



The following was posted on FaceBook in response to the publishing of the Peasmarsh Site Assessments :

There is a mistake in the housing capacity suggested for PM01 Flackley Ash. The AECOM report recommends 3-5 dwellings for this site, and this is also what was presented to us in the Parish Annual Assembly on 18-May (where a 'site factor' of 20% was reported). The PSA on page 22, however, suddenly recommends 10 houses, based on an assumed 'site factor' of 50%. The original AECOM report actually didn't list a 'site factor' for PM01 at all, it just states 3-5 dwellings. There is no basis for changing to 10 houses in the PSA. If you are going to arbitrarily change numbers and make up site factors then the numbers and assumptions for all sites can be disputed.

Similarly, for PM02 Woodside, you are arbitrarily increasing the 'site factor' that was recommended by AECOM at 50% to 75%, increasing the dwellings from 8 to 10.

The 'site factor' is obviously a major fudge-factor and it is not tenable to just make up or alter the factor as you please.

For PM02 Woodside the PSA provides no explanation or justification for why a 'site factor' of 75% is more suitable than 50%, while for PM03 Old Football Ground you keep to the 50% recommended by AECOM. For PM01 Flackley Ash, AECOM didn't even suggest a 'site factor' at all, they simply state explicitly '3 to 5 dwellings', so there is simply no argument for raising this 10.

This is the PNDP Steering Group response :

The first thing to say is that there is not a mistake in the assessments document and the second is to point to Section 5 of the consultants' SOA which makes it clear that the SOA is only a starting point and not necessarily the final position.

The other general point to note is that the consultants only spent a day in Peasmarsh assessing the sites : their work was, as is stated in the PSA, very much based on a thorough understanding of national planning guidance without any real local knowledge.

You are correct of course, the site factor – intended to reflect the issues of how the site sits in the landscape of the AONB – is somewhat subjective. The steering group has done its best to arrive at capacity figures which reflect the wishes of the stakeholders within the context of national and district guidance, some elements of which were not taken into account by the consultants.

PM01 Flackley Ash

As you say, the consultants didn't even justify the 3 to 5 dwellings they included in the SOA : very subjective indeed.

If you do the maths you will see that the site factor has to be 23% to achieve 5 dwellings on the 0.8 ha site [and therefore much less for 3 dwellings]. How can that be justified when the site doesn't even feature in the greater landscape? Even Tanyard Field was given a 30% site factor by the consultants and that is a field which features strongly in the landscape. The steering group considers a very modest 50% site factor [again, if you do the maths, the Orchard Way site was given a site factor of 100% by the consultants] is more than justified.



PM02 Woodside

This site features even less in the landscape than Flackley Ash.

Because of the sudden jump from 90% to 80% in the second [infrastructure] factor at a reduced area of 0.4ha, if you do the maths you will see that applying a site factor of ~60% also delivers 10 dwellings on the site. We could have used a similar site factor for Flackley Ash but that would have meant a comparative capacity of more than 10 and then the NPPF guidance on AONB's would have applied and the capacity would have been reduced to 10.

The other point with both Flackley Ash and Woodside is that these will have to be rural exception sites so developments will have to be for truly affordable houses which means smaller, probably semi-detached properties where the housing density might well be more than 30 dph. That has been ignored because of the overarching NPPF guidance. The developments should be light and airy.

PM03 Old Football Ground

You rightly point out that we chose not to adjust the site factor of 50% selected by the consultants. That is because, using that factor, the site capacity is 10 dwellings. As above, any calculation which arrives at more than 10 is meaningless because of the overarching NPPF guidance.

Apologies for such a lengthy response but there is a lot to say