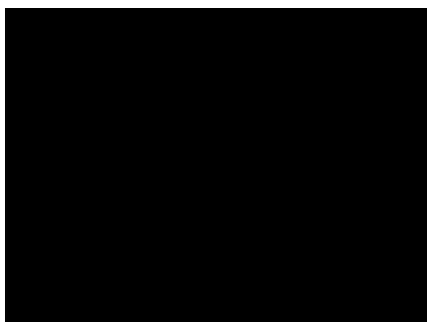
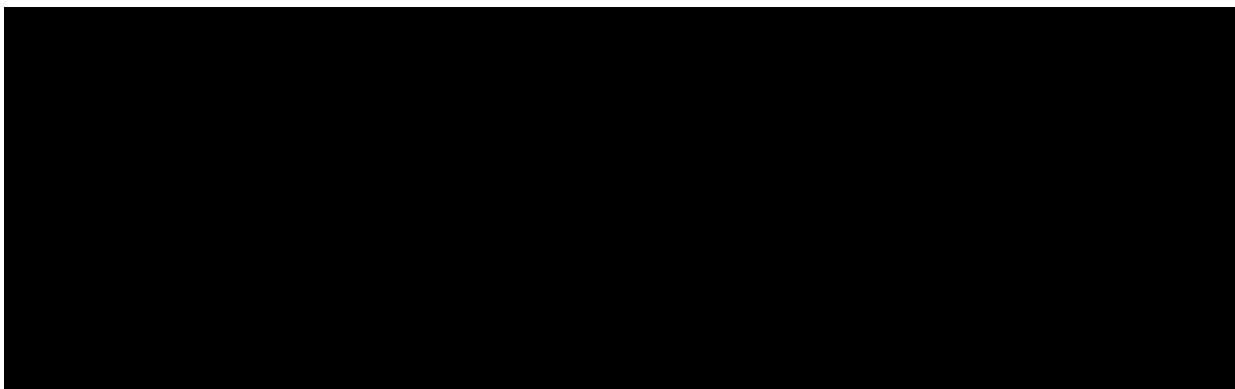




FAO: Chief Planning Officer, FHDC.



We are registering an objection to the planning application **21/0290/FH**. We are objecting on the following grounds:

1. Road Traffic Issues:

- The A260 is a straight road with a national speed restriction of 60mph. This road runs throughout the whole length of the village with no restrictions and the speed of the traffic poses a considerable danger, both to anyone accessing the road, crossing the road or using the footpaths. In addition, if the village is approached from the Folkestone direction there is a deep dip in the road and, coupled with the speed of traffic, visibility and reactions are compromised.
- The type of traffic using this road is extremely varied. In addition to the high volume of cars, a large part comprises of HGV's and heavy farm machinery. Accessing driveways on and off the road is extremely dangerous. The proposal to site four dwellings with families would place additional dangers.
- HGV's have frequently been re-routed along this road when the M2 and M20 have been closed due to traffic accidents, as well as closure of lanes due to disruption at the Port of Dover. The lorry parks promised in the wake of Brexit are still to be completed and the use of the road by these vehicles will, in all likelihood, continue.

2. Traffic Surveys:

It was noted that a traffic survey was set up on the A260 by MetroCount. This was in place from Monday 11th January, 2021 until its removal on Thursday 14th January, 2021.

- The Transport and Highways Technical Note on the application file states in its conclusions (paragraph 2.4) that the traffic flow is light. The survey was conducted during a national lockdown during which all road usage has been much diminished. Therefore, any results will misrepresent the regular vehicle usage. Furthermore, figures from the Port of Dover show that when comparing bookings for 2020 (throughout the Covid pandemic) with the more usual figures for 2019, cars were 69.48% lower and coaches were 84.05% lower. This proves that there have been far fewer vehicles using the roads within the area than normal.
- In their letter dated 27th August, 2020, the Highways Department stated that the applicant should provide a 7-day survey to support their planning application. The survey that was undertaken was for 4 days only. In addition to this, it was **not** placed outside the entrance to the site of the planning application where the A260 is straight. Instead, it was placed outside the bungalows on the same side of the road but much nearer the double bend in the village, where vehicles slow their speed in order to navigate these dangerous bends. The entrance to the proposed site is on the straight stretch of road some distance before these bends.

3. Access onto and along the A260:

Policy T19 of the **Kent Local Plan** states: 'Development will normally be refused which involves the construction of a new access onto the primary or secondary road network, or the increased use of an existing access directly onto that network, where an increased risk of accidents or significant traffic delays may result.'

- The access from properties onto this road is dangerous due to the speed of oncoming traffic, the amount of vehicles and the geographical lay out of the road. The proposed application would allow four families with multiple vehicles between them to use the entrance. In addition, some of these vehicles would be large tourers entering and exiting.
- Visibility onto the road from any access is limited and poses a significant danger to both the oncoming traffic and the vehicles using the entrance. Kent Highways states in its technical notes that 'a safe access can be delivered which is capable of accommodating the required visibility splays'. However, it must be noted that the entrance has already been illegally widened by the removal of hedges before any planning application was submitted.

- There is no continual pavement along the A260 or within the village. If travelling on foot, this makes crossing the extremely busy road potentially very dangerous.
- The width of the pavement is quite narrow and, in several stretches, it is single width only. This has serious implications for families, parents with pushchairs and accompanying young children, especially to and from the local primary school.

4. Area of Outstanding Natural Beauty:

- This site is located in an AONB in the Kent Downs and, as such, 'Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight...' (National Planning Policy Framework, February 2019, paragraph 172). This policy is also stated in the Kent Downs AONB Management Plan (SD1) where the need to conserve the natural beauty of the Kent Downs AONB should be given the highest level of protection. We feel that the proposed plans would be in direct contravention to these policies which have been established and accepted by the Council itself.
- The western boundary [REDACTED], [REDACTED], is designated as Ancient British Woodland and Kent Downs AONB. This has been in existence since 1600, or before. Only 2.4% of this type of woodland remains of our land area. This particular wood has remained relatively undisturbed for centuries and has a unique environment which supports a complex habitat of birds, insects, plants and fungi. This includes orchids, nightjars, white admiral butterflies, nightingales, badgers and habitats that are managed for dormice.
- On the submitted planning application form, Box 15 (Trees and Hedges) asks 'Are there trees or hedges on the proposed development site? The applicant has stated no. There are both of these on the proposed development site. This is supported by their Ecological Assessment which states on page 2 section 3 that the surrounding hedgerows, trees and scrub are retained. The report continues with the statement: 'Heras fencing should be erected to establish root protection zones around all mature trees along each boundary. (section 4.2: Habitats).
- On the submitted planning application form, Box 15 (Trees and hedges) asks, 'Are there trees or hedges on land adjacent to the proposed development site that could...be important as part of the local landscape character?'. The applicant has stated no. This is incorrect. We believe that the woodland on the western boundary and surrounding hedgerows are extremely important features of the landscape and deserve to be recognised as such. The

Ecological Assessment recognises that there is also a tree belt and a species-rich hedgerow adjacent to the northern boundary of the site

- **Box 13** on the planning application (**Biodiversity and Geological Conservation**), asks the applicant, 'Is there a reasonable likelihood of the following being affected adversely... within the application or on land adjacent to or near the application site?'. It then lists protected and priority species, designated sites, important habitats or other biodiversity features and features of geological importance. The applicant has answered no to all points. We believe that the adjacent land/sites will be affected by all of these points. In addition, in their Ecological Assessment (section 3.6: Dormice) it states that the hedgerows on the site have high potential to support common dormice which are a European Protected Species as well as being used by foraging and commuting bats.
- Up until June 2020 this plot of land has always been agricultural/pasture. An extensive part of it has now had hardcore spread over it, resulting in a loss of habitat for reptiles (snakes, common lizards and newts/frogs/toads) and small mammals such as voles. It is well known that the natural diet of barn owls, which are protected by the **Wildlife and Countryside Act 1981**, comprises mainly of voles and other small mammals. Barn owls have been sighted in this area.
- The pasture, at the rear of the present plot, was removed and left bare. It is now, according to the Ecological Assessment which accompanies this application, an area of 'tall ruderal herbs and annual/short perennial vegetation.' Ruderal herbs are plants growing on waste ground or amongst rubbish and this highlights the fact that this area, which was pasture/agricultural land for centuries, was destroyed at the same time as the hard core was laid.
- An ancient hedgerow, planted in 1844 under the Enclosure Act, has already been removed. Bats have been regularly sighted in and around the remaining hedges. The Ecological Assessment (section 2.4) states that evidence confirming the presence of bats that was found was clearly recorded.
- **SD8** of the **Kent Downs AONB Management Plan** states that proposals which would 'negatively impact on the distinctive landform, landscape character, special characteristics and qualities, the setting and views to and from the AONB will be **opposed**...'. We believe that all of the proposals within the application impact negatively. Because the hedge has been removed and four gateways installed, the site can be seen from the main road, the wood and the neighbouring properties.
- **The Kent Downs AONB Document** which is on file states that: i) the proposed widened access would necessitate the removal of a large section of the existing hedgerow which contributes to the rural character of this part of the Kent Downs AONB and is likely to impact on biodiversity as well as opening up views of the site and ii) that the existing hedgerow along the front

boundary to be maintained at a height of not less than 2 metres.’ These two points are **not** proposals. Sections of the hedge have already been removed illegally, the entrance was widened and the fencing was erected on June 6th/7th 2020, a total of **9 months** before this report was written.

5. Development in Rural Communities:

- **The National Planning Policy Framework (2019)** restricts developments in rural areas in the interests of countryside conservation and efficient use of land. We believe that allowing the proposed planning application would be contrary to this policy.
- **Policy SS1 in the FHDC Core Strategy** states that in the North Downs Area, of which Selsted is part, ‘major development will be refused within the AONB, other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest.’ Selsted is an extremely small hamlet. Four families and 12 new structures are being proposed within a relatively small area of land. Any definition of a major development should be compared with the size of the existing developments within which it is being proposed and judged accordingly.
- The total measurements for the amenity buildings are 128m². If the area of 4 static homes (which will probably be much larger than an amenity building), 4 tourers and an unknown number of vehicles for 4 families including space for parking and manoeuvring, is added then we believe that this is an extremely high-density of occupancy on a 0.34 ha site. In addition, when compared with existing sites in Selsted and, as a percentage of dwellings, it constitutes a large development for this type of settlement.
- In the **Design and Access Statement** provided by the applicants, **page 2: Policy Considerations**, it is recognised that the application site is within an AONB but is not a major development and only has localised consequences. It therefore acknowledges that there **will** be consequences. However, it does not state what they are.

6. Static and mobile homes:

- **The Kent Downs AONB Management Plan (SD2)** states: ‘The local character, qualities and distinctiveness of the Kent Downs AONB will be conserved and enhanced in the design, scale, setting and materials of new development, redevelopment and infrastructure...’ Within the surrounding area of 5 miles there are 100 Listed Buildings. This community contains 8 of those buildings. We feel the nature of the proposed buildings, the materials used in their construction and the nature of static caravans and touring homes would be contrary to this and that the unique character of the community would be compromised, both historically and visually. This is supported by statement **SD9** in the **Kent Downs AONB Management Plan**. ‘The particular historic and locally

distinctive character of rural settlement and buildings of the Kent Downs AONB will be maintained and strengthened.'

- When a planning application was sought for an extension to The Cottage (Y08/0300/SH), which adjoins the site of 21/0290/FH, it was with the condition: that the external appearance of the works when completed match that of the original...and shall not detract from the character of the building or the appearance of the area generally in accordance of policies BE1 and BE8 of the Shepway District Local Plan Review and QL1 of the Kent and Medway Structure Plan. This supports the previous point made above. The character of the proposed statics and amenity buildings do not conform with any existing buildings within Selsted and consequently we believe the visual impact would affect the character and appearance of the area and locality.
- The activities resulting from 4 families, such as noise from generators and vehicles would also have a high impact on the neighbouring properties.

7. Previous planning applications at Selsted:

- Several previous planning applications for Selsted have been refused, amongst which are:
 - i. **Change of use from agricultural land to allow a siting of a mobile home (98/1057/SH)**
 - ii. **A dwelling for one family only, on the land on the south of The Cottage, Canterbury Road. (88/0848/SH)**

Both of these reflect **exactly** the same request as the present application, but for much smaller developments, and yet they were refused for all the reasons in the objections stated above.

- iii. The previous owners of the land, where the current proposed development has been applied for, have stated that planning permission had been sought previously on the plot but that it had always been refused by the council.
- If the present application is granted on land on the **north side of The Cottage, Canterbury Road**, it would contravene previous planning refusals. In the light of this, future planning applications will have to be considered favourably.

8. Waste Storage and Collection:

- **Box 7 on the planning application** states that there is no provision for either storage, collection or removal of waste. As the proposal is for 17 individuals to be living on this site, we believe that a great deal of waste will be generated and that this is a matter that needs urgent attention when considering this proposal.

9. Planning Policy for Traveller Sites:

In the **Department for Local Communities and Government Planning Policy for Traveller Sites** publication (2015), there are several sections which we feel relate directly to this planning application:

- **Section 14.** 'When assessing the suitability of sites in rural or semi-rural settings, local planning authorities should ensure that the scale of such sites does not dominate the nearest settled community.'

As mentioned in objection 4 above, Selsted is extremely small and the approval of this planning application would directly contravene section 14.

- **Section 4.i)** '...to reduce tensions between settled and traveller communities in plan-making and planning decisions.'

and

- **Section 13.a)** '...promote peaceful and integrated co-existence between the site and the local community.'

We believe that the tensions that are already present between the established community and the proposed community would escalate.

- **Section 4.k)** '...for local planning authorities to have due regard to the protection of local amenity and local environment.'

The site has already, ahead of planning permission, been destroyed by the removal of several metres of ancient hedges and the illegal spreading of many tonnes of hardcore. This hardcore now covers an area of 0.36 hectares (just under 1 acre) which is half the site.

It must be emphasised that the activities that have already taken place on this site have all been done illegally with disregard for the planning laws and the injunction order **G00CT467** issued by **FHDC**. These activities include:

- the change of use from agricultural land to a residential caravan site for 4 gypsy families (residence in a static home on site has already been observed).
- The removal of hedges.
- The laying of hardcore over half of the site.
- The widening of the entrance to approximately 10 sq. metres.

10. Ecological Assessment:

- This assessment contradicts itself: in **section 1.1** it states that the walkover was conducted on 1st December, 2020, but in **section 2.2** it appears to have been on 7th December, 2020. This is a tiny window within a year in the middle of winter and, as such, cannot be considered as a true representation of the

environmental value of the site given that many species are dormant during winter months or are missing altogether. As can be seen by the photographs included in the assessment, the weather was poor.

- This assessment states that further surveys are recommended in the cases of bats, breeding birds, dormice and newts.
- **Section 6, Conclusion, p 21** states ‘the land under application is dominated by unsealed hard standing which has very low impact for bio-diversity...and is unlikely to result in significant impacts on protected species.’ However, the point here for **all** wildlife is that it would have been of value if it had not been illegally resurfaced **before** planning permission was sought. This assessment should have been done before any work started on the site.

11. IDOM Response:

- This document confirms that ‘risks to the proposed development from land contamination are likely to be low given that the site has remained undeveloped to date.’ Because the land has never been developed there should be equal consideration given to how the development may contaminate the land. The land, in an AONB, has **already** suffered contamination by the laying of hardcore and the destruction of the pasture at the rear section of the plot.

12. Sustainable Urban Drainage Report:

- In the **Ecological Assessment** it states quite clearly (**Fig.1 p. 6 and edged in red**) that the application site ‘comprises an area of unsealed hard standing adjacent to Canterbury Road behind which there is an area of tall ruderal herbs, annual/short perennial vegetation and bare ground, **which is not included in the application.**’ In addition, **in box 21 on the Public Application form** it also clearly states that the site area is 0.36 ha which is only half of the 0.7 ha plot. If this is the case, why is the proposed drainage system to be sited on the western section of the field which they have stated lies outside the application site? The installation of a package treatment plant, a 50mx1mx1m trench and in addition, filter drains, all below ground and within the adjoining paddock, means that development and further destruction of the environment will be taking place on an area for which there has been no planning application.
- The drainage report states that the proposed package treatment plant would be capable of catering for a population of 20 persons. At present, according to the **Design and Access statement**, it is proposed that there will be 17 residents on the site. This number could easily be increased in the future which means that the treatment plant may well be insufficient to meet the needs.
- The natural fall of the land is towards Stony Lane Wood, an ancient woodland. All excess water/drainage will be discharged into the natural field drainage system, which slopes towards the wood.
 - It states that the proposed filter drain would have adequate capacity to cope with surface water run-off. It later states that the foul drainage, after it has

been treated, would be discharged into the filter drain. However, it does not state whether it has the capacity for both foul and surface water.

- None of the drainage is shown on the drawings of the submitted plans. Neither is there any indication of how the foul drainage will be discharged from the 4 amenity blocks (which will be sited in 4 different areas of the hard standing) to the treatment plant which would be sited on the western section of the land away from the hard standing, and from there into the filter drain.

13. **Design and Access Statement:**

There are inaccuracies and a lack of information in this statement.

- There is no public house within Selsted.
- The site is located on Canterbury Road, not Cambridge Road.
- It has been stated in this document that the New Romney site does not meet the personal needs of the applicants but does not say why. The New Romney site has schools and amenities within the area that are serving all the present occupants of this site and, consequently, meets the needs that are required.
- This document also states that: **the families do not have any other sites to which they could go if evicted from the application site.** It would appear that the families are not presently residing on the Selsted site and no information has been provided as to where these 4 families are living at the moment.
- It states that two children are at school in Canterbury but does not indicate which schools the remaining school-aged children attend.
- It does not state why the families need to vacate their present site and accommodation in favour of the proposed site in Selsted.

Some of the comments from agencies and organisations which should be protecting the environment and ensuring that it is a safe place in which to live, are both disappointing and disturbing. These reports form part of the collective information when considering this planning application and we feel that some elements are unclear and, in some cases, seriously inaccurate and as such, misleading to those with the responsibility of considering the objections.

Our society is governed at both national and local levels and consequently, authorities and organisations should be working to uphold the law, to protect the environment and to protect the society in which we live. Failure to meet these crucial and fundamental responsibilities by those entrusted to do so on our behalf can only lead to a complete loss of faith in the planning system of this country.

We ask that our objections to this planning application are given full and careful consideration.

Yours sincerely,

Myra Readman

Simon Readman