

## **SHARPS HILL DEVELOPMENT 19/01493/OUT**

### **Sandhurst Parish Council Response:**

The Parish Council believes that the proposed development is contrary to the interests of local residents and would be detrimental to the landscape of the High Weald AONB. Consequently we OPPOSE the application in its current form for the reasons stated below.

### **Impact on High Weald AONB:**

Paragraph 172 of the National Planning Policy Framework (NPPF) indicates that great weight should be given to conserving and enhancing landscape and scenic beauty in Areas of Outstanding Natural Beauty. In addition, the scale and extent of development within these designated areas should be limited, and planning permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. In particular consideration should be given to the need for the development...

In addition, Policy CP14 of the Council's Core Strategy indicates, among other things, that new development will generally be restricted to sites within the Limits of Built Development (LBD) of villages, and that the countryside will be protected for its own sake and a policy of restraint will operate in order to maintain the landscape character and quality of the countryside.

The proposed development is outside the LBD and while its proponents assert that it forms a natural infill adjacent to the LBD, we disagree. We believe it would extend the village envelope into open countryside by linking the C.20th estates with the historic buildings of Bayford House (grade II listed) and the associated Sharps Hill Oast which currently stand clearly outside the village in a rural setting. In doing so, it might also set a precedent for development of other sites outside the LBD, leading to incremental expansion of the village in a way inappropriate for the AONB. Furthermore, by its nature this development will feel and look like a housing estate detached from the core of the village.

We agree with comments from the Conservation Officer, Debbie Maltby, that "the site is important as part of the green entrance to (and exit from) the village, and the experience of this when entering the historic core forms part of the significance of the Conservation Area. ...The widening and paving of the access will in [her] view be a significant change to the character of the entrance, and hedges will be less substantial and slightly more formal than the existing arrangement, and will clearly open it up more". The developers claim that the development would be well screened and hidden but we believe that "it will be apparent that there is a development of this size no matter how much it is screened, given the increased activity and inevitable hardening of landscaping", particularly as most of the screening vegetation is deciduous and would be of limited effectiveness for much of the year. Indeed, photographs supplied by the developer are universally taken at times of full leaf, using wide angle lens, thereby minimising the apparent visual impact.

### **Effects on Transport and Highway Safety**

Pedestrian access from the development is not linked to existing parts of the village community and residents would need to walk into the village along the busy A268 on a footpath that does not yet exist (or cross the road twice) or if cycling by making a hazardous right turn across the traffic where speeds are often excessive. The nearest bus stop for the infrequent local services is at the Sponden Lane junction, which has no pedestrian access from the site. These factors will tend to encourage the

use of motor vehicles for most journeys leading to adverse environmental impact.

The congestion at the Hawkhurst crossroads is well known and will be further increased by traffic from this development. This will be exacerbated by the need for residents to travel to Hawkhurst to access key facilities such as doctors' surgeries which are not available in Sandhurst.

Highways England has raised no objection to this application. However, their terms of reference only extend to its effect on the "Strategic Road Network" i.e. the A21. The effect on the traffic and safety of the A268 does not appear to have been considered in this context. Our view is that a significant danger will be introduced by having a large number of vehicle movements in and out of the proposed development.

The entrance to the site is just within the village 30 mph area, outside of which is national speed limit. On approach from the west, vehicles, including many HGVs, come down Megrim's Hill at high speed, braking only at the last minute to enter the 30 mph area. As a result, many are still travelling at much higher speeds well beyond the speed limit change, as evidenced by results collected by Speedwatch volunteers in Queen Street, some 200m within the limit, and also by the numbers of offenders caught by speed camera vans operating in the same area. Vehicles travelling in the opposite direction can be observed to accelerate hard as soon as the national speed limit sign comes into view and as a result pass the site access point at high speed (in many cases more than 60mph). This behaviour presents real dangers for vehicles entering the proposed site, especially those approaching from the west, as drivers of following vehicles may not expect them to be making the right turn, which will often necessitate coming to a halt while awaiting approaching traffic to pass. This problem could be alleviated though not eliminated by extending the speed limit further westwards, possibly to Silverden Lane, or by introducing a 40mph "buffer" zone on the Megrim's Hill approach.

### **Environmental and Wildlife Concerns**

The current site is a partially wild area including a variety of natural habitats. The developer's surveys of wildlife appear superficial. The neighbouring area is known to contain significant populations of reptiles, amphibians, bats and birds, including some less common species and it is likely that the development site is used by many of those. The report by TWBC Landscape and Biodiversity Officer, David Scully, in response to the original 2019 application was critical in this context. There do not appear to have been any improvements in this application. It is inconceivable that replacing such an area with a manicured housing estate, even with a token pond, can represent an improvement to biodiversity.

Further, the area is notable for its nocturnal tranquillity and darkness. The addition of so many dwellings is likely to increase the level of light pollution significantly.

The comments of the Archaeological Officer in respect of possible archaeological heritage on site should be noted.

### **Housing Needs in Tunbridge Wells Borough**

If this application were to be approved at the proposed level, it would take Sandhurst well above the number of dwellings required to fulfil local housing plan commitments and there is no evidence of unsatisfied housing need in the village. Although the parish lacks a Neighbourhood Plan, the survey of the village, which was intended to lead to such a plan, identified that the preference of residents was overwhelmingly for smaller developments in different locations around the village. Larger

developments were almost unanimously opposed. However, a much scaled down and reimagined version of this proposal might possibly accord with residents' preferences.

This proposal was originally conceived against the background of a national housing development agenda that was put in place pre-pandemic. We would therefore urge TWBC to consider the huge implications the pandemic brings to our society for the future, not least the recently raised possibility that the nation's housing needs might be met in different ways such as re-purposing office and other commercial premises following the impact of Covid-19 on working practices. We need to question what impact this policy move will have on the borough's plans before committing to build more housing in sensitive areas.

### **Plan Detail and Financial Aspects**

The layout of the planned estate is essentially a truncated version of the previous plan with a similar housing density but occupying only the northern part of the site, leaving open the possibility that a later application might be made to infill the remainder. There is no mention of who will be responsible for future maintenance of the open/communal areas. Also, as a square layout placed as it is at about 45° to the line of the road it looks like exactly what it is - an implant in the landscape out of keeping with the natural development of existing settlements.

As part of the recovery from the effects of Covid-19, much has been said by government about the aspiration to 'build, back, better'. This includes a renewed ambition to accelerate towards carbon neutrality well before 2050. There appears to be no evidence in this application of any corresponding commitment on behalf of the developer.

The KCC Development Contribution letter suggests developer levies of just under £70,000, of which over £60,000 would be earmarked for Hawkhurst Primary School, some three miles away, while Sandhurst Primary School is within easy walking distance of the site. The remaining contributions do not directly benefit Sandhurst, the next largest (c. £6,300) being for Cranbrook Hub. No direct financial benefit to Sandhurst is proposed.

### **Conclusion**

Even setting aside the longer term effects of the pandemic on housing provision policy, there are no discernable benefits to Sandhurst and its residents from this development to set against the many negative impacts identified above and in the various submissions on the TWBC website.

We therefore recommend refusal of the application in this form.

This does not mean that we are necessarily opposed to sympathetic and limited redevelopment of the site on a scale more appropriate to the habitat and specific site attributes.

**Sandhurst Parish Council : 11 December 2020**