

Your ref:

Our ref: 36172/5501/TAA/GH/6232

06th April 2016

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Simon Cole
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Dear Simon

RE: Ashford Local Plan – Proposed “Landscape Protection Policy – Aldington”

With regard to our previous letter dated 18 November 2015 (attached to this letter for reference at Appendix A), Aldington Parish Council has appointed Peter Brett Associates LLP to help to develop a local plan policy position, with appropriate supporting evidence, to provide protection to the sensitive villages and rural area in the south eastern part of the Borough. In addition to using our own technical expertise, we have also engaged Prof. Kathryn Moore, the Landscape Professor at City of Birmingham University to provide robustness and rigour to the landscape and environmental aspects of the evidence base.

The Parish Council considers that the continuing pressure for development of all types in this area has created a deteriorating environment and that whilst appropriate development is to be supported, a need for a stronger level of local policy protection can be made in the context of this area having particular characteristics that are worthy of a particular policy response.

We have gathered evidence that shows that the proximity of the end of the South Downs to this area, and the distinctive character of settlements and rural lanes that this has created should be considered significant in spatial planning terms. The landscape is assessed in more detail below, but in summary the network of narrow lanes, with typically high hedges, and settlement areas alongside are highly vulnerable to even small changes in usage. They lead into villages and hamlets where the built form is often close to the carriageway, and are typically narrow and often with no footways.

The whole area is used by a range of people – including walkers, pedestrians, equestrian riders and cyclists, both within the settlement areas and beyond. These users have a further reliance on the lanes that serve the area. This also means that even small changes in usage of these routes by vehicles can have a detrimental effect on the amenity and safety of the lanes for more vulnerable users.

From a landscape perspective, a considerable degree of fragility can be detected which we consider the assessment provides evidence suggesting protection is appropriate.

Development pressures are likely to pose significant challenges within the area, with increasing demands on water resources, the landscape, biodiversity and the sense of place. All of these factors need to be very carefully taken into account to guide future decision making.

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In our earlier letter in November, we set out the principles of the Local Plan Protection Policy as it was envisaged for Aldington, and said that we would support this with an evidence base and further analysis in support of the policy being included in the Local Plan. Therefore, this letter is to:

- provide you with further information in terms of the area proposed to be covered by the area-specific local plan policy based on the assessment we have undertaken,
- present the evidence gathered to date to support the policy; and
- provide a draft policy wording for your consideration and for inclusion within the draft Local Plan.

Based on the assessment of the wider area, and considering the need for the policy to be applied to an area which has consistent characteristics and a common requirement for a protection policy as envisaged, we have defined a boundary for the policy as shown on the plan below. This comprises the parishes of Aldington, Bonnington and Bilsington as well as the northern part of Mersham Parish (the part of the Parish to the south of the M20 and north of the railway).

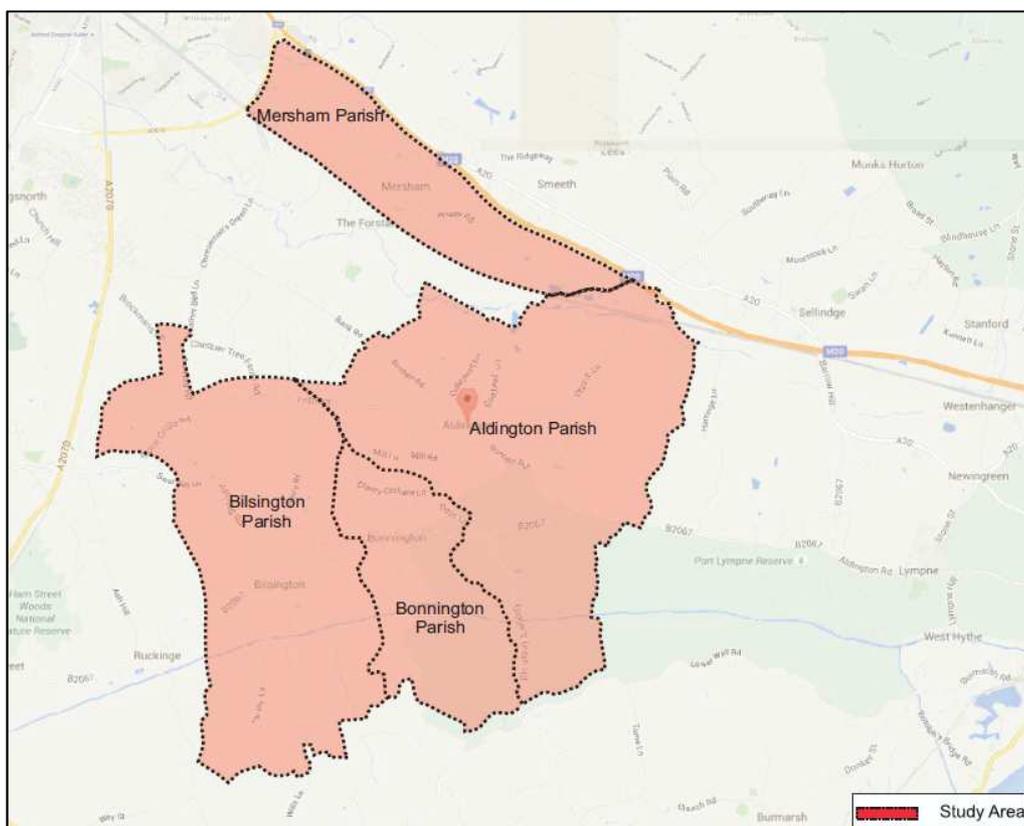


Figure 1: South Eastern Saxon Shore Villages Study/Policy Area

Proposed sub area for draft local plan policy

For ease of reference we have suggested that the policy area should be referred to as the “South-east Saxon Shore Landscape Area”. It is considered that the three parishes share similar characteristics and are similarly impacted by the traffic, noise, air quality, environmental and social impacts of development in the sub area. In addition, these parishes share a common highway network of narrow lanes and rural routes, often and increasingly used by unsuitable vehicles, which serve to increase the impacts of development disproportionately.

The need for the policy is borne out of a genuine local concern, expressed by residents and the Parish Councils, that the issues identified in terms of traffic, noise, air quality, environmental and social impacts of changes to land use in the area have already resulted in a cumulative impact over



time. There is concern that a continuation of small developments within the area, whilst potentially of themselves modest in scale, will add to this cumulative impact.

This formed the basis for assessment, and the development of an evidence base to respond to this concern where it was found to be justified.

There is scope for a policy for the area that brings together a series of concerns across a range of topics dealt with individually by the Local Plan – transport, environment, safety and so on, in a way that allows the cumulative effects of land use changes to be assessed in a holistic manner. Hence, it is the interactions between these policies that has been given a greater focus in the Landscape Protection Policy, creating a more comprehensive test for development proposals and change of use consents that reflects the significance of impacts on the area defined.

Evidence

In order to support the development of an area specific local plan policy, evidence has been gathered in a number of ways. This has included reference to accessible sources of data (such as records of road traffic accidents), specific collection of traffic data, vehicle speed surveys and photographic evidence. PBA have coordinated the collation of the data, but much of the input came from the support of local residents and the Parish Councils, who have demonstrated their commitment to the process through a significant community effort to collect the necessary data. This has included the involvement of the local Primary School, who adopted the scheme as a project related to road safety and planning issues.

This letter presents the evidence which has been collected and is intended to demonstrate how the existing issues which the Parishes face are likely to be caused, in part, by cumulative development within the area.

In the November letter we set out a series of policy tests for development proposals within the South-east Saxon Shore Landscape Area that we intended to gather evidence in support of. We have now refined these tests in the light of the evidence gathered, and so the tests we now propose to include the policy relate to the following areas:

- Landscape setting, historic and archaeological reference points, biodiversity and ecological issues;
- Traffic impacts and effects;
- The cumulative effect on the lanes, verges and hedgerows.

The evidence that has been collated therefore relates to one, or all of these three areas for test under the draft policy.

Landscape Assessment

The following section is a summary of a more detailed landscape assessment which can be found in Appendix B.

The South Eastern Saxon Shore Line (SESSL) is a complex of a number of fragile landscapes of very different qualities and characteristics, which as a whole, create a rural, tranquil part of the world with a very strong sense of place.

The area is essentially rural in character. Settlements generally start below the spring line of the North Downs, but are concentrated on the shoulders of the valleys. Small, nucleated settlements, nestled into the folds of the landscape are sheltered and hidden by woodlands even when on the higher ground. Traditional farm buildings are sparsely dotted along the distinctive pattern of north-south orientated routeways and lanes that cross the valley, also protected by woodlands.

The fragility of the landscape comes from the threat of disturbance of this intensely localised yet balanced settlement pattern that has emerged from the cultural, topographical, geological, geomorphological and hydrological systems of the valley. As a whole, this determines a spatial quality that is invaluable, providing a sense of tranquillity and a rural setting to be seen from afar as well as experienced locally.



Natural England's National Character Areas (NCAs) are areas that share similar landscape characteristics, and which follow natural lines in the landscape rather than administrative boundaries, making them a good decision-making framework for the natural environment. NCA profiles can help communities to inform their decision-making about the places that they live in and care for. The NCAs within the area are listed below. Their descriptions can be found in Appendix B.

- NCA 119 The North Downs National Character Area (NCA) - Part of the NCA 119 is designated as the Kent Downs AONB
- NCA 120 Wealden Greensand
- 121 Low Weald National Character Area profile
- NCA 123 Romney Marshes

Appendix B sets out a number of 'Statements of Environmental Opportunity' (SEOs) which offer guidance on the critical issues of the NCAs, which could help to achieve sustainable growth and a more secure environmental future. These include such things as:

- Protect and manage the nationally recognised and distinctive character of the landscape,
- Manage and significantly enhance the quality of the characteristic wetland and water environment...which will contribute to sustainable flood risk management, regulation of water availability, as well as enhancing the sense of place, biodiversity, recreation and wetland habitat adaptation to climate change.
- Plan to deliver a network of integrated, well managed green spaces in existing and developing urban areas.

We consider that the area specific policy that we propose follows this guidance, and emphasises the importance and special nature of this area for particular protection in the Local Plan.

Historic and architectural characteristics of the sub area

There are a large number of important buildings within the proposed policy area, with a very high proportion of listed buildings (See Appendix C). These are spread across the entire area, and so are intrinsic to the quality and character of it. The setting of these is worthy of protection in their own right, but the wider context of them picks up on the landscape assessment set out above. The quantity and dispersion of listed buildings across the area is further evidence of the quality and importance of the ancient transition landscape between the North Downs and the High Weald. It was essentially settled in ancient times, and has a high proportion of significant historic buildings as a result.

This suggests that whilst the individual setting of buildings in their own terms is important, the wider landscape setting of all of these listed buildings taken together and dispersed along the ancient highways is also significant.

It would be reasonable in this context, and with the importance that can be ascribed to the way that development has occurred in the area, to suggest that further development proposals should be managed, and probably be modest, matching the scale and quality of what has happened historically. Large scale housing developments are unlikely to be able to meet this criteria, and development proposals that do come forward should be able to show that they achieve similar quality standards to their surroundings.

In addition to the listed buildings that have particular protection, the Parish Council invited local people, as part of this study, to suggest buildings and places that had particular importance in the collective memory of the area. These are listed below and can be seen in Appendix D:

- Walnut Tree Inn
- Fire station
- School
- Post office
- Village Hall
- Aldington Fresh foods



Local people also identified locations that they consider to be examples of good architectural design locally and should be held up as an example to future developers. The particular places identified are listed below and can also be seen in Appendix D:

- Aldington Meadow development;
- The terrace of cottages below Aldington PO Stores and the terrace opposite those Stores;
- Badgers Close;
- St Martin's Cottages (at the top of Forge Hill);
- Howarths in Dickson's Bourne;
- Boughton House in Mill Lane;
- Walnut Ridge.

Biodiversity & Ecology

We have reviewed the study area in respect of locations that are considered to be valuable in terms of ecology or environmentally. As well as a professional review, the local residents have also input locations that they consider to be valuable, ecological assets to the area for review as part of the policy evidence base. These have been included at Appendix D and E and, along with their particular value, are identified below:

- Local woods (Poulton Wood, Handen Wood, Blackthorn and Stockhill Woods [the old brick kilns beside the footpath in Blackthorn Wood], Whites wood and Stockhill Wood);
- The high bank in Dickson's Bourne which has various wild flowers;
- Mill Road which includes blue and white violets (roughly opposite The Cott);
- Mill Lane, especially the lower end has wild flowers throughout Spring and Summer;
- The western and northern hedges and banks of the big field opposite Aldington Church (wildlife and hops) (not a public right of way);
- Rockybourne track and the land on each side;
- The Royal Military Canal;
- The steep rough field leading down to the Bourne stream with the footpath which comes out onto Dickson's Bourne has many wild flowers and orchids;
- The Churches; and
- Agricultural and amenity fields
- Aldington Knoll.

It is important that the amenity and value of these locations is retained in their current form, particularly those which have footpaths or bridleways and hence which form attractors in their own right. There is a risk that the cumulative impact of local development is degrading them and so the policy must ensure that no future negative impacts occur at these locations. Their setting in the landscape remains important, linked to the views into and out of these areas.

In addition, the residents have noted that these locations are focal points for wildlife activity, including cuckoos, nightingales and a variety of owls – although sightings of these seem to have markedly diminished in recent years. Hence, development proposals should respect these locations in particular and would be expected to take a detailed and comprehensive approach to the ecological species within and around the sub area.

Traffic impacts and effects

The rural lanes and streets through the villages and hamlets in the area have developed from ancient trackways over time. They are distinctive in their own right, typically with high hedges on both sides, and a winding alignment with poor intervisibility for vehicles approaching each other. Any logic to their alignment has been lost over time, and they are generally unsuitable for high volumes of traffic or for commercial vehicles. They rarely have footways, and verges can be quite minimal in places.

Observation shows that they are vulnerable to damage, with over-running of verges and damage to carriageway edges across the area. Where this occurs on a very occasional or random basis,



perhaps when an agricultural vehicle meets a car then the over-running damage is short lived, and does not cause a problem. However, there are some locations where this has become the norm – either because of the unique characteristics of the road in that location, or because there has been an intensification of usage that means the damage is perpetuated.

In order to investigate these issues, and compile evidence to support the need for particular protection, a series of exercises have been undertaken. These are set out below and should be considered in terms of a suitable policy approach.

Traffic Counts

We defined a series of locations to undertake traffic counts, in order to gain an understanding of the traffic patterns in the area. These were undertaken as single day classified counts, but were supplemented by strategically located ATC counters that provided context over an entire week, as well as providing speed verification data. The count locations were configured to most efficiently collect data across the area, but also to allow cross-verification between counts to verify accuracy.

The counts were undertaken on a typical weekday, with turning movements being collected at each location between 0700 and 1900. The locations where the counts were collected are set out below and, along with the results, can be seen in Appendix F.

- Roman Road / Frith Road
- Roman Road / Goldwell Lane / Forge Hill
- Boat Lane / Knoll Hill / B2067
- Ruckinge Road / Ashford Road / B2067 / New Church Road (Bilsington crossroads)
- Stones Cross Road / Frith Road / Ashford Road

The results of the traffic counts showed that whilst the overall quantum of traffic at each count location could be considered to be low to moderate in terms of the capacity of the road, the proportion of HGV's was markedly higher than expected.

The DfT's "Open Data for Minor Roads 2010-2015" database shows that the average proportion of HGVs on minor roads in both Kent and the South East is 6%. The results of the traffic counts showed that every one of the junctions experienced HGV flows higher than this.

The most notable examples were the Bilsington and Stones Cross crossroads where a range of between 4%-18% and 4%-21% of (daily) HGVs turning movements were recorded (respectively). Frith Road is also shown to receive a heavy HGV flow with 14% of the total left-turning flow from Frith Road onto Roman Road being HGV's. The fact that the total vehicle flows at the junctions are moderate only seeks to highlight the number of HGVs that use these routes.

During the same week as the manual counts, two Automatic Traffic Counters (ATCs) were laid within the area (Station Road and New Road Hill) in order to provide a larger sample of vehicle numbers, types and speeds and also to verify the manual counts. The ATCs did verify the manual counts (showing slightly higher flows than the manual counts) and also highlighted the higher than average proportion of HGVs at these locations, which were 8% (daily) in each direction at each location.

Speed data

Speed surveys were undertaken in January 2016 at the following nine locations where there was considered to be a potential speeding issue: Knoll Hill, Goldwell Lane, Forge Hill, Frith Road, Bonnington B2067, Ruckinge Road, Ashford Road, Newchurch Road and Bonnington Road.

Although traffic flows were light on some roads, statistically relevant samples of between 103 and 465 two-way samples were collected in each location. The data showed that in each of the five locations where the speed limit was 30mph, the 85th %ile speed was higher and in some cases reached as high as 38mph. The speed data was verified by the ATC tubes which showed the 30mph speed limit on Roman Road was being exceeded with 85th %ile speeds of 34mph (EB) and 36mph (WB). The raw data can be seen in Appendix F.



The speeds recorded, although in excess of the speed limit and therefore of themselves undesirable, were not so excessive that they could be considered to be likely to give rise to a substantial safety concern. However, they demonstrate that speeds are higher than the design speed of the road, and that this is likely to exacerbate the instances when damage may occur to the verges and hedges alongside the lanes – it is obvious that the time available for drivers to react when they meet each other is significantly reduced if their closing speed is greater.

The risk of over-running and erosion of the lane corridor occurring is even higher where the likelihood is increased that one of the vehicles will be an HGV.

The persistent and widespread nature of the excessive speeds also has an undesirable and detrimental impact on the amenity of the lanes. When they are being used by vulnerable users – pedestrians, walkers, cyclists and equestrian riders, where there are often no footways provided, then the attractiveness of these legitimate and sustainable rural pursuits is diminished, and ultimately increased traffic impacts may well cause these activities to decline.

Crash Data

The crash data for the area was assessed, but no particular patterns or statistically significant effects were evident.

Photographic evidence

An extensive collection of photographic evidence has been compiled showing damage to local verges and carriageways across the study area. The entire collection is shown at Appendix D, but it is significant to consider these in two categories – the first showing locations where a random event has occurred, causing a vehicle to over-run the verge and leave a mark, the second, more important locations showing a consistent level of regular over-running where the amenity and functionality of the highway is being affected.

The first group suggest that vehicle speeds may be excessive on the rural lanes, as drivers may be unable to stop or to see each other in sufficient time to give way to each other where there is room to pass, and so they are forced to over-run the verge to avoid an incident. This does not create lasting damage, but is symptomatic of the diminution of the amenity of the road overall, and for vulnerable users in particular.

The second group points to a different issue – that the road is being regularly used by an unsuitable type of vehicle – probably an HGV. The traffic counts suggest that it is unlikely that these events are being perpetuated due to the volume of traffic on the lanes, as this is not generally high enough to cause a problem, but it is clear that a higher than expected proportion of traffic across the area is HGV, and that these vehicles require a larger footprint area to manoeuvre. This, again, is evidence of the diminution of the amenity of the area, and the possibility that road widening or remedial works may be carried out in the future that would change the character of the lanes forever.

Photographic evidence showing pinch points / blind spots on the network which are exacerbated by an increasing number of vehicles, including HGVs, can be seen in Appendix D.

It has also been noted that there are some locations where there are regular encroachments onto the verge – for example on Roman Road in the vicinity of the school (as shown on the photographs in Appendix D). This is caused by a number of vehicles that park here during school drop off and pick up times. The effect is a continual degradation of the verge, and the amenity of the road in this area. The risk is that this would worsen, or that the behaviour would be regularised with some engineering works to prevent the ongoing damage. There is a concern, therefore, that there could be a creeping urbanisation of the character of the roads and lanes in the area, which would reduce their value as part of the historic landscape over time, and hence change the landscape.

Photographic evidence has also been collected showing existing flooding issues around the villages. These include Station Road and Bower Road and can be seen in Appendix D. At this stage, without a detailed review, the cause of the flooding is unknown. However, further urbanisation of the area, whether by new development or increased surfaced highway areas would exacerbate this issue. Additional hard surfaced areas should be designed to be cognisant of local



flooding issues (not just flood zones highlighted by the Environment Agency) and be designed and conditioned appropriately to ensure that any impact will be fully mitigated.

A plan showing a summary of all of the photographic evidence collected can be seen in Appendix D.

Development Effects

The proposed Landscape Protection Policy is not intended to be either pro or anti-development, but is intended to ensure that any proposals that come forward meet a series of holistic tests that will protect the landscape character and value of the area. Hence, whilst small-scale new development would not add a significant level of activity to the area, in terms of numbers of vehicles or people movement, the cumulative effect of land use changes and developments over time would lead to the further degradation of the area.

Therefore, the application of the tests in the policy is intended to require an interconnected consideration of the issues, across transport, landscape quality, amenity and the assessment of impacts. Furthermore, it is intended that the tests would be considered on a cumulative basis, with successive proposals always being considered in the context of significant previous changes in the area to consider the accumulated effects. This will mean that individual proposals, where they are permitted, would not create a precedent for further development, as the cumulative effects of further even very similar proposals may make them unacceptable.

Proposed Policy Wording: Landscape Protection of South Eastern Saxon Shore Villages

Taking into account the characteristics of the area, the quantitative and qualitative assessment undertaken in transport and landscape assessments, and the evidence collected, an area specific local plan policy to address new development in the South-east Saxon Shore Landscape Area is proposed to be worded as follows:

‘Proposals for land use changes and development in the South-east Saxon Shore Landscape Area (as defined on the Proposals Map) will only be permitted provided that all of the following criteria are met:

- a) *The land use change or development respects the landscape setting of the area and can be demonstrated to be in keeping with the form and style of existing development as a sensitive transition between the High Weald and North Downs AONB areas. Particular emphasis will be placed on the visual effects of development in the context of views into and out of the site, and the historic disposition of development relative to the surrounding topography.*
- b) *The land use change or development respects the historic and archaeological reference points and sites of biodiversity value, and in particular, can demonstrate that it will not exacerbate current impacts to the character and function of existing highway corridors and lanes, and the street amenity in villages and other settlements areas.*
- c) *The development will have no impact on the pursuance of rural activities on the adjacent lanes and highways that may be considered sensitive to development impacts;*
- d) *It can be demonstrated that the development will not on its own or cumulatively as a result of other previously implemented, permitted, committed or planned schemes within or adjacent to the South Eastern Saxon Shore area generate a type or amount of traffic that would be inappropriate or detrimental to the rural road network that serves it; and*
- e) *There would be no impact either individually or cumulatively as a result of other previously implemented, permitted, committed or planned schemes within or adjacent to the South-east Saxon Shore Landscape Area on the*



character of or important features within the area including the rural lanes, verges and hedgerows which cross the area’.

We understand that it is your intention to present the draft Local Plan to Cabinet in May 2016. We hope that our previous letter dated 18 November 2015, the evidence set out and appended to this letter and the suggested draft policy wording outlined above will be considered for inclusion in the draft Local Plan which is presented to Members and subsequently taken to public consultation later in the year.

We trust the enclosed is helpful, and we would be grateful if you could let us have your thoughts on the proposed policy in due course. In the meantime if you do have any questions or comments, please do not hesitate to get in touch.

Yours sincerely

Tim Allen
Partner
For and on behalf of
PETER BRETT ASSOCIATES LLP

Enc: Evidence Appendices



Appendix A – Letter



Appendix B – Detailed Landscape Assessment

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Appendix C – Listed Buildings

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Appendix D – Photographic Evidence

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Appendix E – Wildlife Information

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Appendix F – Traffic Data

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