

## Kimbolton Parish Council

### Response to Planning application P163693/RM

This statement is the formal response of the Parish Council to the above planning application – referred to as The RM application. The statement consists of the following:

1. A summary of the consideration of the approved proposals for the development of the site. This is important as it provides the starting point to our assessment of the current RM application.
2. Our comments on the RM application in detail with respect to the following concerns:
  - Housing mix
  - Design and layout
  - Surface water run-off and flooding
  - Soft landscaping and internal boundaries
3. Our recommendation for the Council's determination of the RM application

#### 1. Background

The RM Application relates to outline planning permission P/151145/O, granted on 29 April 2016 with an associated s106 Agreement. The outline application was submitted on 20<sup>th</sup> April 2015 and included a number of documents including a Design and Access Statement and Planning Statement. The Parish Council submitted written comments to the planning application and supporting information following an Extraordinary Meeting on 19<sup>th</sup> May 2015. Our response raised concerns over surface water and sewage management, highway safety and pedestrian access and the impact on local infrastructure. The Parish Council acknowledged the benefits of the scheme in providing a mix of tenures and housing types.

54 other representations were made to the planning application, highlighting the considerable local concerns with the proposals and the overwhelming majority of these responses were objections. The responses raised a number of issues and significantly, included comments by the Council's Landscape Team over the prominence of the site in the wider landscape setting of the village, and the degree to which it extends beyond the notional boundary of the settlement.

The Report to Planning Committee weighed these comments and recognised the benefits of the scheme including the ability of the development to provide 'a greater supply of housing and breadth of choice, including 40% affordable' (para 6.24). This assessment was made on the basis of the Design and Access Statement submitted with the planning application which includes an indicative layout. This shows a development of 16 market homes (made up of 4x two bedroom, 8x three bedroom and 4x four bedroom), and five affordable houses.

The mixed nature and tenure of the proposed dwellings were factors that weighed heavily in favour of the proposal particularly by Planning Committee and was a major consideration for the Parish Council in making its comments.

The current RM Application differs from the outline planning application in a number of ways – most significantly there is no on-site affordable housing. This is because the signed s106

agreement is clearly at odds with the Heads of Terms attached to the Planning Committee Report and the contents of the Report itself as summarised above. We understand that the process followed in negotiating the signed s106 is subject to an investigation, specifically whether Council officers have acted ultra-vires.

The second key difference is that the housing mix which in the RM Application is now skewed towards larger housing – 2x five bedroom, 9x four bedroom, 6x three bedroom and 4x bungalows. This means that there is no 2x bedroom housing, more than double the number of 4x bedroom and significantly less 3 bedroom. 5x bedroom housing was not indicated to form part of the original proposals.

For these reasons, the development associated with the RM Application is of a different form to that submitted as part of the outline planning application. The Parish Council is very disappointed that the major benefits of the submitted outline scheme in terms of affordable housing and mix focussed on smaller two and three bedroom family housing no longer prevail.

## **2. Detailed comments**

Our detailed comments are based on the Policies and Proposals of the adopted Herefordshire Core Strategy and the emerging Kimbolton Neighbourhood Plan.

The Neighbourhood Plan is at a relatively early stage in its preparation – the Neighbourhood Area having been designated in July 2015 and the Plan formally ‘launched’ at a Public Meeting in April 2016. A Community Survey took place in the Summer of 2016 and the associated Report can be accessed via <http://kimboltonhamnish.co.uk/neighbourhood-plan/consultations/>. The Community Survey provides a comprehensive and up to date understanding of community priorities and views over the scale of future development in the Parish. It is surprising that the RM Application does not refer to this Report.

In December 2016 the Neighbourhood Plan Character Appraisal was published for consultation alongside a draft settlement boundary. The Character Appraisal follows a tried and tested approach and provides a detailed understanding of the whole of the Parish with a focus on Kimbolton village. It supplements the Herefordshire Landscape Character Assessment.

### Issue 1 – Housing mix

Core Strategy Policy RA2(4) requires that new housing development in identified rural villages (including Kimbolton village) should ‘result in the delivery of schemes which generate the size, type, tenure and range of housing that is required in particular settlements, reflecting local demand’. Our interpretation of this wording indicates that if proposals fail to meet this test then they should be refused.

The Neighbourhood Plan Evidence Base Report (<http://kimboltonhamnish.co.uk/neighbourhood-plan/evidence/>) shows that the housing mix of the Parish is broadly similar to the pattern in Herefordshire and England. The great majority of homes are either owner occupied (46%) or mortgaged (25%), skewed towards detached property in higher Council Tax bands. There is a paucity of smaller lower-cost market or affordable accommodation.

The Herefordshire Local Housing Market Assessment (2012/13)

([https://www.herefordshire.gov.uk/media/7673526/herefordshire\\_local\\_housing\\_market\\_assessment\\_final\\_amended.pdf](https://www.herefordshire.gov.uk/media/7673526/herefordshire_local_housing_market_assessment_final_amended.pdf)) produced by GL Hearn consultants provides a further insight into local housing needs in terms of tenure and size for the period 2011-31. Kimbolton is located within the Leominster Housing Market Area (HMA), and for market housing, Figure 40 of the Study shows that the priority is for three bedroom housing, making up 51.5% of forecast needs, followed by two-bedroom housing (24.4% of needs). Larger four plus bedroom housing makes up only 17.8% of needs.

The Neighbourhood Plan Community Survey sought views on the type and tenure of new housing in the Parish. The survey received a response rate of 73% which is considered to be sufficiently high to be statistically robust. The survey shows that the preferred tenure for new housing in the Parish is for Starter Homes (a form of affordable housing) and Owner Occupied Homes. The least popular form of new housing was large detached private houses – seen as most important by only six out of 151 responses.

In summary, the evidence base points to the need for new development in Kimbolton to be focussed on the provision of smaller scale housing to meet identified needs in order to be compliant with Core Strategy Policy RA2(4). The current RM Application is focussed on large family housing and so is contrary to this Policy. By contrast, the indicative layout and tenure mix associated with the outline planning application to which the RM Application follows would have provided a much more satisfactory development. It is regrettable that the applicant has not chosen to submit a RM Application which is more closely related to that which was submitted in outline form in 2015.

## Issue 2 – Design and layout

Core Strategy Policy RA2(3) requires that housing proposals in Kimbolton village should result in the ‘development of high quality....schemes which are appropriate to their context and make a positive contribution to the surrounding environment and its landscape setting’. The need for high quality development which is based on an understanding of local character is emphasised in Policy LD1 (Landscape and Townscape) and Policy SD1 (Sustainable design and energy efficiency). In particular, bullet point 2 of Policy SD1 requires that new buildings are designed to maintain local distinctiveness through the use of local architectural detailing, materials and scale.

The RM Application proposes a low-density development with the majority of dwellings on one of two terraced development platforms served by cul-de-sacs parallel to the line of the A4112. None of the properties front onto the A4112. The buildings use a limited palette of materials dominated by brick and timber cladding and fibre roofing tiles. Architecturally, the design of the houses is of a modern and functional style with minimal detailing.

The Neighbourhood Plan Characterisation Study provides a detailed description of Kimbolton Village. The Report describes Kimbolton as an attractive and distinctive rural village with a historic medieval settlement at its core (para 5.7.1). the village has developed in an organic way and post-war development has taken the form of limited infill and two larger ‘extensions’ – Chestnut Avenue and Stockton Rock – both typical of their time but located and laid out in such a way that does not

jar with the overall character of the village (para 5.7.3). Buildings are of a variety of architectural styles and materials with extensive use of brick and stone with slate and clay tile roofs.

The RM Application site is within sub-area A - Little Bury and Stockton Ride. Para 5.1.21 of the Report identifies this area as having an open character which makes it very sensitive to development. Para 5.1.23 sets out a series of recommendations on the future management and development of the area including the RM Application site. It states that the priority for this site should include 'ensuring that the scale, siting and massing of new residential development.....is consistent with the existing domestic character and building materials....' Map 13 of the Character Appraisal identifies the view into the site from the A4112 as a 'key view' and the existing hedgerow which forms the southern boundary of the RM Application site is referenced in para 5.1.6.

The RM application fails to have regard to this character. The development is inward looking and 'turns its back' on the village. The layout has the character of a suburban development rather than one associated with an attractive Herefordshire village. The terraced design solution is not an inevitable consequence of the topography as can be seen by the more imaginative and sensitively designed Stockton Rock development where the spine road takes a more sinuous line which provides for variation in levels. The effect of this layout is to locate the larger houses on the higher development platform so as to dominate the development itself and the setting of this part of the village.

The treatment of the A4112 junction is extremely disappointing, consisting of a sewage treatment plant and a blank retaining wall on either side of the access road with the view dominated by the rear elevations of proposed properties (4) and (3). The majority of dwellings in Kimbolton front onto the A4112 or the minor lanes which run from it.

The Herefordshire Strategic Housing Land availability Assessment identifies the southern part of the site as being suitable for development but on the basis that 'there is potential for a well-designed development but sensitive road frontage treatment is required'. For the reasons set out above, the proposal fails to respond to this requirement.

The total dominance of large detached properties is also at odds with local character. The village provides a pleasing mix of housing types including detached properties but also significant clusters of semi-detached particularly at Stockton Rock and Chestnut Avenue. Again, the Stockton Rock scheme provides a more imaginative and sensitive design solution and inspiration for the RM Application – a mix of detached and semi-detached properties which are laid out to take advantage of changes in levels.

Turning to design and materials, the palette is very limited, with extensive use of timber cladding and brick. Timber cladding in Kimbolton is largely limited to former agricultural buildings and is the exception for residential properties. Stone and brick are much more common with some properties in render. The design and access statement submitted with the RM Application emphasises the 'simple..high quality' design in contrast to replicating traditional styles. While the Core Strategy encourages the use of innovative design, it is considered that in this instance the functional appearance of the properties, limited void to solid ratio with expansive areas of brick gives the development an oppressive and uniform character at odds with its surroundings and that of the village as a whole. There is no attempt to use local architectural styles and detailing and

again, the development is of a suburban design not consistent with the character of an attractive and distinctive Herefordshire village.

### Issue 3 – surface water run-off, flooding and sewage treatment

In our response to the outline planning application in 2015, concerns were raised over the impact of the development on local flooding and how treated sewage would be discharged into existing networks. We remain concerned that the proposal will exacerbate flooding particularly due to surface water run-off from the internal estate roads' downslope to the A4112. The information submitted with the RM Application does not provide a solution in terms of how and where surface water run-off will be diverted into drainage systems and similarly, how the treated sewage will be discharged into existing systems and watercourses. We look forward to the views of the Councils drainage team to this issue.

### Issue 4 – Soft landscaping and internal boundary treatments

The RM application is supported by a soft landscaping scheme as detailed in drawing number 16-117-01 prepared by bea landscape design limited. This indicates a new hedgerow on the northern site boundary and a short stretch of hedgerow to the rear of property (3) which are welcomed. However, the site plan drawing number 1817.02.02 indicates a 1m chain link fence on the northern boundary, and a 1.8m close boarded timber fence on the internal estate road. The two drawings are therefore contrary. The Parish Council recommends that opportunities to create new hedgerows both within and more importantly on the boundary of the development are critical in minimising its impact on the landscape and in the interests of maximising habitat creation. Hedgerow management and creation is a key recommendation of the Character Assessment in para 7.0.1.

The treatment of the western boundary of the site is most unsatisfactory in both drawings. Drawing 1817.02.02 indicates a chain link fence running along the full length of this boundary with a metal gate providing access from the turning head of the cul-de-sac into the field to the west. The purpose of this gate is unclear. This western boundary should be similarly made up of a native mixed hedge so as to minimise the impact of the development upon the surrounding landscape.

### **3. Recommendation**

For the reasons set out above, the Parish Council recommends that the RM Application is contrary to the policies and proposals of the adopted Development Plan and cannot be permitted in its current form. The development is of a layout and design inconsistent with its surroundings and will make a negative contribution to the character of the area. The housing mix fails to meet the identified needs of the local area and will exacerbate the paucity of small family housing which the local community sees as the priority. The Parish Council is surprised at the lack of engagement with the local community in the preparation of the RM Application given the degree of local interest associated with the extant outline permission.

We strongly recommend that the applicant is requested to withdraw the current application and we welcome the opportunity to work with them and the Council to agree a more appropriate

development. If the applicant is unwilling to withdraw the application then planning permission should be refused.