

Badgers,
Ashcombe Lane,
Kingston,
BN7 3JZ

27th November 2018

Dear Sirs,

POSTION STATEMENT IN RELATION TO PROPOSED HOUSING ALLOCATION SITE AT CASTELMER, KINGSTON

I fully agree with all the key concerns that Kingston Parish Council has brought to the Inspector's attention and wish to add the following comments specifically in relation to the Castelmere site:

I support the views expressed by Strutt and Parker on behalf of Mr David Hambrook that the proposal has not been justified and is not effective. Furthermore, I note that the relaxations to the draft Plan sought by the landowners at Castelmere (comments submitted on their behalf by DMH Stallard) would significantly reduce the benefits of the site promoted by SDNPA. Specifically, they asked that woodland should not be made publicly accessible, or provide an enhanced biodiversity area, that the site cannot reasonably provide the links proposed to off-site footpaths, and that the level of affordable housing should be treated as a target only rather than a requirement otherwise the development may not be deliverable. These relaxations, together with the highway access issues discussed below, significantly undermine SDNPA's 'rationale' stated during the consultation period for proposing Castelmere as the preferred site.

In their Summary of Issues and Responses SDNPA note that the site at Castelmere is considered to be well-related to the village. I disagree with this statement, development at this location would more appropriately be described as extended backland development. The 'commercial garage' is a very small and self-contained unit, and the 'dilapidated greenhouses' comprise merely three old greenhouse frames that could very easily be removed. To suggest that a housing development of the scale proposed could improve the appearance of the site is extremely misleading.

Regarding the highway access issues to Castelmere, SDNPA have advised that, following the advice given by HCC's Engineering Consultancy and the contrary evidence provided by the landowner of an omission site, the landowner commissioned more detailed highway evidence from a third consultant to show that suitable access can be achieved. This clearly demonstrates that the site was included in the draft Plan without any certainty at all about whether suitable safe access is possible. Therefore, this site has not been assessed to the same level as other potential sites in the village, as SDNPA have repeatedly claimed. This also totally undermines SDNPA's advice to residents during a telephone conversation between my neighbour Mrs Wendy Forbes and SDNPA's Lucy Howard on 12th July 2017 when Ms Howard stated that 'there are no issues with the site that cannot be resolved during the planning stage'. SDNPA were not in a position to make that assertion because the issue of access had not been appropriately investigated.

We have not been advised of the scope / findings of the more detailed highway evidence that was sought by the landowner, but we are aware that further traffic survey equipment was installed in Ashcombe Lane near the site access in August 2018. We assume this was to support the evidence being gathered by the landowner, but have been unable to find out any details as ESCC have advised that the equipment was installed without the required licence and therefore they do not know who was responsible. The detectors were placed south of the site access, where vehicle speeds are lower, whereas equipment previously installed in spring 2018 was located both north and south of the access giving a more reliable indicator of vehicle speeds. Furthermore, the latest survey was undertaken in August, which is not a 'neutral month' in terms of DfT guidance, and as the data was obtained during school holidays when traffic patterns and

volumes change, would not be considered typical and best practice if used in conjunction with a planning application. I would therefore be very cautious of any assertion about the suitability of the proposed access that is based on data obtained from the August 2018 survey.

The Statement of Common Ground between Devine homes and SDNPA that was very recently published includes the pre-application advice given by ESCC. The Council have advised that the visibility available does not comply with DMRB standards but 'is in line with' the requirements of Manual for Streets 2 and, 'given the location of the site, is acceptable in this instance'. If this view is based on the surveys undertaken in August 2018 then this view is open to challenge for the reasons I have outlined above. Furthermore, the Council advise that the impact of the improvements and close proximity to the junction with The Avenue opposite would need to be addressed. This is not referred to in the Statement of Common Ground, and no information has been given by SDNPA, Devine Homes or the Landowner as to how this matter will be resolved. This is a key issue, as it is difficult to see a solution that does not involve physical measures in Ashcombe Lane. Such measures would most likely significantly affect the appearance and character of this part of the village and may require street lighting, something that SDNPA have unofficially alluded to in the past but has been brushed under the carpet since. Such measures would undoubtedly cause outcry amongst residents throughout the village, and it appears as though SDNPA and Devine Homes are trying to push ahead with the Plan for Castelmer whilst keeping these consequences very quiet.

As well as access to the site from Ashcombe Lane, I have grave concerns about the proposed access arrangements within the site and specifically to our property 'Badgers', about which we have been given no information. ESCC have been unable to comment on this aspect as they have not seen any layout plans. Away from Ashcombe Lane the horizontal and vertical alignment of the existing access to the development site and our property does not meet Manual for Streets 2. Due to the need to maintain the existing alignment at the property Benallan, by visual inspection it appears that it may not be possible to maintain the existing arrangement for access to our property. The access road to Badgers, Maylea and Orchard House has a very steep and blind bend at the corner of Badgers. This is currently not ideal, but manageable due to the low number of traffic movements. However, this could not be maintained on safety grounds if the development were to go ahead. and would not be acceptable to ESCC. It is difficult to see how a safe access could be provided without a very significant alteration to the access arrangements for these three properties. SDNPA have made no comment about the very significant adverse impact that the proposed access would have on 'Badgers', due to the horizontal and vertical alignment, inevitable removal of mature trees, and extremely close proximity of the new access to ground and first-floor windows in living and bedrooms. It appears that a widened access road would be almost at first floor bedroom window height. This would be an unacceptable intrusion on our privacy, and require a very imposing retaining wall immediately outside the ground floor living room windows. No mention has been made of these internal access issues in any of the SDNPA or Devine Homes documents, and they have not indicated that they have sought pre-application advice from ESCC.

The very significant issues of access appear to have been totally disregarded by SDNPA in their determination to push Castelmer through as the preferred site in Kingston at very short notice, without due consideration or appropriate assessment of potential planning effects.



Lindsay Alexander (Mrs)