpose of which is to store water in times of significant rainfall, so that it can be released into the water courses beyond Poppyfields at a rate that would not lead to flooding downstream of the development. The Developer has spent a considerable amount of time and effort in ensuring that the sewers and surface water drains now have an Undertaker who owns them and the residents pay water charges in line with those paid by any other homeowner in the area.

Monitoring of the build process: Site S55 in the Ashford Local Plan has been granted outline planning permission. If and when building on this site goes ahead, detailed planning permission needs to factor in this experience and to take account of the Hydrology reports to ensure the water in this area remains sustainable and safe from contamination.

When a planning application is granted there needs to be a more effective system by which each condition of planning can be checked and inspected at the appropriate time in the build process. The residents picked up this matter after the Condition 24 should have been inspected and discharged by ABC. With any planning application the planning authority granting permission, other interested parties (i.e. Southern Water), and the nominated Building Control agent (in this case NHBC), need to ensure that the conditions of planning are taking place and will lead to a satisfactory outcome.

Adoption of roads and open spaces: The question of private ownership of open space, roads and sewers and surface water drainage needs to be looked at carefully. Residents on these developments pay identical Council Tax to that of other residents in similarly banded houses. Yet they then incur service charges to a management company and as members of a Property Management Company, they have to ensure that the upkeep of the development takes place. Adoption of roads and open spaces by the local council may be preferable and prevent issues for the future, not least from residents who seek to get their Council Tax reduced to help offset the significant costs they incur with the service charges. In Ashford in the early 1990's these issues did not seem to exist as developments were built with adopted roads, sewers and open spaces.

Ownership of sewers: With regard to adopted sewers. In 2011 the Government passed a regulation, 'The Water Industry Schemes for Adoption of Private Sewers Regulations'ⁱⁱⁱ which had the stated objective that homeowners only had responsibility for sewers within their freehold boundary. The intention was to prevent homeowners from incurring costs for repairs of sewers outside their freehold. New build housing needs to have the same regulation, otherwise a repeat Act of Parliament or Regulation will be needed for houses built after 2011.

Responsibility for Building Control: The primary Building Control for Poppyfields was with the NHBC rather than the Planning Authority. The experience for Poppyfields is that the Planning Authority is impeded from enforcing matters and without being the Building Control Provider, can provide less or no support to residents when issues occur. Equally, the NHBC as the Building Control have said to residents that they can only help with regard to issues within the freehold of properties, and not with issues of infrastructure beyond the freeholds of resident's individual properties. This leaves a gap in the process of infrastructure building control and spaces including that of landscaping.

Reliance on individuals: The drainage issues in Poppyfields have been addressed because of the collective will of its residents to ensure that potential problems were resolved prior to the builder's handing over ownership of the land and infrastructure to the Residents. The Residents identified issues as they arose and collectively addressed them through the right parties. This should not really replace the responsibilities of Planning & Enforcement Services, Building Control and Service Undertakers, which are crucial to protect individual residents and local communities. Many of the Conditions of Planning do in fact need to be addressed and ready for discharge before there are any residents occupying dwellings. Consequently, a greater level of communication and collaboration between all parties is crucial to success.

Conclusions

The Developer has worked very effectively with the residents to ensure that Poppyfields is a well built and high quality development, and its response to the issues of residents is something that other building companies should look to emulate.

Residents on future developments in Charing and Ashford are the people who have to pay the multi-million pound costs of these developments. There needs to be improved clearer standards in the planning and enforcement process which means residents have complete confidence in the whole planning and build process knowing their investments in their homes are secure. They also should be able to feel confident that their new homes will not impact negatively on the existing environment and the settlements they come to live in.

i Planning Application 12/00793/CONF/AS

<https://planning.ashford.gov.uk/Planning/details.aspx?systemkey=108269&pageindex=0>

ii Planning Application 12/00793/CONF/AS, Supporting Documents, (13 Nov 2018) Letter from Icosa Water Dated 19 October 2018

<https://planning.ashford.gov.uk/Planning/IDOX/default.aspx?docid=1706396>

iii The private sewers transfer regulations

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69356/private-sewers-transfer-guidance110928.pdf



BDW Kent
Weald House
88 Main Road
Sundridge
Kent
TN14 6ER

19th October 2018

FAO Mr Peter Ralph

Dear Sir,

Poppyfields, Maidstone Road, Charing – NAV application

Further to our recent e-mail communication I can confirm that Southern Water have indicated that they are happy for the NAV to proceed as a consented site for all 60 plots on the Poppyfields development. I have attached a plan showing the NAV boundary and the points of connection to their sewer.

The proposal now includes both foul and surface water networks within the development excluding the sewer diverted under S185 of the Water Industry Act 1991. This sewer will remain adopted by Southern Water and will serve as Icosa Waters point of connection for some of the site.

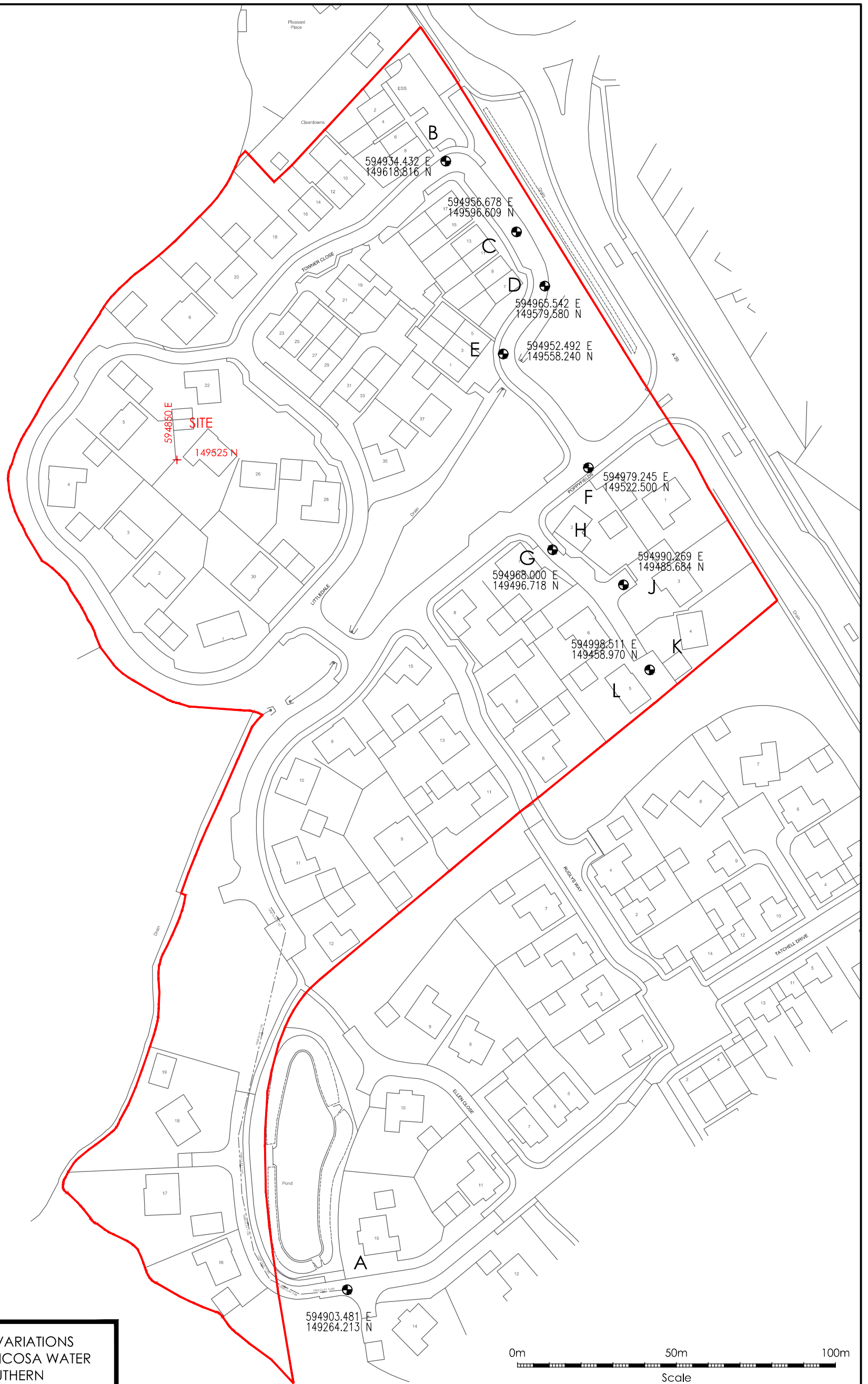
The rest of the site will be owned and operated by Icosa Water who will adopt the foul and surface water networks including the storage tanks and we are now working with Ofwat to progress the NAV licence as quickly as possible. We anticipate this will be completed in the next 4 to 5 months and will keep you updated on progress.

Should you have any queries then please contact my Developer Services team at developerservices@icosawater.co.uk or by telephone on 0330 320 0762

Yours faithfully,

A solid black rectangular box used to redact the signature of Stephen Bradley.

Stephen Bradley
Chief Executive
Icosa Water



PLAN REFERRED TO IN THE VARIATIONS
OF THE APPOINTMENTS OF ICOSA WATER
SERVICES LIMITED AND SOUTHERN
WATER SERVICES LIMITED,
AS SEWERAGE UNDERTAKERS, MADE BY
THE WATER SERVICES REGULATION
AUTHORITY ON



Technical & Development Services (Southern) Ltd
Hillreed House, 54 Queen Street
Horsham, West Sussex, RH13 5AD
Tel 01403 276 888

Title:

MAIDSTONE ROAD, CHARRING
SEWERAGE SERVICE AREA PLAN
SCALE 1:1250

Drawing Number:

18-003-SSA-01

Rev:

B

NOTIFICATION OF CONSENT OF THE LOCAL PLANNING AUTHORITY

Date of Consent

09 November 2018



ASHFORD
BOROUGH COUNCIL

Civic Centre

Tannery Lane

Ashford

Kent TN23 1PL

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Mrs K Dunn
BDW Kent
Weald House
88 Main Road
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Sevenoaks
Kent
TN14 6ER

APPLICATION NO: 12/00793/CONF/AS

PROPOSAL: Discharge condition 24

**LOCATION: Land South West of A20 roundabout, Maidstone Road,
Charing, Kent**

**APPLICANT: BDW Kent Weald House 88 Main Road Sundridge
Sevenoaks TN14 6ER**

DECISION: DISCHARGE CONDITION of permission reference 12/00793/AS listed below

Condition : 24 (Sewerage)

in accordance with the accompanying plans and/or details as follows:-

Brand Consulting - Letter dated 19 January 2018

Drawing 24559_FWD - As built survey

Letter dated 14 June 2017 - Southern Water

Southern Water Sewer Agreement dated 20/10/2017

Drawings: 11283/001; 11283/002; 11283/003; 11283/004; 11283/005;
11283/006; 11283/1068

Drawing H6604-BDWK-S104-3-ICOSA-adoption

Letter from DWH dated 26 October 2018

Letter from Icosa Water dated 19 October 2018

S185 Vesting Certificate

S185 letter from SW dated 03/01/18

Notes to Applicant

This grant of planning permission does not give any legal right to carry out the development on over or under the land of another person or contrary to the rights of any such person. If there is any doubt the applicant should seek his/her own independent legal advice before implementing the planning permission.

Outstanding conditions from this submission awaiting decision.	None
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Head of Development Management and Strategic Sites

Appeal by Gladman Development Ltd

PINS Reference: APP/E2205/W/16/3154089

Ashford Borough Council reference: 16/00303/AS

Land south of railway line and west of Pluckley Road, Charing, Kent

Proof of Evidence of Colin Burns

Traffic and Pedestrian Issues

The Kent Branch of the Campaign to Protect Rural England exists to protect the beauty, tranquillity and diversity of the Kent countryside.

CPRE Kent, Queen's Head House, Ashford Road, Charing, Kent TN27 0AD
www.cprekent.org.uk Phone: 01233 714540 Email: info@cprekent.org.uk

Registered charity (number 1092012), limited company registered in England (number 4335730).

Land south of railway line and west of Pluckley Road, Charing, Kent

Outline planning application for up to 245 dwellings (including 35% affordable housing), introduction of structural planting and landscaping, informal public open space and children's play area (LEAP and MUGA), balancing ponds, vehicular access point from Pluckley Road and associated ancillary works. All matters reserved with the exception of the means of access onto Pluckley Road.

LPA Ref No: 17/00303/AS

PINs Ref No: APP/E2205/W/17/3182838

1. Introduction

- 1.1 My name is Colin Burns and I live at Ardoran on Pluckley Road. I have been a resident of Charing for 14 years and have lived on Pluckley Road for 9 years.
- 1.2 As a professional engineer I am used to assessing risks and have a good understanding of how the likelihood of a risk and the severity of a risk both have to be considered to estimate an overall level of risk.
- 1.3 I act on behalf of the Pluckley Road Residents with regard to highway and pedestrian safety issues. I believe this planning application should be rejected on pedestrian and highway safety grounds. I will not cover all the pedestrian and highway issues which have been raised previously during this application process; such as including no step free access to the train, the bus not being viable, walking distances to village not being acceptable and increase in vibration causing both disturbance and damage.
- 1.4 I will concentrate on the five major safety risks, which have been identified by the residents of Pluckley Road and Station Road. These are risks which increase the chances of a fatality on Pluckley Road and Station Road. These major safety risks are:-
- 1) Speeding
 - 2) Substandard and narrow pavements
 - 3) Station Road is dangerous to cross
 - 4) Pluckley Road is a designated lorry route
 - 5) The siting of the proposed access road creates a further traffic hazard
- I will go through each of these explaining why they are a risk currently, how Gladman's proposals would add to this risk, and how the additional pedestrian traffic will increase these risks further.
- 1.5 The problems of Station Road have been documented and acknowledged for some time. They were considered sufficiently serious that in 2015 a meeting was held which included the KCC cabinet member for Environment and Transport, the Leader of Ashford Borough Council and the Highways Manager for East Kent. Included was the A20 crossing being on the wrong side of Station Road, the poor condition of Pluckley Road and Station Road, poor site lines for pedestrians, narrow and sloping pavements, increasing HGV quantities, pavement mounting, congestion and speeding. ([Minutes included in appendix 1](#))
- 1.6 The original Transport Plan developed by Gladman, which included a safety audit, and claimed to promote safe and sustainable pedestrian and public transport failed to mention any of these five identified safety issues, except the first one (speeding).
- 1.7 Following KCC highways objections, Gladman in their transport plan revision, now acknowledge and accept that the pavements are substandard and that Station Road is dangerous to cross. Although Gladman now also acknowledge that Pluckley Road is a signed lorry route, they do not accept that this is a material risk. Gladman still do not acknowledge that the access junction is not in a safe position.

- 1.8 The proposed development is south of the railway line and all access is along Station Road and Pluckley Road. There are currently no residential areas south of the railway line, only roadside houses. Pluckley Road is a signed lorry route and the pavements are not fit for purpose.

2 Speeding - visibility sweeps are only suitable for 30mph traffic

- 2.1 As an increase in the visibility splays cannot be achieved. Gladman have proposed addressing the limited visibility from the development's access junction with a traffic calming scheme to reduce the actual speeds to within the 30mph limit on this stretch of road [1].
- 2.2 A horizontal traffic calming scheme was agreed not to be suitable due to the intermittent traffic flow on this rural road [2].
The Vertical traffic calming scheme was rejected by KCC on further study [4]. It has not been proven feasible or safe for this lorry route.
KCC highways also stated that it would cause excessive vibration further increasing carriageway and property damage, especially at the full width raised table at the access junction. I do not believe lorries would actually straddle all of the other proposed speed cushions as the bends in the road would hinder them from lining up correctly. [\(Picture in appendix 2\)](#)
- 2.3 Gladman did not notice or accept that Pluckley Road was a designated lorry route when the traffic calming scheme was proposed and no feasibility studies with regards to lorries have been carried out. Any traffic calming must be proven to reduce the danger from lorries and not increase it. The major risk on Pluckley Road is that a lorry will hit a pedestrian using the walled pavement.
- 2.4 The first steps in implementing traffic calming are now generally accepted to be education of the locals and increased signage [6]. These have not been undertaken. No residential development, other than roadside homes, has ever been planned or approved south of the railway bridge on Pluckley Road because of its unique risks.
- 2.5 Gladman's revised transport plan does not contain any further investigation into the proposed traffic calming. No changes have been proposed and no impact on pedestrian safety has been submitted. There appears to have been no consultation over the traffic calming proposals with either the emergency services, residents or road haulage associations. Pluckley Road residents have not been consulted and this is unacceptable.
- 2.6 Ensuring speeds are successfully reduced to 30mph is critical because the visibility splays depend on it. Any traffic calming scheme would need to be designed, implemented and monitored to prove that the speed reduction had been safely achieved before any planning application could be considered.
- 2.7 Speeding was the only one of the five major safety issues which the appellant identified in their initial transport plan, and still they have failed to address the risk to emerging traffic.

3 The pavement is only 1.0m wide over the entire length of the railway bridge and for a significant part of Station Road

- 3.1 The pavement is 1.0m wide for 54m over the railway bridge and passing pedestrians are forced to step onto the main road and into the path of vehicles including HGVs. [\(Pavement map in appendix 3\)](#)

- 3.2 It is difficult to negotiate the railway bridge with a pram or holding the hand of a child. There is no provision for pedestrians to pass each other and there are HGVs right up to the edge of the pavement, reducing the effective usable pavement width to less than 800 mm due to overhanging mirrors.
- 3.3 Gladman state that this is suitable for the majority of pedestrians as a wheelchair is only 700mm wide, but it is not suitable because of the length of the restricted pavement. The Governments Inclusive Mobility Guide states that 1.8m is required except over short distances to avoid obstacles ([Extract in appendix 4](#))
Bear in mind that you are right up against a brick wall and have a pavement drop into a lorry route. ([Picture of wheelchair in appendix 5](#))
- 3.4 This development is likely to at least quadruple the pedestrians using the Pluckley Road railway bridge substandard pavement. If this development is to be sustainable then the homeowners would be expected to walk or cycle over the bridge using a narrow footpath thus increasing the risk.
- 3.5 There are 58 roadside houses within a half mile radius south of the railway bridge and 82 roadside houses within a 1-mile radius. The proposed development of 245 houses therefore represents a 300% increase in pedestrians using the bridge. ([Map in appendix 6](#))
The proposed development, assuming that there is to be affordable housing on the site, could reasonably expected to have children and a higher occupancy thus producing more pedestrian journeys per household, consequently a 300% increase could be a very conservative estimate.
- 3.6 Gladman's claim that it is "highly unlikely" that pedestrians will meet on the bridge [9].
They provide timings, which seem to suggest that it is feasible for pedestrians to cross the bridge in single file as it only takes 11.5 seconds to cross the bridge [10].
Firstly, their timings are questionable as it would require a walking speed of 11mph. From my calculations it actually takes 41s to walk 55m at the more realistic speed of 3mph, and this is born out in reality.
- 3.7 Secondly, irrespective of 11.5s or 41s or an elderly lady who might take 2 minutes; what is an acceptable time to wait whilst the person coming from the other direction completes the crossing of the bridge?
It is therefore likely that pedestrians will pass one another on the bridge. This happens now, especially at peak times and when school buses and trains are due.
- 3.8 As an example, it is perfectly possible that at 7:45 in the morning the 12 Homewood School children I counted will be walking south to catch their school bus and 12 residents from the proposed development will be walking north to catch the 7:53 Ashford and the 7:54 London trains. They would all have to leave home 10 minutes earlier to cross the bridge in single file, and will not attempt to cross until it is their turn.
- 3.9 Gladman have also proposed "redistribution of footway, carriageway and verge widths over the railway bridge" but have not provided any feasibility study [11] so it is unclear if lining up will be an issue for the lorries because of the bend to the south of the bridge.
- 3.10 Gladman's suggestion of narrowing Pluckley Road means that HGVs will be forced even closer to the pavement, so increasing the risk of trapping a pedestrian between the wall of the railway bridge. How can this be regarded as increasing safety ?

3.11 The proposed widened pavement is still not wide enough to support two-way pedestrian traffic. It does not even meet the required 1.5m “acceptable minimum” defined in the Governments Inclusive Mobility Guide [12].

Quote “Page 11, section 3.1 Widths

A clear width of **2000mm** allows two wheelchairs to pass one another comfortably. This should be regarded as the minimum under normal circumstances. Where this is not possible because of physical constraints **1500mm** could be regarded as the minimum acceptable under most circumstances, giving sufficient space for a wheelchair user and a walker to pass one another. The absolute minimum, where there is an obstacle, should be **1000mm** clear space. The maximum length of restricted width should be **6 metres”** .

3.12 I would argue that nothing less than the 1.8m wide pavement, defined for “Local Distributor Road” in the Kent design guide for movement ([13] page 123) is required for pedestrians to pass one another safely and for disabled use of the pavement on a main road especially as it is a designated signed lorry route.

3.13 Gladman have suggested, in their revised transport plan, proposed “improvements to the PRoW network as AW35 is an attractive alternative” [14]. This path is muddy, narrow, unlit, overgrown and cannot be used by bikes, pushchairs or wheelchairs. (Picture appendix 7)

3.14 KCC stated that because of its very rural nature any potential upgrade of this path is far from straightforward [15]. Also, I am not aware of any discussion with the land owners in order to complete the link as far as Hither Field. Finally, who would be responsible for maintaining this path ?

3.15 This suggestion does not address the pavement issue as the path is a greater distance for all of the houses on the proposed development than walking over the railway bridge. From the centre of the proposed development it is twice the distance to use the path to the railway station, 800m as opposed to 400m using the bridge. (Map of distances in appendix 8)

3.16 It is therefore likely that all residents from the proposed development will use the more direct Pluckley Road pavement to access the railway station.

3.17 Gladman conclude in their revised transport plan, that there is no safety issue on Pluckley Road as there have not been any accidents involving pedestrians in the last 5 years [18]:-

- The number of pedestrians is currently low, it will at least quadruple if this development is built.
- Although the likelihood of an incident is low, the result of any incident involving an HGV and a pedestrian is likely to be severe, if not fatal.
- One of the reported incidents in the Traffic Assessment [19] describes a “slight accident”, “a south-westbound vehicle had drifted into the oncoming lane, thereby causing a head-on collision with a HGV. The HGV subsequently crashed into a wall.” This demonstrates how easily a slight incident could become serious when it involves HGVs in close proximity to pedestrians who are on a pavement restricted by a wall. (Picture of repaired wall in appendix 9)

4 Station Road is very dangerous to cross for many reasons

4.1 The need to cross Station Road to access the school or shops is required because the controlled crossing on the A20 to access the village is on the east side of the road. (Annotated map in

- 4.2 The width of Station Road at the Surgery Close junction is so small that the central white line has been removed. At its narrowest point it is less than 4.9m wide.
- 4.3 The first part of the pavement on the east side of Station Road is narrow; it is less than 950mm wide for 56m and reduces to only 850mm at two specific points. This width is further reduced when accounting for overhanging wing mirrors and 'struck chords' of long vehicles at the bend. [\(Picture in appendix 11\)](#)
- 4.4 On Station Road the pavement is poor, it slopes excessively, and most houses are close to the road. It is also often flooded between numbers 29 and 35 Station Road [\(Picture in appendix 12\)](#)
- 4.5 Almost all of Station Road is in the conservation area with 7 listed buildings (all grade 2 except one grade 2*) on the east side and it also has curtilage-listed walls.
- 4.6 Gladman have now accepted that Station Road is a dangerous crossing for all the pedestrians accessing the village centre amenities **[20]**. In their revised transport plan they propose a tactile paved dropped kerb at the Village Hall point to solve the concerns raised by KCC highways.
- 4.7 Station Road does not have any controlled crossing provision. It is a very awkward crossing requiring much care, concentration and patience. It is near to the dangerous A20 junction, it is on a blind bend and is a narrow pinch point on a major lorry route.
- 4.8 In reality delivery vehicles and tradesmen are prone to stopping on Station Road further down where it straightens. This can cause a significant elongation of the pinch point.
- 4.9 Passing lorries and other vehicles have to mount the pavement to pass each other. To be fair, the lorries do tend to do this at extremely low speeds, but they still do it when pedestrians are in the vicinity.
- 4.10 As the number of pedestrians increases one of three things will occur:
- 1) either the lorries will have to wait longer before accessing the pavement and congestion will inevitably increase
 - 2) or lorries will compete for the pavement and pedestrians will have to "give way" to them
 - 3) the occurrence of reversing and manoeuvring of lorries will increase
- The frequency of all three of these situations will increase. It is impossible to predict in what ratio and it is hard to gauge the increase in pedestrian risk, suffice to say, as pedestrian numbers increase so does the risk to pedestrian safety.
- 4.11 The safest place to cross Station Road is some 130m back from the A20 Junction where it is a straight section. You get much better visibility which outweighs the possibility of slightly higher speeds.
- 4.12 Gladman's propose a pedestrian crossing point of Station Road that is 25m back from the A20 junction **[21]**. This is even less safe due to the severe additional risks:-
- Visibility restricted, especially crossing from East to West
 - It is closer to the dangerous A20 junction (at least 5 "injury" accidents in the last 5 years) [\(Crash map in appendix 13\)](#)
 - It is not uncommon for vehicles to take the junction from the A20 into Station Road at speeds above 20mph [\(ATC speed summary in appendix 14\)](#)

- Queuing traffic for the A20 junction of the acknowledged 6 car lengths [22] would extend beyond the crossing point and make it very unsafe as it would reduce visibility for crossing pedestrians
- Two lorries queuing at the A20 junction would make this crossing point unusable
- Lorries having to mount the pavement to pass other vehicles.

4.13 The speed limit on the A20 is 40mph and the junction can be taken at speeds faster than 20mph as there are crash barriers and guard rails removing the driver's worry about pedestrians crossing at the actual junction itself. It can be assumed that the crash barriers were added to protect pedestrians at the junction. The constant flow of following traffic on the A20 adds further pressure for a driver to maintain speed when turning into Station Road. [\(Picture of junction appendix 15\)](#)

4.14 Neither location is safe, which is why the dangerous crossing of Station Road was raised as a serious safety concern for this development [23], even though it was not identified in the application's safety audit.

5 Pluckley Road is the only permissible lorry route serving a significant portion of the Weald_of Kent

5.1 With the relatively low number of pedestrians using Pluckley and Station Road's substandard pavement currently, the issue of lorry separation has been managed. Pedestrians are getting away with stepping out into the road when passing each other. With the quadrupling of pedestrians proposed, it will considerably increase the risk of a pedestrian being hit by a lorry.

5.2 Gladman's revised transport plan does not address this highway issue even though they now acknowledge that Pluckley Road is a signed lorry route. [\(Picture of A20 signs in appendix 16\)](#)

5.3 Gladman claim that Pluckley Road carries only a low number of HGVs [24]. This is strongly contested and I believe the 5 day average "Heavy Percentage" of 11.5% northbound and 12% southbound is much more realistic. Gladman acknowledge that their HGV counts are not correct and that the data is inconsistent [25]. I believe that this is because accuracy is significantly reduced when braking or accelerating, so the positioning of the traffic sensors are critical. In these circumstances HGVs can be mistakenly logged as 2 cars instead. [\(ATC count summary in appendix 17\)](#)

5.4 Pluckley Road carries not just all the HGV traffic from the A20 to Smarden and Pluckley, as signed but a significant proportion heading as far west as Sutton Valence, as far South as Headcorn and as far east as Bethersden. It is also used as a cut through to the A274, especially since the Leeds village HGV restrictions have been put in place.

5.5 It is the only permissible HGV access point to the south between Maidstone and Ashford, with the exception of Hothfield (which is signed to "Ford Mill"). All other routes south from the A20 are signed as HGV prohibited.

5.6 The fact that Pluckley Road is a major HGV route should form the basis for the entire transport plan instead of avoiding this key issue.

5.7 Gladman's proposal to narrow the carriageway [26] of Pluckley Road to facilitate a wider pavement is reducing safety, not increasing it. It would increase the chance of a lorry hitting the pavement and consequently a pedestrian.

- 5.8 There is no feasibility offered and Gladman's say only that "it appears to be possible" [27]. No discussion with KCC highways has taken place. The bend in Pluckley Road, south of the railway bridge will further hinder lorries lining up for the proposed narrower carriageway. A full feasibility study, accounting for lorries travelling at 30mph, is needed to ensure proper safety. Planning approval should not be given on such a knee jerk proposal, especially when it involves a serious pedestrian safety issue.
- 5.9 Farm traffic is also a big component of Pluckley Road when, particularly at harvest time, large agricultural machinery monopolises the road well into the night and during the early morning.
- 5.10 There is no provision for cyclists. Cycling on the pavement or even pushing a bike, would be an additional safety risk. Cyclists have to use and share the narrow and winding Pluckley Road and Station Road with the HGVs.
- 5.11 Pluckley Road is in a poor condition because of the numerous repairs to underground services in the roadway which are caused by the volume of HGV traffic.
- 5.12 Gladman appear to be labouring under the misconception that Pluckley Road is a residential road [28]. Pluckley Road is not a residential road. Pluckley Road is a main road with the primary purpose of the signed lorry route servicing a significant portion of the Weald of Kent.

6 **The proposed access junction is not in a safe position being directly opposite 3 residential driveways**

- 6.1 The proposed access road to the development site, is directly opposite the driveway for three houses. There has not been any safety assessment made for those leaving and entering these properties by car and more importantly on foot [29] ([Pictures appendix 18](#))
- 6.2 Gladman have not even provided a site plan [30]. The only plan provided is P16005-003 which shows the proposed site access road location, which is totally insufficient. It does not even show the existing driveways and how they combine to form what could be perceived as a layby. ([My annotated site plan in appendix 19](#))
- 6.3 How will the residents walk from the three properties? There is no footpath on the east side of Pluckley Road. A diagonal crossing for pedestrians from these three properties would be the only way to cross and avoiding the proposed junction. This contravenes *The Highway code (Section 1, Rules for Pedestrians, Rule 7 "Do not cross the road diagonally")* ([Ownership document in appendix 20](#)) ([Picture in appendix 21](#))
- 6.4 Cars waiting to turn right into the proposed development's access road would inadvertently cause drivers going south on Pluckley Road to undertake into the combined private driveways which could be perceived as a layby. This is also where the residents must stand to cross the road. ([Picture in appendix 22](#))
- 6.5 It is also a real risk that drivers may try to avoid the full width raised table by driving into the "perceived" layby ([Picture in appendix 23](#))
- 6.6 The driveways are steep down to the junction. This combined with the clay subsoil leads to excessive water running off these driveways. In freezing conditions the junction will be covered in a significant amount of ice ([Picture in appendix 24](#))

- 6.7 A detailed site plan of the proposed junction is the first requirement to appreciate the road traffic risks. Despite having raised this issue as early as the pre-planning application consultation, Gladman have chosen to ignore it.

7 Conclusion

- 7.1 Gladman have failed to identify the major safety issues from the outset.
- 7.2 They have not developed a transport plan which is centred on the unique risks associated with Pluckley Road.
- 7.3 Gladman have not proposed any increase to the development junction visibility splays onto Pluckley Road to match the actual speeds on this road.
- 7.4 The proposed traffic calming measures have been deemed unsuitable for Pluckley Road as it is a narrow and winding, non-residential road. No traffic calming measures have been agreed and there is no plan on how a reduction in speed can be implemented safely on this major lorry route.
- 7.5 Gladman's claim that pedestrians are highly unlikely to pass one another on the railway bridge pavement is wrong. This happens already.
- 7.6 The proposed possible quadrupling of pedestrians using the substandard pavement will significantly increase the risk of an HGV hitting them.
- 7.7 Gladman wish to narrow Pluckley Road which would reduce safety, not increase it.
- 7.8 Gladman's suggested measures would still not accommodate a safe two-way pedestrian use of the railway bridge pavement.
- 7.9 Gladman have not addressed the awkward and dangerous pedestrian crossing of Station Road with any material improvement. In fact, Gladman are proposing that pedestrians should cross Station Road in an even less safe place than that which I use.
- 7.10 The proposed access road to the development is not in a safe position, being directly opposite the combined driveway of three houses, which may act as an undertaking layby.
- 7.11 Gladman do not accept that Pluckley Road as a major HGV route is a material safety risk.
- 7.12 The fact that there are 5 significant safety concerns dictates a level of severity of the overall safety risk. The 5 safety risks identified by the residents of Pluckley Road are:-
- 1) Visibility splays are inadequate
 - 2) The pavements are too narrow
 - 3) Station Road is dangerous to cross ([Email in Appendix 25](#))
 - 4) Pluckley Road is a lorry route
 - 5) The proposed access junction is not in a safe position.

All remain unaddressed and the chance of a fatality as a result from this development going ahead is significantly increased.

References

- [1] P16005 Transport Assessment, page 15, section 3.3.4
- [2] Technical Note/02, section 2.1.57
- [3] P16005/001 Transport Assessment, pages 103 and 107, Appendix D, Technical note/01, section 5
- [4] KCC Highways objection 1, dated 19th April 2017, pages 2 and 3 and KCC Highways objection 2, dated 13th July 2017, page 3
- [5] Technical Note/02, section 3.1.13
- [6] KCCs *'Using Traffic Calming to Manage Speed in Kent'* pages 5 and 18
https://www.kent.gov.uk/data/assets/pdf_file/0016/13039/Making-it-Happen-Using-traffic-calming-to-manage-speeds-in-Kent-practitioners-guide.pdf
- [7] Technical Note/02, section 2.1.59
- [8] Technical Note/02, section 2.1.6
- [9] Technical Note/02, section 2.1.7
- [10] Technical Note/02, section 2.1.8
- [11] Technical Note/02, section 2.1.10
- [12] DfT Inclusive Mobility, page 11, section 3.1, Widths (1.5m is the minimum acceptable, except over very short distances)
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/3695/inclusive-mobility.pdf
- [13] Now superseded by Kent design guide for movement, page 123. Now termed "Local distributor Road" (but still the required pavement width is greater than 1.8m)
https://www.kent.gov.uk/data/assets/pdf_file/0018/12096/design-guide-movement.pdf
- [14] Technical Note/02, section 2.1.13
- [15] KCC Highways objection 2, dated 13th July 2017, page 1
- [16] Technical Note/02, section 2.1.2
- [17] Technical Note/02, section 2.1.1
- [18] Technical Note/02, section 2.1.6
- [19] P16005 Traffic Assessment, page 46, section 7.1.6
- [20] Technical Note/02, section 2.1.4
- [21] Technical Note/02, section 2.1.12
- [22] Technical Note/02, section 2.1.84 and Appendix VIII, page 111, table queue lengths station road pm
- [23] Colin Burns objection dated 31st March 2017, paragraph 5 (Dangerous pedestrian access)
- [24] Technical Note/02, section 3.1.13
- [25] Technical Note/02, section 2.1.78
- [26] Technical Note/02, section 2.1.11
- [27] Technical Note/02, section 2.1.10
- [28] Technical Note/02, section 3.1.17
- [29] Colin Burns objection dated 31st March 2017, first 3 paragraphs (total loss of pedestrian access, domestic drives directly opposite, illegal and unsafe maneuvers)
- [30] Gladman Rule 6 Statement of Case, page 20, highway response table

Appendices: Traffic and Pedestrian Issues

Appendix 1: Minutes of KCC/ABC/CPC meeting re Station and Pluckley Roads June 26th 2015

Present:

KCC: Cllr Matthew Balfour (Cabinet Member for Environment and Transport); Cllr Charlie Simkins (Member for Ashford Rural West and Member of Environment and Transport Committee); Toby Howe, (Highways Manager, East Kent); Bill Ronan, (Communities Engagement Officer for Ashford District)

ABC: Cllr Gerry Clarkson (Leader and Ward Member for Charing)

Pluckley Parish Council: Cllrs Chris Housman (Chair) and Sue Beattie

Kent Police: ???? and PCSO Gary Carr

Charing: Cllrs Reed, Leyland and Weekes; Clive Woodward; Tony Leyland (taking minutes)

1. After a welcome to visitors and a brief introduction from Tylden Reed, attendees were taken on a short walkabout to see: Crossroads (known danger spot); Pedestrian crossing on “wrong side” of Station Road obliging those visiting Parish Hall, Surgery and Station to cross Station Road; Poor sightlines for pedestrians; Narrow and sloping pavements; Poor condition of road with frequent gullies, potholes and loose drain and manhole covers; Pavement outside nos 29-35 often floods; Lack of continuous pavement on south side of road on and after railway bridge; shoulders of road on railway bridge partly sunk; how traffic speeds up on approaching Pluckley Road. Almost all of Station Road is in the conservation area with 7 listed buildings on the south side and curtilage-listed walls; most houses are close to the road.
2. On returning to the Parish Hall additional issues were mentioned:

Increased curb mounting expected if more clay lorries or others use Station Rd since an x% increase in wide vehicles would generate a greater than 2x% increase in pavement mounting.

Also the effect of additional restrictions in the area as a whole has pushed even more traffic onto Station/Pluckley Rd and the route through Pluckley. Majority of alternative routes now signed “not suitable for Lorries” but not Station/Pluckley Rd, even though it is not considered suitable.

Video shown from Surgery Close along Station and Pluckley rd, highlighting poor quality of road surface, gutters, drain covers and gullies. At end of 30mph restriction no pavement to serve Health Club, Vets and housing to offer separation for pedestrians from fast moving traffic.

Generally poor condition of road between Pluckley and Charing.

It was pointed out that Lorries using Station Rd and the route through Pluckley were not only using it for access but as a cut through to the A274; reducing the number of such movements was one of the key objectives. The essential use by local businesses was limited, along with agricultural vehicles, but the cut through to the A274 also attracted large inter-continental style container lorries.

3. Police representatives outlined the results of the two surveys they had undertaken on 10th and 12th June at the corner of Charing Heath Lane, using a camera or in a marked police vehicle. Of the 246 vehicles logged during surveys there was only one recorded speeding offence and only 1 other offence. The area was not therefore considered as a priority area for police enforcement. It was pointed out that the speeding results were at odds with full traffic survey carried out in 2012 as part of a planning application process; presumably as traffic slowed on seeing the police.

The Police Reps then left the meeting.

4. Representatives of Pluckley PC added that they also experienced issues with lorry congestion at the top of the village including frequent curb mounting on Forge Hill; again this would be exacerbated if more clay lorries used the road. The spot was close to the dangerous junction with The Street.

Applications to have the 30mph speed limits in Pluckley extended were rejected on technical grounds, as the extended areas did not meet police requirements for enforcement.

KCC felt that imposing a 50mph limit on the road from Charing to Pluckley would be counter-productive as the road conditions themselves gave drivers a lead on the safe speed. A specific limit could encourage drivers to drive up to it even when they should be going more slowly.

Pluckley also has a problem with parking associated with the Station which narrowed the road to single file, made worse by lorry movements.

5. The issues and possible solutions or mitigation measures were then discussed.

The road from Pluckley to the A20 via Little Chart and Pluckley was suggested as a possible route that could take some lorry traffic. Gerry Clarkson said that **as there were plans to develop the Hothfield area which could involve a relief road, ABC would take into account the wider aspect of transport in the area including heavy vehicle flows but that was for the future.**

The access to Leeds village was specifically signed as unsuitable for large lorries (17 tonne restriction), but not the entrance to Station Rd. The possibility of a Leeds by-pass enabling a better route for lorries between the A274 and the motorway system was raised. KCC said that there were discussions on-going about a “relief” road but not a by-pass but because of financial constraints this was unlikely in the foreseeable future. As measures to improve the situation the use of speed remainder signage and width and weight restrictions in both Charing and Pluckley were tabled.

It was felt that Speed Reminder signs could be effective and should be explored; even if the possibility of police enforcement was limited. ABC had had good results from solar powered reminder signage, and may be willing to help KCC financially if suitable sites and uses were identified in Charing and Pluckley.

It was noted by KCC that the police and not the Council were responsible for enforcement of speed and weight restrictions and except in exceptional cases, usually road safety blackspots, these were not a priority.

Enforcement cameras were discussed but these were difficult to set up in the current economic climate and additional ones were focussed on accident blackspots

A system of northbound traffic giving way to southbound before the narrowing of Station Rd would be looked at by KCC.

There was a discussion about raising curbs or reducing the extent of dropped curbs to attenuate curb mounting but it was not felt it would deter the main offenders due to the size of the vehicles involved.

There seemed little doubt that the restrictions signed at Leeds pushed heavy traffic on to Station Rd **and a cost effective way of helping Charing would be to remove all the positive encouragement to lorries on existing signage.**

The issue of intensification of use of Station and Pluckley road through potential new housing developments along Pluckley Road was discussed. Gerry Clarkson stated that as far as ABC was concerned any presumption for further new development in Charing was along the A20 and then only as far as the garage. Any significant development in Pluckley Road would be resisted.

The question of moving the A20 pedestrian crossing to the north of the junction was discussed. It was considered an expensive option that might better be considered as part of a move to have a comprehensive system of lights at the junction itself.

Toby Howe felt that the white centre line in the narrowest points of Station Road was unhelpful since it encourages drivers to think the road was wider than it is thus encouraging pavement mounting. Removing it, possibly adding cross-hatching at the edges and/or "road narrows" signs, could encourage large vehicles to wait to use the road available rather than mounting the pavements.

He agreed that the problem of dropped gullies and drain covers needed to be dealt with but that full resurfacing was unlikely due to financial constraints and the consequent current make do and mend policy at KCC.

KCC were willing to look at any relevant signage proposals, as they accepted that, even if not enforced, the perceptions created by effective signage could improve matters; particularly if backed by funding from ABC.

Gerry Clarkson argued that in the past Charing had been very accommodating in accepting developments such as the Crematorium, the slaughterhouse and Ardo. It had accepted two significant housing developments. Charing was not a "nimby" village and **it was now time for its needs to be brought higher up the KCC priority list.**

It was noted that the falls on the narrow pavement through Station Rd were dangerous; particularly in winter. The last time they were surfaced tarmac was merely added thus compounding the problem. **As BT was about to dig some of the pavements up for cable laying in connection with providing faster broadband, KCC would be asked to ensure that they are re-laid to an acceptable fall and that other areas not covered by their works are programmed in due course for renewal to the revised falls.**

KCC would also look at the reported flooding in front of 29 to 35 Station Rd.

KCC were asked to consider the feasibility of having a pavement up to the Health Club complex and an extension of the 30mph speed limit.

They said they would look at the pavement issue but felt the extension of the speed limit was more problematic as it involved meeting Department of Transport criteria. However, it was up to the PC to make the application and it helped that there were other PCs in the area doing the same thing. Now was the time to do it.

Tylden Reed pointed out the frequent damage to the central street furniture at the A20 junction, particularly the bollard to the west of the junction. He suggested that next time it was damaged it should be re-sited further back to improve turning arcs for large vehicles thus reducing damage in future. KCC agreed to look into this.

There was an open discussion on the inconsistencies and dangers of the speed limits on Charing Hill and the poor positioning of current signage. Options discussed included moving the 40 mph speed limit sign or removing the 60mph stretch altogether. It was argued that there seemed to be no rationale behind the short de-restricted section. In addition at the top of the Hill there was no advance warning for traffic when two lanes narrowed to one. **Charing PC should write to KCC with what they would like to see. Gerry Clarkson said he would write to Ann Barnes the police commissioner to get her to attend a meeting in Charing regarding speed limits.**

Appendix 2: Bend close to the southern approach of Pluckley Road railway bridge



Appendix 3: Pavement map - Pluckley Road and Station Road

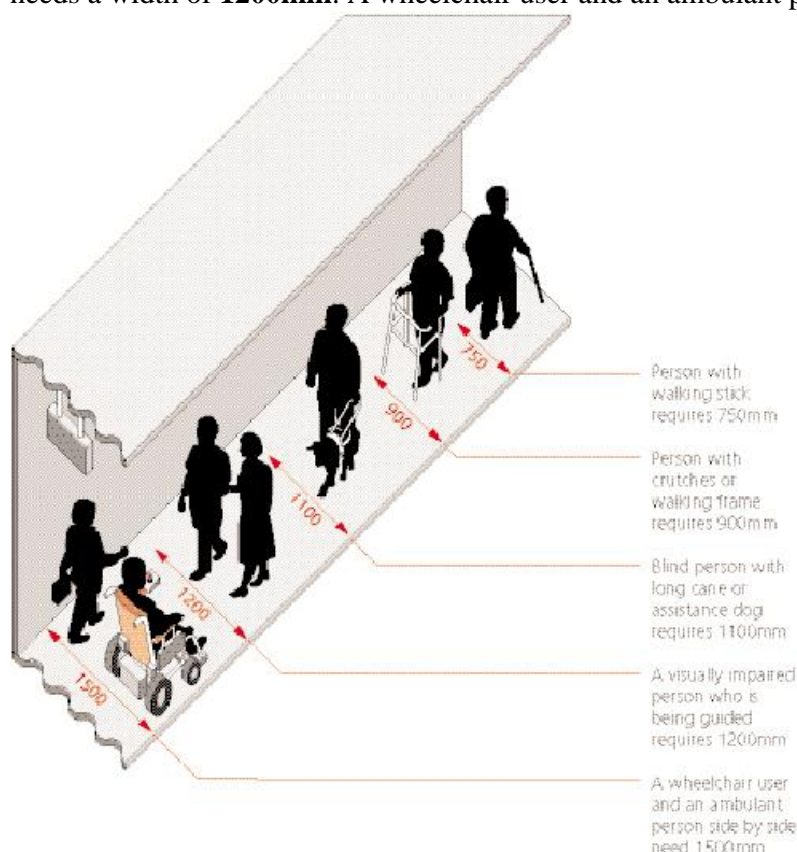


Appendix 4: Government's publication *Inclusive Mobility*

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/3695/inclusive-mobility.pdf

2.2 Mobility impaired and visually impaired people

Someone who does not use a walking aid can manage to walk along a passage way less than **700mm** wide, but just using a walking stick requires greater width than this; a minimum of **750mm**. A person who uses two sticks or crutches, or a walking frame needs a minimum of **900mm**, a blind person using a long cane or with an assistance dog needs **1100mm**. A visually impaired person who is being guided needs a width of **1200mm**. A wheelchair user and an ambulant person side-by-side need **1500mm** width



1.1 Widths

A clear width of **2000mm** allows two wheelchairs to pass one another comfortably. This should be regarded as the minimum under normal circumstances. Where this is not possible because of physical constraints **1500mm** could be regarded as the minimum acceptable under most circumstances, giving sufficient space for a wheelchair user and a walker to pass one another. The absolute minimum, where there is an obstacle, should be **1000mm** clear space. The maximum length of restricted width should be **6 metres** (see also Section 8.3). If there are local restrictions or obstacles causing this sort of reduction in width they should be grouped in a logical and regular pattern to assist visually impaired people.

Appendix 5: Pluckley Road railway bridge 1.0m wide pavement



Appendix 6: Resident dwellings count south of Pluckley Road railway bridge



Appendix 7: AW35 footpath



Appendix 8: Map of walking distances from the proposed development site to Charing railway station



Appendix 9: The wall was hit by an HGV on Station Road

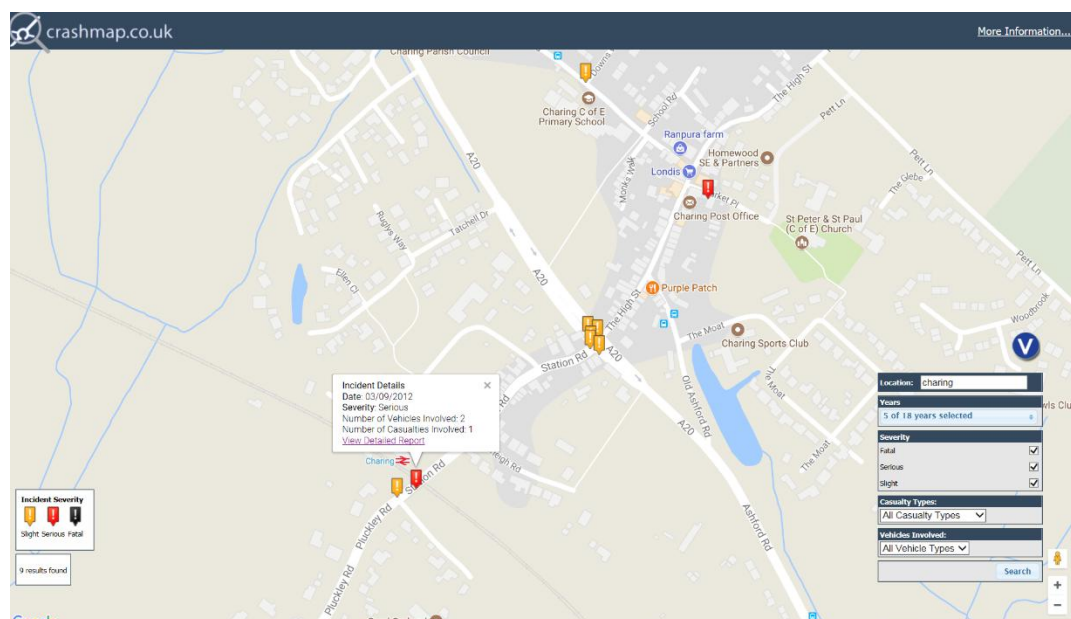


[illegible]

Appendix 12: Inadequate pavement in Station Road



Appendix 13: Crash map data

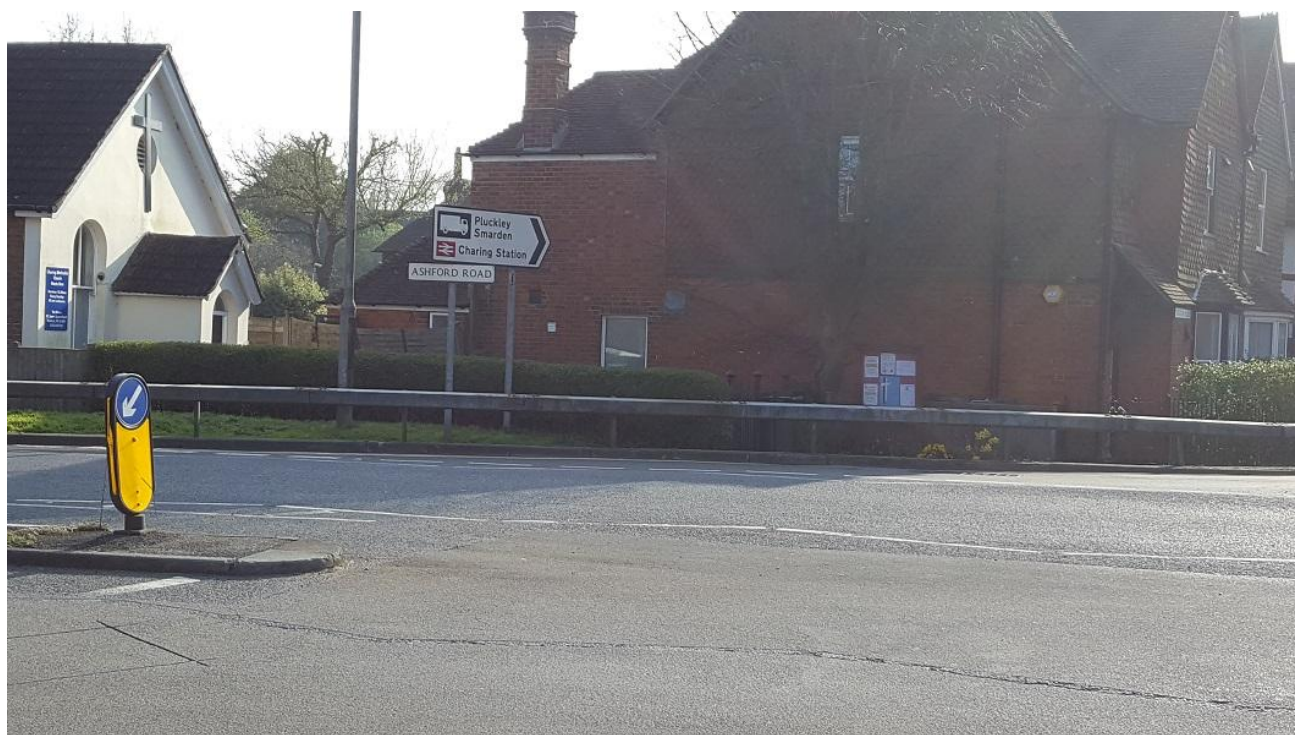


Appendix 14 : Speed map summary

These are the recorded speeds after further slowing down for the pinch point, 25m into Station Road at the proposed crossing point

Summary results from ATR traffic survey, Friday October 6th to Thursday October 12th, 2017									
Station Road Westbound									
Fix1	Time	Vbin	Vbin	Vbin	Vbin	Vbin	Vbin	Vbin	Vbin
		0	10	15	20	25	30	35	40
		10	15	20	25	30	35	40	45
seven day total		338	1736	10719	5926	325	26	5	1

Appendix 15: A20 street signs at the Station Road/Ashford Road junction



Appendix 16: Street sign showing that Pluckley Road is a signed lorry route (A20 heading east in Charing)



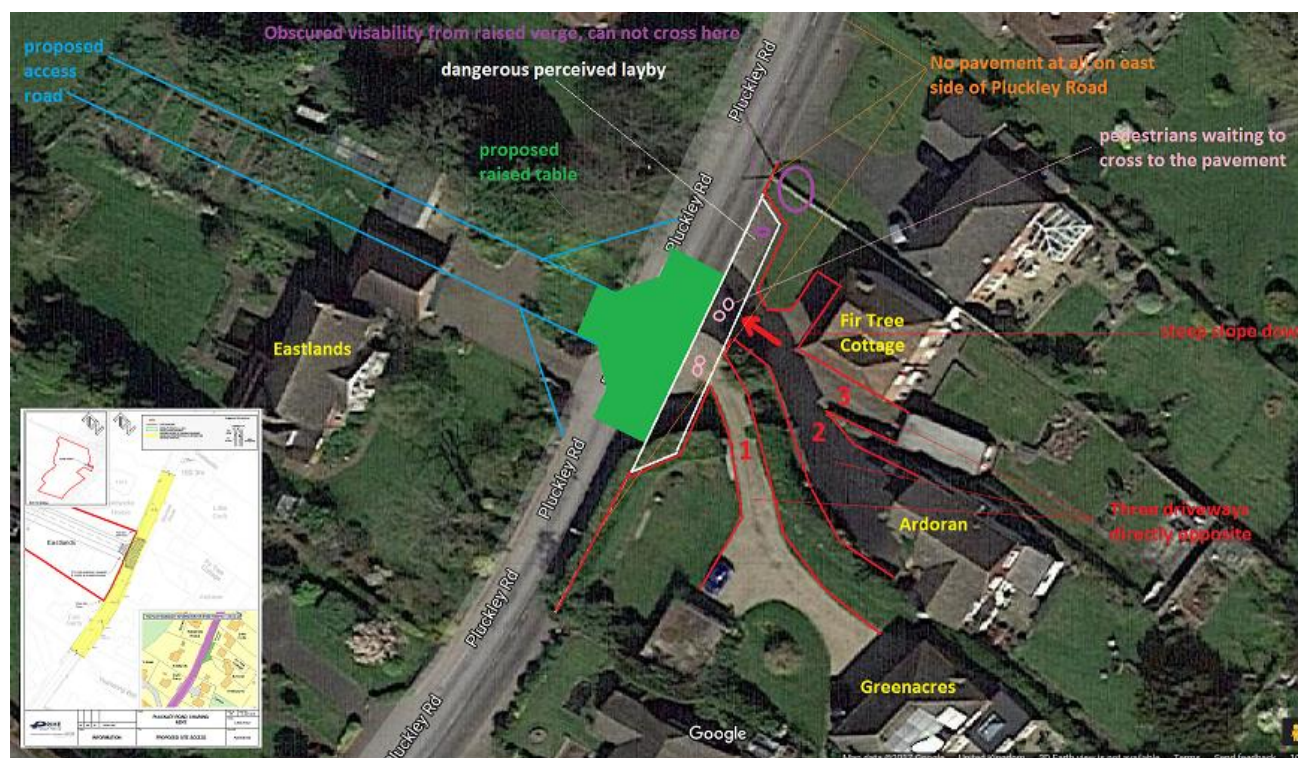
Appendix 17: ATC count summary

Summary results from ATR traffic survey, Friday October 6th to Thursday October 12th, 2017														
Pluckley Road Southbound				No of vehicles by class										
Time	Total	Cls 1	Cls 2	Cls 3	Cls 4	Cls 5	Cls 6	Cls 7	Cls 8	Cls 9	Cls 10	Lorries, heavy vehicles	HGV %	
Mon	2438	18	2114	11	233	23	17	7	6	2	7	295	12.1	
Tue	2497	16	2191	16	234	14	7	3	5	6	5	274	11.0	
Wed	2525	14	2171	22	266	20	3	7	13	5	4	318	12.6	
Thu	2584	25	2212	17	263	32	2	6	4	15	8	330	12.8	
Fri	2634	17	2294	21	256	17	8	5	7	4	5	302	11.5	
Sat	1852	16	1707	20	91	3	3	5	3	3	1	109	5.9	
Sun	1532	51	1409	16	48	2	3	0	0	2	1	56	3.7	
7 day average	16062	157	14098	123	1391	111	43	33	38	37	31	1684	10.5	
5 day average	12678											1519	12.0	

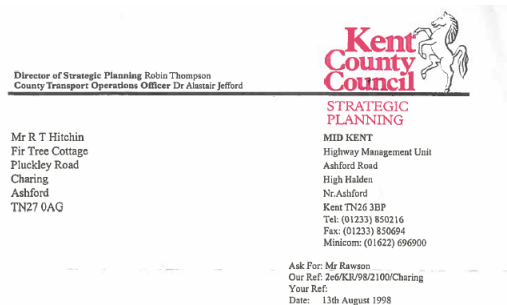
Appendix 18: Proposed site access would be opposite residential properties (Fir Tree Cottage taken from Eastlands)



Appendix 19: Annotated site plan of proposed access junction



Appendix 20: Letter re ownership of layby



Dear Mr Hitchin,

Fir Tree Cottage - Lay-by

I refer to your letter of 11th August 1998 concerning the lay-by fronting the 3 properties in the area. Being in private ownership, the question of lorries encroaching on it is one for the landowners, and any steps taken to protect it would be the prerogative of the owners.

The question of lorry movements on the road during CTRC construction is at present being addressed by the Parish Council, and it may be worth contacting them as they have significant input at present.

Whilst not ideal, Pluckley Road is the most suitable road in the area at present for such movements north to south, and it is difficult to see which roads could be used to cater for this traffic.

Yours sincerely,


K. Rawson,
Maintenance Engineer.

c: Cllr. Doug Gillard ABC
Cllr. Richard King KCC

Head of Network Management John Wale



Appendix 21: Photograph of layby (Ardoran drive looking north on Pluckley Road)



Appendix 22: Pluckley Road southbound



Appendix 23: Three combined drive ways of Fir Tree Cottage, Ardoran and Greenacres



Appendix 24: Water runoff from combined driveway



Appendix 25: Email re safety concerns

----- Forwarded message -----

From: **CLIVE WOODWARD** <clive.woodward@btinternet.com>

Date: 9 December 2015 at 13:44

Subject: Re: RE: Station Road, Near miss 9th December

To: jill.leyland@gmail.com

Hi Jill,

just getting this off my chest following a walk up to the village this morning. I would be happy to circulate to all at our meeting of last June or would be just as happy for you / the Parish Council to forward to them all as a complaint or notice from a villager.

Whilst walking up the village along Station Road and attempting to cross from the Parish Hall to the other side, my wife and I had to step back onto the footpath due to a speeding car coming from the Pluckley direction and then a van had to stop quickly coming from the Ashford direction when we were half way across.

Walking back from the village about 45 minutes later on the narrow footpath on the Pluckley bound side, a rigid bed long wheel based vehicle had to 'kerb scrape' (due to an articulated vehicle coming in the opposite direction and on the footpath) past the two of us walking in single file, first within inches of our heads with the vehicles projecting cab/wing mirror, then literally rubbed along my winter jacket as the side of the vehicle cut a chord across the footpath at its narrowest point and where there is a relatively short-radius bend in the road

alignment and thus the chord encroaches quite some way into the footpath. Meanwhile, the articulated lorry and following cars apparently thought nothing of continuing driving over the footpath on the other side of the road!

It's now over 6 months since we had our meeting and 'walked the site' with the various parties who we rely upon for such issues, and yet nothing has happened to improve the safety of pedestrians. There are no early warning signs of narrow road or footpaths, no speed restrictions, no repairs to or reduction in cross-fall of the footpaths, no reinstatement of kerb heights, no additional pedestrian crossing, no controls to prevent two lorries entering the narrowest part of the road at the same time, and still the existing signage directing HGVs down Station Road remains in place from both the Maidstone and Ashford direction. Furthermore there does not appear to be a clear plan of what will be done and when!

Fortunately both my wife and myself are reasonable fit and can dodge the traffic. However, the consequence of some less able person's or child's jacket getting caught on the side of a vehicle and pulled under the wheels of a 20 -40 tonne lorry does not bear thinking about and thus I believe it is our duty to place these 'near miss' incidents on formal record.

These are, to coin Toby's expression below, safety critical works and as responsible members of the public, Parish Council, Borough Council and County Council, we can not ignore them or leave them to 2017 / 2018 when the necessary road reconstruction works 'might' take place!

Clive



A cyclist using the Pluckley Road pavement heading south at around 8am



A tractor heading south on Station Road

Kent County Council [26 October 2011](#)

Dear Mr Boyle,

Further to your request for information relating to HGV route traffic surveys, you asked the Council to provide responses to the series of questions printed below. Our responses to your questions are in blue below each question.

Please be advised that although the response has been sent from me, I have liaised with KCC Highways and Transportation who have provided the following in answer to your request.

i) When was Pluckley Road/ Station Road, Charing, Kent designated an official HGV route?

Kent County Council has no such official classification of designated HGV routes. In 2001 Kent County Council invested in numerous projects to ensure HGVs were travelling on the most appropriate routes within the County. One of these projects was the production of an advisory lorry route map for Kent which does not identify Pluckley Road/ Station Road, Charing as an appropriate route for HGVs. However, another project was to positively sign some local industrial facilities to avoid HGVs using inappropriate roads to the sites. Due to concerns raised about HGVs using inappropriate routes to various facilities in Pluckley, Egerton, Little Chart, Smarden & Hothfield a signing scheme was implemented. The process for this work was to identify the main attractors of HGVs in the area such as Pivington Mill, Ford Mill, Smarden Business Estate, Marley Farm etc and then sign the most appropriate routes for HGVs to access these facilities. During this study it was clear that the Pluckley / Smarden Road was the most appropriate road for HGVs to access the vast majority of these facilities in terms of comparison between other roads, therefore this was identified via positive signing.

ii) What were the recorded levels of traffic (obtained from surveys by KCC or agents acting on KCC's behalf) at the time of the designation?

Due to the historic nature of the work in question, we regret that recorded traffic levels from the time of designation are not available.

iii) How many traffic surveys have subsequently been conducted, by whom, using what methodology, and what were the exact results?

Kent County Council has no record of carrying out any traffic counts for this particular stretch of the road and therefore does not have any data. However, the Department for Transport are responsible for carrying out some manual counts on this stretch of road and this data is available upon request from [1][\[email address\]](#). The Freight Transport Association may also be able to assist.

iv) What formulae or criteria does KCC Highways use to assess the continuing suitability of a designated HGV route?

As stated in response (i) KCC does not have an official classification of designated HGV routes, and as this project in question is over 7 years old the original documentation relating to it is no longer available. However, a member of the original team that undertook the work has confirmed that potential routes were visually inspected to determine which would be the most appropriate in terms of HGVs accessing different destinations.

I trust this response is helpful to you but if you have any query with the information provided please contact me. However, if you are unhappy with this response, and believe KCC has not complied with legislation, please ask for a review by following our complaints process; details can be found at this link

http://www.kent.gov.uk/your_council/have...

on our website. Please quote reference FOI/11/1432 in any further correspondence relating to this request.

If you still remain dissatisfied following an internal review, you can appeal to the Information Commissioner, who oversees compliance with the Freedom of Information Act 2000. Details of what you need to do, should you wish to pursue this course of action, are available from the Information Commissioner's website

<http://www.ico.gov.uk/complaints/freedom...>

Yours sincerely

Richard Battrum

Information Access Officer

Information Resilience & Transparency

Business Strategy & Support. Governance & Law

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Pluckley Road railway bridge viewed from the south



Pluckley Road railway bridge viewed from the north

Appeal by Gladman Development Ltd

PINS Reference: APP/E2205/W/17/3182838

Ashford Borough Council reference: 17/00303/AS

Land south of railway line and west of Pluckley Road, Charing, Kent

Proof of Evidence of Lucy Simmons

Living on Pluckley Road

The Kent Branch of the Campaign to Protect Rural England exists to protect the beauty, tranquillity and diversity of the Kent countryside.

CPRE Kent, Queen's Head House, Ashford Road, Charing, Kent TN27 0AD
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Registered charity (number 1092012), limited company registered in England (number 4335730).

Land south of railway line and west of Pluckley Road, Charing, Kent

Outline planning application for up to 245 dwellings (including 35% affordable housing), introduction of structural planting and landscaping, informal public open space and children's play area (LEAP and MUGA), balancing ponds, vehicular access point from Pluckley Road and associated ancillary works. All matters reserved with the exception of the means of access onto Pluckley Road.

LPA Ref No: 17/00303/AS

PINs Ref No: APP/E2205/W/17/3182838

1 INTRODUCTION

- 1.1 My name is Lucy Simmons and I am a resident of Pluckley Road in Charing. I taught at the village school for a total of 12 years and was a governor there for four years. I was chairwoman of Charing Gardeners' Society for 18 years and a member of its committee for 32 years.
- 1.2 I am now self-employed, working locally as an independent speech therapist and as a gardener. I live in the Grade 2 listed Broadway Cottages on the edge of the Gladman application site. I have lived there since November 1983
I will talk first about my house, as it is a heritage asset, and then about living on Pluckley Road.

2 MY HOUSE'S HISTORICAL SETTING

- 2.1 The application site on Pluckley Road forms part of the lands of the Manor of Charing. In brief, from the earliest times the Manor of Charing was part of the possessions of the Archdiocese of Canterbury. Its ownership varied between invading kings but by 1070 AD the Manor was a fairly large and wealthy estate. The Manor House is what we know as Palace Farm at the entrance to the churchyard.
- 2.2 Succeeding Archbishops made considerable use of the Manor House and extended it until it became known as The Archbishop's Palace. Archbishop Warham entertained Henry V11 there in 1507 and Henry V111 in 1520. By the 37th year of Henry's reign the king wanted the lands for himself and Archbishop Cranmer had to surrender them to the crown who kept them until 1629. Since then the Manor has passed through various private hands including the Wheler family. But to this day, when an Archbishop of Canterbury visits Charing, by the courtesy of the occupant he robes at the Palace before he proceeds to the church.^[1]
- 2.3 Hasted^[2] records that the trustees and heir of Walter Honywood conveyed the Manor of Charing, with its palace and demesnes, to Sir George Wheler in 1692. From this time the Wheler family has owned plots of land all around the village, which have been tenanted by local farmers.
- 2.4 The Pluckley Road meadows are wet clay and so have long been grassland. The local history society has a record^[3] of a royal inquiry of 13th Feb 1587 into the use and maintenance of the Pluckley Road Palace meadows. This confirms the use of the field as grazing for Archbishop Warham's horses at some time between 1523 and 1532. Later the meadows were used to graze the horses that pulled the village fire engine.
- 2.5 When I moved to the cottage in 1983 there were sheep and lambs in the field in spring, and the further meadow was unimproved and thick with the flowers and varied grasses associated with ancient meadowland, including a few common fragrant orchids.
- 2.6 The Broadway area of Pluckley Road was a wide strip of gently sloping land with a trackway and pond, adjacent to the Palace meadows, where drovers could rest their animals overnight before going on to Ashford Market the next day.

- 2.7 The cottages may have been built to house the poor of the parish, or to house drovers overnight, on land that my ancient deeds say was many years since enclosed from the waste lands of the Manor of Charing. They may also have been farm workers cottages relating to the Grade 2 listed Broadway House, nearby on the eastern side of Pluckley Road, as the 1851 census records George Mundy, a retired medical practitioner, farming 60 acres there, and employing two labourers. The 1840 Tithe map shows several groups of small cottages along this section of Pluckley Road, but of these only The Broadway Cottages remain, hence their historic interest.
- 2.8 The Old Corn Store further down the road was built as a brush factory to employ the poor of the parish and an aged local builder once said to me that “no-one with any money ever lived in your cottages”.
- 2.9 My deeds show that in 1925, Thomas Settatree, bought all three cottages for £95 and it was he who altered the rear roof angle and rebuilt the wooden lean-to walls in brick. In 1951 Thomas sold them to Donald Hardwick who bought an additional area of the adjacent meadow land from Granville Wheler a year later, to create a garden around the cottages.
- 2.10 It is important to see this listed building in its context – as with the long disappeared similar cottages it was a cheaply built dwelling, and it is the only one of its kind to survive. The earliest two of the Broadway Cottages were built to agricultural standards on minimal foundations with one room up, one room down and a timber lean-to at the back.
- 2.11 Another cottage was added slightly later and was rather better built. In accordance with pre-Victorian building style their timber framed structure was infilled with brick which was very heavy for the lightweight frame and may have led to the downfall of the neighbouring cottages, if similarly built.
- 2.12 The listing includes a bakehouse and a stable. The footprint of the stable can still be seen within the garage structure and the brick water cistern and the massive cornerstones that mark out the communal bakehouse are still present in the garden. Many other original features remain to give an insight into the building’s early life and these add value to its historic status for the benefit of current and future generations.
- 2.13 Changes to a listed building and its setting should sustain, reveal and reinforce interest and value, not erode its value. The Broadway Cottages are listed grade 2 and thus warrant every effort to preserve both the building and its historic setting within the Palace meadows area.
- 2.14 Because of the cottages close proximity to the application site any development of the application site would be within the setting of a historic asset. Given its historical association with the open fields of the Manor of Charing its setting would be substantially affected by the new development.
- 2.15 Building modern houses and associated infrastructure over the adjoining grassland setting, increasing the traffic past the front door, shaking its structure and flooding the building as a consequence of construction vehicle vibration which could sever the water main, as has happened in the past, show complete disregard for this heritage

asset and so cannot be considered sustainable development or in keeping with The Wheler Trust's own objective... "The maintenance and preservation of historic buildings and works of art for the benefit of the public - whether or not educational".

3 LIVING ON PLUCKLEY ROAD

- 3.1 I would like to describe a little of life on Pluckley Road for all those who are unfamiliar with the location. In order to gather a clear picture from the different stretches of the road I spent time with 34 neighbours asking each household the same questions about traffic, walking, cycling and driving on the road, the view from their house and their use of the village facilities. I selected the houses between the railway bridge and Charing Heath Road as these lie parallel with the application site.
- 3.2 I bought my house because of its spectacular views across the fields to the Downs. 16 of my neighbours on Pluckley Road bought theirs for the same reason. H.E. Bates, who lived in Little Chart and who's grand daughter I went to school with, knew Charing well. He wrote about the view of the North Downs in his short story, *Some Other Spring*: "It was so long since he'd seen it that he had forgotten how perfectly the low fold of meadows gave way to strips of cornland, the barley almost as white as the chalk on which it grew, and the glowing beauty of the dark beechwoods above and beyond"^[4] That perfectly describes the view that 16 Pluckley Road households have across the Wheler south and north meadows to the Downs.

4 WALKING ON PLUCKLEY ROAD

- 4.1 There are parts of Pluckley Road where the pavement is extremely narrow, measuring just 96cm wide over the railway bridge. In contrast, the safety area marked out along the edge of the platform at the station below is 122cm wide. Colin Burns will cover this in detail, but every single resident that I spoke to said that they feel unsafe walking along Pluckley Road (see Appendix A, paragraph 3). They list the narrow pavements, fear of being hit by a lorry wing mirror, speed of traffic and vehicles mounting the kerb among reasons for their insecurity. Three residents have actually been touched by passing vehicles as they walked on the pavement.
- 4.2 Mostly it is the retired people and the dog walkers who walk to the village. Those of us who are working tend to drive because we don't have time to walk. It takes around ten minutes to walk to the village shop from my house, plus shopping time and very probably chatting time, and then ten minutes to walk home.
- 4.3 Of my neighbours, 21 households drive to the village once per week or more. Seven households drive to the village occasionally. Four people do not drive at all. Some retired people always try to walk but will drive if it is raining. The respondents who live closest to the village will walk more often than drive. The respondents who live furthest away drive to the village more often than walk. The cut off point is The Broadway Cottages area of the road.
- 4.4 Interestingly The Broadway Cottages are located 800 metres from the Londis store in the High Street. This is a pattern that is likely to be followed on a new development within the Wheler Meadows, as even walking in a straight line from the south west

corner of the field to my house takes around ten minutes, so a total walk time from there to the village and back would be over 45 minutes.

- 4.5 I cannot believe that working people who come to live on the application site behind my house would consider doing anything but drive to the village. Once in the village it is often difficult to park - there is simply no room for another 245 cars to try to park there.
- 4.6 If I am going to an evening or weekend event in the Parish Hall near the A20 junction with Pluckley Road I usually walk as the Hall is on my side of the road and parking is limited. However if a commuter or school train has just arrived at the station it is inevitable that I meet people on the railway bridge where someone must step into the road as the pavement is not wide enough for us to pass.
- 4.7 During the day there is a six minute window between the down train and the up train arriving at Charing station which concentrates walking commuters on the narrow bridge. School children walk daily on the narrow path past my house. They also have to pass each other on the bridge at a time when Pluckley Road is at its busiest as the Tenterden coach picks up below my house while the Ashford coaches pick up in the village. They have no option but to step into the road in the rush hour.
- 4.8 Carers and visitors to Charing Court Residential Home, about 8 eight doors down the road from me, are regular walkers on Pluckley Road. However, residents are never seen on the pavements. When my dad was living in Charing Court old peoples home I would sometimes take him out for a change of scenery. My garden gate was the limit of our excursions as the pavement past my house and at the railway bridge wasn't wide enough to accommodate him in his wheelchair. I would only ever take him to my house on Sundays when there was less traffic as he felt so vulnerable.

5 DOG WALKERS

- 5.1 Dog walkers are the most frequent and regular walkers along Pluckley Road, walking daily along the narrow pavements either to reach the village and beyond or to get onto Charing Heath Road as quickly as possible. There are ten households with dogs between the railway bridge and Charing Heath Road. They all pass my house and I know them all to chat to. One resident has commented "Our dogs don't like the lorries – they get spooked by them. We have to walk with them very carefully, in single file". Another household carries their terrier dogs along the narrow sections of the road in order to keep them safe.
- 5.2 In wet weather the footway past the Broadway Cottages presents a further challenge to pedestrians as rain water pours down the road and cars throw a dirty tidal wave across the front of my house. I have to stand indoors and wait until cars have passed before opening my front door, and pedestrians have to run if they see a car approaching or they will get soaked.

6 CYCLING

- 6.1 Unlike most of the Pluckley Road residents I do ride my bike to the village and beyond – but only in quiet times as I always feel very intimidated by lorries passing me on the narrow road. I have not often felt intimidated by car drivers but eight of my

neighbours have told me about aggressive drivers on their part of Pluckley Road. Out of the 35 households that I spoke to only seven will risk cycling on Pluckley Road and they try to get off the road as soon as possible. One family cycles in single file with their daughter between them. I used to cycle with my children but like my neighbours it was only to reach Charing Heath Road and the quieter lanes beyond.

- 6.2 I work in Charing Heath with a young man who cycles daily on the Pluckley Road pavement all the way from the A20 to Charing Heath Road because he finds cycling on the road so frightening, especially in the dark after work. This then adds another hazard for pedestrians.
- 6.3 Charing is actually an attraction for experienced cyclists because Pluckley Road itself, on its uphill approach to Charing, as well as Charing Hill, are both Strava challenges. Strava is a website and mobile app linked to satellite navigation and used by dedicated cyclists to record and share their performance online. The Strava segment entitled "Climb into Charing" demonstrates the popular nature of Pluckley Road as an access point for the A20 and Charing Hill, with 774 cyclists listed as having made 2,000 journeys since Strava gained popularity three years ago. 24 cyclists have already made this trip at least once since the beginning of January 2018. That is one cyclist per day in the height of winter - the least hospitable conditions for the transport mode.
- 6.4 Every Saturday there is at least one pack of club cyclists moving at speed on Pluckley Road and on Sunday there are two or three, even in winter. My son is a club cyclist and reports that these packs will be travelling at 25 mph past my house towards Charing village. Danger awaits them in the future as they wheel around the bend towards Eastlands at 25mph to find a queue of cars exiting or waiting to access the development.

7 DRIVING AND TRAFFIC

- 7.1 As with the planned access at Eastlands, my house is on a bend and the sightlines are poor. I have to edge out into the road, watching the traffic on the opposite side to allow anyone on my side road to move around the protruding front of my car.
- 7.2 Cars often pick up speed as the road straightens out after the railway bridge, and even overtake on the straight stretch beyond my house. Pluckley Road is the route to the motorway emergency access and in my experience, there is at least one emergency vehicle each week rushing to use this access.
- 7.3 Speeding is a major cause of anxiety for my neighbours with nine of them specifically commenting. One had her car overturned by a passing car as she was turning into her drive. Nine of my neighbours comment on how aggressive other drivers are when they slow down to turn into their own drives. They endure gesticulation, swearing and tailgating.
- 7.4 FSG is an agricultural contract company based in Pluckley. They send out enormous agricultural vehicles to local farms using Pluckley Road as their main route. The machines are so big that they span more than a single width of the carriageway, and all trailers rattle loudly. They are least noticeable in the winter. Through the rest of the year they work late into the night and cause traffic to stop when a lorry, bus or another big tractor comes the opposite way. They frequently drive in the private

driveways outside Pluckley Road houses in order to pass other big vehicles, as do lorries and coaches when they pass each other in opposite directions.

8 TRAFFIC CALMING

- 8.1 No-one has consulted with me about this. I do not agree with the Gladman design proposals for horizontal and vertical traffic calming. The road is noisy enough without the associated grinding of lorry gears and additional rattling over platforms. At least now when the traffic is noisy it passes quickly.
- 8.2 It is irritating when the traffic slows down or queues outside my house – as it does for Operation Stack and twice a year on Point to Point days when the cars queue right back from Charing Hill. When vehicles are idling in the road outside the engine fumes and car radio noise come indoors even with the house windows shut, and the traffic calming plan in Gladman’s transport assessment would cause traffic to queue outside the house in both directions, throughout the day, every day. This would be intolerable. Gladman’s own noise and vibration report ^[5] states that noise levels for Pluckley Road residents and across the development site are already over the World Health Organization limits and that when the development is complete noise will rebound off the new houses pushing noise levels even higher. The noise of construction will also increase levels further beyond WHO limits.

9 VIBRATION

- 9.1 The big vehicles drive up the road using both carriageways to avoid overhanging the kerbs. As with the school buses they take up the whole road at the bend by the Parish Hall because the carriageway is so narrow. Vibration from the heavy vehicles shakes my house and sets my car alarm off and it clearly shakes the road too. The Victorian water main has fractured four times uphill from my house and flooded my property twice, mostly recently causing £91,000 worth of damage. Along its length it fractures annually, including by the Pluckley Road railway bridge in July 2016 when tipper trucks were transporting soil for a slurry pit in Little Chart. This would inevitably happen again during an 8-year period of heavy construction traffic uphill from my house.

10 CONCLUSION

- 10.1 Living on Pluckley Road has many drawbacks in terms of traffic and unsafe walking, but there are also benefits of which the wonderful view and the historic rural location are very important to the residents.
- 10.2 Building a very large housing development on the proposed site will destabilise the balance of advantages and disadvantages because it will take away the positive things that make the existing community work – the views and the historic rural setting at the edge of the village – and will increase the hazardous elements of traffic, air and noise pollution.
- 10.3 This development will destroy the setting of an historic grade 2 building. It will result in many more vehicle movements which will increase noise and air pollution. It will increase the danger on an already dangerous road. It will not be an asset for the village but on the contrary, will destroy the ambiance of an historic village settlement. This appeal should be dismissed.

References

1. Notes taken from local information booklet "Charing Church and Village", undated and unattributed
2. Hasted, E., The History and Topographical Survey of Kent, volume 7, 1798
3. From notes transcribed by Duncan Harrington for Pat Winzar (Charing Local History Society) in 1993, from an Inq.A.q.d., 13th Feb 1587. "Interrogatories to be ministred unto the witnesses to be produced on the parte and behalf of Thomas Brente Esquire ..."
4. Bates, H.E. in "Elephant's Nest in a Rhubarb Tree and Other Stories", 1938
5. Wardell Armstrong "Noise and Vibration Assessment" prepared for Gladman Developments Ltd, Jan 2017 para 4.2.1

APPENDIX 1: Summary of Information Contributed by Pluckley Road Residents

Pluckley Road Survey Information..... January 2018

1 Background

- 1.1 In order to get a wider picture than my own of living on Pluckley Road I spent time with 34 neighbours asking them the same questions about traffic, walking, cycling and driving on the road, the view from their houses and their use of the village facilities. This is a summary of what I found out.

2 DEMOGRAPHIC

- 2.1 Of 35 respondents the household comprise, 17 are retired, 18 are working, 7 have young people at school/college.

3 DOG WALKERS

- 3.1 Of 35 respondents 11 own a dog.
- 3.2 Of those 10 have a regular walk from home which involves walking on Pluckley Road once or twice daily. One family carry their 2 dogs through the sections with narrow pavements. The other dog lives at the junction and is walked along Charing Heath Road.
- 3.3 Dogs are walked up to the village and along the Pilgrim's Way, Poppy fields, Pett Lane, Hook Lane, Clewards, the playing fields, and on local footpaths.
- 3.4 Dog owners rarely drive their dogs to a walk so they have to do part of their walk on Pluckley Road.

4 WALKING TO THE VILLAGE/STATION ETC

- 4.1 Of 35 respondents, those who live closest to the railway bridge walk to the village shop (Londis) most often (daily), whether they are retired or not.
- 4.2 Those who live between between the Purlands flats and The Broadway Cottages tend to walk to the village shop 2 or 3 times per week, apart from 1 lady who doesn't drive and so walks daily.
- 4.3 Those who live past the half mile/800 m point only walk to the village shops occasionally with the exception of one man who walks to buy a daily paper.
- 4.4 Dog walkers will tend to use the village shops when out with their dogs rather than make a special journey. One teenager, who lives in the furthest houses from the railway bridge, works at the Londis and walks to work there daily.

- 4.5 Apart from 1 lady who is housebound, **every single respondent said they feel unsafe from the traffic when walking.** They feel unsafe because of:
- Fast traffic
 - Cars and lorries coming very close to pedestrians,
 - Having to cross Pluckley or Station Road
 - The pavements and footpath over the railway bridge being too narrow
 - Fear of being hit by a lorry wing mirror
 - Lorry might suck a pram or toddler into the road
 - Too narrow for a pushchair
 - Having to step out into the traffic to pass other people
 - Poor repairs to pavement – uneven, unsafe pathway
 - Having to stand in hedges when lorries pass because the pavement is so narrow
 - Lorries and other traffic mounting pavement
 - Size of vehicles on the road
 - Narrow sloping pavement by the flint wall is unsafe
 - Scared by the lorries
 - Increased volume of traffic
 - Feeling vulnerable when large vehicles meet in the narrow areas (railway bridge and by Parish Hall)
 - Speed of traffic
 - Walking with children especially in the dark
 - Using the bridge when it's icy.

5 DRIVING TO THE VILLAGE/STATION ETC

- 5.1 Of the 35 respondents retired people like to walk to the village rather than drive.
21 households drive to the village once per week or more.
7 households drive to the village occasionally.
4 people do not drive at all.
- 5.2 Some retired people always try to walk but will drive if it is raining.
- 5.3 In general terms, the respondents who live closest to the village walk more often than drive whilst the respondents who live furthest away drive to the village more often than walk.
- 5.4 The Broadway Cottages area is the cut-off point, at which, and south of which, people will drive to the village more often than walk (other than dog walkers and summer time recreational walkers). The Broadway Cottages are half a mile/800 metres from the Londis shop.

6 OTHER MODES OF TRANSPORT

6.1 TRAIN

Of the 35 respondents 5 households use the train daily, 5 use it weekly/fortnightly, 7 use it approx monthly and 11 use it occasionally.
It is mostly used by teenagers and for daily journeys to school.

6.2 BUS

Of the 35 respondents 4 use the no 10x bus daily for journeys to school. 3 people use it weekly but most households do not use the bus, using cars instead.

6.3 BICYCLE

Of the 35 respondents only 7 households cycle on Pluckley Road.

5 of these have children.

Those who do cycle say they try to get off Pluckley Road as fast as possible or ride on Sundays when it is quieter.

Reasons for not cycling are:

- Too dangerous (4)

- Wouldn't dare! (2)

- I would cycle but not on Pluckley Road – my bike is in my shed (1)

- We have a shed full of bikes but cycling to work (in the village) is so unpleasant because the traffic is intimidating (1)

- The road puts me off cycling (1)

- The road puts me off commuting to work by bike (1)

- Intimidated by lorries coming up behind and passing on the narrow road (1)

7 SHOPPING

7.1 SUPERMARKETS

Of the 35 respondents all but 2 use supermarkets for their main food shop rather than the village shop. Those 2 are elderly and family members bring their food – from supermarkets. 2 households say that they are using the village shops more as they are ageing.

7.2 VILLAGE SHOPS

Of the 35 respondents 7 households use the village shops daily, 14 use the shops weekly, 12 use the shops twice or 3 times per week, and the rest occasionally.

7.3 PETROL STATION

Of the 35 respondents 1 uses the petrol station 3 times per week, 11 households use the petrol station weekly or fortnightly, 9 use the petrol station occasionally (often for mower fuel, but also for flowers, gas, milk and bread).

7.4 CAR REPAIRS

9 households have their cars repaired or buy tyres at Charing Motors.

8 SCHOOL TRANSPORT

8.1 Of the 35 respondents 5 have children who use a school bus and have to cross the narrow railway bridge at peak traffic flows. 1 family drive their children to school to avoid them having to walk on the narrow pavements.

9 DO YOU EVER FEEL UNSAFE WALKING ON PLUCKLEY ROAD?

9.1 Comments:

- "They come so close" - cars and lorries coming very close to pedestrians (4)

- I am elderly and I don't feel safe when I walk up the road (1)

Feel unsafe having to cross Pluckley or Station Road (2)
 The pavements being too narrow (5)
 Fear of being hit by a lorry wing mirror (1) (3x incidents + 1 near miss of actually being hit by lorry mirrors)
 The path over the railway bridge being too narrow and so feel unsafe (4)
 Lorry might suck a pram or toddler into the road (1)
 Too narrow for a pushchair (1)
 Having to step out into the traffic to pass other people/ I always wait for the other person to cross the bridge so I don't have to step into the traffic (3)
 Poor repairs to pavement – uneven, unsafe pathway which is getting narrower as leaves are never cleared (2)
 Having to stand in hedges when lorries pass because the pavement is so narrow (1)
 Lorries and other traffic mounting pavement (3)
 Narrow sloping pavement by the flint wall is unsafe (1)
 Scared by the lorries/size of vehicles on the road (1)
 Increased volume of traffic (1)
 Feel vulnerable when large vehicles meet in the narrow areas (railway bridge and by Parish Hall) (1)
 It was nervewracking to walk along the road in the dark with a 6-year old (1)
 Speed of traffic makes me feel unsafe (5)
 I'm too scared to use the bridge, especially if it's icy (1)

10 POSITIVE THINGS ABOUT LIVING ON PLUCKLEY ROAD

10.1 Comments:

Lovely rural location (1)
 Plenty of wildlife (4)
 Lovely view across Gladman fields to the Downs (16)
 Lovely views towards Ashford as well (5)
 Semi rural feel/edge of the village/sense of living in a rural area (13)
 Nice neighbours/community/village community not a town community (10)
 Sense of space and fresh air (2)
 Peaceful environment (for homes set back from the road)/peaceful in the back garden (6)
 Good access to countryside walks (2)
 Traditional/varied housing character (4)
 Nothing positive to say – deteriorated over the last 20 years (1)

11 ANY EXAMPLES OF TRAFFIC INCIDENTS YOU'VE HAD/OBSERVED ON PLUCKLEY ROAD?

Comments:

11.1 PAVEMENT MOUNTING

- Large vehicles meeting and necessitating one stopping to let the other pass in opposite direction, or mount the pavement (10)
- When I drive I may have to mount the pavement to let a big vehicle pass (4)
- A lorry drove over the pavement outside the Orams and then drove through the layby at Dillington (1)

- Cars and lorries drove over my layby – that's why I put rocks there (1)

11.2 EVASION BY PEDESTRIANS

- I was walking and just past Eastlands a lorry mounted the pavement in front of me when another big vehicle came the other way (1)
- I was walking & had to duck into The Firs because a lorry mounted the kerb and I had to get out of the way (1)
- I get squashed into the side of the path by traffic (1)
- I get right over to the side when a lorry's coming, especially when they are coming from both directions (1)
- Very often I step into the top of the station steps at the bridge, because the lorry wing mirrors stick right out (1)

11.3 INCIDENTS OF VEHICLES TOUCHING PEDESTRIANS

- Walking with a friend a Carrs bus came so close it almost clipped my shoulder bag. I felt the wind on my arm (1)
- A van hit Ruth's carrier bag when she was walking on a narrow part of Pluckley Road with one of our children (1)
- My shoulder was clipped by a lorry when walking near the railway bridge (1)
- I had my basket nudged by a vehicle in the Purlands hedge area (1)

11.4 ACCIDENTS WITNESSED BY RESIDENTS

- I have witnessed 3 road accidents at the cross roads, one fatal (1)
- I've witnessed 2 crashes at the A20 (1)
- I saw an elderly couple crossing Station Road by the Parish Hall and a car came from the A20 and almost hit them (1)
- Crossing Station Road and the A20 is horrendous. There have been accidents (Feb 2017 pedestrian knocked down by footpath to surgery) (1)
- In 2001 I was in my friend's car turning into my drive when we were clipped by a passing car. It flipped our car over. We had the children in the back. It was terrifying (1)
- The S bend is always dangerous. I saw a near miss today – a lorry in the rush hour (1)
- I have witnessed near misses turning out onto the A20 (4)
- There are lots of accidents, mainly at the junction with the A20 (1) I was there when an elderly resident was distracted by a big lorry and tripped over a bramble. She fell with her legs in the road. She was so lucky not to be run over (1)

11.5 SIZE OF VEHICLES

- The traffic is very heavy and there are lots of lorries (1)
- HUGE vehicles travel on Pluckley Road (1)
- The farm vehicles are so big they are wider than the carriageway (1)

11.6 LACK OF SPACE FOR VEHICLES

- As a driver, when driving through the narrow bends extra caution and slow speed are needed (2)
- Cars coming out of the Parish Hall car park swing right out into the carriageway to turn left (1)

- A lorry & a coach tried to pass on the railway bridge & all the traffic came to a standstill/2 lorries passing blocked the road (4)
- I have seen a mobile home on a lorry and a coach trying to pass (1)
- Waiting at the junction with the A20 I regularly meet the school bus coming the other way. It comes SO close and yesterday the person in the car behind me looked so shocked at how close it came (1)
- Getting out of Pluckley Road onto the A20 is difficult. It is such a difficult crossroads (1)
- Traffic queues right back from the A20 when someone is trying to turn right out of Pluckley Road (1)
- When a big vehicle is trying to manoeuvre from A20 into Pluckley Road people have to queue on the A20 (2)
- Once school buses come off the A20 it takes a while for them to straighten up into their own carriageway and then they are at the narrow S bend (1)

11.7 SPEED

- Fast lorries are terrifying when they pass (1)
- Speed of vehicles past our house makes it difficult to cross Pluckley Road (1)
- We can hear the speed of the cars from indoors – several go really fast especially the regular one around 10.30/11pm (2)
- A Christmas my son parked on the other side of the road. He went back to the car with his arms full of kids presents. It was raining and he had his hood up. A vehicle flew past and nearly took him with it. The cars go too fast and our front gate goes out at a point where the traffic is fast (1)
- When pulling out of our drive we have to bear speed of traffic in mind (1)
- I've seen cars speeding and overtaking outside my house (4)

11.8 POOR VISIBILITY

- Exiting Blackberry Lane is a nightmare – we have to creep and stop or go for it (1)
- Getting out of Blackberry Lane is difficult now, the risk will increase with any additional traffic (1)

11.9 NOISE

- I work nights & the road noise from HGVs is intolerable making it hard to sleep (1)
- The road is noisy (1)
- Noise and fumes come into my house when the traffic backs up outside (1)

12 PROBLEMS

12.1 ACCESSING OWN DRIVES/ AGGRESSIVE DRIVING

- Due to the volume of traffic travelling on this “country road” it is frequently difficult to get out of our driveway when going anywhere by car – at all different times. There have been some near misses (1)
- When backing in at night I have to sit waiting to reverse in & I can wait for ages (1)
- When I pull out onto Pluckley Road I have to look both ways as traffic is often on the wrong side (1)
- When you have to back into your drive cars queue up and the drivers intimidate you by pulling faces and shrugging their arms at you (1)

- Intimidation by other cars when driving at 30 – they drive too close behind and then screech past as we slow down to turn into our drive (2)
- Aggressive driving on this section of the road (1)
- When reversing in no-one waits. We regularly get people flashing/becoming aggressive and overtaking you when you started the manoeuvre on an empty road – because they are speeding

12.2 SURFACE WATER – NO CHANCE TO AVOID

- There's loads of water on the carriageway and passing cars throw water up over pedestrians. You have to run past the puddles in case the cars splash you (3)
- Cars aquaplane on the surface water (1)
- Passing cars throw a bow wave of water over the front walls of my house (1)
- The road surface is terrible and nearly always wet. (1)
- The road is so bad with potholes and cracks (1)

12.3 VIBRATION

- The road causes a coating of dust on our car bonnet, our house shakes and our car alarms go off when the big lorries go past. It is noisy (2)
- Vibration of my house caused by lorries (even though our house is set back from the road) N.B. Two are listed buildings (3)

12.4 OTHER COMMENTS ABOUT PLUCKLEY ROAD

- A friend will not visit me now as there is no pavement on our side of Pluckley Road (1)
- It is now difficult to walk our alpacas along the road due to the traffic – their speed, lack of driver awareness and lack of respect for animals means this is hazardous. We always took them out weekly 9 years ago (1)
- Our dogs don't like the lorries – they get spooked by them. We have to walk with them very carefully, in single file (1)
- When our grandchildren wanted to go and play in the park we had to go in the car as we didn't feel it was safe to walk up Pluckley Road with them (1)
- Colin has taken to wearing a reflective jacket when he walks to the village (1)
- As my eyes deteriorate I have to use my ears when I cross the road (1)
- Sometimes the traffic has to stop for me when I cross as I walk with a frame (1)
- Lorry fumes are at child height (1)
- Additional construction traffic will be intolerable – we are thinking of moving (1)

LAND TO THE WEST OF PLUCKLEY ROAD, CHARING

APPEAL BY Gladman Developments

**PROOF OF EVIDENCE OF TOM LA DELL
CAMPAIGN TO PROTECT RURAL ENGLAND, KENT**

**Ashford Borough Council Reference: 17/00303/AS
Planning Inspectorate Reference: APP/E2205/W/17/3182838**

FEBRUARY 2018



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APPENDIX

- TL1 – Qualifications and experience**

1.0 Introduction

- 1.1 My name is Tom La Dell. I provide evidence in this appeal on behalf of the Campaign to Protect Rural England, Kent (CPRE, Kent) regarding the landscape and visual impact of the appeal proposals for the proposed development and the assessment of the impacts and mitigation proposals. My qualifications and experience are set out in Appendix TL1. I rely in this evidence on planning and other evidence provided by Ashford Borough Council (ABC) and CPRE, Kent.
- 1.2 This Proof of Evidence is submitted in respect of the decision by Ashford Borough Council to refuse permission for housing on the site of up to 245 dwellings, access from Pluckley Road, allotments, public open space and landscape planting. It has been prepared within the week before the deadline for the submission of Proofs of Evidence. I have, however, been familiar with Charing, the Kent Downs and the landscape of mid-Kent, and have lived and worked 7km west of the site, for over fifty years.
- 1.3 17/00303/AS has one reason for refusal. This relevant landscape and visual reasons are:
1. *The proposal would be contrary to Policies CS1, CS6, CS9, CS15 and CS18 of the Local Development Framework Core Strategy 2008, Policies TRS1, TRS2, TRS17 and TRS18 of the Tenterden and Rural Sites DPD 2010 and Policies GP12, EN9, EN10 and EN27 of the Ashford Borough Local Plan 2000 and emerging Policies SP1, SP2, SP6, HOU4, HOU5, ENV3, ENV5, and ENV13 of the Ashford Local Plan 2030, and the National Planning Policy Framework, and would therefore represent development contrary to interests of acknowledged planning importance and a form of unsustainable development, and this is not considered to be outweighed by the benefits of the development cited by the applicant, for the following reasons:*
 - a. *the scale and location of development proposed would have a significant adverse urbanising impact, out of character with the established edge of settlement character and would be unacceptably harmful to the visual amenity of the area.*
 - b. *The resulting development would harm a valued landscape which forms part of the Charing Farmlands Landscape Character Area. Impacting upon its acknowledged rural character that forms an important component of the setting of, and entrance to Charing.*

- c. *Given the topography and levels of this part of the Charing Farmlands Landscape Character Area relative to other parts of the existing settlement including the A20 movement corridor running through the village of Charing, the scale and location of the development proposed would have an adverse impact on the landscape views currently available to the site from the nearby AONB, the North Downs Way and the PROW, to the detriment of the landscape and how the settlement of Charing is read within that landscape.*
- d. *The development would not protect landscape character, visual amenity or scenic value and would result in a significant and unacceptable extension to Charing.*

Scope of my evidence

- 1.4 My evidence principally addresses the landscape and the visual impacts of the proposals in the surrounding landscape and on the existing development pattern of the village of Charing. This is in relation to the Landscape and Visual Appraisal (LVA) by FPCR dated December 2016 submitted with the application and my own visits to the site and its surroundings within the last week. It also addresses the Framework Plan by FPCR 6734-L-03C in relation to the landscape and visual impacts and the feasibility of the proposals on this drawing.

2.0 Landscape and Visual Impact Assessment

- 2.1 The LVA submitted with the application refers in paragraphs 4.8 to 4.10 to the Ashford landscape Character Assessment (2009), 132, Charing Farmlands. In the quotations from the text it omits the important assessments of the built edges of Charing village that *“To the west, views are more open across larger scale arable field, punctuated by small woodland clumps and scattered farmsteads”* and *“To the east the pattern of landscape is much influenced by the urban edge of Charing and the route of the A20 in terms of field pattern and land use”*. The land to the west of Charing is thus considered to be more open and the edge of Charing is not mentioned as a landscape feature. It continues that *“In contrast, [to the historic core of the village] more recent brick housing is situated on the outskirts of the historic core of the village”*. The Sensitivity of the landscape is quoted, including that *“However, more recent housing does not respect the local character and dilutes the sense of place”*. It is thus clear that in relation to the description of Charing Farmlands the proposed development goes strongly against the assessment and the descriptions of Charing and its landscape setting. The proposals do not relate to the historic core of Charing or to more recent development. It is a proposal in essentially open countryside and not related to the pattern of the village of Charing.
- 2.2 In paragraphs 4.18 and 4.19, Site and Immediate Context it is claimed that ‘An assessment of landscape character of the site and its immediate context has been carried out, providing a finer level of assessment than the published studies’. A cursory description of the local landscape is made in paragraph 4.19 which does not describe the landform at all, when this is the most important element of assessing the landscape and visual impacts of the development in the local landscape.
- 2.3 In paragraph 4.25 Scenic Quality it is stated that ‘The landscape within the site is represented by an agricultural landscape on the fringes of the settlement of Charing’. It then goes on to say that ‘The landscape character is therefore inevitably influenced by its relationship to the urban edge’. There is no evidence to provide justification for the connection between these two statements. It is clear when in the locality that there is no significant connection between the site and the ‘urban edge’ of Charing. There is scattered housing on the west side of Pluckley Road and there are continuous detached houses in large gardens on Charing Heath Road. The railway station, platform and

substation are in a cutting and only visible when close to them. The housing is more or less continuous along the east side of Pluckley Road but it is not correct to call it 'urban edge'. It is one dwelling deep (apart from the land south of the railway line which was a former industrial estate) of detached houses in relatively large gardens and is correctly called 'ribbon development' in the CGMS Heritage Statement. It should be concluded that the proposal is a massive backland development in an area of scattered housing outside the core of Charing village and with the long western edge facing the open countryside. It would be wholly suburban in character and not related in any way to the existing built form along Pluckley Road.

- 2.4 The assessment in paragraph 4.32 is that the sensitivity and landscape value of the site is 'medium'. In the context of the Charing Farmlands Landscape Character Area this is positive and confirms that the site is an integral part of the open landscape.
- 2.5 The failure to properly identify and describe the local landscape is also reflected in paragraphs 4.34 to 4.57, **Visual Baseline**. There is a public footpath close to the western boundary of the site and no photographs have been taken or visual assessment made from this important location. The site rises up from the western boundary to the eastern boundary and it is clear on site that the impact of the roofs of the houses rising up the slope will have a very large urbanising impact on the local landscape. This is not assessed and no visualisations or cross-sections appear to have been provided as evidence for the landscape and visual conclusions in the LVA.
- 2.6 In paragraph 6.7 it is stated that 'The recent direction of growth has therefore been located in a south westerly direction, with housing still under construction at Poppy Fields.'. Poppy Fields is west of the centre of Charing, while the proposed development is south west of the centre of Charing and well beyond the cluster of housing around the village centre. The implication suggesting that Poppy Fields and the proposed development continue the same pattern of expansion of Charing is thus incorrect. It continues that: 'The proposals will continue the historic growth direction of Charing in the 21st century'. There is no evidence base to support this and the statement is in fact both wrong and misleading. All the recent growth of Charing has been around the ancient village centre. Much of the ribbon development along Pluckley Road is earlier 20th century and before the effective control of ribbon development.

- 2.7 Paragraph 6.9 states that 'The development will result in a strong sense of place creating a strong green settlement edge ...' but the 'sense of place is not defined. In fact it will be a large suburban housing estate tacked on the scattered housing along Pluckley Road. This is wholly out of character with the modest extensions around the centre of Charing which are in small clusters.
- 2.8 The conclusions in paragraph 7.4 are thus entirely wrong and the proposed development will not have a **minor adverse** residual effect on the Charing Farmlands Character Area. The same errors as described above are repeated to justify this conclusion.

3.0 Framework Plan

- 3.1 The FPCR Framework Plan with the planning application is for access, housing, allotments and public open space and landscape planting on the site. The planting proposals are not entirely clear. The tree planting and 'meadows' referred to in the LVA are not separated in the key. It appears that the dark green is trees and the paler green is meadow. If this is the case, there is nowhere near enough tree planting to achieve the proposed future screening of views from the Kent Downs Area of Outstanding Natural Beauty (AONB) and the local views as proposed in the LVA. Effective long term screening of the views will require tree and shrub belts to be at least 10 metres wide. It will have to be demonstrated that the tree planting will not adversely affect existing and proposed properties by shading when it reaches its mature height of say 20 metres. It is recognised that this is an outline application but evidence should be provided to demonstrate that adequate tree planting can be provided in the context of the proposals to provide the predicted landscape and visual mitigation. These comments are by no means meant to indicate that it is considered that the proposed development is considered acceptable on landscape and visual criteria in this location.

4.0 Conclusions

- 4.1 The planning application is for housing, allotments, public open space and landscape planting on the site. The Landscape and Visual Assessment does not adequately assess the landscape and visual impacts on the site. It does not provide an appropriate evidence base for the conclusions. It thus does not state the actual impacts of the development on the local landscape and views. There are errors in the description of the settlement of Charing and the way it has developed over the years, particularly in the last century. The LVA does not recognise that the proposed development is a massive backland development behind scattered houses fronting Pluckley Road and tries to couch this in vague terms. Give this and the incomplete assessment of the local landscape the LVA does not give an accurate assessment of the range of impacts which it should have considered.
- 4.2 I thus respectfully request that on the grounds of landscape and visual assessment and the potential of the proposed development to harm the local landscape and the development pattern of Charing that this appeal be refused.

TOM LA DELL QUALIFICATIONS AND EXPERIENCE

APPENDIX TL1

Tom LaDell

Appendix TL1

Qualifications and Experience

I am a Chartered Member of the Landscape Institute and a Member of the Chartered Institute of Ecology and Environmental Management. I have a degree in Botany from Oxford University and a post graduate diploma in Landscape Design from Manchester University. I have practised as a Landscape Architect since 1969 in the London Borough of Lambeth and then Kent County Council, until I established Tom LaDell Landscape Architects in 1984 and LaDellWood in 2012.

I have practised in most areas of landscape architecture including housing, employment, industrial, retail, minerals and waste, urban and rural recreation, ecology and development, trees and development, master planning, environmental impact assessment and many aspects of landscape planning. The latter includes Landscape and Visual Impact Assessments (LVIA) in accordance with the LVIA guidance applicable at the time. I have worked on many housing and other developments on urban and village fringes. Our practice includes ecology with surveys, mitigation, enhancement and management fully integrated in to our landscape work.

Appeal by Gladman Development Ltd

PINS Reference: APP/E2205/W/17/3182838

Ashford Borough Council reference: 17/00303/AS

Land south of railway line and west of Pluckley Road, Charing, Kent

Proof of Evidence of Jill Leyland

Charing and Future Development

The Kent Branch of the Campaign to Protect Rural England exists to protect the beauty, tranquillity and diversity of the Kent countryside.

CPRE Kent, Queen's Head House, Ashford Road, Charing, Kent TN27 0AD

www.cprekent.org.uk Phone: 01233 714540 Email: info@cprekent.org.uk

Registered charity (number 1092012), limited company registered in England (number 4335730).

Land south of railway line and west of Pluckley Road, Charing, Kent

Outline planning application for up to 245 dwellings (including 35% affordable housing), introduction of structural planting and landscaping, informal public open space and children's play area (LEAP and MUGA), balancing ponds, vehicular access point from Pluckley Road and associated ancillary works. All matters reserved with the exception of the means of access onto Pluckley Road.

LPA Ref No: 17/00303/AS

PINs Ref No: APP/E2205/W/17/3182838

1. Introduction

- 1.1 My name is Gillian (usually known as Jill) Leyland. I live at 21 Station Road in Charing. I moved to Charing in 2010. In March 2014 I was co-opted as a parish councillor and my position as a councillor was subsequently confirmed in the May 2015 elections. I became Chair of the Parish Council in May 2016.
- 1.2 My position as Chair and the very active role I have played in the Parish Council since joining it make me well placed to comment on a number of points relevant to this Inquiry.
- 1.3 In addition, my long professional experience as a statistician and economist have given me knowledge and analytical skills which help in assessing a number of the potential impacts of development on the parish.
- 1.4 While largely retired, I am currently a member of an advisory panel established to assist the Office for National Statistics to improve its coverage of economic statistics in the wake of the Bean review as well as being a member of the National Statistician's Advisory Panel on Consumer Prices. In recent years I have also played an active role in the work of the Royal Statistical Society. This has included a four- year term as a Vice President and giving both oral and written evidence to House of Commons select committees.

2. Charing Parish Council

- 2.1 Charing Parish Council (CPC) made strong objections to the proposed development both when it was considered by Ashford Borough Council and in our comments on the Appeal. I will not seek to repeat them in full here but in summary, in addition to its proposed size, we considered the site to be unsustainable since:
 - (i) It would provide a totally incongruous urbanised sprawl extending significantly away from the edge of the village and out of line with the limited scale and the character it now enjoys;
 - (ii) It would damage visual amenity, the landscape character and the setting of Grade II listed Broadway Cottages;
 - (iii) It is highly visible from key viewpoints in the AONB, thus adversely affecting the AONB's setting;
 - (iv) The proposed access has major and serious problems that could not be overcome;
 - (v) It would add substantially to the well-known traffic problems on Pluckley and Station Roads and the A20/Station Road junction;
 - (vi) Pedestrian access to the village centre, the school, the church, the bus stops and even the close-by station and GP surgery is unsafe and unsatisfactory and cannot be improved. Wheelchair access is very difficult;
 - (vii) The proposed 8 years of development means that neighbours will be exposed to the problems of construction for far too long;
 - (viii) The suggested benefits are exaggerated and in no way compensate for the disadvantages.

- 2.2 Other witnesses, with whose statements my fellow parish councillors and I fully agree, will cover some of these issues in depth in their evidence. For my part, after a brief background, I shall start by citing evidence on residents' opinions to demonstrate the importance to them of views and the surrounding countryside as well as maintaining the village character. This evidence is taken mainly from the questionnaire and other work undertaken during the course of preparation of our Neighbourhood Plan.
- 2.3 I shall then go on to cover the huge amount of development that is already in view for Charing. I shall show that adding this site on top of existing, permitted and planned development could increase the size of the village by well over 50% and that this site is the most harmful of all the sites under consideration. I shall consider the potential impact on facilities and infrastructure as well as commenting on public transport. And I shall comment briefly on the alleged economic benefits that Gladman claim.

3. Background to Charing

- 3.1 Charing parish consists of the village of Charing itself, the settlements of Charing Heath and Westwell Leaon and the surrounding area. Charing Heath is in a separate Ward (Weald Central) to the rest of the parish which is in Charing Ward. Since the proposed development is on the outskirts of Charing village much of my text will relate either just to Charing itself or to Charing ward.
- 3.2 Charing is an historic village with a recorded history¹ dating back to the 8th century and much evidence of habitation before then, almost certainly due to its position on the spring line (where water falling on the permeable chalk of the North Downs meets a layer of impermeable clay and emerges as springs) and by early transport routes. The village grew slowly through the ages. It has many fine listed buildings including, in addition to the well-known Archbishops' Palace, a Grade 1 listed church, a characterful High Street and many buildings dating from the late Middle Ages, Tudor times and the 17th and 18th centuries.
- 3.3 Physically it stands on the lower parts of the scarp slope of the North Downs so it has the Downs AONB on one side and the pleasant undulating fields, pastures and small woods of the Vale of Holmesdale on the other. The juxtaposition of the two landscapes and the attractive village gives a series of beautiful and much appreciated views. These are much appreciated by residents and visitors alike.

4. Views of Residents

- 4.1 It is the combination of its history and its geography that underlies the essential character of Charing and that makes it, for many residents, a "special" place to live. Preserving the essence of these qualities and its "village character" is highly important to residents. Charing parish is in the middle of preparing its Neighbourhood Plan and this process has enabled views of residents to be gathered on a range of topics. The importance to residents of the surrounding scenery and views, and of protecting both the historic village and the sense of community, were themes that arose repeatedly.
- 4.2 The process included a questionnaire distributed to all residents aged 16 and over. One of the questions in it was "On a scale of 1 to 5, where 1 is not important and 5 is important, how much do you value the following in Charing Parish?" The top answer, with an average score of 4.75 out of 5, was "surrounded by beautiful countryside". At least three quarters of those who filled in the

¹ Brief details of its history are given in the evidence by Lucy Simmons.

questionnaire voted various views important to them with views of the North Downs cited by 87% of respondents.

4.3 The three top answers in the questionnaire to the question, “When thinking about building new homes and new housing developments in the parish what is important? (Scale of 1 to 5 where 1 is not important and 5 is very important)” were (score out of 5):

- Protect the historical North Downs Way and Pilgrims Way4.70 (94%)
- Designs that respect the scale of the existing village landscape.....4.67 (93%)
- Protect the designated Areas of Outstanding [Natural] Beauty.....4.64 (93%)

4.4 Appendix 1 gives the full answers to these and other questions quoted from the questionnaire. These answers are not a surprise since similar sentiments were expressed in previous parish plans. And in a recent brief survey of the new residents of the Poppyfields developments, many mentioned walking on footpaths with the Pilgrims Way being a favourite of several respondents.

4.5 Charing is a lively and vibrant village with much going on. There is a strong sense of community which shows itself when needed. I witnessed it myself in 2016 when it seemed for a while as if the village might lose its Post Office. Many people have told me of the way the whole community came together to support the candidature of the Archbishops’ Palace in the BBC “Restoration” programme. Appendices list some of the events filmed over the years by a resident, Mr Harold Trill, and a current list of clubs, societies and activities. In other words, Charing does not need additional residents to maintain its social vitality.

4.6 There are negatives. Apart from the current absence of a full pub, restaurant and hotel a key negative that comes through is traffic and parking. In the very first Neighbourhood Plan workshop, residents were asked to say what was “tops” about the parish, what was “pants”, and what their dream was for Charing. Traffic and speeding gained the most votes for “pants” with Pluckley and Station Roads getting frequent mentions. The attractive environment and community spirit were among the “tops” while “retaining village character” was the most frequently mentioned “dream”.

5. The impact of the A20

5.1 As mentioned, Charing developed partly as it was on ancient transport routes. Proximity to transport links remains true today although the major transport routes of the M20 and High Speed/Channel Tunnel railway, while they go through the parish, are a little distance from the village (they do affect our second settlement of Charing Heath more seriously). The line from Canterbury and Ashford to Maidstone and London Victoria passes on the edge of the village (with the proposed development site just beyond it).

5.2 However the A20 passes right through the village and this negatively affects village life. The historic core with the High Street, church, library and school is on the northern side. The GP surgery, railway station, parish hall and Methodist church are on the southern side. It is perceived as a challenge to cross, particularly away from the pedestrian traffic lights. In the five years 2012 to 2016 there were five reported injury accidents² close to the cross roads with Station Road and the High Street as well as a further accident a little further along towards Ashford.

² Source: www.crashmap.co.uk

- 5.3 In the first half of 2017 there were two further injury accidents between the roundabout and the cross roads. In one of these the pedestrian was very seriously injured. There are frequent but uncounted non-injury crashes. The barriers surrounding the cross roads show the dents and damage caused by vehicles hitting them.
- 5.4 The impact of the A20 is intensified for people in the northern side of the village since if they have to visit the surgery, parish hall or station, they then have to cross Station Road (see statement by Colin Burns). Meanwhile the two latest major housing developments, as well as all the proposed sites are on the south side of the A20 away from the village centre.
- 5.5 The A20 is the relief road whenever the section of the M20 between junctions 8 and 9 is shut. In particular this happens whenever Phases 2 or 3 of Operation Stack occur. Phase 2 closes the coast bound section of the M20 between junctions 8 and 9; phase 3 closes the London bound direction as well. All normal traffic then is directed down the A20, resulting in the road carrying a continuous stream of traffic. During such times it is more difficult to move around or through the village by car and to cross at the A20/Station Road junction.
- 5.6 It is also more difficult for pedestrians to cross the A20 and this even includes crossing at the pedestrian lights. These are set so that when you press the button the sensors wait until there is a gap in the traffic before turning the lights red. Normally this works fine – but in Operation Stack times gaps rarely occur. When Phase 3 of Operation Stack occurs complete gridlock results. Between January and August 2015 Operation Stack was implemented on 32 days. This included three implementations each lasting five days; and on two occasions Phase 3 was used³.
- 5.7 There are clearly concerns that Operation Stack or similar problems could become more frequent should border controls be imposed following a hard Brexit.

6. The new building Charing is facing

- 6.1 Charing Parish Council (CPC) acknowledges that, given the housing crisis, Charing may have to accept housing development on sites which are not ideal.
- 6.2 On top of extant planning permissions for the parish amounting to 141 dwellings, the emerging Local Plan would add a further 200 homes. When completions to date are included this would bring the proposed increase in housing numbers to 33% for Charing parish and 35% for Charing ward compared to the 2011 base line. Details are shown in the table in the appendices.
- 6.3 CPC considers the increase in housing numbers in the draft Ashford Borough Local Plan to be too high. We are also of the opinion that there are a number of unresolved issues with the proposed allocations. We have set out these objections in response to the emerging Local Plan and will make our submissions to the forthcoming Local Plan examination.
- 6.4 Nevertheless while we have serious concerns about the sites proposed in the draft Ashford Borough Local Plan, we consider them less harmful than the appeal site. In particular they have, or are capable of having, direct access to the A20 so would avoid adding further traffic to Station and

³ [Highways England evidence to House of Commons Transport Committee](#), February 2016

Pluckley Roads - roads with well documented problems. Safer pedestrian routes to the village could be established compared to the appeal site. In contrast to these housing allocations, the appeal site is both more noticeable from footpaths on the AONB than other sites and less capable, given the way it slopes, of mitigation.

- 6.5 If development at the appeal site is approved it will mean that either sites which are less harmful overall will not be developed or, if they go ahead, Charing would be faced with an increase in dwellings of over 50% (well over 50% for Charing ward). We trust that no one would consider such a rapid increase in housing to be acceptable for an historic village.
- 6.6 Finally it is worth quoting an opinion of the Inspector who assessed Ashford's adopted Core Strategy. Referring to Tenterden and to the three "tier 2" settlements of Charing, Hamstreet and Wye, his [report](#) (paragraph 4.201 on page 43) states:

Having looked at those reports for myself (and visited the 4 settlements), I consider that it would be challenging to identify sufficient land within them, especially if the amount is increased to avoid reliance on windfalls. They are attractive rural settlements and, apart from Hamstreet, are closely surrounded, in part at least, by AONBs. Further development at Wye, unless opportunities occur on the college site, and Charing seems particularly problematic.

Paragraph 4.190 of the same report is also pertinent.

7. Facilities and infrastructure

- 7.1 Worryingly this substantial growth in housing is not accompanied by any active planning for the needed growth in infrastructure and facilities.
- 7.2 Turning to specific facilities, other witnesses are dealing with water issues. I will simply say that preserving the water supply and quality and extent of the aquifers from which we get our drinking water, which the site overlays, is a key concern to Charing residents and the Parish Council.
- 7.3 The problems of Pluckley and Station Roads and the A20 is also being dealt with elsewhere. Again I simply reiterate that these are major and longstanding concerns of both residents and the Parish Council.
- 7.4 There are many concerns among residents over pressure on the GP surgery which is currently approaching capacity at around 9,800 patients. In addition to Charing the surgery has also to consider future housing growth in other areas it services including Challock, Egerton, Pluckley, Hothfield, Smarden and other villages together with the Local Plan proposed sites along the A20 at Tutt Hill and the land behind the Holiday Inn. The surgery manager has commented:

"The Charing Surgery has serious concerns about the proposed Gladman development and the impact the significant increase in the patient population will have on the surgery. The Practice Manager has written, called and emailed Gladman to discuss the development but has had no response to any of the attempts at communication. Further it should be noted that the written correspondence from the surgery is not noted in the list of objections on the planning application.

"In order to be able to accommodate the growth in population that would come as a result of this development, the surgery needs to be consulted at the earliest possible stage to allow for the

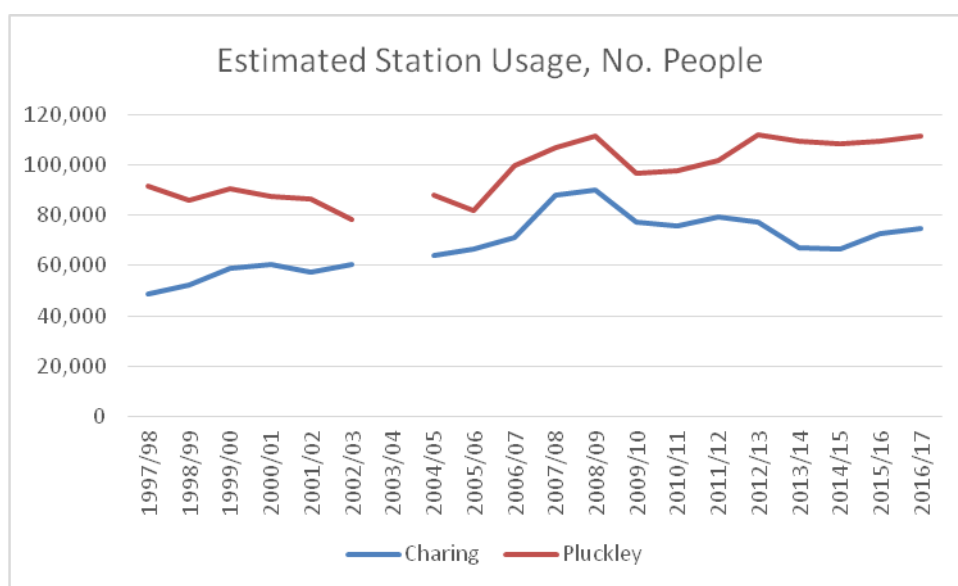
appropriate planning and recruitment to take place. The surgery building would need to be physically expanded and a GP would need to be recruited. Funding from the developers would be imperative to support the physical expansion of the surgery and that funding would be required at the outset of any development to allow the expansion to happen in time to accommodate the increase in patients. “

- 7.5 It is very concerning that Gladman have shown no interest in this problem. Leaving funding to be delivered via S106 monies is not a guarantee that funds will be forthcoming. We have just had a clear example of this. On January 31st full planning permission was finally granted for an age restricted (available to those aged over 55) housing development in Charing for 51 units; outline planning permission was granted for open market housing on an adjacent and related site. The S106 agreement gives the Local GP surgery money for each open market house. But there is nothing in respect of the age-restricted development despite surgery requests and the inevitable higher than normal demand for the surgery's services from the future residents.
- 7.6 Parking is also a problem at the surgery with the car park often being full.
- 7.7 The school has room to grow and is being reviewed with a view to expanding. Initially capacity will rise from accepting 20 students per age year at present to 30 to give a full one form entry. Ultimately it could become a full two-form entry school. Again though proper financing will be essential. This must include provision for on-site drop offs and pick ups since the situation in School Road is already a safety concern at these times. Charing school caters for children from Hothfield and other adjoining parishes and will almost certainly therefore be required to cater for children from the proposed Tutt Hill and Holiday Inn sites.
- 7.8 If more than one major development occurs at the same time then this will exacerbate problems enormously and the situation will be further worsened. Gladman have recently submitted an outline application for 135 homes on the “Wheler North” fields (the larger part of the “Land adjoining Poppyfields” site).
- 7.9 Charing lacks a modern community hall of sufficient size and with parking. The current Parish Hall, built 1897, has no parking, is expensive to heat and would need structural alterations to enable proper facilities for the disabled to be installed. Charing does have two other community spaces in the church Barn and the Pavilion in the Playing Field but both are of smaller size and the Barn has virtually no parking either. Arguably these facilities are tolerable for the village as it stands but would be grossly inadequate for a larger population.
- 7.10 Finally parking in the village is already a problem. It is barely tolerable for the current population but would be completely impossible for a larger population. Incidentally, the proposed sites along the A20 will add to the problems here.

8. Travel and transport

- 8.1 Charing appears to be considered a sustainable village due to its railway station. Undoubtedly this is a benefit but it is not as great a benefit as might appear.
- 8.2 First the station has no disabled access to the “up” platform. This is a major lack affecting not just the disabled but also those with pushchairs or heavy luggage. A new footbridge was installed in 2015 which has provision for lifts to be fitted but this has not yet occurred. The ticket office is manned week-day mornings only and is always under threat of closing altogether. With no support staff to help, at times a disabled or elderly passenger even now is on his or her own.

- 8.3 The trains take 1 hour and 20 minutes at best to get to London. The station they arrive at is Victoria. This is good for people working in government offices in Westminster but less practical for people working in the City or other areas of London. It is noticeable that Pluckley Station, which has trains going to London Bridge, Cannon Street, Waterloo East and Victoria, with a travel time of just over an hour to London Bridge, is far more used than Charing, despite Pluckley being a smaller village, as the following chart of data from the Office of the Rail Regulator demonstrates:



Source: Office of the Rail Regulator

- 8.4 Between 08.41 and 15.47 there is only one train to London per hour. Between 09.41 and 15.41 there is only one train to Ashford per hour. If you commute to work in Maidstone there is no train between 07.57 and 08.41. Connectivity with the High Speed services from Ashford is patchy so many people who use the High Speed drive to Ashford rather than use the train.
- 8.5 The 10X bus service to Ashford and Maidstone runs just once an hour (see appendix) and usually takes 19 minutes to Ashford and over half an hour to Maidstone. There are no buses to Maidstone after 18.08 hours and no buses to Ashford after 19.26 hours. Kent County is currently in discussions with bus companies regarding the subsidies for socially necessary services so it is not certain whether the full 10X service or its 10/10A extension to, among other destinations, the William Harvey hospital, will continue.
- 8.6 Despite Charing's train station and bus services the vast majority of people travel to work by car. In the 2011 census 907 people, 25% of the population between 16 and 74, said they travelled to work by car or van with a further 49 being a passenger. 89 people used the train and only 7 the bus.

9. The alleged economic benefits

- 9.1 Gladman claims a number of economic benefits to Charing from the development notably the expenditure from the new residents. But this would only be of benefit to the Parish if the new residents were to use local shops and services. Given the distance from village shops and the substandard pavements residents would be more likely to drive than walk. Given the parking difficulties since they are already in their cars they would seem more likely simply to drive on elsewhere to where there are greater shopping choices.
- 9.2 The proposed benefits from construction employment during the development period are also exaggerated. The shortage of skilled labour for the construction industry is well known. Much employment would therefore only come from existing construction projects so the net economic gain would be far less than claimed. In addition most workers would come from outside the village and many would probably commute by car.

10. Conclusion

- 10.1 In conclusion, I believe, as do my fellow parish councillors, that this proposed development is completely unsustainable. It would place huge pressure on facilities and on physical and social infrastructure. The priceless setting of the AONB would be irretrievably damaged. It would generate a substantial increase in car journeys since bus and train services are infrequent and a safe walking route to the village centre and other local facilities does not exist. It would provide an incongruous urbanised sprawl on the outskirts of the village. The proposed 8 years of construction are far too long.
- 10.2 Other potential sites are less harmful. The alleged benefits are uncertain at best. In short, it would be a disaster for Charing. The Parish Council asks, therefore, that the appeal be dismissed.

Appendix 1

Full answers to the Neighbourhood Plan questionnaire on questions cited

1,092 validated responses were received. These accounted for 46% of the relevant 2011 census population and 54% of 2011 census households.

Question 3 : How much do you value the following in Charing Parish?

(On a scale of 1 to 5 where 1 is not important and 5 is important. Please put a number in each box but leave blank if you feel unable to comment.)

	Average response out of 5
Easy to commute	3.76
Surrounded by beautiful countryside	4.75
The sports and leisure facilities	3.08
Charing Primary School	3.08
High Street	4.27
Small local businesses incl. farm shops	4.30
The post office	4.61
The library	3.82
Hotels/ bed and breakfast	2.68
Green spaces within the villages	4.47
The sense of community	4.29
The pubs	3.68
The restaurants	3.65
Churches	3.46
Good business opportunities	2.96
GP practice	4.69
Pharmacy	4.70
The sense of history of the area	4.20
Historic buildings	4.18
Community venues	3.89
Footpaths in the parish	4.24

Question 14. When thinking about building new homes and new housing developments in the parish what is important?

(On a scale of 1 to 5 where 1 is not important and 5 is important. Please put a number in each box but leave blank if you don't feel able to comment.)

	Average score out of 5
Designs that respect the scale of the existing village landscape	4.67
The use of traditional local building materials	4.08
High levels of energy conservation in new buildings	4.35
Inspirational designs based on new thinking in architecture	2.52
Designs that take into account the character of the Weald setting	4.43
Developments with varied house designs	3.96
Open green spaces and gardens within new developments	4.44
Better pedestrian and cycle access to Charing village centre.	3.97
Clear street signs that respects the village setting	3.88
Better protection of historic features throughout the parish	4.25
Better protection of the High Street for businesses	4.41
Improved flood prevention	3.48
Good management of the varied local wildlife	4.26
Better road safety throughout the parish	4.30
Protect the designated Areas of Outstanding Beauty (AOB) in the parish	4.64
Protect the historical North Downs Way and Pilgrims Way	4.70
New homes provide off-street parking	4.61
Additional facilities are provided to service the extra residents	4.61

Question 15. Which of the following open spaces, buildings, places, views do you consider important?

(Please tick all boxes that apply)

	Number	% of total respondents
Current views of Charing church from inside and outside the village	909	83.2
Archbishop's Palace	828	75.8
Current views of the North Downs from inside and outside the villages	950	87.0
Views of the villages from the Pilgrims Way	819	75.0
Views of the countryside from existing houses	873	79.9
Current views of the Heath (Charing Heath) from inside the village	578	52.9

Appendix 2

Some of the past and more recent community events

Based on information from Harold Trill who has lived in the village for 51 years and who filmed all of them.

1. Tudor May Fayre 1967 (programme 2 shillings and six pence (half a crown)). This was a major event carried out by many, many people. The money raised went to the Charing Sports Club to help pay for the purchase of the land now known as the Arthur Baker Playing Field (Mr Baker had left money in his will). Subsequently many people picked buckets of flint off the field which became the Charing Bowls Club.
2. In 1983 the Charing village School had a 100 years' anniversary sports day. The school has always been very active and gets involved with village activities, lessons permitting. Some four years ago they experimented with a 10 Kilometre run to help raise funds. This turned out to be such a success that they have now established it as an ongoing event. Parents and volunteers all involved.
3. In 1984 a party of ladies went on a Pilgrimage to Jerusalem. On their return they wanted to do some embroidery work for the village church. The then Vicar loaned them £100 and they also ran coffee mornings to get funds to start. Their hard work and many hours of dedicated stitching, some by individuals, some done by groups such as the W.I and Church Guild, resulted in 26 Pew Runners with approximately 72 thousand stitches in each one.
4. 1992: The church needed at least £60,000 to refurbish the six bells in the tower and allied machinery plus much-needed repairs to the church fabric. The year became known as a year to remember. Many activities took place, e.g. Church Flower festival, Canterbury Choir evening, Christmas Pantomimes, musical recitals, plays, Opera in the Garden (Old Vicarage). The response of the villagers and friends more than raised the £60K.
5. In 1997 the village of Charing entered the South East in Bloom competition. Against many other villages in the South East, Charing were the outright winners. Mr Trill filmed most of the year's activities and described the response from everyone as "heart-warming. Every road in the village was inspected by the judges. People took pride in their own patch. Hanging baskets everywhere. Another truly great community effort."
6. The Village Christmas lights have run for many years. At one time they were run by the Village Traders Association. When it became unviable for the Traders the 'Ladies of the Lights' took up the challenge and have made a great success of the operation (see appendix 3).
7. Year 2000, the church wanted to install pathway lights and tower flood lights. Donations were asked for - the community responded. The floodlit tower can be seen from the main A20 road, the pathways are lit for safe walking.
8. Mr Trill was asked to produce a Millennium Film for the School. Every family who had a child at the school received a copy. He interviewed the children of the older classes, and asked them what 2000 onwards might bring. Fascinating replies were recorded for the future.
9. In 2003, the newly appointed Community Warden had been approached by families complaining about state of children's play area, swings in the Playing Field. In addition, the old sports pavilion was in need of a paint cover. A grant was obtained from the B&Q citizens fund and on the day a large number of people of all ages turned up. The pavilion was painted, the whole area cleaned up, bushes trimmed, swings rehung & painted sand changed.

10. The Scouts organisation has had an active group since early in the 20th century. They desperately needed a new hut and HQ at an estimated cost of £50,000. They started fund- raising four years ago. Events included a film show, fire walk and a colour run. The hut is now built – largely with volunteer labour.

11. A few years ago the old sports pavilion burnt down. A temporary pavilion was installed and plans were drawn up for new permanent Pavilion. A number of people offered to help build it and it was done largely with volunteer labour. The village now has a Pavilion that caters for sports events and can be used for public functions.

Appendix 3

Current clubs, activities, events

History Society,
Charing Archaeological Society,
Charing Surgery walking group,
Charing Surgery Gardening Group,
Gardeners Society,
Senior Citizens club,
Bowls Club,
Cricket Club,
Football Clubs (Charing and Charing Heath),
Youth football,
Tennis Club,
Brownies,
Cubs,
Scouts,
Beavers,
Guild of players,
Country Ways Quilters,
Knit & Natter Library group,
Table Tennis,
Villagers Voice.
Zumba,
Badminton
Ballroom,
Whist Drive,
Yoga
Fun train music classes for under 5s
Weekly Farmers Market

Annual and periodic events

Christmas Magical Evening
Church Fete
Village Picnic
Coffee mornings and other fund raising events
Charing's Christmas Lights are a feature of the village; the Magical Evening and a number of other fund raising events are devoted to that.
Villagers Voice organises events to fund raise for local needs such as scouts and the school

Appendix 4

Existing and planned developments in Charing (Number of dwellings)

	Charing Parish	Charing Ward	Charing Heath
2011 census*	1,298	1,135	163
Completions to February 4th 2018	83	78	5
<i>No of completions above which were windfall</i>	<i>22</i>	<i>17</i>	<i>5</i>
Implied current housing stock	1,381	1,213	168
% increase since 2011	6.4	6.9	3.1
Extant permissions (windfall in brown)			
Orbit age restricted development	51	51	
"Char 1" (outline)**	35	35	
Yewtree Park mobile homes	23	23	
The Green	9	9	
Other	23	14	9
Total extant permissions	141	132	9
Permissions plus completions	224	210	14
% increase since 2011	17.3	18.5	8.6
Other sites in ABC Local Plan			
Land behind Northdowns Garage	20	20	
Land west of Poppyfields	180	180	
Total in Plan without PP	200	200	
Planned, permissions and completions	424	410	14
% increase since 2011	32.7	36.1	8.6
<i>Plan plus permissions as % current stock</i>	<i>24.7</i>	<i>27.4</i>	<i>5.4</i>
Appeal site	245	245	
Total with appeal site	669	655	14
% increase since 2011	51.5	57.7	8.6

* Census definitions may differ slightly from planning definitions.

**The number of units was not specified in the outline permission. 35 is the number allocated in the draft Local Plan.

Appendix 5

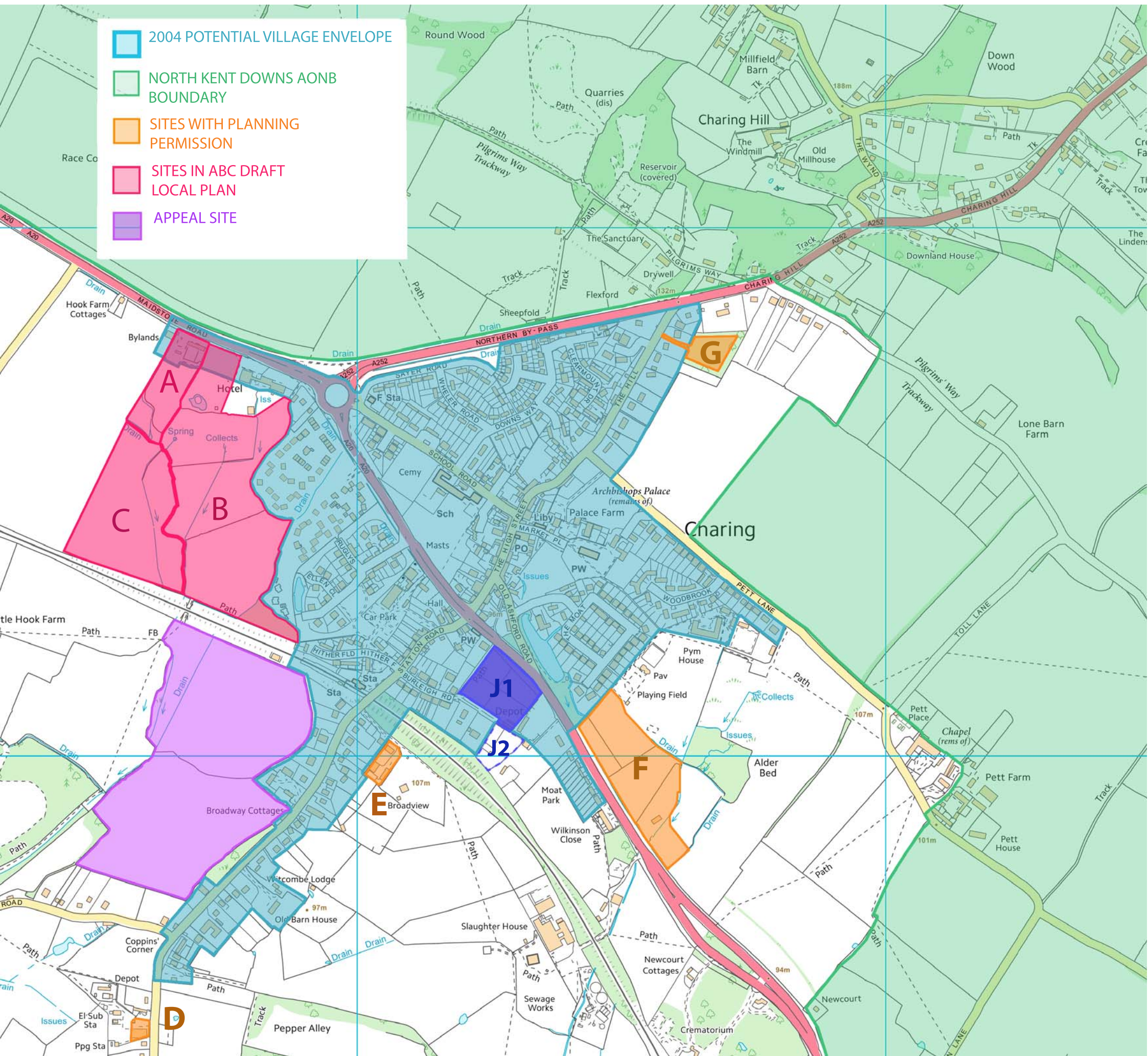
Proposed development sites

On the map site F is the combined site for the Age restricted housing and “Char 1” (Land south of the Arthur Baker Playing Fields).

A is the Northdowns Garage site (s28).

B and C together make up “Land adjoining Poppyfields”, B is land now controlled by Gladman in respect of which a planning application has now been submitted.

J1 is Parsons Mead, a 2017 omission site, and J2 a possible extension to it.



Appendix 6

Bus timetables

Folkestone • Hythe • Lympne • Sellindge • Brabourne Lees • William Harvey Hospital • Ashford
 Folkestone • Hythe • Saltwood • Sellindge • Brabourne Lees • William Harvey Hospital • Ashford
 Ashford • Charing • Lenham • Harrietsham • Bearsted • Maidstone

10
10A
10X

easyACCESS for everyone

Bus routes 10/10A & 10X are normally operated with low floor easyACCESS buses. Although we make every effort to provide easyACCESS buses, there may be circumstances when we need to substitute another bus rather than miss a journey.

MONDAYS TO SATURDAYS except Bank Holidays															SUNDAYS & BANK HOLIDAYS															
route number	10A	10A	10	10A	10	10A	10	10A	10	10A	10	10A	10	10A	10	10A	10A	10	10A	10	10A	10	10A	route number	10	10	10	10		
Folkestone Bus Station Bay D1	0605	0700	0820	0840	0918	0948	1018	1048	1118	1148	1218	1248	1318	1348	1418	Sch	NSch	1518	HG	1620	1653	1723	1800	Folkestone Bus Station Bay D1	0910	1120	1410	1620		
Sandgate Memorial	0611	0706	0826	0846	0924	0954	1024	1054	1124	1154	1224	1254	1324	1354	1424	1454	1454	1524	1545	1626	1659	1729	1806	Sandgate Memorial	0916	1126	1416	1626		
Seabrook The Fountain	0615	0710	0830	0850	0928	0958	1028	1058	1128	1158	1228	1258	1328	1358	1428	1458	1458	1528	1549	1630	1703	1733	1810	Seabrook The Fountain	0920	1130	1420	1630		
Hythe Red Lion Square	0622	0717	0840	0900	0938	1008	1038	1108	1138	1208	1238	1308	1338	1408	1438	1508	1508	1538	1557	1640	1713	1743	1818	Hythe Red Lion Square	0927	1137	1427	1637		
Saltwood Brockhill Road	0627	0723	↓	0906	↓	1014	↓	1114	↓	1214	↓	1314	↓	1414	↓	1514	1514	↓	1603	↓	1719	↓	1823	↓	↓	↓	↓			
Sandling Rail Station ⇄	0630	0727	↓	0910	↓	1018	↓	1118	↓	1218	↓	1318	↓	1418	↓	1518	1518	↓	1607	↓	1723	↓	1827	↓	↓	↓	↓			
Newingreen Ashford Road	↓	↓	↓	↓	↓	1023	↓	1123	↓	1223	↓	1323	↓	1423	↓	1523	1523	↓	↓	↓	1728	↓	↓	↓	↓	↓	↓			
Newingreen Stone Street	0634	0732	0848	0915	0946	↓	1046	↓	1146	↓	1246	↓	1346	↓	1446	↓	1546	1612	1648	↓	1751	↓	1832	Newingreen Stone Street	0934	1144	1434	1644		
Lympne The County Members	0637	0736	0851	0918	0949	↓	1049	↓	1149	↓	1249	↓	1349	↓	1449	↓	1549	1615	1651	↓	1754	↓	1835	Lympne The County Members	0936	1146	1436	1646		
Port Lympne Wild Animal Park 🐘	↓	↓	↓	↓	0952	↓	1052	↓	1152	↓	1252	↓	1352	↓	1452	↓	1552	↓	1654	↓	1757	↓	↓	↓	↓	↓	↓			
Sellindge Swan Lane ⇄	0642	0745	0858	0925	0958	1028	1058	1128	1158	1228	1258	1328	1358	1428	1458	1528	1528	1558	1622	1700	1733	1803	1842	Sellindge Swan Lane (Ashford Road)	0942	1152	1442	1652		
Sellindge Greenfields	↓	↓	↓	0930	↓	1031	↓	1131	↓	1231	↓	1331	↓	1431	↓	1531	1531	↓	1625	1703	1736	1806	1844	↓	↓	↓	↓			
Brabourne Lees The Woolpack	0649	0754	0907	0942	1007	1042	1107	1142	1207	1242	1307	1342	1407	1442	1507	1542	1542	1607	1634	1714	1747	1817	1854	Brabourne Lees The Woolpack	0950	1200	1450	1700		
Willesborough Tesco	0655	0802	0913	0948	1013	1048	1113	1148	1213	1248	1313	1348	1413	1448	1513	1548	1548	1613	1640	1720	1753	1823	1900	Willesborough Tesco	0956	1206	1456	1706		
William Harvey Hospital grounds	0658	0807	0918	0953	1018	1053	1118	1153	1218	1253	1318	1353	1418	1453	1518	1553	1553	1618	1645	1725	1758	1828	1904	William Harvey Hospital grounds	1000	1210	1500	1710		
Ashford Rail Station ⇄ (domestic side)	0707	0825	0931	1006	1031	1106	1131	1206	1231	1306	1331	1406	1431	1505	1531	1613	1606	1631	1658	1738	1811	1841	1915	Ashford Rail Station ⇄ (domestic side)	1010	1220	1510	1720		
<div> To comply with Department for Transport guidance, this journey makes a guaranteed connection at Ashford - stay on the bus.</div>															<div> 10X</div>															
Ashford Rail Station ⇄ (domestic side)	0620	NS	Sch	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	1558	1606	↓	↓	1743	↓	↓	↓	Ashford Rail Station ⇄ (domestic side)	0804	1010	1220	1510	1720	
Ashford Elwick Road Stop K opp. County Square	0624	↓	↓	0714	0830	0937	1037	1137	1237	1337	↓	↓	↓	↓	↓	1604	1612	↓	↓	1750	↓	↓	↓	Ashford Elwick Road Stop K opp. County Square	0808	1018	1228	1518	1728	
Highworth School (schooldays only)	↓	↓	↓	0834	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓			
Sainsbury's Bybrook	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓			
Potters Corner The Hare and Hounds	0630	0720	0720	0839	0944	↓	1044	↓	1144	↓	1248	↓	1344	↓	1444	↓	1611	↓	1619	↓	1757	↓	↓	↓	Potters Corner The Hare and Hounds	0815	1025	1235	1525	1735
Hothfield School Road	0633	↓	↓	0723	0843	0948	↓	1048	↓	1148	↓	1252	↓	1348	↓	1448	↓	1615	↓	1623	↓	1801	↓	↓	Hothfield School Road	0818	1028	1238	1528	1738
Charing School Road	0640	↓	↓	0730	0850	0955	↓	1055	↓	1155	↓	1259	↓	1355	↓	1455	↓	1622	↓	1630	↓	1808	↓	↓	Charing School Road	0825	1035	1245	1535	1745
Charing Heath Church Hill	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓			
Lenham The Square	0647	0735	0737	0857	1002	↓	1102	↓	1202	↓	1306	↓	1402	↓	1502	↓	1640	↓	1648	↓	1815	↓	↓	↓	Lenham The Square	0832	1042	1252	1542	1752
Harrietsham The Roebuck Inn	0654	0746	0746	0906	1011	↓	1111	↓	1211	↓	1315	↓	1411	↓	1511	↓	1649	↓	1657	↓	1824	↓	↓	↓	Harrietsham The Roebuck Inn	0839	1049	1259	1549	1759
Hollingbourne The Great Danes Hotel	0700	0755	0755	0912	1017	↓	1117	↓	1217	↓	1321	↓	1417	↓	1504	1517	1655	↓	1703	↓	1830	↓	↓	↓	Hollingbourne The Great Danes Hotel	0845	1055	1305	1555	1805
Bearsted The Lion of Kent Pub	0705	0801	0801	0918	1022	↓	1122	↓	1222	↓	1326	↓	1422	↓	1509	1522	1700	↓	1708	↓	1834	↓	↓	↓	Bearsted The Lion of Kent Pub	0850	1100	1310	1600	1810
Maidstone opp. Royal Star Arcade	0713	0818	0815	0928	1032	↓	1132	↓	1232	↓	1336	↓	1432	↓	1519	1532	1710	↓	1718	↓	1842	↓	↓	↓	Maidstone opp. Royal Star Arcade	0857	1107	1307	1607	1817
Maidstone Earl Street	0715	↓	↓	0818	0930	1034	↓	1134	↓	1234	↓	1338	↓	1434	↓	1521	1534	1712	↓	1720	↓	1844	↓	↓	Maidstone Earl Street	0859	1109	1319	1609	1819
Tonbridge Road Schools (schooldays only)	0843	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓			
This bus starts from Maidstone Road/Sir John Fogge Avenue at 0718.															This bus continues to Ashford on Saturdays and on Mondays to Fridays during school holidays only.															
															This bus starts from Hythe Road Schools at 1550.															

Some Monday to Saturday buses and all Sunday buses on routes 10/10X, are operated on behalf of Kent County Council by a private contractor.

- NS - These bus journeys do not run on Saturdays.

NSch - These bus journeys run on Saturdays, and on Mondays to Fridays during school holidays only.

1654 - These bus journeys serve Port Lympne Wild Animal Park during British Summer Time only.

Sch - These bus journeys run on schooldays only.
- HG - This bus starts from the Harvey Grammar school at 1535.

- Buses serving Greenfields stop at the end of Swan Lane, other buses stop in Ashford Road.

- These bus journeys are not normally operated with an easy access bus.

- This bus continues to Elwick Road opposite County Square.

For other buses to Saltwood see routes 16 (for Brockhill School) and 18.

Please note that special bus timetables may apply during the Christmas period between 24 December and 1 January. Please contact us for details.

This timetable will operate from 4 January 2016.

Maidstone • Bearsted • Harrietsham • Lenham • Charing • Ashford
















Ashford • William Harvey Hospital • Brabourne Lees • Sellindge • Saltwood • Hythe • Folkestone

Ashford • William Harvey Hospital • Brabourne Lees • Sellindge • Lympe • Hythe • Folkestone

10X
10A
10

easyACCESS for everyone
Bus routes 10/10A & 10X are normally operated with low floor easyACCESS buses. Although we make every effort to provide easyACCESS buses, there may be circumstances when we need to substitute another bus rather than miss a journey.



MONDAYS TO SATURDAYS except Bank Holidays															SUNDAYS & BANK HOLIDAYS								
route number	10X	10X	10X	10X	10X	10X	10X	10X	10X	10X	10X	10X	10X	10X	route number	10X	10X	10X	10X	10X			
	NS																						
Tonbridge Road Schools (schooldays only)														1555									
Maidstone Earl Street Stop V2	0716	0842	0942	1046	1146	1246	1346			1446	1530	1602	1734	1849	Maidstone Earl Street Stop V2	0904	1124	1404	1624	1824			
Maidstone King Street Stop L1	0718	0845	0945	1049	1149	1249	1349			1449	1535	1605	1737	1852	Maidstone King Street Stop L1	0906	1126	1406	1626	1826			
Bearsted The Lion of Kent Pub	0726	0857	0953	1057	1157	1257	1357			1457	1547	1617	1745	1900	Bearsted The Lion of Kent Pub	0913	1133	1413	1633	1833			
Hollingbourne The Great Danes Hotel	0731	0902	0958	1102	1202	1302	1402			1502	1552	1622	1750	1905	Hollingbourne The Great Danes Hotel	0917	1137	1417	1637	1837			
Harrietsham The Roebuck Inn	0737	0907	1003	1107	1207	1307	1407			1557	1627	1756	1911		Harrietsham The Roebuck Inn	0923	1143	1423	1643	1843			
Lenham The Square	0744	0914	1010	1114	1214	1314	1414			1604	1634	1803	1918		Lenham The Square	0930	1150	1430	1650	1850			
Charing Heath Church Hill	0753	▼	▼	▼	▼	▼	▼			▼	▼	▼	▼			▼	▼	▼	▼	▼			
Charing School Road	0803	0922	1018	1122	1222	1322	1422			1612	1642	1811	1926		Charing School Road	0938	1158	1438	1658	1858			
Hothfield School Road	0809	0929	1025	1129	1229	1329	1429			1619	1649	1818	1933		Hothfield School Road	0945	1205	1445	1705	1905			
Potters Corner The Hare and Hounds	0813	0933	1029	1133	1233	1333	1433			1623	1653	1822	1937		Potters Corner The Hare and Hounds	0949	1209	1449	1709	1909			
Sainsbury's Bybrook	▼	▼	1034	▼	▼	▼	▼			▼	▼	▼	▼			▼	▼	▼	▼	▼			
Ashford Elwick Road County Square	0825	0941	1041	1141	1241	1341	1441			1631	1701	1830	1944		Ashford Elwick Road County Square	0955	1215	1455	1715	1915			
<div> To comply with Department for Transport guidance, this journey makes a guaranteed connection at Ashford - stay on the bus.</div>																							
	10	10A	10A	10A	10	10A	10	10A	10	10A	10	10A	10	10A	10	10	10	10	10	10			
	NS	Sch	Sch	NSch	10	10A	10	10A	10	10A	10	10A	10	10A	10	10	10	10	10	10			
Ashford Elwick Road County Square Stop L	0630	0659	0710	0825	0906	0944	1014	1044	1114	1144	1214	1244	1314	1344	1414	1444	1510	1543	1644	1710	1744	1846	▼
Ashford Rail Station ⇄ (domestic side)	0633	0704	0715	0830	0910	0948	1006	1048	1106	1148	1206	1248	1306	1348	1406	1448	1514	1548	1648	1714	1748	1850	1947
William Harvey Hospital grounds	0643	0717	0729	0844	0924	1002	1028	1102	1128	1202	1228	1302	1328	1402	1428	1502	1528	1602	1702	1728	1802	1902	
Willesborough opp. Tesco	0645	0720	0732	0847	0927	1005	1031	1105	1131	1205	1231	1305	1331	1405	1431	1505	1531	1605	1705	1731	1805	1905	
Brabourne Lees The Woolpack	▼	0728	0738	0853	0933	1011	1037	1111	1137	1211	1237	1311	1337	1411	1437	1511	1537	1611	1711	1737	1811	1911	
Stanford North Junction	▼	0713	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼
Sellindge Greenfields	▼	0720	0741	0749	0904	0944	▼	1048	▼	1148	▼	1248	▼	1348	▼	1448	1522	1622	1722	▼	1822	1919	
Sellindge Swan Lane ♦	0651	0723	0743	0751	0907	0947	1020	1051	1120	1151	1220	1251	1320	1351	1420	1451	1525	1546	1625	1725	1746	1825	1922
Port Lympe Wild Animal Park 🐾	▼	▼	▼	▼	▼	1026	▼	1126	▼	1226	▼	1326	▼	1426	▼	1531	▼	1631	1731	1831	▼	▼	
Lympe The County Members	▼	0729	0750	0757	0913	0953	1029	1129	1229	1329	1429	1534	1634	1734	1834	1928							
Newingreen Stone Street	▼	0732	0755	0801	0916	0956	1032	1132	1232	1332	1432	1537	1637	1737	1837	1931							
Newingreen Ashford Road	0655	▼	▼	▼	▼	▼	1056	▼	1156	▼	1256	▼	1356	▼	1456	▼	1551	▼	▼	1751	▼	▼	
Sandling Rail Station ⇄	▼	0738	0801	0807	▼	1002	▼	1102	▼	1202	▼	1302	▼	1402	▼	1502	▼	▼	▼	▼	▼	▼	▼
Brockhill Park College	▼	▼	0806	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼
Saltwood The Green	▼	0742	0811	0811	▼	1006	▼	1106	▼	1206	▼	1306	▼	1406	▼	1506	▼	▼	▼	▼	▼	▼	▼
Hythe Red Lion Square	0700	0747	0818	0818	0927	1012	1042	1112	1142	1212	1242	1312	1342	1412	1442	1512	1547	1601	1647	1747	1802	1845	1939
Seabrook The Fountain	0708	0755	0825	0825	0934	1019	1049	1119	1149	1219	1249	1319	1349	1419	1449	1519	1554	1608	1654	1754	1809	1851	1945
Sandgate Memorial	0713	0800	0829	0829	0938	1023	1053	1123	1153	1223	1253	1323	1353	1423	1453	1523	1557	1612	1658	1758	1813	1855	1949
Folkestone Bus Station	0720	0807	0838	0838	0947	1032	1102	1132	1202	1232	1302	1332	1402	1432	1502	1532	1607	1621	1707	1807	1822	1901	1955
Harvey Grammar School (schooldays only)	0815	0843																					
This bus continues beyond Hythe to Folkestone on Saturdays and on Mondays to Fridays during school holidays only. (On schooldays it terminates at Hythe Red Lion Square where you can change to route 100 at 1519 for Folkestone).															On schooldays this bus starts from Highworth School (Catholic Church) at 1544 and serves all subsequent stops 5 minutes later than the times shown.								

This bus continues beyond Hythe to Folkestone on Saturdays and on Mondays to Fridays during school holidays only. (On schooldays it terminates at Hythe Red Lion Square where you can change to route 100 at 1519 for Folkestone).

On schooldays this bus starts from Highworth School (Catholic Church) at 1544 and serves all subsequent stops 5 minutes later than the times shown.

NSch - These bus journeys run on Saturdays, and on Mondays to Fridays during school holidays only.

1631 - These bus journeys serve Port Lympe Wild Animal Park during British Summer Time only.

♦ - Buses serving Greenfields stop at the end of Swan Lane, other buses stop in Ashford Road.

NS - These bus journeys do not run on Saturdays.

Sch - These bus journeys run on schooldays only.

1610 - Serves Earl Street on Saturdays, and on Mondays to Fridays during school holidays only. On schooldays it starts from Tonbridge Road at 1555.

Please note that special bus timetables may apply during the Christmas period between 24 December and 1 January. Please contact us for details.

This timetable will operate from 4 January 2016.

Appeal by Gladman Development Ltd

PINS Reference: APP/E2205/W/17/3182838

Ashford Borough Council reference: 17/00303/AS

Land south of railway line and west of Pluckley Road, Charing, Kent

Proof of Evidence of Natalie Croome

A Young Person's View

The Kent Branch of the Campaign to Protect Rural England exists to protect the beauty, tranquillity and diversity of the Kent countryside.

CPRE Kent, Queen's Head House, Ashford Road, Charing, Kent TN27 0AD
www.cprekent.org.uk Phone: 01233 714540 Email: info@cprekent.org.uk

Registered charity (number 1092012), limited company registered in England (number 4335730).

Land south of railway line and west of Pluckley Road, Charing, Kent

Outline planning application for up to 245 dwellings (including 35% affordable housing), introduction of structural planting and landscaping, informal public open space and children's play area (LEAP and MUGA), balancing ponds, vehicular access point from Pluckley Road and associated ancillary works. All matters reserved with the exception of the means of access onto Pluckley Road.

LPA Ref No: 17/00303/AS

PINs Ref No: APP/E2205/W/17/3182838

1 Introduction

- 1.1 My name is Natalie Croome, I live at Greenacres, Pluckley Road and I am year 7 student at Highworth Grammar School in Ashford.
- 1.2 Greenacres is directly opposite the entrance to the proposed development site.

2 A Young Person's View

- 2.1 I don't see why Gladman want to continue trying to get an additional 500 cars daily by building along a road that is completely and utterly unsuitable.
- 2.2 Everyone in Charing, including my family, neighbours and friends will suffer for no good reason.
- 2.3 I use Pluckley Road/ Station Road everyday during the school week to go to and from my bus stop in The Moat. My bus, the 10X, takes secondary school children to schools in Ashford and Maidstone. Other children in the village get on coaches and the 124 bus at the railway bridge and at stop a bit further up Pluckley Road going to schools in Tenderden or Ashford and many walk to the Train. Some students use more than one bus. All travelling through Station Road.
- 2.4 My Bus routes are surprisingly good. I only had to phone my mum once last term because the bus broke down.
- 2.5 In the morning I have taken to grabbing a lift from my Dad to take me to the Moat Bus stop. This drive is not quicker than walking because it's difficult for my Dad to drive across the A20 to the high Street. But although it is only a 10-minute walk, which I quite like - it is just too dangerous. The cars / traffic come very close to the pavement where I am walking and because they come from behind me I just can't see them in time to avoid being splashed. On too many occasions in the last term I have turned up for school with wet shoes and splashed and dirty uniform. You have to walk single file. My mum tells me a hundred times to keep away from the kerb because the traffic is forced very close to us, especially if they are large lorries and there are vehicles coming the opposite way. The road twists and several parts pinch, which also forces the cars to come right next to the kerb, of a very narrow pavement.
- 2.6 Noise from the cars makes conversation impossible and the lorries blast you with noise inches away from my shoulders.
- 2.7 Walking home in the afternoon isn't so much of a problem because I can actually see the cars coming towards me and dodge as necessary to avoid being splashed and when I'm home I can get changed.
- 2.8 I objected last year to the entrance being opposite my home because I don't think if 500 cars were turning into or out of the site opposite our house it would be possible to walk across the road to / from our house. It would make our life a nightmare. And cars would undoubtedly try to use our driveway to slip past vehicles turning in to the site.....which is where I need to stand to cross the road.

- 2.9 I cross the road every day at exactly where this entrance is proposed because there is no pavement on our side. Cars coming in and out of the village go around blind bends on both sides and often we have to run or stop our crossing because the vision is so bad. I would be crossing direct into a busy road junction if this goes ahead. We know this site better than anyone and cars exiting have very restricted vision on a speedy road.
- 2.10 Cycling along Pluckley Road / Station road is also far too dangerous. My brother and his family live locally near the village supermarket, but Pluckley Road is not wide enough for me to cycle there safely. Cars come within inches of my bike or put pressure on me as they wait behind whilst I cycle along the road. I have seen a few kids who got forced onto pavements by cars regularly as it's the only safe option.

3. Conclusion

- 3.1. Last but not least Charing is a beautiful mediaeval village, the views out of my bedroom are stunning, and all of this will be lost forever. Effectively Charing will become a town, my views & the Village will be changed forever. Pluckley Road will change from a village road to a major road & by doubling the size of Charing the character of the Village will be changed forever.
- 3.2. As a 12-year old I would hope that the Village which is more than 300 years old can remain the safe and lovely village which it is today for tomorrow's children.

PLUCKLEY ROAD STATEMENT

STATEMENT

My name is Katie Miller and I am the Planning Manager at the Kent Downs AONB Unit. I have a Bachelor of Science Honours Degree in City and Regional Planning and a post graduate Diploma in Town Planning both from Cardiff University. I am a Member of the Royal Town Planning Institute and have over twenty years' experience in town planning, the majority of which has been in Development Management. I have been employed at the Kent Downs AONB Unit for just under 3 years.

While not lying within the boundary of the Kent Downs AONB, which lies along the northern edge of the A20, approximately 550 metres to the north of the appeal site, the site nevertheless forms part of its setting, by virtue of its proximity to the AONB and the fact that the majority of the site is visible from the AONB. This includes views from the North Downs Way National Trail, the long distance footpath which runs for 153 miles along the scarp of the North Downs and from various public rights of way to the north and south of the North Downs Way, in particular from Public Rights of Way AW2 and AW3A and AW4 all on the North Downs Scarp.

The views out from the AONB and in particular southwards from the escarpment of the North Downs were a principle reason for the designation of the AONB and are identified as one of the special characteristics and qualities of the AONB.

From both higher elevations and lower elevations in the AONB, the appeal site is viewed as rural undeveloped countryside. While views of the built form of Charing are possible, much of the built development associated with the village is screened by topography or existing tree cover or views are filtered by mature trees. The application site, in contrast is open in views, with little in the way of existing vegetation screening the majority of the site and with the rising topography of the land up to Pluckley Road exacerbating its prominence in views from the AONB. The proposed development comprising 245 dwellings would be viewed from the AONB as an extensive expansion of the village to the south and west and considerably alter the character of views experienced from the AONB from undeveloped countryside providing a rural setting to the village to a large scale suburban development.

This is not the case with the proposed allocations being put forward by Ashford Borough Council to the north of the appeal site, which sit on lower ground and benefits from existing vegetative screening and with appropriate mitigation would have a much less harmful impact.

It is not considered that the impact of development here in views from the AONB could be satisfactorily mitigated. The Green Infrastructure plan submitted in support of the application proposes little in the way of structural tree planting that would be effective in mitigating impact in views from the higher elevations of the Kent Downs AONB.

As such, it is contended that the application is in conflict with paragraph 115 of the NPPF which requires that great weight should be given to conserving landscape and scenic beauty in Areas of Outstanding Natural Beauty and confirms that AONBs have the highest status of protection in relation to landscape and scenic beauty, the same as that afforded to National Parks.

A High Court Case in February 2015 (Stroud District Council v Secretary of State for Communities and Local Government) confirmed that the landscape and scenic beauty of an AONB can be affected by views out from the designated area with the judgement concluding that paragraph 115 of the NPPF

can cover the impact of land viewed in conjunction with the AONB from the AONB, not just land within the AONB itself.

As such should it be determined that Ashford does not have a 5 year housing land supply it is contended that the tilted balance set out at para 14 of the NPPF is disengaged due to the AONB being specifically included as a Footnote 9 designation and the fact the proposals, would not in my view, comply with para 115 of the NPPF relating to conserving the AONB.

In addition to being in conflict with the NPPF, the proposal is also contrary to the emerging Ashford Local plan policy ENV3b which requires proposals both within and affecting the AONB to conserve and enhance the landscape and other special qualities of the AONB.

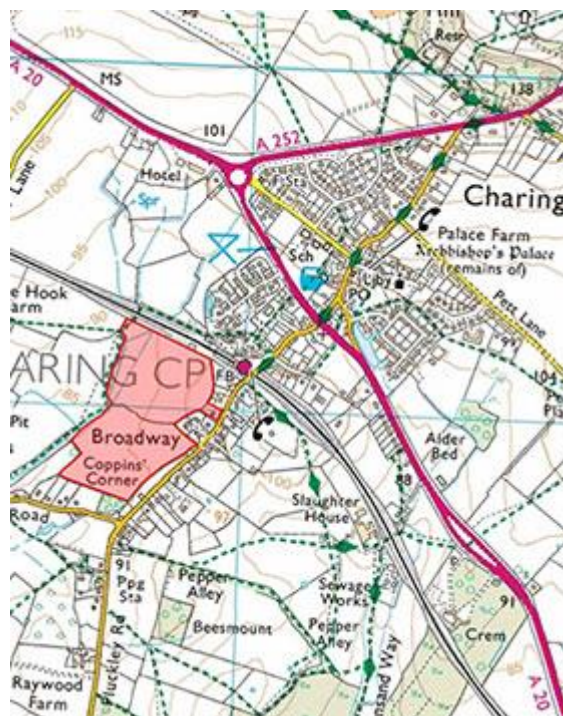
The proposal would also be contrary to the Kent Downs AONB management plan and in particular policy SD8 which specifically refers to the need to protect views to and from the AONB. The Management Plan also advises that where the qualities of the AONB that were instrumental to its designation are affected, then the impacts should be given considerable weight in decisions and that this particularly applies to views to and from the scarp of the North Downs. The Planning Practice Guidance confirms both that Management Plans can be material considerations in the determination of planning applications and that the Duty Of Regard set out at S85 of the Countryside and Rights of Way Act 2000, the primary legislation relation to AONBs, which requires relevant authorities to have regard to the purpose of conserving and enhancing AONBs, is relevant not just to proposals occurring with an AONB boundary but also in respect of proposals located outside of an AONB but impacting on them.

Project 161 - Wheler South Fields

Introduction

In 2017 an outline planning application (17/00303/AS) for up to 245 houses was made by Gladman Ltd regarding the land known as Wheler South that lies south of the railway line and west of Pluckley Road (see map). This was strongly opposed by the Parish Council and the village in general. It was refused by Ashford Borough Council – with a unanimous vote on the Planning Committee – for a number of reasons including the urbanising effect on Charing, harm to the landscape including views from the AONB, harm to the setting of a listed building (Broadway Cottages) and unsustainable transport links. The last included the absence of safe pedestrian links to the village centre, the additional traffic on Station Road with a worsening of its well-known problems, and the distance from the nearest bus stop.

Gladman appealed against the refusal and a public inquiry was held in March/April 2018. The Kent branch of the Council for the Preservation of Rural England (CPRE) became a Rule 6 participant in the Inquiry working alongside the Parish Council.



The result of the Inquiry was due in August 2018. A major plank of the Gladman bid was their assertion that Ashford was deemed at the time not to have a five year housing supply. As it happened the examination of Ashford's Local Plan was also carried out in the first months of 2018 overlapping the Wheler South inquiry. The Inspectors carrying out the examination found that due to the delaying impact of Junction 10A works on a number of developments in the borough it would be appropriate to assess housing supply over a period of 7 years rather than the normal 5 and on this basis they judged that Ashford's housing supply was adequate. This undermined the Gladman bid for this site (and others in the borough) and as a result they withdrew their application before the results of the Inquiry were known.

This leaves open the possibility that they could apply again should Ashford fall short of a satisfactory housing supply or any other target a future government might introduce.

The site remains highly unsatisfactory for housing development and the rest of this project includes some of the documents from the appeal hearing which cover the issues with it. In addition the Hydrology Report at Project 131 is also relevant.