



**ASHFORD**  
BOROUGH COUNCIL

**Local Development Framework**

**CORE STRATEGY**

***Submission Document***

**PRE-SUBMISSION CONSULTATION**

**REGULATION 28 STATEMENT**

**November 2006**

## Contents

	Page No:
Regulation 28 Statement	3
Appendix A Core stakeholders consulted at pre-submission consultation stage	5
Appendix B Participation carried out at pre-submission consultation stage	7
Appendix C Consultees sent a copy of the Core Strategy 'Preferred Options' Report not already included in Appendix A	11
Appendix D Consultation Letter sent with copy of the Core Strategy and summary Leaflet	12
Appendix E Public Advertisement in the Kent Messenger	16
Appendix F Main issues raised in consultation	17
Preferred Option	
1: The Overall Vision for the Borough	17
2: The Broad Distribution of Development	19
3: Ashford Town Centre	25
4: Ashford Urban Area	31
5: The Growth Areas Around Ashford	36
6: Tenterden, the Villages and the Rural Area	39
7: Design and Sustainability	48
8: Formal Reviews of Progress Towards Balanced, Sustainable Growth	52
9: Phasing of Development and Land Supply	53
10: Delivering the Range of Physical and Community Infrastructure	38
11: The Organisational Framework for Delivering Ashford's Future	61
12: Affordable Housing	62
13: Type of Affordable Provision	65
14: Housing Mix	69
15: Provision for Gypsies and Travellers	71
16: Key Principles for the Natural Environment	72
17: Leisure	76
18: Supply, Wastewater and Flooding	82
Great Chart	86
Kennington Circle	89
Site-Specific Representations	96
Miscellaneous Representations	101

## **PRE-SUBMISSION CONSULTATION - REGULATION 28 STATEMENT**

This Statement sets out the information required under Regulation 28 of the Town and Country Planning (Local Development) (England) Regulations 2004 in relation to the Core Strategy Development Plan Document. Regulation 28(1) requires that the submission of a Development Plan Document is accompanied by a Statement pursuant to Regulation 25, setting out the following:

- (a) which bodies were consulted pursuant to regulation 25(1) [the Issues and Options Stage];
- (b) how those bodies were consulted;
- (c) a summary of the main issues raised; and
- (d) how those main issues have been dealt with in the DPD.

In addition, Regulation 28(1) also requires a Statement regarding all representations made under Regulation 27(2) in respect of the Preferred Options. The Statement must set out:

- (a) the number of representations made;
- (b) a summary of the main issues raised; and
- (c) how those main issues have been addressed in the DPD.

This Statement addresses both of the above issues.

### **Sustainability Appraisal**

The Planning and Compulsory Purchase Act (2004) requires Sustainability Appraisals to be carried out on Local Development Plan Document (DPD), including Supplementary Planning Documents (SPDs). In order to assess the sustainability impacts of different plan and policy options, an appraisal framework was devised, with inputs from key stakeholders. The Sustainability Report, which is appended to the Core Strategy Submission Document, provides an independent, qualitative appraisal of the Core Strategy DPD.

The Core Strategy and the SEA/SA are based on an extensive options development, consultation and assessment process undertaken as part of the Greater Ashford Development Framework. The Sustainability Appraisal Report thus reflects the SEA/SA process which underpinned the evolution of the Greater Ashford Development Framework. At each stage in the LDF preparation, an assessment has been undertaken and recommendations made as to how the sustainability of the plan might be improved. The SA recommendations have been integral to developing the Core Strategy policies.

The Sustainability Appraisal has been consulted on in accordance with government guidance (*Sustainability Appraisal of Regional Spatial Strategies and Local Development Document*, ODPM, 2005). This included a scoping report (consulted in autumn 2005) and responses received throughout the Core Strategy preparation process (see Part A and Part B below).

### **PART A: CONSULTATION UNDER REGULATION 25**

Before preparing the Core Strategy, extensive consultation was undertaken within the framework of the Greater Ashford Development Framework (GADF). The GADF is the first masterplan for the Borough to be prepared as part of the new planning system and is the principal supporting document for the Core Strategy. Consultation on the GADF forms the Issues and Options Stage pursuant to regulation 25(1) for the Core Strategy. The final GADF report sets out the consultation process undertaken, as well as explaining and justifying the preferred options and other options considered.

The first major consultation event was held at Eastwell Manor between the 26 – 29 April 2004, where a selection of stakeholder groups were invited to participate in an intensive four-day workshop. The workshop focused on capacity building; on the quality agenda, building on the principals identified in the Ashford's Future Study [Halcrow 2002] Report; the scale of growth challenge for Ashford identified in the governments Sustainable Communities Plan; to clarify the issues of growth and to explore and develop a preferred growth scenario. Stakeholders consulted at the first Eastwell Manor workshop are listed in appendix A.

The second stage in the consultation process was the establishment of the Town Team a group of representatives who would liaise with their respective communities as the GADF evolves. Another main function for the Town Team was to formulate a Town Charter, which sets out the primary principals and aspirations for Ashford's development. Members of the Town Team are listed at the back of appendix A.

The third part was a wider public consultation event held on the 22 May at County Square Shopping Centre in Ashford's Town Centre. Representatives of consultants, Ashford Borough Council and Ashford's Future introduced the growth challenge to members of the public, in order to capture their ideas and opinions. At this event 1500 people engaged in consultation activities, of these approximately 500 people involved directly in playing a version of the Scenario 3 game [see GADF]; approximately 1000 additional people walked through the exhibition and 300 written responses were gained.

The final major GADF event was held between 12<sup>th</sup> and 16<sup>th</sup> July 2004 again at Eastwell Manor consisting of a two-day workshop with the purpose of reviewing the preferred strategic growth model, in light of the consultation so far, in addition to this a two-day specialist series of focus groups was held, with outcomes featuring at a public exhibition in Charter House.

The GADF report reflects a summary of an extensive programme of studies and consultation events and decision-making undertaken over the course of work during 2004 and early 2005, a list of the main events and meetings is provided in appendix B. On the basis of the above, the Authority considers that it has complied with the consultation requirements of Regulation 25.

## **PART B: CONSULTATION UNDER REGULATION 26**

We then prepared a Core Strategy 'Preferred Options' report and carried out consultation on this report for a ten-week period from Friday 17<sup>th</sup> June to Friday 26<sup>th</sup> August 2005.

- The document, including the proposals matters [in the form of a consultation letter and summary leaflet] were available for inspection during normal office hours at:
  - Ashford Borough Council Civic Centre, Tannery Lane, Ashford
  - The Council's Tenterden Sub-Office, 6/7 The Fairings, Tenterden
  - Ashford Library, Church Road, Ashford
  - Charing Library, Market Place, Charing
  - Tenterden Library, 55 High Street, Tenterden
  - Wye Library, 6 Upper Bridge Street, Wye
- The document and proposals matters were available on our website, [www.ashford.gov.uk](http://www.ashford.gov.uk), together with information explaining where and when paper copies of the document were available for inspection.
- We placed an advertisement in the Kent Express, which was carried on 16<sup>th</sup> June 2005.
- We sent copies of the document, along with the proposals matters and details of the forthcoming exhibitions, to all the bodies listed in appendix A and appendix C. We also sent a copy of the consultation letter and summary leaflet to over 750 interested stakeholders and general interest groups, saved on the LDF database.
- Inline with the emerging Ashford Statement of Community Involvement we held eleven staffed public exhibitions during the consultation period around the Borough at the following parishes of: Mersham & Sevington, Kingsnorth, Tenterden, Wye, Charing, Shadoxhurst, Great Chart with Singleton, Kennington, South Ashford, Boughton Aluph, Willesborough and Ashford Town Centre County Square. A Core Strategy 'Preferred Options' Summary Leaflet was produced for members of the public to take away with them.
- We further publicised the Core Strategy 'Preferred Options' consultation within articles in the Kent Messenger Newspaper and Ashford's Voice magazine.

We enclose a copy of the proposals matters in the form of the consultation letter in appendix D and the public advertisement appendix E.

We received 1586 representations on the Core Strategy 'Preferred Options' report. We provide a summary of the main issues raised and the way they were addressed in the Core Strategy in appendix F.

Some representations asked for additional bodies/persons to be added to the Councils LDF database and these bodies have been added.

**Core stakeholders consulted at pre-submission consultation stage**

*Regional Planning Body*

- South East England Regional Assembly
- Government Office for the South East

**Highways Agency**

**Adjoining Local Planning Authorities**

- Canterbury City Council
- Maidstone Borough Council
- Shepway District Council
- Swale Borough Council
- Tunbridge Wells Borough Council
- Rother District Council

**County Councils**

- ***Kent County Council***
- County Councillor for Ashford North
- County Councillor for Ashford South
- County Councillor for Ashford Rural East
- County Councillor for Ashford Rural West
- County Councillor for Tenterden

**The Parish Councils of:**

- Aldington & Bonnington
- Appledore
- Bethersden
- Biddenden
- Bilsington
- Boughton Aluph & Eastwell
- Brabourne
- Brook
- Challock
- Charing
- Chilham
- Egerton
- Godmersham
- Great Chart with Singleton
- Hastingleigh
- High Halden
- Hothfield
- Kenardington
- Kingsnorth
- Little Chart
- Mersham & Sevington
- Molash
- Newenden
- Orlestone
- Pluckley
- Rolvenden
- Ruckinge
- Shadoxhurst
- Sarden
- Smeeth
- Stanhope
- Stone
- Tenterden
- Warehorne
- Westwell
- Wittersham
- Woodchurch
- Wye & Hinxhill

**The Countryside Agency  
The Environment Agency**

**The Historic Buildings and Monuments  
Commission for England**

- English Heritage South East Region
- ***English Nature***

*Strategic Rail Authority*

- Network Rail

*Regional Development Agency*

- South East England Development Agency

**Any of the bodies from the following list who are exercising functions in any part of the area of the LPA; SHA; Person to whom a licence has been granted under Section 7(2) of the Gas Act 1986; Sewage undertaker; Water undertaker.**

- Ashford Primary Care Trust
- Kent & Medway Strategic Health Authority
- British Gas Transco - South East
- Mid-Kent Water Ltd
- Southern Water
- The National Grid
- Countryside Properties PLC
- Kentish Express
- The Arts Council
- United Taxis
- Learning and Skills Council
- Parsons Brinkerhoff Infrastructure
- Ashford Future Core Delivery Team
- Kent Invicta Chamber of Commerce Industry and Enterprise
- Find a Voice
- Business Link Kent
- Stagecoach East Kent Limited
- Eurostar (UK) Ltd
- Housing Corporation
- Kent Rural Community Council
- Richard Griffiths Architects
- Tourism South East
- Boots the Chemist Limited
- Ashford YMCA
- RPS Group
- South Eastern Trains
- English Partnerships
- Home Builders Federation
- Ashford Rural Trust
- Ashford Citizens Advice Bureau
- Parklife
- Kent Association for the Disabled
- CB Richard Ellis Limited
- Sainsburys
- Kent Energy Centre
- MP for Ashford
- Batchelors Factory
- Kennington Community Forum
- Alliance and Leicester
- Housing Association Limited
- Willesborough and Newtown Community Forum
- Hyde Housing Association Limited
- Southern Gas Networks
- Halcrow Consulting Limited
- Age Concern
- Debenhams
- South Kent College
- CABE
- William Harvey Hospital

- Roger Joyce Associates
- Housing Corporation
- Ashford Asian Society
- Time RPS Limited
- Eurotunnel
- Ashford Federation of Arts
- Central Ashford Community Forum
- HR Wallingford
- McArthur Glen Designer Outlet
- Kent Wildlife Trust
- Christ Church C of E High School
- Kentish Express
- Godinton Trust
- Ashford Borough Tenants Forum
- Chairman of Tenterden Town Council
- Stoodley Phippen Solicitors
- North Street Surgery
- Headley Brothers Ltd
- Black and Veatch
- Land Securities Ltd
- HR Wallingford
- South Willesborough-Newtown Residents Association
- ASDA Stores Limited
- Newtown Community Residents Association
- Pluckley C of E Primary School
- DCLG
- Planit International Ltd
- Singleton Surgery
- Kentish Stour Countryside Project
- Amion Consulting
- Shopmobility
- Kent County Council-
- Ashford Independent Group
- Ashford Museum
- The Soil Association
- Quest International
- Kent Police

**The Town Team:**

- Ward Member for Singleton South
- Ward Member for Wye
- Ward Member for Highfield Ashford
- Ward Member for Tenterden South
- Ward Member for Downs North
- Ward Member for South Willesborough Ashford
- Ward Member for Boughton Aluph and Eastwell
- Ward Member for Weald South
- Ward Member for North Willesborough Ashford
- Kent Association of Parish Councils
- Ashford District and South East Region CPRE
- Ashford Chamber of Commerce Industry and Enterprise
- Ashford Town Centre Partnership
- Kennington Urban Forum
- Kent County Council Education and Libraries
- Ashford Borough Council
- GHG Consultancy Ltd
- Ashford Rural Trust
- Ashford Fire Brigade
- Sawyer and Fisher
- Mid Kent Social Services
- Richard Griffiths Architects
- Kent Wildlife Trust
- Mid Kent Social Services
- Ashford Churches Together
- Weald of Kent Preservation Society
- Boughton Aluph Parish Council
- Bockhanger Steering Group
- Towers School Governors
- Mersham and Sevington Parish Council
- Ashford ACCESS
- Places for People
- Shadoxhurst Parish Council
- Local Resident
- Bilsington Church
- St Johns Ambulance
- Ashford Borough Tenants Forum
- Willesborough Urban Forum
- Imperial College of Wye
- Ashford and District Volunteer Bureau
- Mid and South Kent Council for Voluntary Services
- Kent Association for the Disabled
- Ashford Visual Artists

## Appendix B

## Participation carried out at pre-submission consultation stage

Date	Consultation	Consultation technique used	Targeted consultees
Autumn 2000	Steering Group Formation	Steering Group of Strategic Partners formed as a result of Ashford being identified for potential significant growth over the next thirty years.	Strategic Partners
September / October 2001	Quality of Life Visioning Workshops	Four workshops based around the economy, transport and community. Open to a wide range of public sector organisations and the wider community was involved through using community representatives	Community representatives including county, Borough and Parish Councillors, representatives from other Kent Districts, amenity, residents and tenants groups and representatives from voluntary organisations
November 2001	Questionnaire	Questionnaires sent out within the Ashford Review quarterly	Sent to all residents within Ashford Borough
January / March 2002	Presentations	Presentation given on the background to the study and progress so far	Residents and special interests groups
April 2002	Handbook for change published	General consultation setting out what matters and why for Ashford's quality of life	General public and those with an interest in Ashford's growth
April 2002	Ashford Review Magazine consultation	Simple questionnaire asking residents to express their vision for Ashford over the next 30 years	This questionnaire was circulated in the Ashford Review magazine to all households in the Borough
May 2002	Visioning Workshops	Workshops held at the Stour Centre, giving participants the opportunity to help develop the direction of growth in Ashford and clarified the principles that should underpin growth as well as some of the major projects required i.e. infrastructure and service provision. The outputs of these workshops were fed into the development of the "Sustainable Growth Options Report" including similar representatives to the Quality of Life Workshop	Open to a wide range of public sector organisations and the wider community was involved through using community representatives including County, Borough and Parish Councillors, representatives from other Kent Districts, amenity, residents and tenants groups and representatives from voluntary organisations. Over 100 people attended in total
August / September 2002	Ashford's Future Leaflet Consultation	Following the completion of the "Sustainable Growth Options Report" wide consultation was carried out on the 3 options that were recommended for further testing. 55,000 leaflets were circulated to households, businesses and retailers within the Borough and selectively via partner organisations	Publication and distribution to all Ashford residents on three scenario's included within the framework for change
September 2002	Staffed Public Exhibition	A 5-day staffed exhibition held at Ashford's main shopping centre. 2,000 responses were received, which were fed into the final "overarching report" as well as the Borough Council decision to support the broad recommendation for growth	General Public Consultation event open to all

Date	Consultation	Consultation technique used	Targeted consultees
December 2002	Ashford's Future Summary Leaflet	This leaflet summarised the study conclusions. 10,000 leaflets were circulated	Leaflets circulated to residents, organisations and companies and circulated more widely through the other Ashford's Future partner organisations
January 2002	Ashford Visioning Workshop	Visioning workshop held at Godinton House, Ashford	Involving Kent County Council and key stakeholders in order to build strategic partnerships before the launch of the community's plan and blue sky visioning workshops
August 2003	Deputy Prime Minister Visit	Deputy Prime Minister visits Ashford	Informal meeting with Architects and stakeholders
October 2003	Visioning Design Workshop	This design workshop held at Eastwell Manor involved key stakeholders and all those with an interest in the town in order to build up design proposals for the Town Centre and to inform the consultants commissioned to prepare the Ashford Town Centre Development Framework. From this, 3 design options for the Town Centre were to be produced	A range of key stakeholders were involved in this event, similar to those present at the Quality of Life Workshops
September 2003	Local Plan policy assessment survey	Survey of the existing Local Plan policies and format to assess users satisfaction of the document and any suggestions for change/improvement	Councillors, Parish Councillors, local amenity and interest groups and agents and developers
November 2003	Ashford Water Environment Conference	Ideas Workshops held at Eastwell Manor, Ashford, to discuss integrated water management issues associated with Ashford's growth	Stakeholders, experts, consultants all involved in this session
November 2003- February 2004	Interactive Youth Sessions	A range of participatory exercises, have taken place with the young people in the Borough to involve this potentially excluded group. Exercises involved a schools roadshow held at Liquid Nightclub, and term project	Large scale conference involving Key stages 3 and 4 from local schools in Ashford and Kent Institute of Architecture and Design students looking at specific sites. The outcomes of this to be fed into the general Masterplanning of Ashford
February 2004	Placecheck	This exercise consisted of an extensive audit of the Town Centre and was intended to involve the wider community	Local residents groups, the Town Centre Partnership etc
March 2004	Ashford Town Centre Development Framework Workshop	This workshop looked in detail at the 3 town centre options put forward by the consultants and an assessment of the schemes and consideration of phasing priorities	Key stakeholders, interest groups, etc, similar to the quality of life workshops
March 2004	Public Exhibition	Consultation and public exhibition on Town Centre growth scenarios held at Centre Piece Church, Ashford	Exhibition open to the general public and available to anyone with an interest
March 2004	Stakeholder Seminar	Seminar held at Julie Rose Athletic Stadium to develop scenarios for Ashford town centre consultation exhibition	Variety of Stakeholders

Date	Consultation	Consultation technique used	Targeted consultees
Ongoing	Ashford's Future Newsletter	Throughout the study process, newsletters were sent every 1 to 2 months to all those on the Ashford's Future database, which is a database containing names and addresses of over 2,000 organisations and individuals who have requested to be kept up to date on the progress of the Ashford's Future Study. The newsletters have summarised the progress being made on the study, informed people of key consultation events, and summarised the key findings of the study to date. This will continue to take place throughout the process and ensures that all relevant stakeholders are kept informed and given the opportunity to get involved if they feel it is appropriate	Range of stakeholders held on the Ashford Future's Database
Ongoing	Targeted involvement of key infrastructure/ service providers	Key infrastructure / service delivery organisations have been kept up to date individually with relevant meetings, networking between consultants working on various projects and the client project team	Variety of stakeholders
April 2004	Greater Ashford Development Framework Design Workshops and Public Exhibition	Results from the October 2003 design workshops fed into the Greater Ashford Development Framework, which were discussed and explored at a 4-day design workshop, held at Eastwell Manor, Ashford to develop different options. A public exhibition was held at the end of the week to display work carried out	Workshops involving stakeholders, interest and amenity groups, Councillors, Parish Councils and the Town Team, to discuss growth scenarios and the development of a Town Charter.  Exhibition open to anyone with an interest
June 2004	Meeting with key landowners	Meetings and discussions with key landowners and agents acting on behalf of landowners to outline the process, progress so far and explore landowner interests etc	Variety of key landowners, agents and developers.
September 2004	Councillor workshop	Workshop focusing on looking at the options for development and assessing key sites and their implications	All Council members invited
October 2004	Parish Council workshop	Workshop focusing on looking at the options for development and assessing key sites and their implications	Affected Parish Councils surrounding Ashford's urban area
November 2004	Councillor workshop	Workshop looking at the Town Centre Masterplanning work and movement issues	All Councillors invited
January 2005	Landowners workshop	Two workshops held, one for major landowners and developers, and the other specifically for town centre landowners. The workshops provided an update to the Greater Ashford Development Framework. Consultation also covered delivery issues and the LDF timetable	Major landowners and developers, and Town Centre Landowners

<b>Date</b>	<b>Consultation</b>	<b>Consultation technique used</b>	<b>Targeted consultees</b>
February 2005	Victoria Road Public Exhibition	A special exhibition detailing proposals for a new development at Victoria Road. The proposed new development to include retail, office/light industrial units, restaurant/public house, hotel and residential developments	Residents that live near the site were informed of the exhibition
February 2005	Sustainability Workshop	The workshop brought Ashford's Future delivery partners together to adopt a shared approach and common set of environmental standards for development. Fifteen action points originating from the workshop developed into a Thirty Four point action programme for an environmental programme for Ashford	A workshop involving Ashford Borough Council, Kent County Council, and other key agencies
February 2005	Greater Ashford Development Framework Workshops	Four workshops held. Each workshop included a presentation from Urban Initiatives and Alan Baxter Associates and provided an update on the LDF and its relationship with GADF. An exhibition of related material was available for attendees to view and a copy of the latest masterplan and a comment sheet to return later were available	All key Greater Ashford Development Framework stakeholders including consultants, the Town Team, the Councillors, Delivery Board Members and Agencies
March 2005	Public Realm Workshop for Bank Street	A workshop inviting the public to discuss proposed street improvements at Bank Street and the area around the domestic rail station	A public exhibition – invitations sent to all neighbours of Bank Street
March 2005	Discovery Centre Workshop	A one-day workshop involving student from the Kent Institute of Art and Design and students from Lille in France, to design a billboard for the Discovery Centre	A public exhibition - all Councillors invited and various dignitaries
April 2005	Town Centre Workshop	An Ashford Town Centre Workshop updating on work progressed following the January Landowners Workshop and inviting attendees to discuss preferred options for the town centre	Key stakeholders and interest groups

## Appendix C

### Consultees sent a copy of the Core Strategy 'Preferred Options' Report not already included in Appendix A

- Kent County Council Education and Libraries
- Social Services
- English Partnerships
- Ashford Rotary Group- Early Bird
- Ashford's Future Delivery Team
- Cyma Architects Limited
- Transport 2000 Trust
- Confederation of British Industry
- Aquarius Press
- Brooke Smith Associates
- Tenderden and District Residents Association
- Urban Initiatives
- South Kent Education Business Partnership
- Crest Nicholson
- Clouds Cards & Gifts Ltd
- Trident Building Consultancy Ltd
- Crime Reduction Department Ashford Police Station
- Bar 3 Zero
- The Nyasa Partnership Limited
- Stanhope Estate Panel
- Green Party
- London Ashford Lydd Airport
- Central Ashford Residents Association
- Holder Mathias Architects
- CPRE Ashford District and South East Region
- Ashford Umbrella
- Allen Pyke Associates
- Kent and Medway Economic Board
- Clague Architects
- Doves Funeral Directors
- John Floyd and Associates
- The Individual Learning Company Limited
- Bibblybobs
- Allen Pyke Associates
- GHg Consultancy Ltd
- Mecca Bingo
- RBS
- Chapman Taylor
- Alliance and Leicester
- Capita Symonds Ltd
- County Square Shopping Centre
- Milton Keynes Borough Council
- National Car Parks Limited
- Green Party
- The Institution of Highways and Transportation
- Victoria Road Primary School
- Hyde Housing Association Limited
- Parklife
- Stanhope REACT
- Architectureand
- Hillreed Homes
- Joseph James Partnership
- University of Kent at Canterbury
- Hillreed Homes
- Dover District Council
- MKA Chartered Architects
- Wheelchair Users Group
- KCC Highways
- Ashford Town Centre Partnership
- Cranmer Investments
- Leslie Jones Architects
- London and Continental Stations and Property Ltd
- HSBC Bank PLC
- Victim Support
- Ashford Borough Council
- Norwest
- M2R Architecture
- Mid and South Kent Council for Voluntary Services
- Pronuptia Bridalwear
- Portrush Investments
- Clague Architects
- Kent Association of Parish Councils
- Stanhope REACT
- University of Kent at Canterbury
- Cross River Partnership - Lambeth Office
- Imperial College at Wye
- RBS
- Babtie Group
- Leslie Jones Architects
- Ashford Museum Committee
- Ashford Town Bowls Club
- David Lock Associates
- Ashford Jobcentre
- Lake - London and Kent Estates
- St Mary's CE Primary School
- Chapman Taylor
- Brake Bros
- Woolworths plc
- Harrisons Chartered Surveyors
- Wye Village Design Group
- Housing Corporation
- Sandyhurst Lane Residents Association
- Strutt and Parker
- Hallett and Co Solicitors
- Ashford Fire Brigade
- Sterling Developments
- Space Syntax
- Ashford and District Volunteer Bureau
- DCLG
- Quintain Estates and Development PLC
- The Kent Architecture Centre
- Biscoe and Stanton
- Kent Planning
- John Thompson and Partners
- Cattell Skinner Design Partnership
- Stagecoach East Kent Limited
- GTL Properties
- Park Mall Shopping Centre
- Design Practice
- Space Syntax
- Water Voice
- Colyer Commercial
- Ashford Rural Trust
- Alan Baxter and Associates
- Taylor Riley Chartered Surveyors
- Ashford Museum
- Leslie Jones Architects
- Catalyst Capital LLP
- Adscene
- Walker Construction UK Limited
- Crundale Parish Meeting
- Moat Housing Group
- Berkeley Homes Eastern Limited
- Evata Consulting UK Ltd
- Bill Dunster Architects
- Wilkinson Eyre
- Cluttons LLP
- Great Chart Ashford's Future Action Committee
- Ashford School

Appendix D

**Consultation Letter sent with copy of the Core Strategy and summary leaflet**

**PLANNING AND DEVELOPMENT**

HEAD OF PLANNING AND DEVELOPMENT  
Richard Alderton

Direct Line (01233) 330213  
Ask For Ian Grundy  
E-mail [ian.grundy@ashford.gov.uk](mailto:ian.grundy@ashford.gov.uk)  
Fax No (01233) 330642  
DX 30204 Ashford (Kent)  
Our Ref IG/PDU  
Your Ref  
Date 15<sup>th</sup> June 2005

Dear Consultee

**ASHFORD BOROUGH LOCAL DEVELOPMENT FRAMEWORK:  
PRE-SUBMISSION CONSULTATION ON THE CORE STRATEGY –  
'PREFERRED OPTIONS' REPORT**

Ashford Borough Council has prepared a Preferred Options Report, which is the first formal stage in the production of the Core Strategy for the Ashford Local Development Framework. The report sets out the Council's 'preferred options' on a series of key planning issues, including the vision for the future of the Borough. It also outlines the broad locations proposed for housing development, together with other strategic needs such as employment, retail and transport developments. This document has been produced to trigger public debate on options before a 'submission version' of the Core Strategy is produced next Spring.

We are inviting consultees from the **17 June – 26 August** to make representations on the 'Preferred Options' report during a ten-week public consultation period. This is in accordance with Regulation 26 of the Town and Country Planning (Local Development) (England) Regulations 2004.

Please find enclosed a copy of the 'Preferred Options' report, together with a representation form and its accompanying guidance note. Following the consultation period and careful consideration of all comments received, we will produce a Core Strategy document, which will be submitted to the Secretary of State, where there will be a further opportunity to make representations.

We hope that you take this opportunity to formally express your views on the preferred options shown, and look forward to receiving your comments.

Yours faithfully,

Richard Alderton

We will be running a series of exhibitions around the Borough where you will be able to meet Officers from the Planning and Development Unit who will be on hand to answer any queries or questions you may have on the Core Strategy 'Preferred Options' Report or the Ashford Local Development Framework.

Exhibition dates are shown in the table below.

<b>Parish</b>	<b>Date</b>	<b>Venue</b>	<b>Time</b>
Mersham & Sevington	Monday 27 <sup>th</sup> June	Mountbatten Hall	3:00 – 8pm
Kingsnorth	Wednesday 29 <sup>th</sup> June	Kingsnorth Primary School	3:30 – 8pm
Tenterden	Wednesday 6 <sup>th</sup> July	Town Hall Assembly Room	3:00 – 8pm
Wye	Thursday 7 <sup>th</sup> July	Methodist Hall	3:00 – 8pm
Charing	Monday 4 <sup>th</sup> July	Parish Hall	3:00 – 8pm
Shadoxhurst	Friday 15 <sup>th</sup> July	Village Hall	3:00 – 8pm
Great Chart with Singleton	Wednesday 13 <sup>th</sup> July	Great Chart Village Hall	3:00 – 8pm
Kennington	Tuesday 19 <sup>th</sup> July	Julie Rose	3:00 – 8pm
South Ashford	Wednesday 20 <sup>th</sup> July	St. Simon's Church, Brookfield	3:00 – 8pm
Boughton Aluph	Friday 29 <sup>th</sup> July	Parish Hall, Boughton Aluph	3:00 – 8pm
Ashford Town Centre	1 <sup>st</sup> – 2 <sup>nd</sup> July	County Square	3:00 – 8pm
Ashford Town Centre	From Friday 17 <sup>th</sup> June	Ashford Library	Static display
Ashford Town Centre	22 <sup>nd</sup> – 26 <sup>th</sup> August	Committee Room 2, Civic Centre, Tannery Lane, Ashford	Static display

**Consultation Letter sent with a copy of the summary leaflet**

**PLANNING AND DEVELOPMENT**

HEAD OF PLANNING AND DEVELOPMENT  
Richard Alderton

Direct Line (01233) 330213  
Ask For Ian Grundy  
E-mail [ian.grundy@ashford.gov.uk](mailto:ian.grundy@ashford.gov.uk)  
Fax No (01233) 330642  
DX 30204 Ashford (Kent)  
Our Ref IG/PDU  
Date 15<sup>th</sup> June 2005

Dear Consultee,

**ASHFORD BOROUGH LOCAL DEVELOPMENT FRAMEWORK:  
PRE-SUBMISSION CONSULTATION ON THE CORE STRATEGY –  
'PREFERRED OPTIONS' REPORT**

The Council has prepared a Core Strategy 'Preferred Options' Report, which is the first formal stage in the production of the Core Strategy for the Ashford Local Development Framework. This consultation document sets out the Councils 'preferred options' on a series of key planning issues, including the vision for the future of the Borough. It also outlines the broad locations proposed for housing development, together with other strategic needs such as employment, retail and transport developments. This document is a requirement under the Planning and Compulsory Purchase Act 2004, and has been produced to trigger public debate on options before a 'submission version' of the Core Strategy is produced next Spring.

Between the **17 June and 26 August** we are inviting comments on the options contained within the document during a ten-week public consultation period. The Core Strategy 'Preferred Options' Report will be located at the following sites during this period:

- Ashford Borough Council, The Civic Centre, Tannery Lane, Ashford, Kent, TN23 1PL.
- Ashford Borough Council Tenterden Office, 67 The Fairings, Tenterden, TN30 6QX.
- Ashford Library, Church Road, Ashford, TN23 1QX.
- Charing Library, Market Place, Charing, Ashford, TN27 0LR.
- Tenterden Library, 55 High Street, Tenterden, TN30 6BD.
- Wye Library, 6 Upper Bridge Street, Wye, Ashford, TN25 5AF.
- On the Council website at [www.ashford.gov.uk](http://www.ashford.gov.uk)

Following the consultation period and careful consideration of all comments received, we will produce a Core Strategy document, which will be submitted to the Secretary of State, where there will be a further opportunity to make representations.

We hope that you take this opportunity to formally express your views on the preferred options shown, and look forward to receiving your comments.

Yours faithfully,

Richard Alderton

We will be running a series of exhibitions around the Borough where you will be able to meet Officers from the Planning and Development Unit who will be on hand to answer any queries or questions you may have on the Core Strategy 'Preferred Options' Report or the Ashford Local Development Framework.

Exhibition dates are shown in the table below.

Parish	Date	Venue	Time
Mersham & Sevington	Monday 27 <sup>th</sup> June	Mountbatten Hall	3:00 – 8pm
Kingsnorth	Wednesday 29 <sup>th</sup> June	Kingsnorth Primary School	3:30 – 8pm
Tenterden	Wednesday 6 <sup>th</sup> July	Town Hall Assembly Room	3:00 – 8pm
Wye	Thursday 7 <sup>th</sup> July	Methodist Hall	3:00 – 8pm
Charing	Monday 4 <sup>th</sup> July	Parish Hall	3:00 – 8pm
Shadoxhurst	Friday 15 <sup>th</sup> July	Village Hall	3:00 – 8pm
Great Chart with Singleton	Wednesday 13 <sup>th</sup> July	Great Chart Village Hall	3:00 – 8pm
Kennington	Tuesday 19 <sup>th</sup> July	Julie Rose	3:00 – 8pm
South Ashford	Wednesday 20 <sup>th</sup> July	St. Simon's Church, Brookfield	3:00 – 8pm
Boughton Aluph	Friday 29 <sup>th</sup> July	Parish Hall, Boughton Aluph	3:00 – 8pm
Ashford Town Centre	1 <sup>st</sup> – 2 <sup>nd</sup> July	County Square	3:00 – 8pm
Ashford Town Centre	From Friday 17 <sup>th</sup> June	Ashford Library	Static display
Ashford Town Centre	22 <sup>nd</sup> – 26 <sup>th</sup> August	Committee Room 2, Civic Centre, Tannery Lane, Ashford	Static display

**Public Advertisement in the Kent Messenger**

**ASHFORD BOROUGH COUNCIL**

**NOTICE OF PRE-SUBMISSION  
PUBLIC PARTICIPATION OF THE  
CORE STRATEGY  
'PREFERRED OPTIONS' REPORT**



**Planning and Compulsory Purchase Act (2004)  
Regulation 26 - Town and Country Planning  
(Local Development) (England) Regulations 2004.**

Ashford Borough Council has prepared a Preferred Options Report, which is the first formal stage in the production of the Core Strategy for the Ashford Local Development Framework. The report sets out the Councils 'preferred options' on a series of key planning issues facing the Borough. This report has been produced to trigger public debate on options before a 'submission version' of the Core Strategy is produced next Spring.

We are inviting members of the public to make representations in objection to, or in support of the pre-submission 'Preferred Options' Report. Copies are available for public inspection free of charge, between 17<sup>th</sup> June and 26<sup>th</sup> August during opening hours at:

- Ashford Borough Council, The Civic Centre, Tannery Lane, Ashford, Kent, TN23 1PL.
- Ashford Borough Council Tenterden Office, 67 The Fairings, Tenterden, TN30 6QX.
- Ashford Library, Church Road, Ashford, TN23 1QX.
- Charing Library, Market Place, Charing, Ashford, TN27 0LR.
- Tenterden Library, 55 High Street, Tenterden, TN30 6BD.
- Wye Library, 6 Upper Bridge Street, Wye, Ashford, TN25 5AF.
- On the Council website at [www.ashford.gov.uk](http://www.ashford.gov.uk)

Representations relating to the 'Preferred Options' Report can be sent:

- in writing to: Planning and Development Unit,  
Ashford Borough Council, Civic Centre, Tannery Lane, Ashford, Kent,  
TN23 1PL.
- or by email to: [ashfordldf@ashford.gov.uk](mailto:ashfordldf@ashford.gov.uk)

We can only consider representations that are received during the 10 week consultation period ending on the 26<sup>th</sup> August 2005. Further information can be viewed from the Councils website at [www.ashford.gov.uk](http://www.ashford.gov.uk), or by emailing [ashfordldf@ashford.gov.uk](mailto:ashfordldf@ashford.gov.uk), or by telephoning (01233) 330213.

Large format and audio versions of this notice are available on request call (01233) 330229.

## APPENDIX F

### MAIN ISSUES RAISED IN CONSULTATION

#### Preferred Option 1: The Overall Vision for the Borough

Representations were received from the following organisations

209 – Ashford Green Party	900 – Bovis Homes	1554 – Great Chart with Singleton Parish Council
275 – Churches Together in Ashford	1026 – London & Continental Stations & Property	1572 – GSE Waterbrook Ltd
362 – Mrs M Mills	1047 – South Kent College	1583 – Capel House Property Trust
368 – Countryside Agency	1062 – Kent Downs AONB Unit	1632 – Save Great Chart Action Group
382 – Boughton Aluph & Eastwell Parish Council	1088 – Mersham & Sevington Parish Council	1654 – Kent County Council Strategic Planning
408 – Shadoxhurst Parish Council	1256 – Ashford's Future	1673 – Quintain Estates and Development
434 – Kingsnorth Parish Council	1306 – Westbury Homes (Holdings) Ltd	1688 – Ashford Partnership
462 – Aldington & Bonnington Parish Council	1327 – CPRE Kent	1720 – Boughton Aluph & Eastwell Parish Plan
481 – WWF-UK	1374 – Orlestone Parish Council	2066 – Pentland Jarvis Holdings
780 – South Ashford Parishes Partnership	1431 – Highways Agency	
816 – Kent Wildlife Trust	1450 – English Nature	
895 – Church Commissioners for England	1507 – Ward Homes	
	1519 – Kier Property	
	1528 – Ashford Rugby Club	

#### General Support

##### Main Issues Raised:

275, 368, 382, 408, 434, 462, 780, 895, 1026, 1047, 1062, 1088, 1256, 1306, 1327, 1374, 1431, 1450, 1720: There was general support for the policy approach in this section. Many also confirmed their support for the overall vision and general approach set by the existing Local Plan's Guiding Principles updated to reflect the objectives of the Halcrow report and the GADF.

Several representations expressed support for the commitments to protecting and improving the environment and the planning approach to the rural area, although representations 368, 382 and 1062 felt that the principles of environmental protection could be further enhanced.

434, 462, 1327, 1088: It is essential that Option 1(B) [community involvement] should be given real substance. Representation 1047 considered that an additional guiding principle should be introduced to reflect the importance of providing enhanced education and training facilities. One representation (1088) considered that Option 1(C) [need to reflect national guidance] should reflect local policy rather than national policy.

##### Council's Response:

275, 368, 382, 408, 434, 462, 780, 895, 1026, 1047, 1062, 1088, 1256, 1306, 1327, 1374, 1431, 1450, 1720: The support for the overall approach is welcomed. There seems little sense in departing from the well-founded objectives of the Borough Local Plan and it is noted that none of these have been seriously questioned by any of the representations. It is considered that the commitments to protecting and improving the environment provide an appropriate level of protection. More detailed protection will be provided in subsequent DPD policies.

1047: The GADF report recognises the importance of education and training facilities in the future growth of Ashford. The LDF therefore contains support for education and training facilities in the Core Strategy, which will be expanded upon in subsequent DPDs.

434, 462, 1327, 1088: Government guidance including PPS1 has recognised and strengthened the importance of community involvement in the planning process. It should be noted that LDF policies are required to reflect national and regional planning guidance, although the detail of policies will always reflect local circumstances.

#### General Objections

##### Main Issues Raised:

900, 1507 and 1528 considered that the LDF should be more flexible. In particular, it should allow for small-scale opportunities that were not set out in the Ashford's Future or GADF studies, especially with regard the provision of community facilities and infrastructure to cater for a growing population.

1583 felt that the Council have missed the opportunity to review existing guiding principles where needed, although the respondent did not identify any specific changes or indicate areas of concern.

362 objected to option 1(C) on the basis that local views should take precedence over national guidance. 209 felt that there

should be a retreat from the scale of expansion proposed in Ashford in general.

1688 felt there is a need to for the Community Strategy and related planning issues to be described in more detail so it is clearer how it fits in with the process. 1654 felt there was not enough reference to the emerging KMSP policies. 816 considered that PPS 9 (Biodiversity) had not been taken fully into account. 481 believed there is a need to create a guiding principle that refers to an aim of reducing the demand for resource consumption using ecological footprint as an indicator.

1519 felt that the vision would not deliver sufficient land in the right areas for the market to react sufficiently. The focus on town centre sites first is unlikely to stir up any interest from developers.

2066 considered there should be explicit references to RPG9 chapter 12 and also the extent to which community involvement should be allowed to slow down the system.

Council's Response:

900, 507, 1528, 1583: Whilst the Core Strategy and the LDF in general will provide an appropriate level of flexibility, it is considered that the Overall Vision sets a firm set of parameters for development. The GADF masterplan, as amended, will form the overall framework for development; however, this is intended to indicate broad areas for development rather than allocating individual sites. As such, smaller-scale application proposals for developments not indicated on the GADF masterplan will be considered on their merits in accordance with LDF policies. The guiding principles have been reconsidered and updated where appropriate within Policy CS1.

362, 209: Whilst local views have an important part to play in the process of developing LDF policies, local planning authorities are required to ensure that their LDF accords with national and regional planning policies. The Government has identified Ashford as a Growth Area. The Borough Council's role, as the local planning authority, is to facilitate this growth in the most sustainable way through the LDF process.

1688: It is important that there is a strong relationship between the Community Strategy and the LDF in order to link the objectives. The Core Strategy has been developed taking account of the aims of the Community Strategy, as demonstrated in Appendix 3 to the Core Strategy.

1654: The Core Strategy has been developed to accord with the aims and objectives of national and regional planning guidance and the Kent & Medway Structure Plan (KMSP). The need for the LDF to fully accord with the KMSP is recognised.

816, 481: The Core Strategy has also taken account of PPS9. References to biodiversity and sustainable development have been considerably strengthened since the publication of the Preferred Options report to add detail and respond to views raised in consultation. Policy CS1(E) lists enhancing biodiversity and seeking to minimise resource consumption as key guiding principles for development, addressing the concerns raised by the respondents.

1519: RPG9 places considerable importance on the role of the town centre in delivering Ashford's growth. Adequate priority should therefore be given to enabling development in the town centre during the early phases of the plan. Insufficient constraints on greenfield development could deter investment in the town centre during the early phases of the LDF. Officers disagree that this town centre focus will not stir up interest from developers; indeed, such investment is already underway.

2066: The Core Strategy refers to the Ashford chapter of RPG9 where appropriate. The Council recognises the importance of allowing all stakeholders to have a say in the planning process. Public consultation has an important role to play, as recognised in PPS1.

**Lack of Detail / Clarity**

Main Issues Raised:

1554, 1572, 1632, 1673: The overall Vision set out in Preferred Option 1 is not sufficiently detailed or is too vague. In particular, 1673 considered that overall housing and employment figures should be included in the Core Strategy. 2066 asked for the Halcrow Urban Capacity Study to be published by the Council.

Council's Response:

1554, 1572, 1632, 1673, 2066: The purpose of the Overall Vision, as set out in the Preferred Options report, was to set out the general principles towards the future planning approach in the Borough and a revised, more detailed version forms Policy CS1 and its supporting text. The Core Strategy is a strategic document, which will be supplemented by more detailed policies in subsequent DPDs. As a result, it is considered that this section contains an appropriate level of detail. Overall housing and employment figures for the LDF period are included elsewhere in Policy CS2 of the Core Strategy. The Urban Capacity Study has been published as a background document to the Core Strategy.

## Preferred Option 2: The Broad Distribution of Development

The following representations were received in relation to Preferred Option 2:

130 – Mr E Fowler	969 – Taylor Woodrow	1375 – Orlestone Parish Council
169 – Mr S Penny	Developments Ltd	1394 – Victoria Residents Business
181 – Mr & Mrs Cox	983 – Taylor Woodrow	and Recreation Action
206 – Mrs J Lewis	Developments Ltd	Group
210 – Ashford Green Party	985 – Taylor Woodrow	1396 – Victoria Residents Business
280 – Victoria Residents Business	Developments Ltd	and Recreation Action
& Recreation Action	997 – Taylor Woodrow	Group
Group	Developments Ltd	1411 – English Partnerships
281 – Victoria Residents Business	999 – Taylor Woodrow	1426 – Ms E Kerr
& Recreation Action	Developments Ltd	1427 – Ms E Kerr
Group	1028 – London & Continental	1433 – Highways Agency
304 – Old Stacians Cricket Club	Stations & Property Ltd	1451 – English Nature
317 – Ms P Ward	1071 – Kent Downs AONB Unit	1490 – Mr Pratt
336 – Mr R Shrubbs	1093 – Mersham & Sevington	1506 – Ward Homes Ltd
337 – Mr R Shrubbs	Parish Council	1511 – Berkeley Community
339 – Mr R Shrubbs	1095 – Mersham & Sevington	Villages
349 – Mr R Shrubbs	Parish Council	1520 – Kier Property
369 – Countryside Agency	1195 – Mr S D Walker	1529 – Ashford Rugby Club
386 – Mr H Le Clercq	1210 – Mr R Bowen	1573 – GSE Waterbrook Ltd
396 – Trinity College Cambridge	1217 – Mr R Knowles	1593 – Kier Property Developments
401 – Boughton Aluph & Eastwell	1234 – Imperial College London	1599 – ZED Homes
Parish Council	1241 – Mr J Fox	1624 – Mr D White
402 – Mr K Blanshard	1242 – Ms J Fox	1655 – Kent County Council
409 – Shadoxhurst Parish Council	1243 – Ms E Fox	Strategic Planning
435 – Kingsnorth Parish Council	1257 – Ashford's Future	1656 – Kent County Council
436 – Kingsnorth Parish Council	1274 – Churches Together in	Strategic Planning
463 – Aldington & Bonnington	Ashford	1674 – Quintain Estates and
Parish Council	1289 – Ms H Blanshard	Developments
781 – South Ashford Parishes	1292 – Ms K Fox	1689 – Ashford Partnership
Partnership	1347 – Mrs S Dunn	1705 – Environment Agency
815 – Kent Wildlife Trust	1354 – Boughton Aluph & Eastwell	1717 – Mr & Mrs Beaumont
886 – Hillreed Developments Ltd	Parish Plan	1718 – The Ashford Society 74A
897 – Church Commissioners for	1355 – Ms S McGeever	1739 – Mr C Foley
England	1356 – Ms S McGeever	1744 – Mr D Goldfinch
899 – Boxvine Ltd	1363 – Pentland Homes Ltd &	1764 – Pentland Jarvis Holdings
938 – Bovis Homes Ltd	Jarvis Homes Ltd	

### Comments on the General Strategic Spatial Approach

#### Main Issues Raised:

Several representations related to the GADF growth model approach. 409, 1028, 1093, 1689, 1656, 435, 1234, 1257, 1274, 1289 and 1411 gave general support for the compact growth model. 369, 1451, 1071 and 463 also supported it subject to appropriate emphasis on the green structuring of the masterplan; impact on the AONB; and subject to infrastructure, environmental and rural/urban interface issues being properly addressed.

781, 339, 1292, 1241, 1242 and 1243 all supported the firm phasing of the LDF up to 2021, whilst 1355 and 436 specifically supported the post-2021 phasing of the Kingsnorth urban extension. 1375 supported the masterplan phasing subject to infrastructure being in place. 1674 supported town centre sites being developed first within the growth model. 969 supported high-density development along major public transport routes. 1095 supported option 2 but strongly opposed so much development being proposed for the south-eastern sector of Ashford.

1764 said there was no capacity study to support the quantum of development proposed for the town centre – if no evidence is provided, additional greenfield allocations should be made instead. They argued that Kingsnorth is the most accessible growth area to disadvantaged communities and the town centre and that it scores best on the retention of environmental capital compared with other growth areas.

401 and 402 supported the growth model but objected to the Kennington elements, whilst 1045 also supported the model.

317, 1217 and 1490 objected to the development of Ashford in general because of increased traffic congestion, more flooding and more strain on schools, doctors and hospitals. 1356 said more development should be proposed north of the M20 and had specific concerns about roads, water, culture and social amenities. 1739 and 1195 believed the masterplan fails to make sufficient use of land adjoining the existing urban area, especially to the east of Ashford, contrary to Government planning guidance principles.

886 believed the balance of residential development towards Ashford is too high and an 80:20 split between Ashford and the rest of the Borough would be more appropriate, arguing the spatial framework should be adjusted accordingly. 1718 said a large 'metro' light railway system based on existing railway lines should be the basis for locating new development.

#### Council's Response:

369, 409, 435, 463, 1028, 1071, 1093, 1234, 1257, 1274, 1289, 1411, 1451, 1656, 1689: The compact growth model advocated in the GADF and Preferred Options report is predicated on delivering the appropriate levels of infrastructure and facilities to achieve balanced sustainable communities. General support for the growth model and its key principles is welcomed; however, the Core Strategy is a strategic document and site-specific details will be considered in subsequent DPDs.

436, 781, 339, 969, 1095, 1292, 1241, 1242, 1243, 1355, 1375, 1674: The proposed masterplan recognises the major landscape and access constraints that limit development potential to the north of Ashford; consequently major development areas are focused to the south of the town in accordance with RPG9, the Kent & Medway Structure Plan policy and the thrust of recent Local Plan policy. The evolution of the GADF masterplan considered several development scenarios but major development north of Ashford was not favoured due to the strong policy direction and prevailing environmental constraints.

401, 402: Changes to the GADF development proposals at Kennington are proposed in the Core Strategy – these are discussed separately in relation to the Kennington Circle representations.

317, 1195, 1217, 1356, 1490, 1739: The scale of Ashford's growth proposed in the Core Strategy is consistent with that set out in RPG9, the draft South East Plan and the adopted Structure Plan. The Core Strategy makes clear that adequate infrastructure and services must be provided to ensure sustainable growth. The compact growth model clearly supports the principle of redevelopment within or adjoining the existing urban area. Of the 31,000 dwellings proposed in the GADF up to 2031, some 12-13,000 dwellings are identified on existing allocations adjoining the urban area, in the town centre or on other sites within or adjoining the built-up area. The sustainability of major urban extensions to the south of the town will depend upon creating a critical mass of residents and supporting employment, retail and community facilities; any significant reduction in the size of those neighbourhoods through the allocation of more small, piecemeal sites on the edge of Ashford could have an adverse effect on the overall sustainability of the plan by diluting the compactness and connectivity of development across the town. No significant change to the broad disposition of development is proposed.

1764: The capacity of the town centre and other sites in the Ashford urban area has been considered since the publication of the Preferred Options report, by the urban capacity study and, in urban design terms, through the Town Centre Development Framework (Urban Initiatives) to support the emerging Town Centre AAP. This work confirms the broad assumptions about residential capacity encompassed in the Core Strategy. The response on the Kingsnorth proposal is considered separately.

886: The proposed balance of development within the Borough is not considered to be incorrect. The proposed growth targets for the Ashford area are set out in RPG9, the draft South East Plan, and the Structure Plan, and are based on a thorough assessment of the capacity of the town and its environs to accommodate growth over a sustained period. Ashford is clearly the most sustainable settlement in the Borough and so is the preferred location for the majority of new development within the LDF period. The settlements outside Ashford have a different but important role to play in accommodating new development on a limited scale, in keeping with their role, character and context, and reflecting their inherent development constraints. It is envisaged that there will be 1,500 new dwellings outside Ashford in the period up to 2021 (7.5% of total new dwellings in the Borough to 2021); any further re-direction of growth from Ashford would put additional pressure on rural settlements to cater for new development and would undermine the focus on infrastructure delivery and investment within Ashford itself. The objector's suggestion of an 80:20 split would mean 4,000 new dwellings would need to be provided outside Ashford by 2021. The Preferred Options approach is consistent with the targets for housing provision and its distribution in the Kent & Medway Structure Plan, so the Core Strategy should continue to make provision for those targets.

1718: Using existing railway lines as the basis for a strategic masterplan was considered during the evolution of the GADF proposals; however, this swiftly concluded that as services would not be sufficiently frequent or flexible, rail services could not achieve the levels of modal shift away from car travel needed to make the masterplan operate satisfactorily. The objector's approach would neither be economically viable as an alternative to the proposed growth model, nor achieve the sustainability benefits of additional public transport patronage around which the Smartlink public transport network is based; thus it is not a suitable basis for reconsidering the spatial distribution of development around Ashford.

#### **Area-specific comments: Sandyhurst / Eureka**

##### Main Issues Raised:

Three representations commented on the Sandyhurst/Eureka area. 386 objected to the proposed use of land abutting the north-western boundary of the Eureka Business Park for light industrial purposes; instead a 4-acre area could be utilised for residential development in the first phase of the Plan. 1354 objected in principle to the expansion of the Business Park on the grounds of additional traffic, effects on local services and impact on the character of the locality. 396 proposed re-allocating the western part of the Business Park to residential use in place of commercial uses and bringing the area forward into the first phase.

##### Council's Response:

386, 1354, 396: The Eureka Science and Business Park has been a long-standing allocation in Local Plans and outline planning permission has recently been granted for office and light industrial uses. The area is well located close to M20 Junction 9 and the setting is attractive to potential investors and occupiers. Traditionally, Sandyhurst Lane has been seen as the outer boundary of Ashford to the north-west of the town and the development along the lane enjoys a semi-rural character. Extending the boundaries of the Business Park would enable further employment development to be created in this location and would help to contribute employment opportunities at the higher end of the market but this should be in the context of the character of the surrounding area.

There is potential, recognised in the GADF (p.110), that Eureka may become more of a mixed use area and this could allow limited high-quality residential development within the future development of the Eureka area, in particular along the main

spine road and along the sensitive boundary with properties in Sandhurst Lane. The Core Strategy recognises this principle, but the detailed approach to the mix of uses and layout will be set out in subsequent DPDs.

**Area-specific comments: Kingsnorth**

Main Issues Raised:

304 outlined concerns about the future of the Old Stacians Cricket Club and facilities and sought either the retention of their grounds as part of future development at Kingsnorth or relocation within the Borough. 1717 opposed any new development south of Magpie Hall Road and Steeds Lane and suggested a 'green belt' from there to Hamstreet. 1624 also felt that the Core Strategy should be more specific about limiting the extent of rural development and that it should not extend further south than Magpie Hall Road. 1764 suggested the Kingsnorth growth area should be brought forward at an early stage.

Council's Response:

304, 1717, 1624: Site specific allocations are not made in the Core Strategy and therefore references to specific boundaries are inappropriate. However, taking Magpie Hall Road to be the southern limit of development in the Kingsnorth area is supported in principle and is discussed in more detail in the Site Submissions section of this document. The same issue applies to the future of the Old Stacians facilities and it is not for the Core Strategy to identify whether they should remain in their current location or be relocated, although the GADF implies that this area is likely to be central to any future Kingsnorth urban extension and therefore perhaps a site on the edge of the extension area would be more suitable should this come forward.

1764: This is not supported for the reasons set out in the response to the Site Specific comments in this document

**Area-specific comments: Great Chart / Chilmington Green**

Several objections were received to proposed development on the western side of the A28 within the Chilmington Green urban extension; many suggested the deletion of development west of the A28 and its replacement by additional allocation of land as part of the urban extension on the eastern side of the A28. There was also some support, including from 1511 and 1363. This matter is dealt with in full in the Great Chart section of this report.

**Area-specific comments: Kennington**

130: Objects to the detailed proposals for the Kennington Link Road. Again, several objections have been received in relation to proposals in this area. This matter is dealt with in full in the detailed Kennington Circle section of this report.

Area-specific comments:

**Julie Rose Stadium Area**

Main Issue Raised:

1210 is concerned at the 'primary park' notation in the masterplan for the land surrounding the Stadium on the basis that it is not clear what role or facilities the park will have.

Council's Response:

1210: The Stadium / Conningbrook area is identified in the GADF as a key part of the 'green structure' of the masterplan and forms one end of the proposed green 'necklace' that runs through the town linking the Stadium with town centre, Discovery Park and the wetland park around Cheeseman's Green. It is also identified as a location for a regional watersports and recreation facility in line with the aspirations in the existing Local Plan for the restoration of the mineral workings. The precise nature of development at Conningbrook will need to be considered through the site allocation DPD process within the LDF but clearly its location and role within the masterplan demand that recreational activities play an important role in the future development of this area. Its role will be different to the other 'primary parks' identified in the GADF.

**Area-specific comments: Sevington / M20 area**

Main Issues Raised:

1426 objected to the exclusion of the houses between Highfield Lane and "Downsview" in the masterplan and suggested that this area should be designated as additional housing land as an extension to Mersham. 1427 objected to the suggestion that Kingsford Lane would be blocked off at its junction with Highfield Lane as part of the proposed M20 Junction 10a.

Council's Response:

1426, 1427: The detailed layout for the Sevington area should not be covered in the Core Strategy but should properly be considered within the relevant site allocation DPD. However, additional housing land on the periphery of the Sevington employment allocation is not supported as this would create a remote, badly linked residential area unconnected to the major residential urban extension further south at Cheeseman's Green/Waterbrook as well as bringing development closer to Mersham itself and potentially creating a greater impact on the setting of the village. The detailed proposals for junction 10a will be publicised in due course by the Highways Agency and the links into the existing rural lane network will be a factor in determining the final scheme but no decisions have yet been taken in this regard.

**Area-specific comments: Canal District**

Main Issue Raised:

181 seeks the deletion of the proposed Canal District from the masterplan, in particular the area around Riversdale Road.

Council's Response:

181: Although the GADF diagram implies that the Riversdale Road area could be developed as part of any future Canal District proposals, as the area is currently in residential use, the Council would have no intention of acquiring or demolishing the properties there. The Canal District itself has a potentially important role to play in the future development of Ashford and the creation of a more sustainable and attractive entrance to the town centre from the south, although the substantive elements of it that raise flooding issues are not proposed to come forward during the LDF period.

**Area-specific comments: Green Necklace**

Main Issue Raised:

999 objects to the diagrammatic representation of the 'green necklace' as it is shown to override permitted housing land at Park Farm East. It is suggested that it should be moved further south to allow for an expanded Park Farm.

Council's Response:

999: The 'green necklace' designation in the Preferred Options report covers a small area at the southern end of the Park Farm East allocation. It is not the intention of the Core Strategy to supersede existing residential allocations with planning permission and the green necklace in this location has been redefined to create an appropriate edge to the Park Farm East proposals as they come forward in more detail.

**Area-specific comments: South Willesborough Dykes Wetland Park**

Main Issue Raised:

897 objected to the inclusion of the Cheeseman's Green employment land within the proposed wetland park as the land is outside the 1 in 100 year undefended floodplain and is currently allocated in the Borough Local Plan.

Council's Response:

897: The proposed wetland park is seen as a 'transformational' project in the GADF – one that both enhances the ecological importance of the South Willesborough Dykes SNCI and creates a resource and attraction for the benefit of residents and visitors to Ashford, whilst also making best use of an area lying at a key entrance to the town that is constrained by its role as floodplain.

The Council has appointed consultants to develop outline proposals for a wetland park and work has been underway for several months on a conceptual plan. It is acknowledged that developers may need to play a significant role in the creation of such a resource not least as it encompasses privately owned land. Large areas of the Church Commissioners land lie within the potential boundary of the wetland park but most of this lies within the 100-year floodplain. The employment land allocated in the Local Plan (and which now has outline planning permission) is an exception.

However, whilst the inclusion of the currently allocated land should not be fundamental to the creation of the wetland park, the masterplanning work also concluded that additional development in this area was undesirable due to its remoteness from the proposed centre of the Cheeseman's Green urban extension and the Smartlink service that will serve it, that will lie to the south of Captains Wood. Therefore, given that a more compact layout for the urban extension was preferable in sustainability terms, this area of land could contribute to the creation of the wetland park and potentially provide compensatory flood storage capacity should future development within the Canal District floodplain area take place in the post LDF period, which would potentially be in a more sustainable and accessible location.

The Core Strategy confirms that this is the Council's preferred approach to the wider masterplanning of this part of Ashford notwithstanding the presence of extant outline consent for the employment land. The employment land is more suitably located within the Sevington area, which has better potential accessibility. It would help achieve a number of wider goals and not prejudice the future potential for development of the wider Canal District concept whilst itself ensuring a more compact sustainable layout to the Cheeseman's Green urban extension. Therefore, the Council does not agree with the objector.

**Planning Policy and Distribution**

Main Issues Raised:

1520 contended that the broad distribution of development in the GADF is based on a housing requirement that will be superseded by the Regional Spatial Strategy (RSS) when it is adopted in 2007; therefore it may be premature to plan a distribution of development at this stage. In any event, there should be a strictly sequential approach to development based on genuinely developable Brownfield town centre sites first followed by similar sites in the rest of the existing urban area and then urban extensions within 3km of the town centre. A rolling 5-year housing land supply should be maintained. 1655 felt the Core Strategy needs to put development at Greater Ashford within the context of the whole Borough and that there should be more clarity in the justification for the favoured approach to the distribution of development focusing particularly on urban concentration and travel reduction.

Council's Response:

1520: The growth targets and assumptions made in the GADF and the Core Strategy are based around Ashford's capacity to

deliver significant levels of growth over a 30-year period. The emerging RSS is not proposing any amendment to the growth targets for Ashford and therefore the Core Strategy would not be premature or liable to major changes in assumptions about development quanta so as to make it unsound. The sequential approach advocated is broadly consistent with the GADF principles and the phasing of development, however, there will inevitably be the need to monitor and review land releases on a regular basis in accordance with PPG3.

A strict, inflexible sequential approach to release of housing land will not deliver the quantity of new residential development on the timescale envisaged in RPG9 and now, the Core Strategy, given the relative lack of large, brownfield site opportunities around Ashford. A pragmatic approach is required which seeks to control the phasing of major areas of development – some of which will take a decade or more to complete – within the overall principles of sustainable growth and urban regeneration enshrined in the compact growth model.

The Core Strategy sets out the phasing priorities within the Spatial Strategy policies and monitoring mechanisms to achieve the conditions suitable for a consistent delivery of new development and these will be implemented through site allocations in the relevant DPDs.

1655: The Spatial Strategy section of the Core Strategy sets out the clear reasons and justification for the compact growth model and how development of Ashford sits within a regional and local context.

### **Phasing of sites / areas**

#### Main Issues Raised:

In addition to submissions proposing spatial changes to the distribution of development, there have been a number of representations proposing changes to the phasing proposals indicated under preferred option 2. 1593 proposes that the whole of the Newtown works site should be shown in phase 1 of the masterplan and that the Canal District should be brought forward into earlier phases. 899 echoes this view on the Canal District. 169 advocates the early development of Kingsnorth within the LDF period. In more general terms, 1599 suggests that the masterplanning approach be revised to prioritise redevelopment of central brownfield sites bringing them into phase 1, whilst 1506 and 938 advocate greater flexibility in the Core Strategy to allow for the earlier bringing forward of sites that may be identified in a later phase.

#### Council's Response

1593: The Newtown Works site is an existing employment allocation in the Local Plan although the objector is proposing a residential-led mixed use scheme for the site at present. A planning application has been submitted. The proposed phasing of the Newtown Works site in the GADF reflects both the scale of development envisaged on the site and the likely highway constraints to major development in this part of Ashford imposed by the need to improve Junction 10. The scheme currently proposed, if granted permission, would take several years to complete and full implementation may not be possible until Junction 10a has been completed; this would take completion of the site beyond 2011 and into phase 2 of the masterplan. As a site-specific issue, this is not a matter for the Core Strategy to specifically address.

899: The future development of the full Canal District shown in the GADF masterplan would rely on finding an appropriate way of mitigating the impact on the 100-year floodplain. The initial section of the Canal District is not subject to such a constraint and can be brought forward earlier and this is reflected in its phasing within the LDF period, but it would be contrary to the guidance in PPG25 and the emerging PPS25 for the Council to propose development in the floodplain here at this stage without being able to identify an acceptable means of mitigating any adverse flooding impact; therefore that part of the Canal District should not be brought forward into the LDF period.

169: The earlier development of the Kingsnorth extension is discussed more fully in the Site-Specific Representations section of this responses report but is not supported.

1599, 1506, 938: The general approach to phasing is also discussed in the responses to representation 1520 above and Preferred Option 9 but the Core Strategy strikes a balance between the promotion of brownfield development in the town centre and other parts of the existing urban area and the release of more easily developable sites that may help to bring forward key infrastructure from either the developments themselves or strategic tariff contributions.

### **General / Miscellaneous Comments**

#### Main Issues Raised:

985 stated that the Core Strategy diagram should include a symbol for the proposed Park Farm rail halt. 1433 pointed out the need to review access arrangements from the trunk road network in light of revisions to the distribution of development or assessment criteria during the LDF process. 281, 349, 280, 1394 and 1396 felt that the GADF masterplan should be given full DPD status in order to be subject to full consultation and examination, with the latter expressing concern about a lack of community involvement in the process. 1744 asked how the 'broad' distribution of development relates to the 'compact' growth model. 1573 thought that option 2 should have set out more clearly the options to be tested through the consultation process rather than relying on the GADF documentation. 1529 believed the approach is unsound as it is inflexible and opportunities outside the GADF areas should be considered on their merits. 210 believed there is an over-reliance on the private sector to deliver new employment for Ashford, the proposed public transport system is too simplistic and the lessons of retail-generated employment and Park & Ride in Canterbury should be taken account of in the planning of Ashford.

206 believed the A28 to be unsuitable to cope with future development and that new roads should be in place before the new population arrives. 983 wished to see all the supporting documentation to the GADF and the use of more up to date flood mapping. 997 did not believe the preferred masterplan reflects the public consultation exercise undertaken and complained that developer interests were excluded from the process. 336 believed an additional layer of DPDs is needed to deal with

major infrastructure issues. 337 stated that every aspect of the masterplan should have a full and thorough public consultation prior to adoption.

815 made several detailed comments on the natural and ecological contents of the GADF but states that development must also include planned green infrastructure as well as new housing and hard infrastructure and that development should protect and enhance SNCIs, avoid damage to existing natural habitat and there should be a two-for-one replacement of a developed semi-natural wildlife habitat.

1347 commented that there was no opportunity to comment or object to the detail of the masterplanning.

Council's Response:

985 – Agreed. The Core Strategy diagram includes reference to the proposed rail halt at Park Farm as a factual matter.

1433 – Agreed. The final distribution of development in the submission Core Strategy will need to be tested in highway terms and schemes approved with the Highways Agency. The HA has commissioned the Ashford Highways & Transport Study (AHTS) to model the proposed scale and spatial distribution of development around Ashford and identify the highway infrastructure improvements necessary to accommodate the phased implementation of that development. In bringing forward detailed site allocations in other LDDs, the Council will identify where constraints to development will occur in the phasing of development without the necessary highway infrastructure. The AHTS is a background document to the Core Strategy.

281, 349, 280, 1394 and 1396 – the GADF document is the key background document to the Core Strategy and provides the detailed story of the evolution of the masterplan for Ashford's growth but it is one of several other important background pieces of work which should be drawn together through the LDF process. It is the LDF and its constituent documents that provide the flexibility to respond to concerns about the GADF and which is subject to full and extensive public consultation, therefore the GADF should not become a DPD in its own right.

1744 – 'Broad' in this sense means 'general' and not 'wide'.

1573 – Option 2 set out in its accompanying diagrams the preferred spatial model of growth contained in the GADF, including the associated phasing. It would have been time consuming and unnecessary to set out all the evolutions of the preferred option twice and it was clearly open to respondents to comment on any alternative model through the consultation.

1529 – The future growth of Ashford must have a firm policy and planned basis, which should be role of an LDF based on the key principles of the GADF. Individual sites will be judged on their merits within the planning policy framework set by the Core Strategy.

210 – The approach advocated by the objector is unrealistic. A new public transport network must be economically viable and deliver what the customer wants, namely a fast, frequent and reliable high quality service. New communities will be planned to achieve greater accessibility to public transport for all residents. Park & Rail solutions are no substitute for Park & Ride sites and could never achieve the scale or service frequency required to make them an attractive alternative. New employment in Ashford will need to be created from a variety of sources and it is evident that the majority of new jobs will be created by the private sector although it is agreed that a Government/public sector relocation would be a highly beneficial catalyst to the local economy.

206 – it is agreed that new roads will need to be in place to accommodate new development as it comes forward. The highway modelling of the masterplan in the AHTS has confirmed that the A28 will need improvement along Chart Road.

983 – all documentation required to support the Submission Core Strategy will be published prior to Submission in accordance with the Regulations to enable all parties to comment fully.

997 – the initial concept plan has evolved from the first workshop at Eastwell Manor and the process is explained fully in the GADF itself. It was entirely right that developer interests were excluded at that stage as there would have been clear commercial vested interests at stake. Since that stage, specific events have been held to engage developers and involve them in the process, in which the objector has participated.

336 – the Core Strategy will deal with the principle of delivering major new pieces of infrastructure to support the proposed growth up to at least 2021 and the subsequent Urban Sites & Infrastructure DPD is intended to consider these in more detail.

337 – consultation arrangements for the LDF are set out in the LDF Statement of Community Involvement which itself was subject to consultation and has now been adopted.

815 – it is agreed that the Core Strategy should be clear that planned green infrastructure is important to the success of creating a high quality environment around which growth and development can take place and benefit from. This is expressed particularly in policy CS1(K) and where major 'green' infrastructure is referred to in chapter 2. Further, more detailed environmental protection policies will be other DPDs and will broadly follow the existing policy approach in the Local Plan and emerging Structure Plan.

1347 – the GADF masterplanning proposals were the subject of extensive consultation and publicity. The LDF, as the statutory planning document provides a formal vehicle for public consultation on the elements of the GADF that the Council wishes to bring forward with consultation and information being carried out in accordance with the adopted SCI.

**Waterworks**

1705 recommended that land be kept available for a future southern wastewater treatment works that may be required for post 2021 development. The Bybrook works are identified as the preferred location for treating wastewater during the LDF period and a new wetland area, adjoining the Bybrook works is suggested to improve the quality of the treated effluent entering the Stour.

Council's Response:

1705: The site identified lies outside the proposed built development areas shown on the masterplan (SE of Stubbs Cross). As this is only indicated as a potential requirement for development in the post LDF period, and would not be compromised by development within the LDF period, it is unnecessary to indicate this site within the Core Strategy. The proposed wetland area could be included within the Urban sites and Infrastructure DPD rather than the Core Strategy.

### Preferred Option 3: Ashford Town Centre

The following representations were received in relation to Preferred Option 3:

173 – Wm Morrison Supermarkets plc	527 – Mr R Dryland	599 – Mr S Underwood
208 – Ashford Green Party	528 – Ms J Wood	600 – M Hancock
211 – Ashford Green Party	529 – Mr P Wood	601 – Mr J Ryan
237 – Mr C Langley	530 – Ms E Minter	602 – British Rail Club
238 – C E Money Penny	531 – Mr G Minter	603 – Mr G Pearson
245 – Mr G Hewins	532 – Ashford Rail Bowls Club	604 – Mr R Owen
269 – Mr J Dean	533 – Mrs C Chalmers	605 – Hythe Bowls Club
276 – Churches Together in Ashford	534 – Mr P Plumridge	606 – Mr W Hellyer
279 – Ms F Kaye	535 – J A Seager	607 – Mr P Moughton
282 – Victoria Residents Business & Recreation Action Group	536 – Mr D Seager	608 – Mr T Llewellyn
283 – Mr & Mrs Driscoll	537 – Mr M Ainsley	609 – Hythe Bowls Club
284 – K & C Salmons	538 – Mrs H Wirt	610 – Mr S Hayward
285 – Mrs B Duggan	539 – Mr C Harris	611 – Miss A Usher
286 – Dr A Vine-Lott	540 – Mr D Annetts	612 – Ashford Rail Staff Club
287 – Mrs M Ades	541 – Mrs J Waymark	613 – Ms L Prior
334 – Mr R Shrubbs	542 – Mr K Smith	614 – Mr A Colaluca
353 – L Lewis	543 – G B Jopley	623 – Mrs V Hodges
356 – C G Martin	544 – Mrs I Aynscombe	624 – Mr R Robinson
358 – Mrs T Stewart	545 – Mrs Butler	625 – Mr J Barclay
370 – Countryside Agency	546 – Mrs M Harmer	626 – Mr I Prior
371 – Countryside Agency	547 – Mr P Clark	627 – P K Ainsley
372 – Countryside Agency	548 – Mrs C Breeds	628 – P R Ainsley
400 – Boughton Aluph & Eastwell Parish Council	549 – Mr P Callaghan	629 – Ms R Nicholas
410 – Shadoxhurst Parish Council	550 – Mr G Breeds	645 – Mr P Nicholas
458 – B Chittenden	551 – Ms J Callaghan	649 – Ms K Barnes
464 – Aldington & Bonnington Parish Council	552 – Ms B Smith	651 – Ashford Rail Bowls Club
484 – Ashford Society 74A	553 – Mr M Smith	653 – Ashford Rail Bowls Club
487 – Mr R Froud	554 – Ms T Callaghan	656 – Mrs W Watson
490 – M Courtley & C Jones	555 – Ms T Callaghan	661 – Mr R Hatch
491 – Mr A Smith	556 – W Wilson	662 – Ms L Spinks
492 – Mr & Mrs Keleher	557 – Ms C Owen	665 – Mr R Hampshire
493 – G H Mitchell	559 – Mr J Anderson	668 – Mrs M Pitkin
494 – Mr G Stewart	560 – Flute Makers Guild	673 – Mrs J Gent
495 – Victoria Residents Action Group	561 – H Newton	676 – Miss H Watson
496 – Mr I Brown	562 – Mrs E Holbrook	677 – Mr C Ifield
497 – Mrs E Steele	563 – B M Holbrook	682 – Mr J McCarthy
498 – Mr T Maxwell	564 – Ashford Rail Bowls Club	686 – Mr A Rose
499 – D Wilding	565 – Ashford Rail Bowls Club	698 – Hythe Bowling Club
500 – Mr R Mills	566 – Ashford Rail Bowls Club	700 – Hythe Bowling Club
501 – Mr & Mrs Williams	567 – Mr I Larkin	702 – Miss C Prior
502 – J A & J D Ruckliff	568 – Ashford Rail Bowls Club	713 – Mr M Luckhurst
503 – Mr & Mrs Coleman	569 – Ashford Active Retirement	714 – Mr J Hammond
504 – Ms S Deveney	570 – Miss T Waymark	715 – Ms L Spinks
505 – Ms P Powling	571 – Mr R Forsythe	716 – Mr J Phillips
506 – D H Smith	572 – Mr R Odell	717 – Ms S Prior
507 – Mr R Savage	573 – Mrs I O'Shea	718 – Mr E Bryant
508 – Ms S Smith	574 – R Bradberry	719 – R S Marsh
509 – R J Sykes	575 – Miss V Wood	720 – Ms K Fairbrass
510 – L Massat	576 – Mr G Greenland	721 – Mr F Fairbrass
511 – M Sounes	577 – Mrs P O'Donnell	722 – Ms D Blake
512 – A C Stott	578 – British Rail Club	723 – Mrs V Goodman
513 – Mr & Mrs Andersen	579 – Mr D Bradberry	724 – Mrs D Horne
514 – Mrs Woods	580 – Ms C Bradberry	725 – Mr G Ifield
515 – Mr & Mrs Stephens	582 – Mr C Holdaway	726 – Mr S Pritchard
516 – Miss L Taylor	581 – C F Downey	727 – Mrs R Redman
517 – Mr N Dryland	583 – Mr J Downey	742 – Mr L O'Leary
518 – B & M Stoker	584 – Ms P Deacon	745 – Mr D O'Leary
519 – Mr & Mrs Moore	585 – Miss K McHugh	748 – E Hodges
520 – Medash Signs Ltd	586 – A Chalmers	752 – Mrs M Scolah
521 – Mrs P Hawkins	587 – Mrs M Fortune	753 – Mr S Scolah
522 – Mr P Hawkins	588 – Mr D Ward	755 – Ms M Price
523 – Mr P Hawkins	589 – Mr K Prior	757 – Mrs Hancock
525 – Mr P Hawkins	590 – Ms A Fleet	760 – Mr G Williams
526 – Mr A Fortune	591 – E S Hatcher	762 – Ms J Williams
	592 – Ashford Rail Bowls Club	764 – Ashford Rail Bowls Club
	593 – Mr P Guest	766 – D Bryant
	594 – Ms C Wiggins	767 – Kengate Dry Cleaning & Laundry
	595 – Mrs L Ifield	768 – Mrs J Bryant
	596 – Hythe Bowling Club	770 – P Streatfield
	597 – P W Wood	771 – Mr A Fletcher
	598 – Mr J Hills	

772 – Mrs C Streatfield	955 – Ashford Railway Club	1286 – Mr K Blanshard
775 – Mr P Robinson	956 – Ms D Wood	1290 – Mrs D Slingsby
777 – Ms M Williams	957 – Mr O Wood	1291 – Mrs D Slingsby
778 – Mr T Andrews	958 – Mr L Hildon	1314 – CPRE Kent
779 – Mr P Lee	959 – Mr P Muchmore	1315 – CPRE Kent
782 – South Ashford Parishes Partnership	960 – Mr R Weeks	1324 – CPRE Kent
784 – Mr G Cole	964 – Mr G McDonald	1325 – CPRE Kent
788 – Mrs M Willes	966 – W R Wilson	1344 – Mr & Mrs Vincer
792 – Mr B Swiwerd	968 – Mr R Nicoll	1368 – Westwell Parish Council
800 – J G Willes	971 – Miss E Marchant	1376 – Orlestone Parish Council
802 – Mr T McHugh	976 – Mrs S Sorrell	1393 – Victoria Residents Business & Recreation Action Group
803 – Ms J Scorah	979 – Mrs A Wright	1395 – Victoria Residents Business & Recreation Action Group
804 – Ms K Thomas	982 – Mr M Fuller	1412 – English Partnerships
805 – Mr D Johnson	988 – Ms T Fuller	1428 – L Herley
808 – Mrs J Fagg	993 – Mr T Williams	1429 – Kent & Medway Learning & Skills Council
814 – M Worsley	998 – Ashford Active Retirement	1432 – Highways Agency
818 – Mrs J Brook	1002 – Mrs Dehara	1461 – Mr T Lee
819 – Mrs E Brown	1004 – Mr N Dehara	1476 – Mr M Leigh
824 – Mr E J Goodall	1005 – A Redman	1478 – BRSA Ashford
828 – Mr M Warren	1006 – Ms N Smith	1479 – BRSA Ashford
833 – Mr J Matthews	1009 – Mr M Stewart	1480 – Q Creative
840 – Miss L Clark	1010 – Mrs S Thomas	1481 – Mr D Corps
841 – Mr T Mayhew	1013 – Mr M Thomas	1482 – Mrs P Gomes
842 – Mr S Andrews	1014 – Ms J Jackson	1483 – R Perry
843 – Mr P Brind	1023 – Mr S Spencer	1484 – Mr K Redden
844 – Miss S Pumfleet	1027 – Mrs G Scott	1485 – Alpha Blinds
845 – Mr & Mrs Hannah	1032 – Mrs K Hills	1486 – Alpha Blinds
848 – Mr R Hodges	1036 – Mr T Hodges	1489 – Mr I McPherson
849 – Mrs P Ward	1039 – Ms K Hodges	1512 – Berkeley Community Villages
850 – Mr R Hills	1043 – Ms D Usher	1521 – Kier Property
852 – Ms E Page	1044 – Ms E Rossiter	1524 – Headley Brothers Ltd
853 – B A Williams	1046 – Ms A Davies	1556 – Great Chart with Singleton Parish Council
854 – Mr P Coglan	1050 – South Kent College	1574 – GSE Waterbrook Ltd
855 – Mrs A Nyamawi Chilumo	1086 – R & S Smith	1585 – Chapel House Property Trust Ltd
856 – A Faulkner	1089 – D C Brown & Son	1600 – ZED Homes
857 – Mr M Murphy	1094 – Alpha Blinds	1634 – Save Great Chart Action Group
858 – Mr J Stevens	1096 – Mersham & Sevington Parish Council	1650 – Home Builders Federation Southern Region
859 – Cheriton Bowls Club	1099 – Mr & Mrs Hogben	1657 – Kent County Council Strategic Planning
888 – Mr C Dugard	1102 – Mr & Mrs Barrett	1675 – Quintain Estates and Developments
892 – Bellway Homes Thames Gateway South	1108 – Mr & Mrs Lunn	1690 – Ashford Partnership
901 – Mr M Goulding	1117 – Aden Electronics	1706 – Environment Agency
902 – Mr D O’Sullivan	1130 – R Beaney	1722 – Boughton Aluph & Eastwell Parish Council
915 – Ms S Smith	1135 – Mr M Higgins	1753 – Quintain Estates and Developments
916 – Mrs T Holloway	1138 – Mr G Moore	1757 – English Heritage
917 – Ms J Williams	1140 – Mr R Adams	1782 – Boughton Aluph & Eastwell Parish Plan
918 – Ms J Rogers	1142 – Mrs P Strang	2067 – Pentland Jarvis Holdings
919 – Mrs Rolfe	1144 – Mr & Mrs Cragg	
920 – Mr W Rolfe	1150 – Mrs S Goldsmith	
921 – Mr H Hodges	1156 – Mr G Bourne	
922 – J N Levy	1160 – Mr S Beaney	
923 – Mr J Levy	1163 – Mrs West	
924 – Mr D Udale	1165 – Mr I Slingsley	
925 – Mrs H Marshall	1166 – B J Lukehurst	
939 – Bovis Homes Ltd	1168 – Mr & Mrs Mansell	
947 – Mr A Peddle	1205 – Mr R Fletcher	
948 – Mrs L Peddle	1214 – C J Crook	
949 – Mrs D Rutherford	1218 – The Parochial Church Council of St Mary the Virgin, Ashford	
950 – Mr S Marshall	1235 – Imperial College London	
951 – Mr G Taylor	1237 – Imperial College London	
952 – Mrs T Taylor	1258 – Ashford’s Future	
953 – Mr A Hodges	1285 – Mr K Blanshard	
954 – Ashford Railway Club		

### **Prioritisation of Brownfield Development over Greenfield**

#### Main Issues Raised:

400, 1722, 1315 and 1690 felt the Core Strategy should take a harder line in requiring brownfield development to come forward in advance of greenfield. Conversely, 1585, 1521, 1235, 939 and 1650 felt that the strategy should allow more greenfield releases if town centre sites are not delivering to the required rate. 939 also felt that a more balanced approach to housing provision was necessary. 2067 commented that peripheral development would be complementary to development in the town centre and requested that a sophisticated analysis is required of the relationship between town centre and greenfield sites. A further analysis is required of all greenfield sites to see which would be best placed for development. Explicit reference should

be made to the existing infrastructure link between Kingsnorth and the town centre. 2067 also commented that the document needs to be reshaped to make it clear that development with the urban area and peripheral development are complementary and essential to the delivery of the Growth Area; that the document needs to acknowledge that properly planned additional peripheral development can deliver a wide range of benefits including the provision of high quality public transport links to existing peripheral development; and that the Core Strategy should include an analysis of that greenfield site, the early release of which can best contribute towards the regeneration of the urban area and the town centre in particular. This is likely to favour the Kingsnorth Growth Area.

Council's Response:

400, 1722, 1315, 1690, 1585, 1521, 1235, 939, 1650, 2067: The responses tend to reflect the particular development interests of the consultees. Government policy guidance is clear that brownfield sites should be released in advance of greenfield sites but this also needs to be put into the context of the particular pressures facing Ashford. The RPG9 chapter on the Ashford Growth Area recognises the importance of the town centre to the spatial strategy for the town as a whole. Therefore, it is important that adequate priority is given to enabling development (commercial and residential) to come forward in the early phases of the plan. If there is insufficient restraint on greenfield development during this time, then it is likely that investment would be firstly focused in those areas to the detriment of the town centre. The Core Strategy therefore recognises that Ashford's growth cannot be accommodated solely on existing urban sites and an appropriate model for peripheral expansion has been developed.

This does need to be set against a need to closely monitor the delivery of development and ensure there is an adequate supply of land available to maintain development levels commensurate with infrastructure levels and the need to deliver the growth agenda in a sustainable way. As a result, it would not be practical or desirable to place a blanket ban on any greenfield development until the town centre is fully developed.

The document does acknowledge that properly planned peripheral development will deliver a range of benefits, including public transport provision and, in order to maximise the benefits, it identifies those growth areas that should be developed first, and clearly sets out the rationale for selecting these areas first.

**Mix of Uses in the Town Centre**

Main Issues Raised:

1675 felt that there should be at least 2,500 dwellings in the town centre and that there should be a concept of mixed-use areas rather than just mixed-use developments. 1657 agreed with this comment and felt there should be room for single use buildings. 1657 has concerns that an over-provision of retail/leisure and office floorspace is proposed and that due weight should be given to community uses. 211 considers that reliance on retail/leisure and office jobs would create a low wage economy for Ashford and locally based companies should be encouraged not chain stores. 1314 comments that priority should be given to commercial uses in the town centre over residential development.

Council's Response:

1675, 1657, 211, 1314: The mix of uses will be crucial for the vitality and viability of the town centre. Residential development has an important role to play in increasing the prevailing resident base in the town centre that will help to sustain a wider economic base. The town centre must also be the key economic driver for the Borough and sufficient land for a major increase in the commercial offer needs to be identified.

Studies carried out by DTZ and JLL to inform the Ashford's Future process have indicated the potential capacity of the town centre to grow as both an office location and a retail and leisure destination as a result of improved strategic communications and increases in demand and catchment. The Core Strategy needs to be clear that additional residential development in the town centre should not be at the expense of, or prejudice the future delivery of, commercial development. There is potential for additional residential development over 2,500 dwellings after 2021 but this figure provides a reasonable balance with other uses up to that point.

The detailed approach to development in the town centre will be set out in the Town Centre Area Action Plan DPD but the principle of mixed-use developments and areas with the potential for single use buildings where appropriate is accepted where these can contribute to the quality of the town centre and its range of uses. It is vitally important that there is also a good provision of community facilities and the proposed Learning Campus will play a major role here.

## **Car Parking and the Ring Road**

### Main Issues Raised:

237 objected to making the Ring Road two-way and instead advocated building on the advantage of swift movement the town centre has. 208 wanted to see the closure of the Ring Road, objected in principle to Victoria Way, and preferred to have Park & Rail from villages rather than Park & Ride sites. 892 stated that town centre development should support a north-south link to serve future development at Kingsnorth post-2021. 525 believed Park & Ride should be implemented at an early specified date and not 'in the foreseeable future', whilst 1324 wanted to see limited parking in the town centre to encourage a shift to greater use of public transport and 372 considered the Core Strategy should include positive proposals to encourage modal shift. 523 sought public consultation on any car parking proposals in the Victoria Road area. 1432 sought a specific parking policy for the town centre to ensure a consistent approach to parking standards.

### Council's Response:

237, 208: The need to fundamentally change the Ring Road is a key element of the Council's strategy for the town centre. The current Ring Road acts as a serious constraint to development and has a hugely adverse impact on the quality of the town's environment. Traffic modelling work in the Ashford Area Transport Study has demonstrated that much traffic on the Ring Road uses it simply as a route from one side of the town to the other and that there is considerable surplus road capacity at nearly all times. Although the Ring Road is effective as carrier of traffic, it is a hostile environment to all other users, especially pedestrians and cyclists. Without the proposed changes to two-way operation, the Ring Road will continue to act as a major physical and perceptual barrier to the growth of the town centre and the upgrading of its environment. The response on the issue of Victoria Way is dealt with separately in this report.

525, 1324, 372, 523, 1432: The delivery of the major expansion of the town centre is dependent on a viable transport system that provides good access by a range of modes to the town centre. The Ashford Parking Strategy promotes a variety of parking solutions as a way of serving the town centre. These range from short-stay parking provided as part of major retail developments within the town centre, to strategic multi-storey car parks around the periphery of the town centre to the delivery of significant Park & Ride facilities on the edge of the town. The first Park & Ride site is proposed to be at The Warren, close to Junction 9 of the M20 which will enable further development to come forward in the town centre.

A balanced approach to parking provision is required and enough parking will need to be provided in the town centre to serve the needs of shoppers and visitors and although, in the longer term, Park & Ride and better public transport should cater for many of these needs, this is not the case in the short term. Parking at rural stations outside Ashford is limited and hence a 'Park & Rail' approach has significant limitations and would not be a substitute for a fully developed Park & Ride site. Detailed parking policies for the town centre, including parking standards should be in the Town Centre AAP or specific SPD, not the Core Strategy.

892: The north-south link advocated would only serve post LDF development at Kingsnorth but such a link could be provided in any event by the A2042 Romney Marsh Road and is not directly linked to town centre development.

## **Delivery Issues**

### Main Issues Raised:

1556 and 1634 felt that the timescale for the revitalisation of the town centre is too short and should be achieved by early in phase 2 (post-2011). However, 1574 questioned whether the regeneration targets could be met in the timescales indicated. 1757 felt the measures to be used to indicate the success of the town centre should be supplemented by one that considers how development has enabled the efficient functioning of the centre. 1325 asked for the term 'step change in the economy' to be explained.

### Council's Response:

1556, 1634: The phasing of town centre development needs to be ambitious yet realistic, and as such the strategic spatial policy approach contained in the Core Strategy promotes the redevelopment opportunities that are available in the short term in advance of alternatives. It is also acknowledged that the commercial market will take time to deliver the demand and growth necessary to deliver the quantum of development and jobs envisaged. The phasing arrangements for the town centre set out in Option 3 strike a reasonable balance in this regard.

Part of this balance is the recognition that a step change in Ashford's economy is required and this effectively requires Ashford town centre to be considered as a far more marketable location than it is at present. The Economic Strategy and Vision approved by the Council sets out some of the steps required to achieve this.

1574, 1757: Indicators to monitor the success of the town centre's regeneration will be crucial in policy development over time and the role developments themselves play in achieving a successful regeneration will be key. A review of their role in helping to meet quantitative and qualitative targets should be part of the Council's monitoring role.

1325: By "step change", the Council means that a significant improvement is required to Ashford's economy. The approved Economic Strategy and Vision sets out how this will be achieved.

## **Miscellaneous**

### Main Issues Raised:

208 believed new housing in Victoria Road should be at least 50% car free. 888 wanted to see places of worship specifically set aside for that use within the town centre. 1706 sought the full integration of SUDS-style drainage systems as part of the town centre redevelopment. 1205 felt that 11+ education has been scantily considered and more schools will be required

Council's Response:

208: There is potential for some limited amount of car-free development within the town centre as this is a location that is well served by other modes of transport and is close to the station. However it must be recognised that there is currently only a limited demand for such development and a requirement to provide significant amounts of such housing is unrealistic.

888: The town centre is a suitable location for places of worship and this is one of a potential range of community facilities that may be required to serve the needs of an enlarged population. Any specific needs will need to be set out and justified in order for specific site proposals to be carried forward through the LDF.

1706: The drainage policy advocated arises from the work on the IWMS and is supported through Core Strategy policy. In particular, Policy CS20 requires development to include appropriate sustainable drainage systems.

1205: It is acknowledged that new schools will be required. Policy CS18 sets out the principle of providing community facilities where needed, whilst detailed policy for new schools will be a detailed matter for consideration in DPDs.

**Scale and Quantum of Development in the Town Centre**

Main Issues Raised:

1600 considered there to be no justification for the proposed level of development in the town centre. 245 believed a decent environment and dense building is a contradiction and thus objects to the scale and quantum of proposed development. 1285 sought development to be restricted to 4 storeys, replacement buildings for Charter and International Houses and to transfer the retail focus back to the town centre.

Council's Response:

1600, 245, 1285: One of the fundamental principles underpinning the proposed expansion of Ashford is the need to focus development and avoid urban sprawl into the surrounding countryside where possible. The town centre plays a crucial role as the most sustainable location for development and as the economic and cultural focus for the Borough. For Ashford to grow in a sustainable manner, the town centre must be the location for significant quantities of new development, which would otherwise need to be located in more peripheral greenfield locations, that are inherently have less sustainable characteristics. This will mean that building densities will need to increase from those traditionally seen in the town centre and a key objective for the Council is to ensure that a new townscape of high quality emerges to complement the best features of the existing centre. It is agreed that the retail focus should be on the town centre but an enlarged town centre from that present today but the detail of storey heights and how particular sites should be considered will be dealt with in the Town Centre AAP.

**Support**

22 representations expressing support for the Council's preferred option 3 were received. These can be summarised as follows:

- General support with no specific comments (410, 464, 1258 and 1368);
- The principle of giving priority to town centre development (1524 and 1753);
- Support for the proposed Learning and Skills Campus, delivery of Victoria Way and a revised Ring Road (1753, 1429, 1050 and 269)
- Intensification of development in the town centre (370,371, 1286)
- Support prioritisation of development in town centre but growth will require brownfield and greenfield land to come forward in tandem (1512)

Comments were also received in respect of importance of the town centre in delivering sustainable growth for Ashford (1237), the improvement in the quality of the town centre and early phasing of development and transport routes (1412), adequate parking close to the town centre (1376), the promotion of St Mary's church for some community and cultural uses (1218), support for new retail development (173) and support for managing the timescale of release of town centre development against greenfield development (276, 1096 and 782).

**Victoria Way**

Main Issues Raised:

A very large number of responses were received in relation to Victoria Way, many of which referred to similar issues. All of the representations received are listed below, whilst the main issues they raise are also summarised below. However, because many respondents raised several points, we have not specifically identified which comment was made by each representation in order to avoid over-complicating this section.

The issue that has generated by far the largest single response to Preferred Option 3 is that of the so-called 'Victoria Way' link. The Preferred Option relates only to the need for a new strategic east-west link through the Victoria Road area but residents and businesses in the area commented in large numbers on the diagrammatic representation in the GADF showing a new road alignment to the south of the existing alignment of Victoria Road.

A large volume of objections were received in relation to Victoria Road: 238, 279, 282-287, 334, 353, 356, 358, 458, 484, 487, 490-523, 525-557, 559-581, 583-614, 623-629, 645, 649, 651, 653, 656, 661, 662, 665, 668, 673, 676, 677, 682, 686, 698, 700,

702, 713-727, 742, 745, 748, 752, 753, 755, 757, 760, 762, 764, 766-768, 770-772, 775, 777-779, 782, 784, 788, 792, 800, 802-805, 808, 814, 818, 819, 824, 828, 833, 840-845, 848-850, 852-859, 901, 902, 915-925, 947-960, 964, 966, 968, 971, 976, 979, 982, 988, 993, 998, 1002, 1004-1006, 1009, 1010, 1013, 1014, 1023, 1027, 1032, 1036, 1039, 1043, 1044, 1046, 1086, 1089, 1094, 1099, 1102, 1108, 1117, 1130, 1135, 1138, 1140, 1142, 1144, 1150, 1156, 1160, 1163, 1165, 1166, 1168, 1214, 1290, 1291, 1344, 1393, 1395, 1428, 1461, 1476, 1478-1486, 1489, 1782.

The points raised are summarised as follows:

- The case for a link from the International Station to Cobbs Wood and Chart Leacon is accepted;
- The route should follow the line of the existing Victoria Road;
- A more southerly route should be deleted due to the cost and duplication of Victoria Road;
- The decrease of land available for redevelopment in the Victoria area;
- It would spoil the riverside environment and the pedestrian / cycleway route;
- The loss of homes and businesses and the Railway sports and social club;
- The exposure of homes in the Bowens Field area to increased noise and pollution and the creation of long term blight for the residential and business communities of the area.
- The alignment of Victoria Road should be protected with sufficient width to allow for the foreseeable required capacity.
- Insufficient consultation.

Council's Response:

As a result of these objections, a workshop was held with local stakeholders to consider the potential options for a strategic route through this area and subsequently, further work was commissioned to look at several options in more detail (Victoria Way Corridor Study). These options are considered in more detail in the Town Centre Area Action Plan Preferred Options Report but the outcome was an endorsement of a route that should broadly follow the alignment of the existing Victoria Road with the deletion of the more southerly alignment indicated on the diagrams in the GADF. It is for the Town Centre AAP to determine the precise alignment of Victoria Way but the Core Strategy should indicate that the principle of the east-west link should be on the alignment of Victoria Road through this area in order to clarify the Council's preference for this route and to alleviate the concerns of the local residents and businesses expressed through the consultation process.

## Preferred Option 4: Ashford Urban Area

The following representations were received in relation to Preferred Option 4:

170 – Mr S Penny	891 – Bellway Homes Thames Gateway South	1460 – Pentland Homes Ltd & Jarvis Homes Ltd
174 – Wm Morrison Supermarkets plc	896 – Church Commissioners for England	1505 – Ward Homes
215 – Ashford Green Party	940 – Bovis Homes Ltd	1522 – Kier Property
217 – Ashford Green Party	1030 – London & Continental Stations & Property Ltd	1525 – Headley Brothers Ltd
236 – Churches Together In Ashford	1100 – Mersham & Sevington Parish Council	1530 – Ashford Rugby Club
247 – Mr G Hewins	1208 – Mrs & Mrs Ursell	1575 – GSE Waterbrook
270 – Mr J Dean	1247 – Ms E Wigmore	1586 – Chapel House Property Trust Ltd
273 – Mr C Jewell	1259 – Ashford’s Future	1594 – Kier Property Developments
305 – Old Stacians Cricket Club	1281 – Mr & Mrs Issett	1601 – ZED Homes
321 – Mr R Shrubbs	1323 – CPRE Kent	1613 – Pentland Homes Ltd
340 – Robert Brett and Sons Ltd	1328 – CPRE Kent	1635 – Save Great Chart Action Group
373 – Countryside Agency	1346 – MJ Allen (Holdings) Ltd	1658 – Kent County Council Strategic Planning
391 – Trinity College Cambridge	1364 – Pentland Homes Ltd & Jarvis Homes Ltd	1676 – Quintain Estates and Developments
411 – Shadoxhurst Parish Council	1377 – Orlestone Parish Council	1691 – Ashford Partnership
438 – Kingsnorth Parish Council	1404 – Mr K Blanshard	1707 – Environment Agency
439 – Kingsnorth Parish Council	1413 – English Partnerships	1749 – Mr R Goodenough
465 – Aldington & Bonnington Parish Council	1434 – Highways Agency	1764 – Pentland Jarvis Holdings
783 – South Ashford Parishes Partnership		2068 – Pentland Jarvis Holding

### Support

#### Main Issues Raised:

This Preferred Option got broad support (411, 465, 1208, 1259, 1377, 1100, 1364, 783, 1613).

Specific support was given to the principle of bringing forward development opportunities in, and close to, Ashford town centre (1525, 1055, 270). Support was also expressed for the proposed policy of bringing forward brownfield development sites at the earliest opportunity (340, 1413, 1030, 321). 1413 wished to see the definition of brownfield development tightened by the addition of the words “within the town centre”. 1505 and 1434 supported the proposal to give favourable consideration to ‘departure’ applications which would serve to release key elements of infrastructure.

#### Council’s Response

Expressions of support for the overall approach set out in this Option are welcomed.

### Phasing

#### Main Issues Raised:

1530 objected on the grounds that flexibility is required in phasing to accommodate smaller scale proposals which may emerge outside of the GADF proposals. 1460, 1586, 170 requested that the Kingsnorth allocation should be released earlier in the phasing programme on the basis that this proposed allocation uses predominantly existing infrastructure and established public transport facilities. The phasing of other sites is inappropriate as it skews development in favour of allocations which are dependent on major new investment infrastructure.

391 requested that the proposed phasing of Sandyhurst/Eureka should be brought forward to phase 1. 1658 and 1676 stated that this Option should be strengthened to express policy imperative of giving priority to release of previously developed land and applying the sequential approach to site selection in all cases notwithstanding that the growth is predicated on the release of large quantities of greenfield land. Brownfield land should be encouraged to come forward in advance of the completion of the LDF process.

1601 and 1594 said there is conflict between the Option seeking to bring forward brownfield development and the GADF phasing and masterplan which do not support early prioritisation of central brownfield sites. Phase 1 has 9,070 units and only 1,350 in the town centre or town centre periphery sites. Victoria Road development should all be in phase 1 to deliver Victoria Way. Entire development of Newtown Works should be in phase 1 given its sustainability and regeneration benefits. Given its brownfield status its development should take priority over Greenfield site releases in the constraints set by junction 10.

1247 and 273 objected to building on grade 1 agricultural land and more houses being built in advance of infrastructure. 940 objected to the priority given to the release of brownfield sites. 217 objected to current phasing – wish to see greenfield sites abandoned or placed in the post 2031 period and objected to the idea of Newtown Way - suggest a range and mix of uses for the Newtown Works site.

1522 said phasing and delivery should be based on a 5-year rolling supply of genuinely deliverable land with no phasing within those 5 years. Where greenfield sites come forward that will provide key infrastructure to ensure the provision of future genuinely

developable land these should be given exceptional consideration that may support departure applications.

#### Council's Response

The issue of the phasing of new development is one of the most important aspects of delivering the quality and form of development proposed in the Core Strategy for the Borough (1658, 1676, 1601, 1594, 1247, 273, 940, 217, 1522). The compact model adopted for the growth of the town of Ashford recognises that whilst the scale of growth required at Ashford is such that greenfield peripheral development is inevitable, the poor quality of the urban realm of the existing town and the availability of brownfield sites within the town mean that a 'mend before extend' approach is appropriate.

This approach has resulted in strong priority being given in the Core Strategy for the early phasing of development in the urban area ahead of peripheral development on the fringes of the town. At the same time the level of growth being required at Ashford means that greenfield development will occur and that there is therefore a need for development to come forward early on in the lifetime of the Core Strategy at a scale which will trigger the early provision of infrastructure, including the planned SMARTLINK public transport system, to ensure the sustainability of that peripheral growth. To enable such infrastructure delivery to be planned properly there has to be an element of phased release of land; it is simply impractical to seek to deliver the levels of development required in the borough by strict adherence to a sequential approach to the release of land.

The parallel implementation of a "mend before extend" approach and a phased release of greenfield sites enables key improvements to the quality of the urban area and its infrastructure to be made early on, such that the town will be better placed to support peripheral growth as the growth agenda is implemented. The requirement to embody an element of flexibility in any phasing (1530) is acknowledged as development sites within the urban area will come forward over the lifetime of the Core Strategy. It is not the role of the Core Strategy to identify sites however; the suitability of such sites will be subject to the normal planning considerations.

1601, 1594: The development at Newtown Works and at Victoria Way set out in the Preferred Options report is indicated as occurring within both phases I and II. Newtown Works is an important brownfield site to deliver the regeneration of the town centre, with a number of distinctive listed buildings associated with its railway history. Development at Victoria Way will serve to deliver key elements of the new infrastructure for the expanded town centre. Both sites will involve such quantities of development as are appropriate to be phased and both require the resolution of infrastructure provision in advance of their development (Newtown Works in particular is conditional on the resolution of the current capacity problems associated with Junction 10 of the M20). It is therefore considered appropriate to phase the delivery of these two sites.

391: Whilst the Core Strategy is not a site-specific document, phasing diagrams included in the Preferred Options Report carried forward from the GADF masterplan do give clear proposals for the phasing of major sites across the Ashford Urban Area. The Sandhurst/Eureka site is shown as continuing between phase 1 and phase 2 of the development at the town. It is accepted that infrastructure is in place and that development proposals for this site are at an advanced stage. This site is promoted in Phase 1 of the GADF masterplan on the grounds that a high quality business park is an essential component of the economic development strategy for Ashford to enable new high technology sectors to develop in the town. The timing for delivering development at Eureka will be linked to the development of a highly skilled workforce through the growing population and the Learning Campus. Take-up at the business park may take a long time, but in the view of the GADF report there is a pressing need in the short term to promote the business park regionally given the benefits that will accrue to the wider economy of East Kent. Development of the Sandhurst/Eureka area in the short term will not be prevented by the Core Strategy.

Further development at Kingsnorth (1460, 1586, 170) is not advocated in the GADF masterplan until towards the end of the GADF time period and, importantly, beyond the lifetime of this Core Strategy. The GADF masterplan report acknowledges that all areas proposed for the final phase of the masterplan post 2021 will be subject to review and are dependent on market confidence in Ashford as a growth area emerging. Delivery of the early phases of the expansion of the town has been based on the compact growth model planned primarily to enhance the Ashford urban core and to keep development away from the extremities where it is more likely to impact on surrounding villages and open countryside. The Kingsnorth area if developed will lie to the extreme south of the expanded town; development earlier in the growth of the town is therefore considered inappropriate and no change in the phasing for this area is proposed.

#### **Departure Applications**

##### Main Issues Raised:

891 wished to see reference made to Phase III in order to allow for departure applications to bring forward elements of the final phases of development as set down in the GADF. 438, 1323 say paragraph 1 of option 4 is a device to give opportunities for developers to urge departures from the Plan and suggests that this avoided by government pre-funding key elements of infrastructure allowing early development of brownfield sites.

1404 objected to the reference to departure applications in advance of the completion of the LDF process on the basis that this implies that development will be developer-led, the Council has no confidence in the plan process and that it is inconsistent with the Strategic Tariff approach. This representation requested the deletion of the second sentence of Preferred Option 4. 1691 stated that care must be taken to ensure that developers do not abuse this option and use it to argue for more departure applications. 1635 was concerned that the departure process could affect their proposal to move a section of Chilmington Green.

##### Council's Response:

The Core Strategy covers the period to 2021 only (891). Development proposed in the GADF report for the period beyond 2021 is indicative only, dependent on market confidence increasing in Ashford as a growth area and a step change in annual housing completion rates. It is not considered appropriate that detailed reference should be made in the Core Strategy to time periods beyond its lifespan.

Departure applications (438, 1323, 1404, 1691, 1635) are an exception to the normal planning process and will remain so. Acknowledgement was felt necessary to be included in Preferred Option 4 to departure applications potentially receiving support where they would deliver key pieces of infrastructure given the particular circumstances faced by the town over the timeframe of the Core Strategy. This Council is working hard on methods to bring forward key elements of the infrastructure improvements necessary to deliver the growth agenda, in particular the development of a Strategic Tariff. The intention is to have such a process in place as SPD in parallel with the adoption of the Core Strategy. In the meantime the normal developer contribution S106 process will continue to apply to deliver infrastructure improvements and direct government funding has been sought and secured for the delivery of strategic infrastructure for the expansion of the town. Departure applications will therefore continue to be treated as exceptions and will be subject to full consultation in the usual way.

## **Other Issues**

### Main Issues Raised:

896 requested the addition of Cheeseman's Green to the list of sites in the accompanying text which refer to sites which are already being developed or have permission. 1346 raised concerns about the future of existing industrial employment premises in the Cobbs Wood Estate depicted as a development area in the Phase II key diagram.

236 was concerned about the failure to address existing areas of concern in the urban structure which lie outside the areas of physical linkages and connectivity. More attention should be paid to the development of new or regenerated neighbourhoods within the existing urban area. 1707 sought the retro-fit of SUDS into the redeveloped areas to reduce storm runoff and diffuse urban pollution.

1749 queried the evidence to suggest that employment opportunities will match population growth within the borough. 305 sought adequate provision being made for the Old Stacians Cricket Club to be located elsewhere in the borough as the phasing plans included in the Core Strategy show new roads and junctions being provided in close proximity to the ground, with consequent detrimental impact on the club's ability to play cricket on the existing grounds.

373 suggested replacing reference to "decent environments" with "high quality and attractive environments" to make this objective more positive. 439 and 1328 said paragraph 2 of option 4 might result in unacceptable impacts on the environment. 1281 objected to the foundation of a number of developments based on an increased use of public transport and a masterplan which would require a major shift in the modal split in order to succeed.

1575 objected to the lack of definition of the Ashford Urban area – this should set out where this area is located, how it relates to GADF, how many dwellings and jobs will be needed in this area and when they will be provided. 247 was totally against the development. 215 objected to housing-led expansion and ever more commuters which will not be sustainable. 174 sought an addition to paragraph 3 on page 24 of the Preferred Options Report to state that the tariff arrangement would only apply to sites outside the town centre where this was reasonably related to that development in line with circular 1/97.

2068 argued that no economic analysis has been produced to ascertain what is a viable scale for the growth areas. They also suggested that explicit reference should be made to the need for the Council to form an effective and constructive partnership with landowners and developers. They also said there should be a rigorous economic analysis in regard to the reference viable scale of the growth areas

### Council's Response:

The list of sites which are already being developed or have permission in the supporting text to Preferred Option 4 was not a full one and was not intended to be so (896). The Core Strategy is not a site-specific document (1346, 305). The issues that are raised in these representations will be addressed in the Urban Sites and Infrastructure DPD.

236 and 1707 raise important points about existing areas of concern within the Ashford urban area. Many of these concerns, as is acknowledged in the representations, cannot be addressed by physical masterplanning – such as low educational standards and low skills bases - but the Core Strategy sets out a framework which seeks to address areas where the land use planning system can work to improve neighbourhoods where problems exist.

1749, 1281, 247, 215: The importance of delivering balanced growth at Ashford underpins the vision for this Core Strategy as set out in the Introduction. As is made clear in the Introduction the strategic development quantities which are required to be provided at the town and in the rest of the borough are set out at national and regional levels. It is not within the scope of the Core Strategy to alter such policies but rather to set down the principles by which additional development will be provided in the Borough. The policy of encouraging increased use of public transport is in line with the sustainability principles promoted at national level and in the Core Strategy as a whole.

373: The policy and supporting text will be altered to replace references to "decent environments" with "high quality design".

439, 1328: The environmental impact of those elements of the implementation of the Core Strategy which will require an Impact Assessment under the 1999 Environmental Impact Regulations will be carefully assessed to ensure no detrimental impacts result to the highly protected areas of the borough's landscape. Policies protecting the environment and in particular the Special Landscape Areas and AONBs within the borough will continue into the LDF. The high quality of the countryside that makes up most of the borough's land area is acknowledged as being one of the borough's greatest assets particularly in the Countryside section of the Core Strategy.

1575: It is not considered necessary in planning for the future of the borough to delineate on a map a boundary for the Ashford Urban Area. Such boundaries inevitably focus debate on the details of their positioning and this is considered inappropriate in a strategic document.

174: Work on the establishment of a Strategic Tariff to deliver key elements of off-site physical and community infrastructure is ongoing. Details of this system are considered in Policy CS8.

2068: The total level of growth for the Greater Ashford urban area is given by the Regional Spatial Strategy with which the Core Strategy must accord. In producing GADF, consultants considered the viability of the scale of development areas in producing recommendations on sustainable new neighbourhoods. Certain thresholds of residential development are recommended to achieve the necessary infrastructure and community facilities which will be provided by the public sector, service providers, utility services and the private sector (for example shops). In addition, a strategic tariff is to be collected to fund necessary key projects. There is no reason to suggest that the scale of the proposed urban extensions would not be economically viable. The Council has been working closely with the 'Ashford Landowners Group' of landowner/developer interests south of Ashford, of which the objector is a leading member. The GADF report considered in detail the scale of the proposed growth areas that would be required in order to provide a full range of community infrastructure. This in turn drew upon previous research including the "Shaping Neighbourhoods" research document produced by the University of the West of England.

## Preferred Option 5: The Growth Areas Around Ashford

The following representations were received in relation to Preferred Option 5:

160 – Cllr P Bartlett	890 – Bellway Homes Thames Gateway South	1378 – Orlestone Parish Council
171 – Mr M Frohnsdorff	893 – Church Commissioners for England	1414 – English Partnerships
172 – Dr and Mrs Frohnsdorff	894 – Church Commissioners for England	1435 – Highways Agency
180 – J Loudon	941 – Bovis Homes Ltd	1445 – English Nature
186 – Ms A Frohnsdorff	995 – Taylor Woodrow Developments Ltd	1459 – Government Office for the South East
212 – Ashford Green Party	1064 – Kent Downs AONB Unit	1504 – Ward Homes Ltd
213 – C Wright	1101 – Mersham & Sevington Parish Council	1515 – Berkeley Community Villages
231 – Churches Together in Ashford	1103 – Mersham & Sevington Parish Council	1523 – Kier Property
257 – Mr & Mrs Issett	1106 – Mersham & Sevington Parish Council	1558 – Great Chart with Singleton Parish Council
258 – Mr & Mrs Issett	1212 – Downland Housing Association	1576 – GSE Waterbrook Ltd
302 – Mrs J Lewis	1219 – C Dugard	1587 – Capel House Property Trust
333 – Robert J Shrubbs	1246 – Mrs S Davison	1595 – Kier Property Developments
335 – Mr R Shrubbs	1260 – Ashford's Future	1602 – ZED Homes
374 – Countryside Agency	1294 – Tenterden Town Council	1636 – Save Great Chart Action Group
398 – Boughton Aluph and Eastwell Parish Council	1304 – Westbury Homes (Holdings) Ltd	1659 – Kent County Council Strategic Planning
412 – Shadoxhurst Parish Council	1313 – CPRE Kent	1677 – Quintain Estates and Developments
440 – Kingsnorth Parish Council	1339 – Mr R Beaugie	1692 – Ashford Partnership
466 – Aldington & Bonnington Parish Council	1352 – Boughton Aluph and Eastwell Parish Plan	1708 – Environment Agency Southern Region
483 – Mr R Airey		1745 – Persimmon Homes
759 – Mr A Colton		1759 – English Heritage
763 – Mr and Mrs P Wilkins		
765 – Cllr P Davison		
875 – South Ashford Parishes Partnership		

### Support

#### Main Issues Raised:

This Preferred Option got broad support (1352, 412, 466, 440, 1659, 1745, 257, 1504, 894, 1378, 759, 1260, 1466, 1515).

A number of representations wished to ensure that the context of any peripheral development areas is not prejudiced and in particular that local landscape designations are retained to provide protected transition zones. Such zones should be of sufficient scale to allow them to be properly cropped and grazed allowing controlled public access through the existing and possibly enhanced PROW network (398,1101,1352). There was also support for proposed networks of clearly defined green spaces and the recognition given to the importance of connectivity between the urban rural fringe and rural areas. (374, 440, 1445, 1313).

The importance of controlling the rate of release of development land in peripheral areas to keep in step with community and social infrastructure provision was highlighted in a number of representations (1677, 1103, 1212, 335, 1313, 1414, 231) whilst recognising that the proposed new neighbourhoods around Ashford will be important in delivering such public transport and other new infrastructure (1414).

#### Council's Response

257, 412, 440, 466, 759, 894, 1260, 1352, 1378, 1466, 1504, 1515, 1659, 1745: The level of support for the overall approach set out in this Option is welcomed.

231, 335, 374, 398, 440, 1101, 1103, 1212, 1313, 1352, 1414, 1445, 1677: The existing urban/rural fringe will generally be retained, enhanced and managed as part of the 'Green Necklace' of open space which will connect existing and proposed new green corridors within and around Ashford. It is agreed that the development of proposed peripheral growth areas should be carefully controlled to ensure that community and social infrastructure is provided at an appropriate pace and scale in parallel with new housing development. Both these points will be worked up in more detail in the forthcoming Area Action Plans for the proposed growth areas.

### General Objections

#### Main Issues Raised:

Objection was raised to the failure of issue C) of Preferred Option 5 to reflect the existence and prioritisation of urban and brownfield sites. It was felt that specific mention should be made here to the phasing of greenfield peripheral development after the investigation and promotion of brownfield urban opportunities (1595, 1602). A small number of representations object to any development at all on greenfield land (171, 172, 186, 763, 213) seeing it as an unsustainable solution to meeting the housing need, while representations 258, 765 and 1246 wished to see a more even spread of development around Ashford and the southern ring of urban villages reduced or removed. 1523 suggested that if RSS housing requirements are greater than expected, additional sustainable greenfield sites should be allocated where these accord with the principles of the compact growth model. 1350 suggested that local edge of town sites of modest scale should also be allocated for development.

More emphasis in this Option was sought to stress the importance of ensuring that urban development supports the sustainability of the surrounding countryside and that development on the periphery of the town is sensitive to surrounding rural communities and makes appropriate links to the surrounding countryside (1064). A clear commitment to maintaining and expanding existing green corridors rather than green 'necklaces' which serve neither ecological diversity nor low-impact transport purposes was advocated (212). Concern was expressed over potential adverse impacts on surrounding smaller settlements and archaeological resources of development on periphery of the town (1759). The failure of the Core Strategy to clearly define the Ashford Growth Area was objected to in 890.

The importance of ensuring that the necessary social and transport infrastructure is in place before new development starts and that there are green lungs between developments was raised in a number of objections (1339, 302). 1692 stressed that planning for social inclusion in the proposed new peripheral communities should include a more holistic approach to isolation than just a good bus service. 212 objected to the road based movement solutions including Victoria Way–Newtown Way and Orchard Way and 483 supported the idea of a new public transport system but feels enhanced use of the train system rather than the buses was preferable. 1219 considered that churches should be added to any list of required community facilities.

The differences between the current Cheeseman's Green allocation and that proposed in the Core Strategy Preferred Options Report were addressed by a number of objections 1304, 1106, 160, 995, 893, 941 and 333. The inclusion of any reference to this specific site in the Core Strategy was deemed inappropriate since it is a document that should not be site specific (1459). The GADF proposed allocation is endorsed in the Core Strategy Preferred Options Report but varies from the site as allocated in the current Borough Local Plan. There were many objections to this change of policy. 1304 objected to the proposals of the GADF being accepted without detailed testing through the LDF process. 1106, 160 and 995 wished to see the Cheeseman's Green development moved back to the current allocated site, north and west of that proposed in GADF given that the current application for the Cheeseman's Green site has been extensively discussed and has been the subject of Enquiry by Design, and that development of the original site would allow a much larger buffer zone of undeveloped countryside between the expanded Ashford and the villages of Mersham and Sevington.

Further development on the East Stour Flood Plain was opposed along with any development to the east of the lane from Sevington railway bridge to Cheeseman's Green and to the east of Highfield Lane. Issue E) of this Preferred Option states that if development of the current allocation at Cheeseman's Green proceeds then a reduction will be made in development elsewhere. 995 stated that the Core Strategy should indicate which area of land will be deleted should the current version proceed, and 941 also sought clarity on this point. 893 objected to any reduction in development elsewhere in the area to the south east of Ashford if the enlarged Cheeseman's Green proposal goes ahead. 333 wished to see any development outside the current masterplan area of this site integrated into the infrastructure and transport facilities.

1294 felt that issues A, B, C, and D of this Option apply equally to any growth area of Tenterden and the policy should therefore be revised accordingly. 180 objected on the grounds that this Option needs to include some detail on how developers can be attracted to the area and how adequate provision of sufficient school and hospital places can be made. The commitment of the private as well as the public sector to delivering the growth agenda should be sought in the view of one objector 1435 whilst 1708 considered that the provision of SUDS should be noted as essential in all new development areas.

A number of representations said the text lacked clarity (1636, 1558, 1576, 875) and can be easily or intentionally misinterpreted.

2069 said that windfall predictions were optimistic and should be scaled down, with the balance added to allocated growth areas.

#### Council's Response:

171, 172, 186, 213, 258, 763, 765, 1246, 1595, 1602: The scale of growth proposed for Ashford cannot realistically be achieved without the release of greenfield land. The priority given to the development of brownfield land in the town generally in advance of development on greenfield sites is a key component of the approach to planning for the growth agenda at Ashford. It is reflected in the 'mend before extend' approach and Compact Growth Model established in the GADF and is endorsed in Core Strategy Policies CS2, CS3, CS4 and CS5. However the Borough Council recognises that there is a significant quantum of development to achieve during the plan period and that it would be impractical to restrict the start of all development on greenfield sites until all brownfield sites had been exhausted. Indeed, the Council consider that there will be benefits in allowing the commencement of limited development of the urban extensions in parallel with the development of brownfield sites. Such development can be supportive of town centre growth by bringing additional expenditure to support new facilities and may result in the early implementation of key new facilities, services or infrastructure. For this reason, the Core Strategy supports the basic principle of the sequential approach but acknowledges the need for phasing and land release to be pragmatic within the parameters of the wider growth model for Ashford. This is implicitly considered in the phasing schedules in section 8 of the GADF that proposes land in both the Chilmington Green and Cheeseman's Green/Waterbrook areas coming forward in the first phase of development, alongside the emphasis on the town centre. Such an approach to phasing recognises the lead-in times necessary for major urban extensions of the type being proposed and the fact that they will be delivered over a long period, maybe a decade or more. Furthermore, the investment in infrastructure required to deliver these areas requires a long term approach to development – for example, an early opportunity to establish the basis of the Smartlink public transport route at either end is a sensible response to this issue. Within the existing urban area, a more stringent approach to the sequential release of residential sites can be applied and this is the proposed approach within policy CS4 unless a key element of strategic infrastructure benefiting the implementation of the wider growth model can be enabled.

258, 765, 1246: The distribution of the proposed urban extensions represents the most sustainable locations at the edge of Ashford and such areas, and the justification for their selection, will continue to be proposed through the Core Strategy.

1350: The sustainability of the major urban extensions to the south of the town depends on creating a critical mass of residents and supporting employment, retail and community facilities alongside sustainable transport options and therefore, any significant reduction in the size of those neighbourhoods through the allocation of more small, piecemeal sites on the edge of Ashford could have an adverse effect on the overall sustainability of the plan as a whole by diluting the compactness of development across the

town. 1692: The mix of locally provided or well connected employment and other services with new housing as proposed within the urban extensions should encourage inclusion.

1523: The capacity of Ashford to absorb substantial new development has been thoroughly tested and additional development through the South East Plan is not envisaged. Additional housing would result in the need for additional employment and other related development and put unsustainable pressure on the area beyond acknowledged capacity.

302, 1339: Each of the three major areas of development proposed will require a sustained programme of investment in social and transport infrastructure on and off site. It is accepted that the development of such peripheral areas should be carefully controlled to ensure that community and social infrastructure is provided at an appropriate pace and scale in parallel with new housing development, and for this reason it is proposed that growth targets and phasing are regularly reviewed. The Core Strategy provides an explanation of the mechanisms, including a Strategic Tariff, which will be put in place to ensure that the recent experience of many communities around the town where infrastructure has lagged behind housing development is not repeated. Such mechanisms will also serve to provide clarity to potential developers and investors and to attract private investment to the expansion of the town and its facilities alongside public sector involvement.

1219: Places of worship are identified in the Core Strategy text as one of the types of community facilities required.

212, 890, 1064, 1759: The importance of ensuring that development on the periphery of the town is sensitive to surrounding rural communities and makes appropriate links to the surrounding countryside is a key principle of the Core Strategy. The development of a sensitive relationship between both the existing and new urban rural fringes and the surrounding rural areas, including the protection, enhancement and management of viable, transition zones is supported as important to the creation of balanced, attractive new neighbourhoods which are well linked both to the existing urban open space and the countryside beyond. Such aspects of the development of growth areas around Ashford will be worked up in more detail in the forthcoming Area Action Plans for the growth areas, if necessary supplemented by development briefs and design codes.

212; 483: There will remain a need for road based infrastructure to serve development during the Core Strategy period although the emphasis of the plan is towards the provision of more sustainable solutions including SMARTLINK in Ashford. Whilst it is envisaged that a new station will be created at Park Farm on the Ashford to Hastings railway line, the urban extensions are not located close to existing railway lines and the SMARTLINK proposal is considered to be the most sustainable option for new public transport provision serving these areas.

160, 333, 893, 941, 995, 1106, 1304, 1459: It is accepted that the Core Strategy should not be site specific, but in this instance the proposed urban extension at Cheeseman's Green is raised as a strategic issue, expanding on the key diagram included in RPG9. The exact extent of the allocation here, as with other key strategic development, is not however determined in the Core Strategy, rather the roles of such urban neighbourhoods in the sustainable expansion of Ashford and overall development strategy for the Borough are clarified. The sustainability of the major urban extensions to the south of the town, including Cheeseman's Green, is dependent upon creating a critical mass of residents to support employment, retail and community facilities and to anchor the new SMARTLINK public transport system. The allocation in the adopted Local Plan for an urban extension at Cheeseman's Green is not large enough to generate such a critical mass and is centred to the north of Captains Wood, removed from the centre of the proposed new urban neighbourhood. The GADF masterplanning work concluded that additional development in this area was undesirable due to its remoteness from the proposed centre of the Cheeseman's Green urban extension and the SMARTLINK service that will serve it, that will lie to the south of Captains Wood. In addition the business park component of this allocation is situated on land proposed for a major wetlands park in the GADF. The proposed wetland park is seen as a 'transformational' project in the GADF – one that both enhances the ecological importance of the South Willesborough Dykes SNCI and creates a resource and attraction for the benefit of residents and visitors to Ashford whilst also making best use of an area that lies on a key entrance to the town that is constrained by its role as floodplain. Given that a more compact layout for this urban extension is preferable in sustainability terms, it is felt that this area of land could contribute to the creation of the wetland park and potentially provide compensatory flood storage capacity should future development within the Canal District floodplain area take place. This Core Strategy consultation is providing precisely the detailed testing requested by 1304.

The concerns that the changes proposed to the boundaries of the development at Cheeseman's Green will reduce the currently proposed buffer zone of undeveloped countryside between the expanded Ashford and the villages of Mersham and Sevington are accepted. The formation of such a buffer, meaningful in its extent and scale, will form part of any re-shaping of this urban village – the delineation of which will be considered in the Cheeseman's Green & Waterbrook AAP, as will the matter of the implications of increased development here, over and above the current local plan allocated site, on development allocations elsewhere.

180, 1294, 1435: The level of development proposed at the three new peripheral settlements – of 4,000 to 6,000 homes – has been carefully set to support a reasonable range of services and to 'anchor' the planned new public transport system proposed for the town. New development in the rural areas will not be at the same scale, but the principles of balanced growth, provision of appropriate transition zones and commitment to high quality appropriate design will apply equally in these areas. Such principles are addressed in the response to Option 6 and will form an important part of the Tenterden & Rural Sites DPD.

An annual monitoring report is required as part of the new LDF system. This will assess the implementation of the LDS documents including the Core Strategy and the extent to which policies are achieved.

1708: The implementation of SUDS (Sustainable Urban Drainage Systems) is addressed directly by Policy CS20.

875, 1558, 1576, 1636: The text of the Preferred Options document has been redrafted to form the Core Strategy Submission Document.

## Preferred Option 6: Tenterden, the Villages and the Rural Area

The following representations were received in relation to Preferred Option 6:

134 – Lakehurst Developments Ltd	443 – Kingsnorth Parish Council	1261 – Ashford's Future
146 – Mr & Mrs Smith	444 – Kingsnorth Parish Council	1295 – Tenterden Town Council
147 – Mr & Mrs Farris	445 – Kingsnorth Parish Council	1309 – CPRE Kent
148 – Mr B Dollimore	446 – Kingsnorth Parish Council	1310 – CPRE Kent
162 – Cox Vernacular Ltd / Sara Cox Ltd	467 – Aldington & Bonnington Parish Council	1311 – CPRE Kent
164 – Mr & Mrs Bromley	482 – Challock Parish Council	1312 – CPRE Kent
165 – Mr & Mrs Bromley	758 – Mr I Browning	1367 – Mr H Whittle
166 – Mr & Mrs Bromley	787 – South Ashford Parishes Partnership	1369 – Westwell Parish Council
167 – Executors of Mrs CC Collard	935 – Mrs E Wills & Mr R Scrimshaw-Wright	1379 – Orlestone Parish Council
168 – Executors of Mrs CC Collard	936 – Mrs E Wills & Mr R Scrimshaw-Wright	1392 – Ms J Hallwood
177 – Mr E Harrison	1067 – Kent Downs AONB Unit	1423 – E P R Boorman Settlement
179 – Mr J Barton	1075 – Kent Downs AONB Unit	1424 – E P R Boorman Settlement
182 – Independence & Access Matters	1076 – Kent Downs AONB Unit	1438 – Otterden Estate
214 – Ashford Green Party	1109 – Mersham & Sevington Parish Council	1442 – Mr M Day
230 – Churches Together in Ashford	1110 – Mersham & Sevington Parish Council	1444 – Mr M Day
240 – Mrs D Chadwick	1111 – Mersham & Sevington Parish Council	1503 – Ward Homes Ltd
243 – Mr G Hewins	1136 – Sweetridge Ltd	1510 – Lydd Airport Action Group
265 – High Weald AONB Unit	1162 – Mr A Curtis-Baker	1527 – Pluckley Parish Council
274 – Mr J E Hosking	1177 – Hothfield Parish Council	1541 – Mr M Day
289 – Smeeth Parish Council	1197 – Mr A Paterson	1542 – Mr M Day
290 – Smeeth Parish Council	1204 – Highways Agency	1544 – Mr M Day
311 – FDC Homes	1220 – Pentland Homes Ltd & Jarvis Homes Ltd	1545 – Mr M Day
312 – Messrs R Baker, M Bushell, P Houchin	1221 – Tenterden & District Residents Association	1546 – Mr M Day
319 – Bilsington Parish Council	1227 – Wye with Hinxhill Parish Council	1547 – Mr M Day
332 – Mr R Shrubbs	1233 – Imperial College London	1559 – Great Chart with Singleton Parish Council
342 – English Rural Housing Association	1234 – Imperial College London	1579 – Millwood Designer Homes Ltd
343 – The Crown Estate	1235 – Imperial College London	1592 – Mrs S Anning
361 – Brook Parish Council	1236 – Little Chart Parish Council	1637 – Save Great Chart Action Group
363 – Woodchurch Parish Council	1237 – Imperial College London	1660 – Kent County Council Strategic Planning
375 – Countryside Agency	1238 – Imperial College London	1687 – Countryside Properties (Southern) Ltd
397 – Boughton Aluph & Eastwell Parish Council	1239 – Imperial College London	1693 – Ashford Partnership
405 – Ruckinge Parish Council	1244 – Hillreed Developments Ltd	1709 – Environment Agency
414 – Shadoxhurst Parish Council		1725 – Boughton Aluph & Eastwell Parish Plan
429 – Weald of Kent Protection Society		1748 – Mr R Goodenough
442 – Kingsnorth Parish Council		1760 – English Heritage
		2070: Pentland Jarvis Holdings

### Support

#### Main Issues Raised:

361, 397, 414, 446, 1261 and 1725 indicated a broad support for the issues raised in this option.

#### Council's Response:

361, 397, 414, 446, 1261, 1725: This support is welcomed.

### Growth Levels in the Rural Areas of the Borough

#### Main Issues Raised:

1510 & 274 felt that it would be prudent to reduce or stop the number of houses to be allocated in the rural area. It was felt that the policy would be to the detriment of the rural area as a whole and lead to a swamping of villages. Settlements should only grow according to local needs development. 1510 stated that the philosophy to build more houses in settlements to maintain the services that exist there was a flawed approach.

Conversely 1244 believed that there is not enough development planned in the villages and there should be more allowed. 289 said some development should be allowed to stop villages dying and to provide opportunities for older residents who wish to stay in their village. 134 felt that the existing rural housing policies are inadequate as they don't meet the needs of the rural population. Demand will increase due to people locating to the GADF area. 1067 felt that the proportion of housing to be allocated in the rural areas was appropriate. 1424 supported the Council's policy of allowing limited growth in appropriate locations.

2070 considered that there needs to be a more realistic view of the contribution which villages can make to the provision of new homes and employment, based upon sound planning principles whilst recognising that such developments will rarely be popular with

established population.

Council's Response

134, 274, 289, 1067, 1244, 1424, 1510, 2070: The Kent and Medway Structure Plan proposes an overall figure for new residential development within Ashford Borough from 2001-21 of 20,000 new dwellings, of which 18,500 should be in the Ashford Growth area. These figures are consistent with the RPG9 targets for development for Ashford and hence provide a reasonable basis on which to plan for the rest of the Borough. Therefore, quantitatively, an assumed contribution of 1,500 dwellings over this period is required in the rural areas of the Borough. These figures are calculated to represent sustainable balanced growth targets for the rural area of the Borough.

Providing balanced growth opportunities to enable people to live and work in one's own rural town/village and the support of local services is a key recurring theme that comes through consultation with rural communities as is the strong desire to retain the qualities of an attractive environment that define the character of the rural settlements.

Planning Policy Statement 7 states that it is the role of the planning authority through their LDDs is to facilitate and promote these growth figures for the rural areas in sustainable patterns of development. This balanced growth in the correct locations will enable inclusive rural communities, encourage sustainable economic growth, protect the environment by resisting urban sprawl and generally improve the overall quality of life for rural dwellers. The issue of determining the appropriate locations for accommodating development is dealt with later in this response.

It is felt that to only allow for local needs housing in rural areas, as opposed to sustainable balanced growth would be detrimental to the overall nature of the rural areas, risking the creation of isolated communities and social exclusion. The growth targets are set to provide the most appropriate balanced levels of growth.

**Phasing of Development in Rural Areas**

Main Issues Raised:

164 & 165 felt that there should be a reference to the KMSF figure of housing growth that went until 2016 in the phasing totals and not just 2001-11 & 2011-2021. 1693 raised the question why the numbers of housing were so different, phase 1 being 250 to 2011 whereas phase 2 is 550 by 2021. 429 enquired what the start date for phase 1 was. 429 also wondered whether there would be a moratorium until 2011 before any more permission were met if 250 are built by 2011. 1423 believed that phase 1 should be 350 and phase 2 should be 450.

182 & 319 stated that any development in the rural areas should not take place until there are significant infrastructure improvements. 1204 indicated the possible need for a trunk road specifically in the rural areas of Greater Ashford's periphery.

Council's Response:

164, 165, 429, 1423, 1693: The start date for phase 1 was 2001, with possible phasing periods in 2011, 2016 and 2021, which is in line with Structure Plan phasing periods. The Core Strategy preferred options report was published in 2005, four years after this date, resulting in the need to allocate fewer sites in phase 1.

The phasing dates set out in the Preferred Option report for the rural areas were not fixed. The important issue is that the growth levels in the rural areas will need to be phased to some degree. Phasing helps to ensure that the growth targets are absorbed more easily and that social and other infrastructure is more able to keep in pace with demands. It is also the case that the economics of development in rural areas, where demand and sales values are high, would be likely to lead to the vast majority of the supply of land in the villages being used up early in the LDF period. Broad phasing over two periods in the Local Development Framework's lifespan will help to counter these problems. The number of houses allocated to each phase reflects these points, regardless of the exact time frame of the phases themselves. The phasing dates set out in the Core Strategy submitted documents are 2006-2013 and 2014-21.

182, 319: Infrastructure issues will be dealt with under the specifics of the site proposals that will be contained within the Tenterden & Rural Sites DPD. Each identified site will have its own infrastructure needs that require detailed policies and these cannot be dealt with at the Core Strategy stage.

**Windfall Prediction in the Rural Area**

Main Issue Raised:

165, 1438, 1444 and 1545 felt that the rate of predicted windfall housing development needs to be reviewed, as basing predictions on past trends is flawed and that there will be a need to allocated higher or lower housing figures if the predicted windfall figures do not come forward as expected. In particular, 2070 considered that the anticipated contribution from unallocated sites should be scaled down to reflect the fact that a large proportion of village sites have already been redeveloped and the Council's firm stance on retaining employment sites in the villages. As a result, an additional 15 dwellings per year should be added to the allocations giving 325 dwellings up to 2011 and a further 700 in the second phase.

Council's Response:

165, 1438, 1444, 1545, 2070: PPG3 states that predicting windfall targets should be derived from examining past trends in windfalls coming forward for development. This has been done in predicting the windfall figure in the Preferred Options report and the Core Strategy Submission document (35 dwellings per annum in the rural area). If these trends continue the net total of windfall

developments by 2021 will be 700 units, leaving 800 units to be found on allocated sites

The process for deciding the windfall figure is therefore in line with national guidance and represents a sound prediction on which to form the basis of the policy in the Core Strategy. There will however be a need to monitor these windfall targets regularly to examine the appropriateness of this policy approach. Therefore, it is proposed that the Core Strategy policy towards residential site allocations in Tenterden and the villages should be based on this level of windfall provision occurring over the LDF period. However, the policy will need to have sufficient flexibility to allow for either fewer or greater numbers of allocated units to be proposed depending on the future windfall trend, so as to ensure that the overall 1,500 dwelling target is achieved by 2021. A phased approach to allocations within the Core Strategy will enable this flexibility to be achieved.

### **Hierarchy of service centres in the rural area**

#### Main Issues Raised:

1424, 1687 and 148 were supportive of the approach that Tenterden should be at the top of the hierarchy of settlements as it represented the most sustainable location outside of Ashford in terms of service provision. 148 made the point that there is a need to provide further housing choice in Tenterden to ensure it continues its role of serving the rural hinterland. Biddenden (147), Chilham (146), Hamstreet (168), Wye (312, 1197, 1547) and Charing (166) were also viewed as appropriate settlements which should be included in the hierarchy. 1349 & 1687 supported the hierarchy approach as it looked to allocate suitable growth in the most suitable locations.

Conversely, 1438 and 375 raised concerns over the hierarchy approach in general. 1438 stated that the hierarchy approach should be altered to three tiers, with Tenterden at the top, followed by Charing, Wye and Hamstreet followed by Biddenden, Chilham and Aldington. This would allow the appropriate amount of growth in these areas depending on the settlement's location in the tiered hierarchy. 375 was concerned that directing development into larger settlements would not necessarily result in less car travel, something that underpins sustainable development and therefore whether the hierarchy approach to rural residential allocations was questionable.

Numerous representations raised the point that only allowing development in the settlements listed in the hierarchy could lead to the detriment of other settlements outside the hierarchy who want and need appropriate small scale growth to survive (167, 177, 1693, 1579, 1109, 179, 787, 1236, 405, 935, 274, 164, 165). This approach would result in over development in some rural settlements of the Borough. 177 & 179 expanded on this issue and highlighted that if there were brownfield opportunities in any settlement then an alternative should be found for that site regardless of the position of the settlement in the hierarchy.

2070 requested explicit recognition that local views should be balanced against the need for homes and jobs.

There were several representations that felt individual villages should have their own individual options as each settlement has differing needs and are independent of each other. There wouldn't be a need to group settlements using this approach (1527, 1637, 1559, 1236, 443, 1311, 442, 1312). 1162 specifically raised Chilham as a settlement that should have its own set of policies.

The following settlements were put forward for inclusion in the settlement hierarchy from residents, local business and or a Parish Council:

- Bethersden (1367, resident)
- Challock (162, local business)
- Chartham\* (1547, resident)
- Hothfield (1177, parish council)
- Shalmsford Street\* (1547, resident)
- Woodchurch (363, parish council & 1592, resident)

\*Shalmsford Street and Chartham lie outside the Borough's boundary and are therefore not considered.

The following settlements were forward for inclusion in the hierarchy from developers:

- Appledore (343)
- High Halden (311 & 2070)
- Shadoxhurst (1503, 1220, & 2070)
- Smarden (134)

The following were identified as settlements which should not be included in the Hierarchy:

- Aldington (1547, resident)
- Chilham (1547, resident)
- Hamstreet (1379, parish council)

#### Council's Response

134, 146, 147, 148, 162, 164, 165, 166, 167, 177, 179, 274, 311, 312, 343, 363, 375, 405, 442, 443, 787, 935, 1109, 1162, 1177, 1197, 1220, 1236, 1311, 1312, 1349, 1367, 1379, 1424, 1438, 1503, 1527, 1547, 1559, 1579, 1592, 1637, 1687, 1693, 2070: A sustainable pattern of development, as highlighted in PPG13, requires active management of the pattern of growth to make the fullest use of public transport, walking and cycling. PPS7 expands this sustainable planning principle for the rural areas specifically and states that growth in rural areas should be located in or near to local service centres where employment, housing including affordable housing, services and other facilities can be provided close together.

Rural settlements differ in their scale and their ability to sustain growth. Larger settlements generally offer more service provision as they incorporate more houses, jobs, existing infrastructure, better public transport provision and leisure facilities. These types of larger settlements provide a critical service centre role for a wide surrounding rural hinterland. It is therefore important to split the allocated growth levels in rural areas proportionally, with the larger, better-equipped settlements accommodating proportionally higher levels of allocated growth.

The identification of the key service centres of Tenterden, Charing, Wye and Hamstreet in the Borough Local Plan was based on a series of 'sustainability indicators', contained within Background Document 12 of the Local Plan, *'Principles Guiding the Location of new Housing Sites'*. These indicators weighted various service provisions, such as awarding points to the number of households, public transport provision, doctors' facilities, shops etc, that were provided by each parish. This survey provided a guide to which settlements scored highest in terms of service provision. The highest scoring settlements were then considered to be appropriate for new allocations and larger scale windfall proposals. This approach was considered to have significant weight by the Inspector at the Local Plan inquiry and therefore has been the basis for the rural spatial strategy described below. It was felt the sustainability matrix used to determine the Preferred Options report list needed further revising to better reflect the current nature of the settlements in question. This updated rural sustainability matrix can be found under the Background Document 'Housing' of the submitted Core Strategy.

Although this methodology represents a 'snapshot', this approach continues to be very useful guide as to a settlement's relative sustainability as a local service centre and its potential to either carry on that role or enhance it. The matrix represents a consistent method which is able to be used throughout the Borough, as it incorporates and ranks every single rural settlement

The Core Strategy Preferred Option report highlighted the need to adapt the Local Plan approach for two main reasons. Firstly because there is an increase in the number of dwellings in the rural areas that need to be allocated in the Core Strategy up to the year 2021 compared to the Local Plan. Restricting all the allocated development to just Tenterden, Charing, Hamstreet and Wye would result in a significant expansion of that would be out of scale and potentially damaging to their character. Therefore other settlements need to be considered for allocated development. Secondly, the different role of the Core Strategy within the LDF and not being a site specific allocations document means that strategic spatial policy can be set out here to guide the allocations process during the preparation of the Tenterden & Rural Sites DPD, due to be released later in the LDF process.

Larger settlements generally offer more service provision, providing a critical service centre role for a wide surrounding rural hinterland. However, some smaller settlements within the rural area have roles to play as localised service centres for their immediate rural hinterland, as set out in the Preferred Options report. This approach is also entirely consistent with PPS7, 'sustainable development in the rural areas'. Although these types of local service centres do not provide the scale of services that the larger more established rural settlements do, they still provide critical service for the settlements in their own direct surrounding rural hinterland. These local service centres, although lower down the sustainability matrix compared to the larger centres, play a key role in the overall sustainability of the rural areas in general.

Involving the community at the earliest stage of the planning process, frontloading consultation is one of the key driving forces to ensuring sustainable development and is a fundamental part of the new planning system. Local views in villages are therefore welcomed as they offer people an opportunity to influence the outcome of a plan content by sharing their in-depth knowledge of local issues and circumstances. The Council is pro-active in its approach to community engagement in the planning system.

It is important that the rural spatial planning policy balances the wishes of local people and the underlying planning merits. For example, if a Parish Council reflects through consultation with the Borough Council that they would like small scale allocated development in their settlement, but the settlement does not score well on the sustainability matrix and is not considered a local service centre, then there is a need to demonstrate that there is a justifiable local exceptional planning case relating to that settlement. Such exceptions may relate to a specific local social, community or economic-related issue. It is important to note that this surrounds the issue of a settlement's desire to accommodate allocated small-scale market-led housing development and does not refer to the issue of local needs housing.

Rural local needs housing developments are specifically reserved for people already associated with the locality, either by residence or work place and are shown to be needed for the future sustainability of the settlement in question. Local needs housing is delivered through an 'exception sites' policy in the Local Plan that permits residential development to occur on sites that would not otherwise be acceptable for such purposes. This approach has delivered 23 rural local needs schemes in the borough and can be considered very successful; as such it is considered that this is still the preferred way to deliver such sites.

***The policy approach regarding the settlement hierarchy is contained within the Core Strategy document under policy CS6.***

It is important to note that not all of the settlements contained within policy CS6 may have sites allocated within them. The settlements that will be eventually selected for small scale allocated growth will be determined through various consultation processes during the production of the Tenterden and Rural sites DPD.

1503, 1220, 2070, 343, 134 Shadoxhurst, Appledore and Smarden which were put forward for inclusion by developers, in the responses to the Core Strategy, were not included at this stage, within the third tier as the settlements did not warrant inclusion through the sustainability matrix or the local wishes processes.

177 & 179: With regard to the issue of brownfield opportunities being acceptable for development regardless of location, this is not in accordance with national guidance and will therefore not be an adopted approach. PPS7 states that priority should be given to the re-use of previously developed brownfield sites in preference to the development of greenfield sites except if no brownfield sites are available or perform so poorly in sustainability considerations. Brownfield opportunities in the rural area that are not allocated as potential development sites in the Local Development Framework, will therefore continue to be dealt with under the development control system and this system will determine the sustainability merits of each site that comes forward.

1162: The detailed policy approach to rural development will be included in the Tenterden & Rural Sites DPD. If there is a need for

individual settlements to have individual policies accorded to them, then it will be included at this stage in the Local Development Framework process and not at the Core Strategy stage.

1527, 1637, 1559, 1236, 443, 1311, 442, 1312, 1162: Community consultation and input at the local level has helped steer the policy approach set out in the Core Strategy. It would not be appropriate to accord individual policies to all individual villages as many of the issues regarding these villages directly relate to each other in terms of their suitability for accommodating growth. It is felt that having a broad policy approach, covering the similar needs and issues of differing settlements is a far more sound approach. In settlements where allocations in the Tenterden & Rural Sites DPD are proposed, the Council will work with the local residents and Parish Councils to examine the options for site identification.

### **Tenterden and its Role in the Rural Area**

#### Main Issues Raised:

1541, 1442, 1295 & 1136 stated that because Tenterden incorporates a greater range of services and is a more sustainable location than other settlements in the Borough it should have its own set of policies separate to those of the rest of the rural area. 1221 felt that an exact figure for housing, including the expected windfall growth for Tenterden, separate from the rest of the rural area, should be included in the Core Strategy.

1546, 1542, and 1244 raised the issue that Tenterden has the ability to accommodate more growth. 1423 felt there needs to be a broader approach to development in Tenterden as the sites identified in the Local Plan have been developed. Conversely 429 raised a concern that growth in Tenterden should be reduced as it is expected to accommodate a disproportionate amount of new dwellings.

1221 raised the point that there needs to be more emphasis on conserving the heritage and landscape of Tenterden. It was also felt that the amount of linear development in Tenterden which has been allowed in the past needs to be addressed in the future. Defining what actually constitutes the limits of continuous development forming the existing built up area would aid this issue. 1221 also raised the point that there needs to be a reference to the Tenterden Health Check Study undertaken by the Parish Council.

#### Council's Response

429, 1136, 1221, 1244, 1295, 1423, 1442, 1541, 1542, 1546: The Tenterden and Rural Sites DPD, due to be released in its preferred option stage in 2007, will incorporate the following:

- Allocated sites for housing, within the settlements included in the settlement hierarchy, as set out in the Core Strategy;
- Policies relating to these specific allocations;
- Policies specific to the rural area which are not considered to be generic development control issues.

The Core Strategy identifies Tenterden's role in the settlement hierarchy and provides a target figure for residential development up to 2021. There is no need or benefit in having a separate DPD which solely deals with Tenterden. Policies specifically relating to Tenterden and the proposed site allocations to achieve the target figure for growth in Tenterden will be included in detail in the appropriate section of the Tenterden and Rural Sites DPD.

In setting an appropriate target for residential development in Tenterden up to 2021, the proposed settlement hierarchy deals with the issue of Tenterden proportionally accommodating more of the overall growth in the rural areas than other rural settlements (See "Hierarchy of Service Centres in the Rural Areas" section above). However, Tenterden has a unique character and is a real asset to the Borough; it is also one of the most picturesque settlements in Kent and is of great historic importance. Tenterden receives many tourist visits each year, providing many economic benefits to the town and the Borough as a whole. It is imperative that this unique character is protected and where possible enhanced. The allocation of sustainable levels of growth in Tenterden will therefore strike a balance between the need for new development, respecting the fact there are constraints inside and on the edge of the town, and the protection and enhancement of the unique character of the town.

The work done on the Tenterden Health Check Study is welcomed, as is continued participation of the Town Council in the planning process. This study, along with consultation with the Town Council will be an invaluable resource when detailed policy is to be formulated for Tenterden. The Tenterden & Rural Sites DPD is the most appropriate stage of the LDF process to achieve this detail.

The site allocations subsequently made in Tenterden that will be contained within the Tenterden and Rural Sites DPD should achieve this target for residential development set out in the Core Strategy.

### **Wye College**

#### Main Issues Raised:

Imperial College made several responses on the subject of Wye College. These were not all made under Preferred Option 6 but for ease of reference they are dealt with in this section. 1233 stated that there was broad support for the depth of work done by the Council to date in determining their overall vision. However they went on to state that there might be compelling reasons to depart from some of the work done to date. This departure would be pertinent given the emergence of the opportunity of national and local importance offered by Imperial College. 1234 stated that development in the Ashford area should not be limited to that set out in the Masterplan and that an opportunity of national and local importance such as offered by Imperial College could be envisaged.

1237 stated broad support for the focus of activity initially on brownfield land opportunities within the town and stated that the town should be the appropriate location for significant quantum of new development in the LDF period. They proceeded to state however, that development should not be limited to just the town centre given the national and local importance offered by Imperial College. 1235 stated that the council should not solely bring forward redevelopment opportunities in the town centre in advance of major

releases of greenfield land on the periphery of Ashford given the potential to miss the opportunity of national and local importance offered by Imperial College.

1238 stated overall support for fact that there will inevitably be considerable loss of greenfield land due to the growth agenda and supported the Council's view that there are possible implications in future if the permission is implemented on land not in the final LDF proposals for the area. In this context they considered some enabling development offered by Imperial should be included as it is of such importance both locally and nationally that could form a new growth area outside those identified in the GADF. 1197 and 1239 stated that there is support for the Council's recognition in Option 6 of the importance of Imperial College's presence at Wye. They considered the opportunity offered by Imperial College is a proposal that allows Imperial College to retain a major presence at Wye and as such is of such importance both locally and nationally it should not be considered behind Tenterden in light of the full potential that it can provide.

Wye Parish Council (1227) considered that the crucial role played by Wye College should not be promoted at the expense of addressing the sustainability needs of Wye in general. The LDF should recognize the fact that Wye wants to remain economically viable local community in its own right and that development opportunities should be considered from all points of view.

Mersham & Sevington Parish Council (1111) said that in view of internal reorganization that has been taking place within Imperial College and its withdrawal of department from Wye College, they query whether Option 6 is still available.

Kent County Council (1660) fully supports the existence and enhancement of a world class research establishment at Imperial College at Wye.

The Kent Downs AONB Unit (1076) strongly supports the policy to seek to retain the world-renowned College facilities. The range of facilities, including the presence of the large conference centre should be retained and secured. The policy should seek to retain the college at Wye. Wye is a unique AONB village not only within Ashford and this is determined in no small part by the knowledge, expertise, heritage and culture provided by the long-established presence of the college. The college in Wye is an integrated part of the life, community and culture of the village and Ashford as a whole.

1693 and 758 asked how the Council would seek to retain the college.

#### Council's Response:

After the consultation period ended, Imperial College announced its intention to explore the possibility of creating a major new research facility and associated Science Park on land owned by the College at Wye. The College commissioned masterplanning work and began to engage with the local community. The Council considered a 'criteria based' policy approach to tackling the likelihood of a proposal coming forward, but recognising its very uncertain nature. The draft policy was shared with local groups.

In August 2006 it became clear that an initial masterplan was circulating widely. Meetings were held with local groups and the view strongly expressed that no policy should be included in the Core Strategy. Officers responded to the LDF Task Group as follows:

*'The emergence of the masterplan does not, on its own, provide a basis for determining whether or not a policy for Wye is appropriate. However further consideration has been given to whether such a policy is necessary in the core strategy. In this connection existing national regional and local policy provides general guidance against which any proposal for Wye which emerges would be considered and there is thus no "policy vacuum" which a Core Strategy policy would be needed to fill. It has become apparent that it is difficult to articulate additional criteria without venturing into what could be seen as site specific issues, which is not appropriate in a core strategy document.*

*Even if a policy is not strictly necessary, it is relevant to consider whether one would nonetheless be helpful. It has become clear over the past months that there is a serious risk that any such policy could be misconstrued. There is a real risk that the inclusion of such a policy would mislead rather than inform. On balance, in the light of all these matters, it is considered that not including a policy is the better option.*

*It is suggested, however that the text (but not any policy) in the submission version of the Core Strategy should contain general wording similar to the paragraph headed "Wye College " on page 29 of the Preferred Options Report (copy attached), but referring to a "high quality knowledge based presence". This general wording was not subject to any specific objection seeking its removal in the consultation'*

The Task group endorsed the proposal to recommend to the Executive that the Council that there should be no policy reference in the Core Strategy to Imperial at Wye.

Subsequently Imperial College announced that the proposals at Wye would not be taken forward.

1076, 1197, 1227, 1660: Several of the responses express general support but this is qualified by some concerns over the possible impact of a project of unknown scale. The lower case (non policy) wording in the text accompanying CS6 recognises the general importance of the Imperial presence at Wye and concludes *'It is therefore crucial that a high quality, knowledge-based presence remains in the Borough at Wye'*.

1233, 1234: Responses refer to the possible national importance of Imperial's proposals and the need not to be limited to the spatial development strategy envisaged for the Core Strategy. At present, however, there is no basis to consider amending the Core Strategy as there are no clear or firm proposals from Imperial. If such proposals do emerge then the Council will have to consider them on their merits at that time in the context of prevailing national and local policy, including of course, the policy proposed in the Core Strategy. The fact that Wye and the surrounding area sit within the Area Of Outstanding Natural Beauty is obviously an issue of particular importance. Comments noted.

1235, 1237, 1238: These made related points on the need to consider a more flexible approach to Greenfield development. 1238

extends this line of argument to encompass the need for 'enabling development'. This argument is not supported – the extensive masterplanning work for Ashford has created a compact and sustainable model for growth with wide community involvement – there is no clear justification for diluting this approach. Any proposals by Imperial would have to be considered against prevailing national and local policy, especially relating to development within the AONB. There is no national precedent for large scale enabling development in the AONB. In any event Imperial College have since announced that they will not be proceeding with the Wye project.

1197, 1239: Tenterden is a settlement several times bigger than Wye and is the second largest centre of population in the Borough. There is no case to alter the proposed settlement hierarchy and in any event Imperial College have announced they will not be proceeding with the Wye project.

758, 1111, 1693: Imperial College reviewed the previous agriculturally-based academic offer at Wye and considered that it is no longer viable. When Imperial announced its decision not to proceed with the Wye project, the following comment was made about its presence at Wye:

*'The College remains committed to the high quality teaching that takes place at Wye and we will continue to support academic teaching activity there. This includes the highly successful Imperial College/University of Kent Applied Business Management undergraduate degree courses, Masters degrees and the Distance Learning Programmes. As we stated in December 2005, we will review the arrangements with University of Kent in 2011'.*

The Council, and many respondents, acknowledge the importance of the local and wider benefits that the presence of a world class institution such as Imperial College bring to Wye and the Borough. The wording included in lower case (non-policy) text accompanying CS6 acknowledges this – this text is re-produced below:

*'The presence of higher education and related research and businesses at Wye over the years has helped to support a thriving, mixed local community but has also been an important part of the Borough's wider academic and business offer. Work on generating the jobs needed to support Ashford's growth role has repeatedly highlighted the importance of further and higher education. This can improve local skills, create a skilled workforce for incoming investors and generate spin-off businesses arising from local research and development. It is crucial that a high quality, knowledge-based presence remains in the Borough at Wye'.*

## **Restricting Growth in the Rural Areas to Within Confines of Existing Settlements**

### Main Issues Raised:

There was support for continuing the sensitive policy stance towards development in the rural areas with continued tight controls on building in the countryside and that any development will be located within the settlement envelope (1110, 1760, 1067, 332, 240 & 1369).

Conversely there was the issue that a balance should be struck between the need to control development in the open countryside versus aspirations and opportunities to facilitate development outside the confines of settlements, should it be needed to sustain the settlement (467, 936, 230 & 167). 165 took this further and implied that the approach to development should be changed to facilitate development in all of the shortlisted settlements, whether this is within the confines or on the periphery of the settlement.

### Council's Response

165, 167, 230, 240, 332, 467, 936, 1067, 1110, 1369, 1760: A fundamental planning principle is the need to protect the countryside from unrestricted growth and urban sprawl. PPS1 states that new building development in the open countryside away from existing settlements, or outside areas allocated for development in development plans, should be strictly controlled. The Government's overall aim is to protect the countryside for the sake of its intrinsic character and beauty, the diversity of its landscapes, heritage and wildlife, the wealth of its natural resources and so it may be enjoyed by all. It is therefore prudent to primarily seek to locate new development within existing settlements so as to limit the impact on the countryside as much as possible.

However there are cases in the rural area where development will be needed on areas adjoining the settlement, such as a need to expand the settlement or adequately supply local business opportunities. The focus of this new development, whether it be within or adjoining the confines of settlement, relates to the key issues of sustainability. PPS7 states that new development should be allocated within or adjoining existing towns and villages, in order to make the fullest use of the service provision which is located within the confines of existing settlements, such as public transport, leisure facilities and jobs. The policy approach would allow for local businesses to move to a site adjoining a settlement on the proviso that the business is playing an important role in the sustainability of the overall settlement.

This policy approach to development in rural areas is of a restrictive nature and has been successfully implemented in the Borough in the past, preventing sporadic uncontrolled development into the countryside. Core Strategy policy CS7 takes forward the overarching principles of restraint.

## **Rural Local Needs and Affordable Housing**

### Main Issues Raised:

The issues of ensuring that local needs housing is supplied, providing it was in a sustainable location, was supported, regardless of the settlement's size and nature (290, 1660 & 1067). There were a number of representations supporting the Council's approach of identifying local needs through an exception sites policy (429, 445, 1309, 342).

Several respondents felt that the local needs approach was not the correct way forward as it was too restrictive to local people's need for a house. They felt the principle of addressing local need should be expanded to allow enough scope and ability for local people to compete for affordable houses when they are let in the rural area (1236, 482, 787 & 1392). 1660 took this issue further and made the point that there should be an undertaking to assess the local need of the larger settlements and the findings should be included in the Local Development Document process or the Community Strategy.

1392 felt that local needs housing should be more clearly defined and that there should be a reference to affordable housing. 1392 stated that 50% of development should be for households on a single income.

#### Council's Response

290, 342, 429, 445, 482, 787, 1067, 1236, 1309, 1392, 1660: There is a distinction between the affordable housing provided by rural local needs housing development and that provided as a percentage of the overall development on qualifying sites through requirements placed on the developer by planning policy. Rural affordable local needs housing is provided for the residents of the parish in question. Local needs housing has been provided through an 'exception sites' policy in the Local Plan that permits residential development to occur on sites that would not otherwise be acceptable for such purposes. This approach has delivered 23 rural local needs schemes in the Borough and can be considered very successful, as such it is considered that this is still the preferred way to deliver such sites and this is reflected in the supporting text to Policy CS6 of the Core Strategy.

The Core Strategy approach to affordable housing policy where it is to be provided as a percentage of the overall development is set out in the responses to Preferred Options 12 and 13.

All affordable housing for rent is let in accordance with the Borough's adopted Lettings Policy. This provides for the fair assessment of household's housing needs and for homes to be made available via the Choice Based Lettings system. The issue of the local needs approach being too restrictive in terms of allowing local residents enough opportunity to compete for affordable houses when they are let is therefore dealt with under the Lettings Policy.

### **Development Envelopes**

#### Main Issue Raised:

164, 165, 444 and 1310 made the point that the envelopes of all settlements in the Borough should be drawn on a proposals map and not defined in purely textual terms. This map could therefore have all small-scale opportunities, including local needs, annotated on this map.

#### Council's Response:

164, 165, 444, 1310: A textual definition as to the confines of a settlement, as has been adopted in policy for many years, leaves little room for doubt in many planning applications and allows for a consistent approach across the Borough. Indeed this approach has tested on appeal several times and has been a successful tool in ensuring the decisions remain consistently implemented.

Lines on a map may appear first-hand to resolve any dispute but it is felt that the issue of where the line is drawn on a map will cause as much debate as the textual definition and the process of identifying sites does now. Another issue regarding maps is that they would need constantly updating to take account of new developments being completed. Therefore, textual definitions should continue to be used to define the confines of the settlement as it has been successful in the past and allows for a consistent Borough wide approach.

### **Local Views and their Role in the Planning System**

#### Main Issues Raised:

134, 1295, 1544 & 1547 stated that although taking on board local wishes is welcomed it should not be a major contributing factor in the decision making process. Sustainability issues should take priority. 1075 recommended that local views through the Village Design Statement process are an important tool to formulating policy. VDS should therefore be adopted as Supplementary Planning Guidance.

#### Council's Response:

134, 1075, 1295, 1544, 1547: Involving the community in the planning system is one of the key driving forces to ensuring sustainable development. Further details regarding this issue are dealt with earlier in this report, under the "Hierarchy of Service Centres within the Rural Areas" section under local views.

Village Design Statements encourage pro-active participation of community groups who seek to be involved in the planning system. The supporting text to Core Strategy Policy CS9 endorses the VDS approach. A key requirement for the contents of the Village Design Statements is that they are consistent and not in conflict with the Borough's local policy and sustainability aims, as set out in the Local Plan and Local Development Framework.

The arrangements for adopting Village Design Statements during the period of transition to the Local Development Framework are complex and whether a Village Design Statement is adopted as Supplementary Planning Guidance or Supplementary Planning Document depends on several factors. The Council is keen to continue to adopt Village Design Statements as supplementary guidance as this gives them some weight in the planning system. The Council is happy to provide support and advice to local communities in the drafting and adoption of their Village Design Statements.

## **Rural Employment**

### Main Issues Raised:

375 & 1748 raised the points that the rural employment base needs to be able to diversify and this should be acknowledged through the planning system. This should be done in the form of facilitating mixed-use developments, allowing people to live and work in close proximity to each other which in turn would reduce traffic congestion. Conversely 1510 felt that it should not be the role of the villages to provide employment in the first place.

### Council's Response:

375, 1510, 1748: PPS7 states that it is the role of local service centres to promote sustainable economic growth and diversification, to ensure local services are available to local people. The policy approach set out in chapter 6 of the Core Strategy – Tenterden and the Villages, relates to the location of **new** employment opportunities within the rural area. Eventually the LDF will contain appropriate policies to achieve balance levels of employment growth in the rural areas through a combination of suitable site allocations in or adjoining rural settlements and policies designed to achieve adequate flexibility in the use or re-use of buildings for commercial purposes. These are matters that should properly be dealt with in some detail within a site allocation DPD and a Generic Policy DPD that will eventually supersede existing Local Plan policies. It is not felt necessary for the Core Strategy itself to directly address this issue.

## **Miscellaneous**

### Main Issues Raised:

343 stated that HG6 should be expanded from just limiting potential minor development to just 4 dwellings. The context of individual sites should determine the capacity and nature of potential development.

243 suggested the only way that housing would stay affordable would be to build for housing associations, as if they were on the open market, their value would rise like any other house so making them affordable.

1693 noted that affordable rural needs have just been subject for a review and it raises the question why another is required so soon.

265 claimed there is a lack of detail as to the role and importance of the AONB.

214 felt the proposed housing densities are too low. Options for creating higher density housing on brownfield sites in villages need to be sensitively considered and implemented wherever possible.

1067 stated as further growth takes place there will be a need for additional demand for higher/further education places accommodated in this area.

1709 stated that development outside Ashford should also maintain or reduce storm runoff. Consideration should be given to the pollution risk to groundwater and surface waters and the Strategic Flood Risk Assessment for the LDF needs to include the whole Borough.

### Council's Response:

343: Minor development relates to development that is not allocated and is of 4 dwellings or less. This approach has been successful in the past in controlling over-development, especially in rural areas. It is not felt there is any planning justification for altering this policy approach at this present time.

243: The majority of affordable housing at present is built for housing associations. There are restrictions as to who is eligible to purchase such property. Further information on this issue is available from the ABC housing department.

1693: The Council undertook a local needs assessment in 2005. The findings and outcomes of this report will be fed into the relevant sections of the Local Development Framework.

265: The AONB areas are an invaluable asset to the landscape and character of the Borough as a whole. Participation in the planning process with the AONB organisations is welcomed, to ensure their views are taken into account when formulating detailed policy. The Tenterden & Rural Sites DPD will detail a policy approach for the areas of the borough covered by AONB.

214: National housing densities, targets and figures are contained in PPG3 and along with local studies will form the Council's approach to housing density in areas of the Borough. The details of housing densities on particular sites, including brownfield sites, will be dealt with under specific site policy information which for the rural areas will be contained within the Tenterden & Rural Sites DPD.

1067: Planning seeks to balance housing growth with adequate provision of services including education. These services play a huge part in ensuring an area is diverse and sustainable. The nature of these proposals for such service provision will be dealt within the detailed policy documents that are to be released at different stages in the Local Development Framework process.

1709: Policies CS19 and CS20 consider Flood Risk and Sustainable Drainage in which issues of storm water runoff have been addressed; Policy CS20 in particular recognises the role of sustainable drainage (SUDS) in reducing water pollution. A Strategic Flood Risk Assessment (SFRA) for whole of the borough has been carried out and has informed the Core Strategy.

## Preferred Option 7: Design and Sustainability

Representations were received from the following organisations:

219 – Ashford Green Party	812 – Kent Wildlife Trust	1415 – English Partnerships
232 – Churches Together In Ashford	813 – Kent Wildlife Trust	1446 – English Nature
246 – Mr G Hewins	898 – Church Commissioners for England	1447 – English Nature
253 – Stagecoach East Kent	967 – Taylor Woodrow Developments Ltd	1502 – Ward Homes Ltd
272 – Mr J Hosking	946 – WWF	1513 – Berkeley Community Villages
331 – Mr R Shrubb	991 – Taylor Woodrow Developments Ltd	1531 – Ashford Rugby Club
376 – Countryside Agency	1033 – London & Continental Stations & Property Ltd	1560 – Great Chart with Singleton Parish Council
395 – Boughton Aluph and Eastwell Parish Council	1066 – Kent Downs AONB Unit	1577 – GSE Waterbrook Ltd
415 – Shadoxhurst Parish Council	1114 – Mersham & Sevington Parish Council	1630 – English Heritage
447 – Kingsnorth Parish Council	1192 – Mr R Fletcher	1638 – Save Great Chart Action Group
448 – Kingsnorth Parish Council	1206 – Highways Agency	1666 – Kent County Council Strategic Planning
449 – Kingsnorth Parish Council	1262 – Ashford's Future	1678 – Quintain Estates and Developments
450 – Kingsnorth Parish Council	1296 – Tenterden Town Council	1694 – Ashford Partnership
468 – Aldington & Bonnington Parish Council	1307 – CPRE Kent	1710 – Environment Agency
480 – WWF	1308 – CPRE Kent	1726 – Boughton Aluph & Eastwell Parish Plan
749 – Arts Council England – South East	1342 – L Wratten	1756 – Ashford Green Party
786 – South Ashford Parishes Partnership	1380 – Orlestone Parish Council	

### Scale of Sustainable Design Standards

#### Main Issues Raised:

898, 991, 967, 1577, 1033 felt that the standards imposed were unrealistic, with 786 highlighting that although they supported the aspirations they 'could impose an undue burden on developers and thus hinder progress'. Specifically, 898 commented that EcoHomes standards are a matter for Building Regulations 2006.

In addition, 1710 highlighted that the water standards did not match up to the Black & Veatch study carried out as part of the IWMS, while 376 argued that the LDF should encourage new development to incorporate renewable energy production.

#### Council's Response:

898, 991, 967, 1577, and 1033: The standards presented in the Preferred Options paper were taken from the GADF section on Sustainable Development (04.5) which had been based on an assessment of the need for standards, the aspirations of the community and its stakeholders and a review of the trend in sustainable construction standards. The Strategic Environmental Assessment (SEA) and the capacity study (Handbook for Change, 2001) also influenced the setting of these standards. The Core Strategy submission paper has taken forward these standards, albeit in a more concise and consistent format.

These objections must be balanced not only against the findings of the Sustainability Appraisal, Government guidance and community aspirations, but representations from 1066 in support of the standards and from 1307, 448, 450, and 219 that these high and challenging standards should be imposed now. In setting these standards the submission document has revised the standards set and a background document on Sustainable Design and Construction has been prepared to demonstrate the evidence base used in setting the respective standards. The Council feels that the evidence base presented and local studies support the level of standards set and do not impose an undue burden on developers.

In respect of respondent 898, the Building Regulations only covers issues around energy efficiency and energy demand of buildings. The BREEAM/EcoHomes quality assured scheme covers standards around a wider variety of issues from public transport, ecological value of the site, eco-labelled goods, space heating and water use. Furthermore the recent consultation on the Code for Sustainable Homes illustrated the benefit of the EcoHomes scheme, with the code itself expanding to cover issues beyond energy. The Core Strategy submission document therefore continues to take this approach based on BREEAM/EcoHomes.

1710: The Council has carried out further work to look at the various standards being proposed for water and how they are taken forward in the EcoHomes/BREEAM scheme whilst recognising the importance of demand management. Discussions with the Environment Agency have taken place to clarify and accept the level of water standards proposed for the Core Strategy. This includes the setting of a EcoHomes/BREEAM water credit standard rather than a technical water use level.

376 suggested the incorporation of renewable energy on site. In light of best practice, PPS22, the Energy Review and recent statements and studies by Government on the implementation of PPS22, Core Strategy Policy CS10 incorporates a PPS22 policy. This is based on a carbon reduction policy above that of Building Regulations which must be delivered through sustainable energy. This satisfies the response made by 376 and fulfils the guidance in PPS22; it is also commensurate with the levels proposed for wider sustainable construction standards through BREEAM/EcoHomes. The approach to levels of the standards set for carbon reduction is the same of that taken to the BREEAM/EcoHomes standards. The Energy Review (DTI, 2006) outlined how the Government are expecting local authorities through the planning system to set ambitious policies for the percentage of energy in new developments to come from on-site renewables. The standards set out in the GADF and Preferred Options reports were relatively ambitious at the time, these have been adjusted to reflect the recent Governments position and best practice examples.

The reader is advised to read the background document on Sustainable Design and Construction for further clarification.

## Phasing of Sustainable Design Standards

### Main Issues Raised:

Even though there were objections to the specific levels of the standards above, few objections were made to the principle of phasing of higher standards over the LDF period. Objections were made from 1307, 448, 450, 1380, and 219 that these high and challenging standards should be imposed now, rejecting the need to allow 'developers and the public sector time to gear up to meet these objectives. 1666 argued that further clarification and rationale for the level and phasing of standards was needed, yet recognising the urgency of these standards. 946 argued that Ashford must achieve the Z-Squared standards sooner, highlighting that the Code for Sustainable Homes gives 'the green light to the need for higher standards for specific initiatives, such as the Ashford Growth Area'. Other representations 1415, 812, 1447, 1513, 376, 480, and 1192 also gave support to the standards set in the option. In addition 480 and 376 argued that the minimum standards should be brought in earlier, with 376 suggesting that EcoHomes Excellent be set as the minimum, given the relative ease at which 'Very Good' is achieved, 1342 also proposed higher standards with specific policies for solar panels, waste recycling and environmentally-friendly building materials.

### Council's Response:

1307, 448, 450, 1380, 219, 946, 1415, 812, 1447, 1513, 376, 480, 1192, 1342: It was clear from these representations that standards for new developments should go further, and be imposed now. Since the preferred options report was published, changes in what constitutes best practice and economic viability have been published. Government guidance and statements have also set the scene for the Core Strategy to set ambitious targets for renewable energy and for developments to move towards zero carbon and carbon neutral developments (Energy Review, DCLG Speech to the Green Alliance). This is dealt with in the overall objective for Policy CS10 Sustainable Design and Construction and in the detail of how zero carbon developments can be achieved through both energy efficiency, sustainable energy and carbon offsetting.

In response to 376 the Core Strategy has set an overall goal of BREEAM/EcoHomes Excellent for all developments. The Borough Council does not feel it is economically viable at present to set one BREEAM/EcoHomes standard for all developments, but that the best approach is to relate them to the types of developments that are likely to come forward under respective DPDs. Policy CS10 therefore puts in place the mechanism to allow standards to increase over time by ratcheting up at the mid-point in the LDF.

In response to 1342 the Core Strategy is not the place to set specific policies on issues such as solar panels and waste recycling; this will come forward in a Supplementary Planning Document (SPD). The Borough Council believes that the BREEAM/EcoHomes scheme and a sustainable energy policy covers this adequately.

1666 the Borough Council has prepared a Sustainable Design and Construction Background Paper which provides the clarification and rationale for the level and phasing of standards.

## Additional Standards (Health, Biodiversity, Culture and Art)

### Main Issues Raised:

**Biodiversity.** 813 and 376 suggested that standards be developed for biodiversity as they are for the other 4 key themes, further suggestion for clarification over biodiversity principles was requested. 449 set out a strong endorsement of biodiversity and nature conservation in the report.

**Community Safety.** 1694 argued that community safety should be included as a strategic issue within the Core Strategy.

**Culture / Art.** 749, 1666 noted that the LDF should seek to embed culture and public art into the planning and design process by means of an appropriate policy, with 749 advocating the involvement of artists into the Core Principles, Design Codes and public realm.

**Health.** 1694 added that public health concerns should be included in this option outlining a number of key principles from a health perspective.

### Council's Response:

**Biodiversity.** 813, 376, 449: It is very difficult to set standards for biodiversity as it is essentially a qualitative measure. It is important here to make the distinction between the consideration of biodiversity in Option 7 and Option 16. Option 7 focuses on the ability to 'design in' standards into new developments – this is a particular reference to paragraph 14 of PPS9 – Biodiversity and Geological Conservation. Policies around the protection and enhancement of biodiversity are to be found in Option 16, which have now formed Policy CS11. The responses made here reflect the guidance set out in PPS9 that considers a mitigation/enhancement approach for new developments; it states "Plan policies should promote opportunities for the incorporation of beneficial biodiversity and geological features within the design of development". However, PPS9 views planning obligations as the main route to incorporating biodiversity within developments. The Borough Council considers that the BREEAM/EcoHomes scheme and other planning mechanisms will allow for the incorporation of beneficial biodiversity features within the design of new developments, further clarification and support is provided in Policy CS11. The respondents who made reference to PPS9 referred specifically to the guidance on Regional Spatial Strategies on setting targets for the restoration and re-creation of priority habitats. Reference is made to Policy NRM4 of the Draft South East Plan which sets out these biodiversity standards for the region and how local authorities "shall avoid a net loss of biodiversity, and actively pursue opportunities to achieve a net gain across the region". However it is important to remember that aside from the other themes such as energy you are working with pre-existing

conditions that have to be considered in the design of the development. PPS9 requirements have been provided for in a separate Biodiversity policy in CS11, the council will produce guidance in the form of SPD which will show how biodiversity features can be designed-in to new developments.

*Community Safety.* 1694: The Core Strategy outlined a number of Guiding principles in CS1, and in set out the key 'Design Qualities' that will be expected in CS9. One of which is 'Continuity and enclosure' which highlights the need for developments to create a safe environment. This highlights the principles of Secured By Design (SBD) and government guidance. It will be the role of subsequent DPD's and guidance to detail the qualities of community safety and how they can be applied to developments.

*Culture/Art.* 749, 1666: These recommendations will be taken forward into the Core Strategy submission document and fed into the development of the design policies for Ashford. Policy CS9 highlights the role of art in the design of new development and emphasises the role that culture can play in creating quality public spaces and legibility. Further guidance and detail will be provided in SPD.

*Health.* 1694: Key principles from a Health perspective are indirectly delivered through the holistic nature of both the design and sustainable elements of new developments. Health has been incorporated into CS1 Guiding Principles which considers all development within the borough. In addition the standard set out in CS9b for BREEAM/EcoHomes and the use of a Sustainability Checklist reinforces these principles at the detailed level. The importance of health will be supported through Supplementary Planning Documents.

### **Application of Standards to Smaller Schemes**

#### Main Issues Raised:

1531 and 1502 commented that the proposals for full design coding and development briefs should be flexible and responsive to the type and scale of the scheme, and that discussion with planning officers is sufficient enough response. They raised the issue of cost of carrying out these procedures on smaller schemes. 1296 commented that it should be made clear that these standards should apply to all developments.

#### Council's Response:

1531, 1502, 1296: It is recognised that clear guidance is needed to specify what types of sites are appropriate for specific targets, however as a strategic document the standards set out in the options report are being set dependent on the main areas of development likely to come forward in the LDF. Flexibility is already provided within the planning system through negotiations with developers and S106 agreements to allow the many tools available for ensuring high quality design for all types of development. The submitted core strategy will outline these key tools and set the threshold at which they will be applied.

In respect of the process for smaller schemes the Borough Council will make it clear which applications and types of schemes will be required to carry out full design coding and development briefs.

### **Monitoring of Standards / Imposing Standards**

#### Main Issue Raised:

1560, 1694, 1638, 1114, 1415 and 331 raised concerns as to how the standards proposed would be monitored and imposed by Ashford Borough Council.

#### Council's Response:

1560, 1694, 1638, 1114, 1415, 331: As part of the new Local Development Framework, each local planning authority will be producing an Annual Monitoring Report (AMR) which will contain information on the extent to which policies set out in the LDF are being achieved. Applications that meet the standards set out in the Core Strategy will be recorded and feed into this annual report. The enforcement of these standards is a key issue which the Borough Council has considered, ultimately the BREEAM/EcoHomes standards is applied to a development at the design stage. The recent Code for Sustainable Home consultation document suggested the need to assess the environmental standards for a home at the completion stage. Indicators for policies CS9 & 10 have been set and will be recorded and reviewed in line with the AMR. The advantage provided by the BREEAM/EcoHomes scheme is that they incorporate a wide array of statistical data that can be used by the Council in monitoring sustainability.

### **Design & Design Codes**

#### Main Issues Raised:

1694, 1630, 1308 and 447 made specific representations on the use of Design Codes to ensure quality design in new developments. 1694, 1308 and 447 objected to the use of the term 'Ashfordness' when discussing the new urban villages, rather that they should create their own identity and not be swallowed up into the 'Ashfordness'. On the other hand, 1678, 1666, 1513 and 272 supported the use and advantages of using Design Codes in delivering high quality developments, 1666 specifically referenced the emerging Kent Design Guide to support Core Strategy policies.

#### Council's Response

1694, 1630, 1308, 447, 1678, 1666, 1513, 272: The identity and character of new urban villages will be important to making them successful, Policies CS2-5 have outlined the overall approach to the new urban extensions. An SPD will provide the platform and standards in which the identity and character of new developments can emerge. It is accepted that the use of the term 'Ashfordness' in this context does suggest an imposed identity and character of design and reference to this will be removed from

the Core Strategy. The Core Strategy will however set out the key 'qualities' of design in Ashford that the Council wishes to deliver, whilst also allowing for the appreciation of the local context.

The Kent Design Guide is to be adopted by Ashford Borough Council as a Supplementary Planning Document. The Core Strategy will reinforce this through policy CS9 and CS10.

### **Other Representations**

#### Main Issues Raised:

Other issues included the suggestion for policies to encourage waste collection facilities to be designed into new developments (1666). 395 suggested further clarification and detail on environmental capital and landscape character. 1756 and 1206 noted the need for sustainable transport to avoid the dependence on over commuting, to deliver a modal shift to occur. 468 objected to the statement 'New building on the countryside' requesting further consultation with local communities and parish councils.

219, 246, 1066 commented that 'A decent environment and dense building is a contradiction in terms'. 1666 and 232 requested further clarification on the approach to sustainable development and definition adopted in the report.

Other general areas of support included 415, 1262, 253, 468, 395 and 1726. 272 requested that clarity is needed as to the legibility of the whole option raising concerns as to the terms used in the preferred option. While 232 questioned how growth will contribute to the development and regeneration of existing communities for the poorest and most disadvantaged communities?"

1446 welcomed the Council's commitment to delivering sustainable development and particularly valued the inclusion of paragraphs on Environmental Capital and Resource Use and Energy Efficiency.

#### Council's Response:

1666: The adoption of the EcoHomes/BREEAM Scheme will ensure that these features are considered as part of a new development, further guidance will be set out in SPD.

395: This is covered in Policy CS1 and CS9 by relating environmental capital and landscape character to the vision of the borough, and the design qualities that developments will be required to adhere to.

1756, 1206: On a development site level sustainable transport issues will be covered by the design policies and the use of EcoHomes/BREEAM. For wider strategic policies on sustainable transport please see Core Strategy Submission Policy CS15.

468: Details of consultation with local communities and parish council are detailed in the Statement of Community Involvement (SCI), the statement 'New building on the countryside' refers to the approach to growth as detailed in PO1 and CS1.

219, 246, and 1066: New developments will be designed so that the densities required will not have an adverse effect on the urban environment in which it will encapsulate, the design of open spaces, permeability and other urban design qualities as outlined in CS9 will help to ensure that a decent environment is fostered.

1666, 232: The definition which the document adopts is that outlined in the UK Sustainable Development Strategy and interpreted in PPS1. The Core Strategy will make reference to this definition without repeating PPS1.

232: This comment relates to the issue of Ashford's growth and the 'mend before extend' principle which is detailed in PO 2, a response to this is given above relating to PO2.

## Preferred Option 8: Formal Reviews of Progress Towards Balanced, Sustainable Growth

Representations were received from the following organisations:

300 – Churches Together in Ashford	1115 – Mersham & Sevington Parish Council	1639 – Save Great Chart Action Group
330 – Mr R Shrubbs	1200 – Canterbury City Council	1670 – Kent County Council Strategic Planning
394 – Boughton Aluph & Eastwell Parish Council	1207 – Highways Agency	1679 – Quintain Estates & Developments
413 – Shadoxhurst Parish Council	1263 – Ashford's Future	1695 – Ashford Partnership
451 – Kingsnorth Parish Council	1275 – Churches Together In Ashford	1711 – Environment Agency
469 – Aldington & Bonnington Parish Council	1322 – CPRE Kent	1727 – Boughton Aluph & Eastwell Parish Plan
789 – South Ashford Parishes Partnership	1362 – Mr D Goldfinch	1741 – Mr D Goldfinch
995 – Persimmon Homes	1381 – Orlestone Parish Council	2071 – Pentland Jarvis Holdings
	1561 – Great Chart with Singleton Parish Council	

### General Support

#### Main Issue Raised:

330, 413, 469, 1263, 1275 and 1381 all raised general support for the overall approach set out in this Option.

#### Council's Response:

330, 413, 469, 1263, 1275, 1381: These comments are welcomed.

### Monitoring and Review

#### Main Issues Raised:

The majority of respondents commented on the frequency of when reviews should be undertaken. 1362 and 1741 felt these should be yearly, as does 995, which seeks inclusion of monitoring mechanisms to manage delivery of development. 451 felt they should be every 3 years, whilst 1561, 1639 and 789 felt these should be every 5 years. 789, 1115, 1322 also proposed annual monitoring of indicators. 1200 thought there should be a methodology for assessing the strategic relationships to neighbouring districts, 1207 seeks specific targets for Green Travel Plans on main sites in any formal review and 1711 would like to see a group to specifically monitor the progress of water management issues. 1670 felt that the approach was consistent with that advocated in the Kent & Medway Structure Plan but that progress towards the delivery of essential water management infrastructure should be added to the formal review framework.

1679 and 1115 considered any formal review should be independent and 1695 felt the Core Strategy should be part of an integrated review process. 394 and 1727 supported the preferred option subject to there being significant public participation at all review stages.

2071 said that the formal review framework should seek to review the extent to which it has been possible to form a constructive partnership between the public and private sectors.

#### Council's Response

394, 451, 789, 995, 1115, 1200, 1207, 1322, 1362, 1561, 1639, 1670, 1679, 1695, 1711, 1727, 1741: Whilst the LDF period is up to 2021, it is acknowledged that there will be a need for a constant and thorough review of how the LDF is being implemented and how the sustainability objectives contained within it are being achieved. The LDF Annual Monitoring Report provides an appropriate vehicle to give a yearly update on key development indicators that can be used to identify trends or constraints that need to be remedied. However, the LDF should only be part of a more formalised and wider-ranging review process as advocated in Option 8 and in the responses, although some of the targets and indicators upon which such a review would take place are undoubtedly relevant for the Annual Monitoring Report (AMR) to pick up. Whilst the AMR will continue to be carried out by the Council, a wider ranging review process could be independently led through the Ashford's Future Delivery Board.

In terms of timescale, any formal review period needs to allow sufficient time to elapse to test outcomes fairly and to allow the effects of policy changes to work through the planning system. This should be at least 3 years although possibly longer initially as the change from Local Plan to LDF policies need to be given time to take effect. The outcomes of the review could then inform any review of the LDF itself. Any such review would naturally be subject to the proper public participation procedures set out in the LDF Statement of Community Involvement. The Annual Monitoring Report is a publicly available document.

The Kent & Medway Structure Plan sets out a series of performance indicators against which the policies in the Structure Plan will be monitored. These tend to be quantitative indicators but the opportunity for including some qualitative indicators when assessing the delivery of the LDF will be appropriate given the objective of improving the quality of development within the Borough that will be enshrined in the LDF.

Of the specific areas for monitoring mentioned in the consultation responses, the delivery of water management and infrastructure objectives are key to sustainable development and these should be included within both a more formalised review process and as part of the LDF annual monitoring. The monitoring of Green Travel Plans will be site and occupier-specific role and is part of a larger objective of achieving a modal shift in transport patterns and therefore individual GTP's should not be monitored on a regular but rather an ad hoc basis related to individual sites. The relationship of Ashford to adjoining districts should be a matter for the County

(or the Regional Assembly) to consider in the implementation of wider strategic planning policies and not for the LDF Core Strategy.

2071: Private representatives on Ashford's Future Economic Development Working Group. The Council work closely with the private sector through organisations such as the Town Centre Partnership and the Chamber of Commerce. This communication between the private and public sector is an important tool of delivering a successful and sustainable future for Ashford Borough and as such the Council will seek to continue to build on this positive working relationship.

### **Employment Options**

#### Main Issues Raised:

Respondent 300 felt that the Core Strategy missed any reference to the active promotion of small-scale job opportunities.

#### Council's Response:

300: The delivery of a range of job opportunities, both small and large scale will be important to the creation of sustainable growth in Ashford and the Borough as a whole. Policy CS1 is clear that a general balance is required between a growing population and the creation of jobs locally, which is considered to apply to small and large scale opportunities. It will be for subsequent DPDs to identify site specific allocations where small scale job opportunities could be provided and set out detailed land use policies to ensure existing locations are retained and new ones encouraged. The monitoring of land uses and job creation will be necessary.

## Preferred Option 9: Phasing of Development and Land Supply

Representations were received from the following organisations:

220 – Ashford Green Party	1201 – Highways Agency	1562 – Great Chart with Singleton Parish Council
239 – Cllr R Hawes	1216 – Mrs S Dunn	1588 – Chapel House Property Trust Ltd
329 – Mr R Shrubbs	1264 – Ashford's Future	1596 – Kier Property Developments
393 – Boughton Aluph & Eastwell Parish Council	1276 – Churches Together in Ashford	1603 – ZED Homes
416 – Shadoxhurst Parish Council	1297 – Tenterden Town Council	1653 – Home Builders Federation
452 – Kingsnorth Parish Council	1305 – Westbury Homes (Holdings) Ltd	1671 – Kent County Council Strategic Planning
470 – Aldington & Bonnington Parish Council	1321 – CPRE Kent	1680 – Quintain Estates & Developments
790 – South Ashford Parishes Partnership	1382 – Orlestone Parish Council	1696 – Ashford Partnership
885 – Central Police Training and Development Authority (Centrex)	1398 – PAR Property Development Ltd	1728 – Boughton Aluph & Eastwell Parish Plan
934 – Mrs E Wills & Mr R Scrimshaw-Wright	1406 – Mr K Blanshard	1755 – Quintain Estates & Developments
1034 – London & Continental Stations & Property Ltd	1416 – English Partnerships	1758 – English Heritage
1118 – Mersham & Sevington Parish Council	1467 – Malcolm Jarvis Homes Ltd	2072 – Pentland Jarvis Holdings
	1501 – Ward Homes Ltd	
	1517 – Berkeley Community Villages	
	1532 – Ashford Rugby Club	

### General Support

#### Main Issue Raised:

416, 1264, 1276, 1297, 1382 and 1034 supported this preferred option, whilst 470, 1562 and 790 agreed that it is a logical way forward.

#### Council's Response:

416, 470, 790, 1034, 1264, 1276, 1297, 1382, 1562: This support is welcomed.

### Deciding on the order of release of allocated sites

#### Main Issue Raised:

Objections 1517, 885, 1588, 1398, 1467, 239, 1305 reflected developer and landowners' views and questioned whether a proposed site or area should be brought forward to the earliest phase. Similarly, 1603 felt that substantial available land and sites were being held back to beyond 2011. 1596 felt that a clear reference to the prioritisation of urban and brownfield regeneration sites had been omitted from Preferred Option 9. 1603 questioned why many central, brownfield sites were phased for development post-2011, despite major greenfield releases in the earlier phase. They consider some central sites to have been pushed back beyond the LDF period, post 2021, when Ashford's peripheral growth is shown to be extensive in earlier phases.

#### Council's Response:

239, 885, 1305, 1398, 1467, 1517, 1588, 1596, 1603: The phasing proposals in GADF provide the basis for the LDF Core Strategy approach in which Urban Initiatives have developed a Strategic Growth Model (SGM) to locate the overall quantum of development within the context of Ashford. There are several factors that set out the criteria used to determine which of the allocated sites should be released first, and which should be released later. This sequence reflects the priorities outlined in the Sustainable Communities Plan, and considers the timeframe over which sites might become ready for development and when they are likely to deliver housing completions. The sites are also assigned to a particular phase so as to provide sufficient opportunities to provide an adequate supply of dwellings to meet the RPG housing requirements. Either because of the size, or the length of phasing period, some larger sites may extend beyond the phase to which they have been assigned. The chosen criterion also reflects the 'mend before extend' approach and the need to make best use of urban sites, it places strategic priority on the need to relate developments to key social and physical infrastructure being provided to service it, particularly the public transport system. The preferred broad distribution of development identified for any one phase is not unduly inflexible or definitive at this stage, area specific action plans will focus on the phasing detail within the relevant LDDs.

### Phasing Periods

#### Main Issues Raised:

1755 and 1653 objected to the two broad phasing periods, with the latter suggesting three 5-year phases commencing from 2006. 1406 objected to the proposed boundary date of 2011 considering there to be insufficient time for any strategic infrastructure to be negotiated proposing phases from 2007-14 and 2014 - 2021. 1588 considered it unlikely that any of the planned development would take place before 2010/11 and that the number of houses that may be brought to the market would be well below assumed numbers. 1671 supported the phasing strategy but stressed that the detailed phasing needed to take into account the development of sustainable transport and in particular viable public transport services from as early as possible, in particular the proposed development of the SMARTLINK guided bus network. 2072 considered that the phasing methodology is flawed and should be

explicitly stated.

Council's Response:

1406, 1588, 1653, 1671, 1755: Phasing is the Council's preferred method to manage land supply. This is in line with the Kent and Medway Structure Plan Policy HP2 which states that *"each local planning authority will phase and manage the release of sites for housing development to ensure that provision accords with the requirements of the growth areas and area based policies specified in this plan; the housing requirements for each district for each of the phasing periods set out in Policy HP1 are met; and generally previously developed sites are brought forward before greenfield sites."* The LDF will cover the period to 2021 with the first proposed phasing period (2001-2011) managed to avoid land supply interruptions where allocated sites in the adopted Ashford Local Plan may have been released for development overlap with the early years of the new development plan documents. The second proposed phase (2011-2021) is planned to cover the period up to the end of the LDF making the phasing strategy a simple one. The two ten-year durations provide enough flexibility to cater for variations in the rate and periods over which sites deliver completions. Longer phase durations would be impracticable and would require a high level of certainty as to which sites would come forward. Shorter phase durations would provide insufficient time to enable decisions to be made regarding major infrastructure investments in and around Ashford.

2072: The Council disagrees that the phasing methodology is flawed, considering it to be appropriate for the reasons set out above.

**Over-Supply**

Main Issues Raised:

452 expressed concern over the planned 15% oversupply of housing land and did not welcome the consequences that an additional 3-4,000 dwellings would bring. Similarly, 1696 acknowledged that an oversupply could create 3 - 4,000 extra dwellings. 1321 was prepared to accept the oversupply principle but did not want the consequences to be an extra 3-4,000 dwellings. 1728 and 393 consider there to be no need for an oversupply of land and wanted phasing to be carefully controlled to prevent unnecessary or premature development of greenfield land. 220 objected to the oversupply of land in favour of a more realistic timetable for expansion.

1588 welcomed the oversupply of 15% of housing land but felt that it was inadequate and wanted to see the whole phasing strategy re-assessed. 1416 and 934 also supported the provision of an oversupply. 1118 supported the preferred option but suggested that where an oversupply of land would result in extra houses being built in Phase I, or Phase II then the number of dwellings built in Phase III should be reduced accordingly. 1680 supported the principle of an oversupply but felt that the 2,500 allocated figure for the town centre should be a minimum and to aim to bring this forward by 2011.

Council's Response:

220, 393, 452, 934, 1118, 1321, 1416, 1588, 1680, 1696, 1728: The oversupply figure is designed to provide a level of flexibility particularly needed for Ashford's circumstances as a growth area. The complexities that are often associated with providing infrastructure, legal agreements, land ownership issues and other approvals all have the potential to impact on the timescales envisaged. Therefore an additional level of supply has been shown in each of the two phases and is an estimate of the level of planned supply needed to actually achieve the requirements set out in regional policy. It is proposed that a 15% oversupply is applied to allocations within the Ashford urban area, excluding the town centre (policy CS4 in the Core Strategy) which would result in allocation of around an additional 600 units in or adjoining the urban area. The residential capacities of both the town centre and the proposed urban extensions are carefully planned to take account of site availability, potential acceptable scales and densities of development, critical mass to support services and environmental impact. The proposed allocation of 2,500 dwellings in the town centre is supported by research into comparative footprints of towns with similar populations to Ashford. In order to understand the implications of the scale of growth the consultants have analysed a number of comparative towns to provide basic physical comparisons and which could also indicate the positive features and investments that a town of a certain size was able to achieve.

There is no sound justification for a planned oversupply of residential allocations in the rest of the Borough. Should allocated sites in the Tenterden & Rural Sites DPD not come forward as expected, additional allocations could be made through a limited review of the DPD. This managed and monitored approach is particularly appropriate in villages where higher growth than is necessary should be avoided in order to protect the intrinsic rural character.

**Monitoring and Review**

Main Issues Raised:

1653 objected to Option 9 and felt that it will not be acceptable to have to wait for the first ten-year period to elapse before any action is taken to address either holding back or releasing additional sites if annual monitoring many years earlier suggests action is needed. Similarly, 329 would like to see the release of land being reviewed at regular short intervals.

Council's Response:

1653, 329: Monitoring is essential to maintain an adequate supply of land and to enable its managed release. Information obtained from monitoring will be used to track progress in respect of the Council's policies and will flag up any problems in supply. A review of the phasing strategy should occur every five years, or sooner if there are indicators of either under or over-provision in the supply of housing land.

**Infrastructure**

**Main Issues Raised:**

1588 stated that many of the Council's preferred housing sites required significant infrastructure provision to be made before they may be brought forward for development. They felt that the phasing of development is inappropriate and favoured allocations that are dependent upon major new investment in infrastructure, and considered the proposals to undervalue those allocations that can be bought forward more quickly and at less cost. 1501 and 1532 wanted to see prioritisation and early implementation given to those developments that can deliver physical or social infrastructure needs. 1758 stated that the timely delivery of infrastructure is an issue for the whole of the South East including Ashford. 1201 stressed the need for an immediate understanding of the infrastructure requirements for the separate phases. 1201 also felt that in order to maintain a safe and efficient trunk road the same approach to phasing should be applied that is already set out for South Ashford, where a percentage of the development comes forward before the Interim Scheme, a further percentage after the Interim Scheme and the remainder when Junction 10a is in place. A similar approach could also be needed at Junction 9 of the M20. 2072 said the Core Strategy should explicitly state that the Council should not seek to frustrate and slow down new development by seeking payments for infrastructure deficit created by past developments.

**Council's Response:**

1588: the objection related to the promotion of development in the Kingsnorth area, which is dealt with elsewhere. The Council believes that the phasing of development within the LDF period is achievable based on realistic assumptions about the delivery of strategic and local infrastructure and the objector has presented no evidence to the contrary in their representation. In any event, an over-supply allowance within the Ashford urban area is included in policy CS4 of the Core Strategy and it would be inappropriate and contrary to Government planning policy guidance to include additional significant greenfield land ahead of available brownfield land.  
1501, 1532: The Core Strategy at policy CS4 sets out that in making site allocations, or in determining planning applications on windfall sites, within or adjoining the Ashford urban area, the Council will give due consideration to greenfield developments that would help to deliver key infrastructure or services for the benefit of the locality or the wider town. This element of flexibility set against a PPG3 compliant sequential approach to release of housing sites is considered to be desirable in the context of the major levels of new development proposed for Ashford.

1758: agreed. The Council is keen to take advantage of relevant good practice and guidance from elsewhere.

1201: agreed. The Highways Agency has commissioned the Ashford Highways & Transport Study (AHTS) to establish highway infrastructure requirements for the whole GADF period to 2031. That is a Background Document to the Core Strategy. The implementation of new development relying upon new capacity associated with those requirements may need to be conditioned as suggested in the representation as happens today around Junction 10.

2072: the strategic tariff approach has been developed to help ensure that an appropriate level of infrastructure is in place to enable sustainable continued growth. This approach creates a central fund which will be used to pay for all of the infrastructure required. As this approach seeks a contribution according to a set formula which will apply to all residential developments, developers will be fully aware of the level of contribution sought from an early stage, thus encouraging a smoother, quicker process.

**Urban Villages**

**Main Issues Raised:**

1321 objected to the building of one urban village at a time and would like this proposal to be re-evaluated. 1216 wanted to see the building of the urban villages being completed sequentially so that full services can be provided in each as they develop.

**Council's Response:**

1321, 1216: The option of building the proposed major urban extensions sequentially would fail to deliver adequate development within the timescales indicated in regional planning guidance and the Structure Plan and could result in added pressure to release piecemeal greenfield development poorly related to the sustainable growth model upon which the Core Strategy is based. There is no reason to conclude that the simultaneous construction of the Chilmington and Cheeseman's Green/Waterbrook areas should result in delays in either extension being populated to the point where a critical mass for infrastructure and service provision. Not developing one of those areas does not mean that the other would come forward any quicker.

**Windfall Sites**

**Main Issues Raised:**

934 felt that the cumulative windfall total should take account of the fact that we are dealing with a 15-year period until 2021 and not a 20-year period and the past trend of an average windfall of 35 units may not be good in the planning policy prevalent era within which development now has to take place.

**Council's Response:**

934: the Council considers the assumption of 35 units per year from windfall sites in the rural areas is a reasonable assumption based upon actual completions over the last 5 years. The objector puts forward no compelling reason or evidence to suggest a different assumption should be made and so no change is proposed.

## Preferred Option 10: Delivering the Range of Physical and Community Infrastructure

Representations were received from the following organisations:

174 – Wm Morrison Supermarkets plc	981 – Taylor Woodrow Developments Ltd	1518 – Berkeley Community Villages
222 – Ashford Green Party	987 – Taylor Woodrow Developments Ltd	1533 – Ashford Rugby Club
223 – Ashford Green Party	1038 – London & Continental Stations & Property Ltd	1563 – Great Chart with Singleton Parish Council
224 – Ashford Green Party	1068 – Kent Downs AONB Unit	1578 – GSE Waterbrook Ltd
233 – Churches Together in Ashford	1040 – South Kent College	1580 – Millwood Designer Homes Ltd
291 – Ashford Rural Trust	1074 – Kent Downs AONB Unit	1589 – Capel House Property Trust Ltd
328 – Mr R Shrubbs	1120 – Mersham & Sevington Parish Council	1597 – Kier Property Developments
377 – Countryside Agency	1126 – Tower Homes Ltd	1604 – ZED Homes
392 – Boughton Aluph & Eastwell Parish Council	1202 – Highways Agency	1606 – Future Ashford Community Infrastructure Group
417 – Shadoxhurst Parish Council	1232 – Mr M Nee	1627 – Kent County Council Property Group
430 – Weald of Kent Protection Society	1265 – Ashford's Future	1641 – Save Great Chart Action Group
453 – Kingsnorth Parish Council	1298 – Tenterden Town Council	1697 – Ashford Partnership
471 – Aldington & Bonnington Parish Council	1320 – CPRE Kent	1681 – Quintain Estates & Developments
750 – Arts Council England, South East	1337 – Ashford Primary Care Trust	1715 – Environment Agency
794 – South Ashford Parishes Partnership	1372 – Westwell Parish Council	1729 – Boughton Aluph & Eastwell Parish Plan
972 – Taylor Woodrow Developments Ltd	1383 – Orlestone Parish Council	2073 – Pentland Jarvis Holdings
	1399 – PAR Property Development Ltd	
	1417 – English Partnerships	
	1500 – Ward Homes Ltd	

### Supporting comments

#### Main Issues Raised:

A number of comments expressed general support for the tariff approach. Many of these make other points, including:

- The need to relate the tariff to wider funding, especially from Government (453, 1417, 328, 1120)
- The need to include a clearer list of infrastructure covered by the tariff spend, including 'green infrastructure' (377, 1074) wider health and social facilities etc (1606).
- The process needs to allow for regular review (1681); should distinguish between brownfield and Greenfield sites (1681) and should allow parish councils discretion over spending in the rural areas (453).
- Option 10 should incorporate explicit reference to the urgent need to establish a delivery company with whom developers can enter into contractual relationships (2073).

#### Council's response:

453, 1417, 328, 1120: The point about wider sources of funding is accepted – it has always been clear that the tariff can only fund a proportion of the full costs of infrastructure arising from Ashford's growth. Mainstream Government funding and investment from service providers and connection charges will continue to contribute the lion's share. In addition, special funding streams such as the Community Infrastructure Fund and other growth area funding have an important role to play. An overall Delivery Plan is being prepared and has helped to inform the tariff approach. It is being discussed with major landowners with the intention of being used in an agreed form to guide future infrastructure investment programmes.

377, 1074, 1606. Whilst the policy includes a broad list of spending areas, it cannot replicate the Delivery Plan which will take all important elements of infrastructure, costs them and identifies funding sources and delivery timetables. The detail sought by some of those responding will be addressed in the Delivery Plan and in the SPD that will be produced to support the Core Strategy and set out how the policy will be applied in detail.

1681, 453. The policy as drafted allows both for regular review of the tariff, and distinguishes between Greenfield and brownfield land.

2073: The delivery mechanism will be set out in detail in the Infrastructure Contributions DPD.

### Points of omission

#### Main Issues Raised:

1337, 1715: Concerned the amount of emphasis given to health and SUDS respectively.

233, 750, 1202: Related to process and organisational issues that will be explained in more detail in the SPD supporting this policy. They are not issues for the level of policy in the Core Strategy.

1372, 1298, 1563: Related to implementation and the timing of delivery and agreement regarding maintenance etc.

Council's response:

1337, 1715: The policy as drafted refers to both of these important issues – all infrastructure that is needed is important for different reasons; the policy does not attempt to distinguish between levels of importance. The Delivery Plan will help to clarify this and the timing of key infrastructure (taking the lead from the Greater Ashford Development Framework). The decision making process and the respective roles of the Borough Council, the Ashford's Future Board and other key stakeholders are the subject of current, parallel work.

233, 750, 1202: These points are acknowledged and are tackled in outline in the Core Strategy but will need to be dealt with in more detail in the accompanying SPD.

1372, 1298, 1563: The delivery process that will work behind the tariff policy is being designed to offer more certainty around the timing of investment in infrastructure. Where appropriate and justified, contributions to the future revenue costs of maintenance of off-site facilities are included in the tariff.

**Process issues – designing and using the policy**

Main Issues Raised:

1679, 981, 972, 987, 1578, 1500, 1038, 222, 1533, 1589, 1518 Express general concerns that policy approach:

- Needs to be fair and open and provide certainty
- Needs transparency on how tariff is spent and developers and landowners need to be involved
- Needs a carefully managed approach to delivery across partners
- Is possibly inflexible and not funding key areas
- Needs closer links between local and central government
- Needs to take account of viability
- Needs more detail on costs
- Needs to include small sites/ or may not be appropriate to do so
- Needs release of smaller development areas to maximise contributions
- Should not be reviewed more frequently than every 5 years

The Council's response:

The need for fairness and an open and transparent approach is central to the tariff initiative. Developers, the general public and stakeholders generally need to know what infrastructure will be provided when and they need greater certainty that it will be delivered. The approach of producing a Delivery Plan, based on a robust cost plan, and seeking buy in from all main public and private sector partners is designed to deliver this greater certainty. The approach proposed is an innovative one and one that needs commitment from central and local government, from the private sector and all key service providers.

The policy proposed is in line with the principles established in circular guidance (5/05) and reflects the guidance there that local authorities in growth areas can consider tariff arrangements to respond to the complex pattern of infrastructure needed in such areas. The text supporting the policy emphasises the need to show how tariff proceeds are being spent in a regular monitoring report. Landowners have been involved in the process to date and will continue to be so.

The delivery arrangements will need careful management and a robust framework is needed to oversee the process to ensure a good match between the pattern of infrastructure provision and the needs it is meeting. A delivery structure is being devised at present that will meet this need, protecting the roles of all key players – landowners, local authorities and other service providers and, of course, the community as a whole.

Allied to the tariff arrangements is the wider issue of mainstream Government funding and specific funding through growth area allocations etc. A dialogue with Government and, in particular, the key spending departments is underway. It is important that the public sector funding commitments are clear – this helps to generate the confidence needed by the private sector to make major long term investments in the town. Public sector commitment to the delivery plan will be important if the co-ordinated approach to providing infrastructure is to succeed.

The viability of development must not be undermined by the requirements of the tariff – this would simply slow or halt development. The likely rate of tariff has been tested with major landowners and, whilst there is no final agreement on a precise figure, there is a degree of consensus about the range within which the tariff is likely to fall. This will be established in the supporting SPD. It will be set at a level that will not, in normal circumstances, remove the incentive to develop.

There will always be exceptional sites (e.g. difficult brownfield sites) and circumstances where a flexible approach will be needed. The policy recognises this and the need in these circumstances to take a flexible approach – typically by having an 'open book' debate on the viability of the project. This can lead to a changed pattern of contributions – both on site and in terms of the tariff rate applied. Such an approach is already used where abnormal costs affect the ability of some developments to fund the full range of on-site infrastructure.

It is not appropriate for the Core Strategy to provide full details of costs – the SPD proposed will cover these and many other aspects of detail.

The policy sets the lowest threshold – one dwelling and above – for contributions to be needed to the tariff. The issues here include equity – the need for infrastructure is generated by individual households so why should small schemes not contribute – and the

administrative costs of collection in relation to the income. It is envisaged that standardised and relatively simple means of collection will be used making the overheads low.

It may be the case that releasing more medium and small sized sites would make scheme more able to afford higher levels of tariff and to provide payments quicker. Whilst this might be the case, the broad strategy for development set in the Core Strategy stems from the earlier masterplanning work for the GADF. This has created a deliberately compact form of development and, for new developments/communities, a general assumption that sustainable, lively and well-served communities need a certain critical mass. Whilst a much more scattered distribution of development could be proposed it is hard to see how this would result in a sustainable pattern for Ashford's growth. Within the major development areas there will be opportunities to create different styles of development to cater for different parts of the market – each with an identifiable sense of place. To this extent a carefully planned growth along the lines suggested in this Core Strategy can occur on a number of fronts at any one time.

The SPD behind this policy will need to be periodically reviewed – equally the private sector needs as much certainty as can be provided about long term commitments. There is a balance to be struck here as circumstances will change and reviews be needed – the policy in the Core Strategy suggests a review period of between 3-5 years. Such a review may in fact be in the landowners' interests.

### **Timing issues**

#### Main Issues Raised:

1604, 1597, 291, 1518, 1578, 1641. Concern was expressed that the tariff should be implemented as soon as possible. A more general point was that infrastructure needed to be provided 'up-front', without having to rely on development taking place. The difficulty funding the tariff contributions early in the development process was highlighted and the need for public sector support to help the cash flow when infrastructure is needed early.

#### The Council's response:

There is an obvious need to put in place a clear way of helping to support the co-ordinated programme of infrastructure needed in coming years. As a general principle, infrastructure should be in place to meet needs as they arise – in the medium term this is one of the aims the tariff aspires to, thereby helping to tackle the wide public disaffection with more traditional approaches. The problem of the early cash flow to fund heavy up-front costs of infrastructure is a very real one – Government investment through the growth areas fund; the national roads programme (junction 10a) and indirectly through organisations such as English Partnerships can all help to provide this early financial support. Often these early costs can be recouped later in the development cycle when the value of completed development can be realised.

### **Issues beyond the growth area**

#### Main Issues Raised:

392, 1320, 1068, 1627, 1729 The view was expressed that villages should retain control of spending over all locally generated tariff money. More generally, there was a concern that funding should be available to tackle the 'downstream' effects of major development. Impacts on the AONB should also be mitigated. In Tenterden and the villages KCC seek more consultation on the issues.

#### The Council's response:

The Core Strategy policy proposes an enhanced approach to developer contributions from residential developments outside the Ashford Growth Area but excludes development from the strategic tariff proposed in policy CS8. This approach recognises that development in those areas, whilst of a much smaller scale in general, may generate some strategic or off-site needs that should be met through a developer contribution in addition to any identified on-site requirements. This will ensure that the scale of any localised needs in Tenterden or the villages can be taken into account in the site allocation process and requirements identified through the DPD process. To apply the strategic tariff for the Ashford Growth Area to a different set of sites with different needs is felt to be less justified against Government policy guidance in Circular 5/05 and retains less of the developer contribution benefit for each locality.

### **Policy coverage**

#### Main Issues Raised:

174, 1126, 291, 1627, 1399 The tariff should not apply to 100% affordable schemes. There is a need for further health facilities. A new golf club should be identified as a major piece of community infrastructure. Sites should be earmarked for general KCC/ community use. The tariff will need to apply to adult education, libraries and youth and community provision.

#### The Council's response:

The policy includes affordable housing as being subject to the tariff. Occupants of affordable housing create additional demands on infrastructure in much the same way as any other household – the case for exclusion therefore is primarily one of the economic impact on scheme delivery. The difficulty here is that public sector funding regimes change over time and may or may not be able to encompass the additional costs of the tariff. The Council would not wish to discourage RSL involvement in the town and will therefore have to explore the practical implications of this aspect of the policy approach and revise the approach as needed. As the policy stands, it encourages a flexible approach based on an open book assessment of project viability.

Various detailed site specific points are not relevant to the Core Strategy and will need to be tackled in subsequent DPDs. The policy refers to a range of strategic infrastructure including these specific services but is not designed in any event to cover every possible form of provision needed. The supporting SPD will provide more details.

## Preferred Option 11: The Organisational Framework for Delivering Ashford's Future

Representations were received from the following organisations:

234 – Churches Together in Ashford	791 – South Ashford Parishes Partnership	1590 – Capel House Property Trust Ltd
294 – Ashford Rural Trust	806 – Kent Wildlife Trust	1642 – Save Great Chart Action Group
327 – Mr R Shrubb	1121 – Mersham & Sevington Parish Council	1682 – Quintain Estates and Developments
390 – Boughton Aluph & Eastwell Parish Council	1266 – Ashford's Future	1698 – Ashford Partnership
418 – Shadoxhurst Parish Council	1319 – CPRE Kent	1714 – Environment Agency
454 – Kingsnorth Parish Council	1384 – Orlestone Parish Council	1730 – Boughton Aluph & Eastwell Parish Plan
472 – Aldington & Bonnington Parish Council	1418 – English Partnerships	2074 – Pentland Jarvis Holdings
	1564 – Great Chart with Singleton Parish Council	

### Support

#### Main Issue Raised:

390, 418, 454, 472, 791, 1121, 1266, 1384, 1564, 1642 and 1730 supported this option. 1121 emphasised that the timing of infrastructure delivery must take precedence.

#### Council's Response:

390, 418, 454, 472, 791, 1121, 1266, 1384, 1564, 1642, 1730: This support is welcomed. The Council recognises that the timing of infrastructure delivery will be vital to the success of Ashford's growth.

### Role of the Board

#### Main Issues Raised:

294 believed that the Council is not acting as a unified body with the result that much of the responsibility for final decisions rests firmly with the Council Leader. 327 would like the Delivery Board to play a part in consulting with the public, to educate them on the Development Plan.

1682 supports Option 11 but considered it important that the Board has the resources and expertise to produce the Delivery Plan. 1418 also supported Option 11 but felt that consensus and shared ownership needed to continue to be developed with the private sector and other organisations not represented on the Board and LSP, and this will be essential in the delivery of the Infrastructure Delivery Plan. 1319 was in general agreement with Option 11 and welcomed the fact that the LSP is to play a vital, key role in the Delivery Plan, and would like to see this specifically mentioned in the Options statement. 234 fully accepted that the LDF 'cannot be an isolated land use planning document' but wanted this statement to be an explicit and prominent part of the Core Strategy's introduction.

#### Council's Response:

294: The Council is a democratically elected body and it is the role of the Leader and his Executive to take responsibility for the Council's policies. However, the growth model proposed in the GADF was approved by the whole Council with only one vote against.

327: Agreed. All the Delivery Board partners have a role to play in explaining and educating the public on the masterplan for Ashford's growth.

234: The supporting text to policy CS1 of the Core Strategy highlights the linkage of the LDF to the Community Strategy and several other sub-strategies that focus on particular topics or issues.

1319, 1418: It is agreed that the LSP and other partners have a key delivery role in implementing the LDF and that the Core Strategy represents a starting point for a shared 'vision' of the Borough's future growth.

1682: Agreed.

### Representation on the Board

#### Main Issues Raised:

234 objected to Option 11 and expressed concern over the omission of the Voluntary and Community sector from representation on the Board, which they considered to be vital to the delivery of essential infrastructure. Their recommended solution would be to use one of the current LSP members as a Board member or seek through RAISE a strategic representative from the Region. 806 felt that the Core Strategy fails to involve environmental agencies in the delivery of sustainable development. 1590 would like to see landowners and developers represented on the Board. 1714 considered there to be two main areas that need organisation change: delivering water efficiency, in both new and existing communities, and the adoption and management of SUDs.

2074: stated that a delivery company with whom developers can enter into contractual relationships is required.

#### Council's Response:

234: It is agreed that the voluntary and community sectors can play an important role but that should not necessarily require direct representation at Delivery Vehicle level. These interests are represented on one of the Ashford's Future Working Groups that discuss detailed management and implementation issues.

806: It is implicit in the Core Strategy that environmental bodies will play an important role in the delivery of Core Strategy policies – an explicit statement is not necessary.

1714: Both water efficiency and SUDs are specifically covered in Core Strategy policy at CS10 and CS20. Organisational change is not a matter for the LDF to specifically address.

1590: The development industry is already represented on the Delivery Board (Robin Pyle – Land Securities). Individual landowner / developer representation would be inappropriate, at least at the forward planning stage, due to obvious competing commercial interests.

2074: A delivery board will be set up to deliver the required infrastructure. Full details of this will be set out in the Infrastructure Contributions DPD.

#### **Links between the Board and the LSP**

##### Main Issues Raised:

1698 and 234 agreed with the reference to 'vital and inter-related roles' played by the Board and the Local Strategic Partnership [LSP] but felt there has been little opportunity to create dialogue between these bodies at Board level and this should be a priority. 1698 and 234 currently consider the Board and LSP to be delivering their own agendas and would like an explicit organisational framework to be envisaged by the Core Strategy in order to overcome the difficulty of ensuring a 'contract' to deliver'. 234 considered there to be a substantial lack of commitment to the LSP and consider there to have been insufficient effort made to integrate work on the Community Strategy and the masterplanning work.

##### Council's Response:

234, 1698: The links between the Community Strategy and the LDF are expressed clearly in the Core Strategy and these can act as a proxy for the relationship between the LSP and the Delivery Board. The precise nature of that relationship and how it can be most efficiently delivered is not a matter for the Core Strategy to deal with specifically.

## Preferred Option 12: Affordable Housing

Representations were received from the following organisations:

225 – Ashford Green Party	1122 – Mersham & Sevington Parish Council	1591 – Capel House Property Trust Ltd
227 – Ashford Green Party	1199 – Canterbury City Council	1598 – Kier Property Developments
228 – Ashford Green Party	1215 – Places for People Group	1605 – ZED Homes
244 – Mr G Hewins	1267 – Ashford's Future	1607 – Future Ashford Community Infrastructure Group
277 – Churches Together in Ashford	1299 – Tenterden Town Council	1643 – Save Great Chart Action Group
296 – Ashford Rural Trust	1318 – CPRE Kent	1651 – Home Builders Federation
326 – Mr R Shrubbs	1370 – Westwell Parish Council	1662 – Kent County Council Strategic Planning
389 – Boughton Aluph & Eastwell Parish Council	1385 – Orlestone Parish Council	1683 – Quintain Estates and Developments
419 – Shadoxhurst Parish Council	1420 – English Partnership	1713 – Environment Agency
455 – Kingsnorth Parish Council	1497 – Ward Homes Ltd	1731 – Boughton Aluph & Eastwell Parish Plan
473 – Aldington & Bonnington Parish Council	1514 – Berkeley Community Villages	2075 – Pentland Jarvis Homes
793 – South Ashford Parishes Partnership	1535 – Ashford Rugby Club	
989 – Taylor Woodrow Developments Ltd	1565 – Great Chart with Singleton Parish Council	
1059 – Kent Downs AONB Unit	1581 – Millwood Designer Homes Ltd	

### General Support

#### Main Issue Raised:

277, 326, 419, 455, 473, 793, 1059, 1122, 1267, 1318, 1370, 1420, 1514, 1607, and 1662 supported the preferred option.

#### Council's Response:

277, 326, 419, 455, 473, 793, 1059, 1122, 1267, 1318, 1370, 1420, 1514, 1607, 1662: This support is welcomed.

### Housing Need Assessments

#### Main Issues Raised:

Several representations relates to the fact that the definitive policy position regarding the proportion of affordable housing that will be required and the site threshold to which it will apply should only be determined after the completion of the council's housing needs assessment (389, 989, 1497, 1535, 1581, 1591, 1598, 1605, 1651, 1731, and 2075).

Affordable housing targets should not render development unviable and the council needs to demonstrate that it has assessed the financial implications and has properly balanced the objectives of securing the regeneration of brownfield sites with the need to provide affordable housing.

It is claimed that between now and 2021 house prices will change and could fall, making any needs survey redundant and in need of review. In such circumstances including specific percentages within the Core Strategy could result in inflexibility. There is uncertainty that sites can provide the 35% particularly given the extent of planned infrastructure requirements. It would be more appropriate to state that this figure is a target and that site-specific circumstances will be taken into account when determining any final percentage figure. The policy should explain that negotiation would form an important part of the process of determining the final amount of affordable housing to be provided on each site.

1199 said there should be reference to the need from surrounding areas having been taken into account in the affordable housing targets.

#### Council's Response:

389, 989, 1497, 1535, 1581, 1591, 1605, 1651, 1731, 2075: A number of respondents have raised the issue of the status of the Council's Housing Needs Assessment and the fact that the actual policy cannot be determined until that work is completed. At the time of production of the Preferred Options report the Housing Needs Assessment was being completed but had not been finalised.

The completed Housing Needs Assessment confirms the recommendation that:

*"If the Local Plan was to be reviewed now we believe the overall affordable housing target should be 35% of the total of all suitable sites negotiated."*

It goes on to state that:

*"Within this target the major requirement is for rented housing and we recommend a balance of around 60% i.e. 21% for rent with around 40% of provision 14%, as low cost market or 'intermediate' housing provided it is delivered at a cost below the cheapest entry level costs in the general market and would be available on a similar basis to subsequent purchasers."*

The Preferred Option suggests that the affordable housing policy should apply to sites of 10 or more dwellings but subsequent to the

publication of the options report draft PPS3 was published which suggest that the minimum threshold should be 15 dwellings. Whilst PPS3 has not yet been finalised, the Core Strategy applies a site threshold of 15 units to the Ashford urban area.

(1199) The Council's housing needs assessment is a survey of the needs generated in the borough of Ashford – the survey has followed the prescribed methodology for the preparation of such surveys. Affordable housing provided at Ashford is primarily to meet the needs generated in the borough. In the wider context, Ashford's role as a growth area means that is accommodating a much greater scale of development than other districts in East Kent and as such is helping to meet some of the broad housing needs of the sub region.

### **Affordable Housing Target**

#### Main Issues Raised:

225 and 228 believed the existing Local Plan target of 20% is woefully inadequate. 50% of new homes should be social housing in order to reduce the Council's waiting list and the term affordable housing should be replaced by "housing which reflects actual local incomes".

1683 noted that Ashford has low value housing whilst onerous affordable housing costs will prevent development coming forward. RPG9 suggests an overall target of 30% of all dwellings being affordable and this does not translate to securing a 30% level on all sites. Consider that seeking even 30% provision on most brownfield sites will lead to sites not coming forward for housing. The current BLP policy position of 20% should remain and suggests that the target be varied between brownfield and greenfield land.

1215 supported the proposal to increase the affordable housing target to 35% but believes that the threshold for affordable housing in rural areas should be lowered to 5 units. 277 questions whether there is a need for a threshold at all.

1713 stated that affordability should not be at the expense of sustainability, particularly water efficiency. Affordable homes should be as water and energy efficient as possible.

#### Council's Response:

225, 228: The 20% figure is currently set out in the BLP that was adopted in 2000. That figure was based on an assessment of housing needs carried out at that time. Considerable changes in the housing market since that time – increasing house prices and changes in income levels for example – mean that there has been a re-assessment of housing needs carried out in 2005.

The needs assessment suggested that the figure of 20% is now inadequate and recommended that a figure of 35% affordable provision is included within the LDF. The needs assessment makes that the point that there is a need for more than 35% but that:

*"Despite the evidence of the scale of need from existing and concealed households, there are wider issues to consider when setting targets for delivery of affordable housing from new developments. Primarily there is a need to build viable, sustainable developments. Essentially planning should be providing for balanced communities, which acknowledge the need for social compatibility if the problems of housing in the past are not to be repeated.*

*Our significant experience of affordable subsidised housing in mixed developments leads us to recommend that 35% of new units negotiated should be the level applied from the total of all sites negotiated."*

Regarding the issue of the definition of affordable housing, the Council is now actively looking at the precise basis upon which affordable housing is assessed and this is likely to be based more closely on the level of local incomes. The Council will produce a Supplementary Planning Document that will deal with the details of the implementation of the affordable housing policy - that is the appropriate document to deal with the specific detail such as how the level of affordability is defined.

There is likely to be some flexibility around this figure of 35% in the same way that the current Borough Local Plan policy is applied, which effectively recognises that individual site circumstances and the requirement to provide additional infrastructure may mean that the level of affordable provision has to vary. The existing BLP specifies that:

*"The exact discount and quantity of affordable housing to be provided will be arrived at through negotiation between the Council and developer."*

1683: The Council is aware that the additional costs of developing brownfield sites may mean that there is a requirement to be flexible about the actual provision of infrastructure on the site but often. The most significant brownfield sites are located within or near to the town centre which the most sustainable locations close to local facilities were affordable housing is likely to be most suitable.

1215. The proposed policy approach is to significantly reduce the site threshold that applies in the villages and rural areas to three units. The number of sites coming forward for development in the villages over 15 dwellings, and therefore triggering the need to make affordable provision, is limited. Accordingly, the threshold has been lowered to three units and even though this would probably have a relatively small impact in terms of overall provision, the effect of even one or two new affordable units being provided in the villages can be significant.

277. A site threshold to which the policy applies provides certainty for developers. The proposed threshold of 15 units is a direct recommendation from the housing needs assessment which assesses the likely level of provision that will be made. The overall scale of development is so high in Ashford that the majority for new provision will be made from large sites – some of which will be quite substantial – the actual level of provision that would be secured from smaller sites is relatively small.

1713. The Core Strategy will set challenging targets for sustainability and design of new development relating to energy, water and

materials – these targets will apply to affordable housing.

### **Housing Associations**

#### Main Issue Raised:

244 considered that the only way that housing would stay affordable would be to build for housing associations. 1299 requested long term control over who is able to purchase or rent affordable housing and the terms of resale.

385 would like any affordable housing built in villages to be treated as local needs housing.

#### Council's Response:

244, 1299: In practice, the vast majority of affordable housing is provided by housing associations. If a developer wished to build a scheme of affordable housing and did not involve a RSL, provided that all the requirements of the policy were met, the Council would be content. It will be a clear requirement of the policy that the housing is provided as affordable in perpetuity.

389: Local needs housing is aimed at tackling a specifically identified local need and is provided on "exception" sites i.e. sites that would not normally be granted permission. These sites will continue to be provided. Affordable housing is built to meet the housing needs of the borough and is not restricted to a local residency qualification or link as with local needs housing. The details of the provision of affordable housing in villages and the likely impact of the lower threshold in rural settlements will be set out in the affordable housing SPD.

### **Housing Numbers Generally**

#### Main Issue Raised:

296 asked why has no challenge been made to the assessment that in excess of 30,000 houses must be built – the inference is that most of the new houses should be for new owners and if it were found that many houses were being acquired by house owners from elsewhere in England there would be a case for fighting the government on the number of homes required.

#### Council's Response:

296: There has been extensive debate and discussion about the overall scale of development proposed for Ashford through the RPG9 process. The Council is content that this is an appropriate figure based on an assessment of environmental capacity issues together with the need to seek a balance with jobs provision on which to base the development of the LDF documents. If there is to be any further discussion about the overall scale of development in the borough it will be debated through the South East plan preparation process that is currently underway.

### **Mix of Affordable Housing**

#### Main Issue Raised:

1565 and 1643 felt there might be a problem in obtaining an even percentage spread for affordable housing – and communities exclusively of such housing should be avoided.

#### Council's Response:

1565, 1643: It is the Council's preferred approach to achieve a spread of affordable housing units throughout a housing scheme and to avoid communities exclusively of such housing. This approach on individual housing schemes, known as "pepper-potting", has been successfully implemented on major schemes already underway in Ashford.

### Preferred Option 13: Type of Affordable Provision

Representations were received from the following organisations:

325 – Mr R Shrubbs	1194 – Mr R Fletcher	1608 – Future Ashford Community
328 – Mr R Shrubbs	1268 – Ashford's Future	Infrastructure Group
388 – Boughton Aluph & Eastwell Parish Council	1277 – Churches Together in Ashford	1644 – Save Great Chart Action Group
420 – Shadoxhurst Parish Council	1317 – CPRE Kent	1663 – Kent County Council
456 – Kingsnorth Parish Council	1360 – Mr D Goldfinch	Strategic Planning
474 – Aldington & Bonnington Parish Council	1386 – Orlestone Parish Council	1684 – Quintain Estates and Developments
795 – South Ashford Parishes Partnership	1419 – English Partnerships	1732 – Boughton Aluph & Eastwell Parish Plan
942 – Bovis Homes Ltd	1499 – Ward Homes Ltd	1742 – Mr D Goldfinch
1125 – Mersham & Sevington Parish Council	1508 – Lydd Airport Action Group	2076 – Pentland Jarvis Holdings
	1536 – Ashford Rugby Club	
	1566 – Great Chart with Singleton Parish Council	

#### General Support

##### Main Issue Raised:

Representations 325, 328, 420, 456, 795, 1125, 1268, 1277, 1386, 1419, 1608 and 1732 supported the preferred option.

##### Council's Response:

325, 328, 420, 456, 795, 1125, 1268, 1277, 1386, 1419, 1608, 1732: This support is welcomed.

#### Location of Affordable Housing

##### Main Issue Raised:

474 felt a more appropriate approach would be for option 13 to require that 25% be affordable housing for rent and 10% other forms of affordable housing also believe that it would be appropriate to differentiate between urban and rural areas of the borough.

##### Council's Response:

474: The proposed approach in terms of split between renting and other forms is based on the outcomes and recommendations of the housing needs assessment. The idea of differentiation between urban and rural areas is expressly supported in PPS3 and this is reflected in the Core Strategy policy which proposes a lower threshold in the villages and rural areas of three dwellings.

#### Mix of Affordable Housing

##### Main Issue Raised:

1499 and 1536 considered that requirements for the mix of affordable housing tenures should only be set out in accordance with demonstrable evidence achieved through a Housing Needs Assessment. Policy for a preferred mix of affordable tenures should only be set out in the Core Strategy if such evidence is robust and incorporates flexibility to respond to changes in housing need over time.

942 considered that with a document that covers development to 2031 it is not possible to determine the proportion of affordable housing that will be required. The provision of affordable housing should be based upon up to date needs surveys and government policy at the time planning permission is granted. The option should be deleted and replaced with a flexible option that relates to the provision of affordable housing in accordance with the needs and policies that are known and in place at the time planning permission is granted.

1684 stated that attempts to split the affordable housing categories now is premature and would lead to economic viability issues. All forms of affordable housing, including key worker housing should be defined for clarity. If the Council aims to increase the overall proportion then because of economic viability issues, it is suggested that the non-rented/intermediate proportion is increased.

1566 and 1644 considered there might be a problem in obtaining an even percentage spread for affordable housing. The essence is that communities of such housing must be avoided.

388 supported the proposed mix, especially the proposal for a significant level of social rented housing.

##### Council's Response:

942, 1499, 1536: The mix of affordable provision is based on the outcomes and recommendations of the Housing Needs Assessment. It is acknowledged that with a long-term plan period that runs to 2021 specific requirements may change. There will be need to be a review of housing needs at intervals over that time period and, if necessary, amendments made to the policy accordingly. It is not feasible to plan on the basis that housing needs should be determined at the time of an application being submitted. The Council and developers require certainty about the level of provision that is to be made at an early stage. There may

be variation around what the precise level of provision is on a site-by-site basis when all other infrastructure provision is taken into account but clarity about the starting point for that negotiation is needed in the form of a clear policy guide.

1684: The submitted Core Strategy and its supporting information will include a specification of each of the types of housing provision that can make up the affordable housing element of new housing schemes. In effect, the proposal to provide 20% affordable housing for social renting equates to the current 20% set out in the BLP with the additional provision up to the 35% total being made up of the other forms of affordable housing, consequently the amount of affordable housing provided will be increased.

1566, 1644: It is the Council's preferred approach to achieve a spread of affordable housing units throughout a housing scheme and to avoid communities exclusively of such housing. This approach on individual housing schemes, known as "pepper-potting", has been successfully implemented on major schemes already underway in Ashford.

388: This support is welcomed.

### **Type of Affordable Housing**

#### Main Issues Raised:

1508 considered there to be no justification for designating affordable housing other than that for rent - other forms of affordable housing cannot remain affordable and as a result this creates a never-ending cycle of development. The 35% should be reduced to 20% for affordable homes for rent. It should be the intention on sites that additional houses can be purchased by flexible financing packages - perhaps up to an additional 15% of units could be purchased in this manner. 2076 considered that the overall affordable housing provision should be 20%.

1663 stated that there must be a degree of uncertainty about this in advance of the needs assessment. It is unclear what is meant by other forms of affordable housing and their roles i.e. what the contribution will be from key worker and intermediate housing which policy HP8 of the KMSP requires should be specified.

1360 and 1742 believed that specific houses can be controlled through restrictive covenants but generally housing can be kept affordable by ensuring adequate supply. Setting aside 15% for other forms of affordable housing is far from adequate when first time buyers have comprised 30% or more of the market. To increase affordability and meet the government's owner-occupier target of 80% a better figure would be in the range 30-45%. Housing should be kept affordable through adequate provision.

#### Council's Response:

1508: The Core Strategy Submission document reflects the concerns of the objector in that it proposes other forms of affordable provision other than renting. The policy approach will provide 20% for social-renting with 15% as other forms of provision – this is likely to be in the forms defined through the housing needs assessment as follows:

*"Affordable housing is that provided with subsidy, both for rent and intermediate market housing, for people who are unable to resolve their housing requirements in the local private sector housing market because of the relationship between housing costs and incomes. This definition covers housing for social rent and "intermediate" housing i.e. shared ownership, low cost home ownership and sub-market rent."*

The other forms of affordable provision will include shared ownership accommodation which does enable home ownership as suggested by the objector.

Draft PPS3 specifically removes low cost market housing from the definition of affordable housing.

1663, 2076: The provision of affordable housing reflects the findings of the needs assessment but also takes into account the needs to create sustainable communities - too great an emphasis on affordable units will not create balanced and sustainable communities. The recommendations of the housing needs assessment reflects this concern:

*"Despite the evidence of the scale of need from existing and concealed households, there are wider issues to consider when setting targets for delivery of affordable housing from new developments. Primarily there is a need to build viable, sustainable developments. Essentially planning should be providing for balanced communities, which acknowledge the need for social compatibility if the problems of housing in the past are not to be repeated."*

*"Our significant experience of affordable subsidised housing in mixed developments leads us to recommend that 35% of new units negotiated should be the level applied from the total of all sites negotiated."*

1360, 1742: Whilst it is an interesting idea that an increase in housing supply would lead to decreasing housing prices and improved affordability, it is simply impractical at this stage to amend the overall housing figures that we are planning for. These have been fixed after prolonged discussion and debate through the Ashford's Future Study and the RPG process. The level of affordable provision and the proposed split in the type of provision has been determined through a comprehensive housing needs assessment.

### **Housing for the Elderly**

#### Main Issue Raised:

1317 considered that there should be greater emphasis on specific provision for the growing elderly component of the population through sheltered accommodation. 1194 said that the commitment in GADF to sheltered accommodation for elderly people is not carried through to preferred options 12, 13 and 14.

Council's Response:

1317, 1194: Housing for the elderly can form part of the affordable housing provision or can be built as open market housing by specialist providers. The provision of sheltered accommodation for the elderly can be part of the affordable provision, if a specific need is identified or it can be built as market housing targeted at those particular groups. The housing needs assessment identified a particular need for sheltered accommodation – this can be incorporated into development schemes when the type of provision is being determined.

## Preferred Option 14: Housing Mix

Representations were received from the following organisations:

324 – Mr R Shrubbs	1269 – Ashford's Future	1609 – Future Ashford Community Infrastructure Group
345 – Mr R Shrubbs	1279 – Churches Together in Ashford	1645 – Save Great Chart Action Group
404 – Mr & Mrs Parr	1300 – Tenterden Town Council	1652 – Home Builders Federation
421 – Shadoxhurst Parish Council	1316 – CPRE Kent	1664 – Kent County Council Strategic Planning
457 – Kingsnorth Parish Council	1387 – Orlestone Parish Council	1685 – Quintain Estates and Developments
475 – Aldington & Bonnington Parish Council	1421 – English Partnerships	1699 – Ashford Partnership
796 – South Ashford Parishes Partnership	1495 – Ward Homes Ltd	
1127 – Mersham & Sevington Parish Council	1537 – Ashford Rugby Club	
	1567 – Great Chart with Singleton Parish Council	

### General Support

#### Main Issue Raised:

Representations 421, 457, 475, 796, 1127, 1269, 1279, 1316, 1387, 1421, 1609 and 1664 supported the preferred option.

#### Council's Response:

421, 457, 475, 796, 1127, 1269, 1279, 1316, 1387, 1421, 1609, 1664: This support is welcomed.

### Housing Mix

#### Main Issue Raised:

1537 and 1495 considered that caution should be exercised in seeking to set out the mix of housing sizes to be delivered. Policy should provide broad guidance about responding to local housing circumstances, the local development context and to providing a range and choice of housing all supported by a credible Housing Needs survey. Policy should not be prescriptive about the mix of housing sizes to be delivered in any given location but should accommodate flexibility in delivering a range of house types and sizes in response to local circumstances

1685 considered it premature to confirm residential mix aspirations until the results of the council's Housing Needs Assessment are known. The Council will also be aware of the draft change to PPG3, which indicates that the government has moved back from empowering local authorities to specify the mix of private housing. Over-prescription as to mix, size and type of housing is to be avoided.

1652 suggested it is premature to arrive at a preferred approach until the council has carried out a detailed local housing market assessment in full consultation with stakeholders. The key factor in emerging policy is that any future targets or site thresholds must not render development unviable. They are concerned about lowering the threshold to 10 dwellings as this will obviously apply to smaller brownfield developments and these sorts of development could very easily be rendered unviable by this policy change - the council should demonstrate that it has assessed these financial implications and has properly balanced the objectives of securing regeneration of brownfield sites with the need to provide affordable housing. Objects to the site thresholds and the target percentage and the type of affordable housing.

324 pointed to a shortage of medium sized family homes and says that developers must not be allowed to control housing mix according to that which is most lucrative for them.

1300 considered that there is continuing pressure to provide larger dwellings in Tenterden and that this pressure is likely to increase directly with the growth of greater Ashford.

#### Council's Response:

1537, 1495, 1685, 1652: The policy contained within the submission Core Strategy is not overly prescriptive but seeks an appropriate mix of accommodation based on the needs assessment this is based around the desire to promote sustainable development and balanced communities. National Guidance contained within PPG 3 'Housing' encourages Local Authorities to undertake local level survey work to ensure that an appropriate sustainable balance of dwelling size is implemented within the Borough. Policy CS13 in the submitted Core Strategy sets out the policy approach regarding the range of dwelling sizes within the Borough. This policy approach is based on an up-to-date local housing needs assessment and housing market survey.

324, 1685: Developers will not be able to dictate or solely control housing mix. It is the role of the Core Strategy policy to ensure that a balanced approach to housing mix is sustainably delivered. Negotiation with developers is an integral and importance part of this process but any scheme that is to be implemented must be in conformity to the broad ranging policies contained within the relevant planning policy documents.

1652: The policy approach set out in the Submitted Core Strategy, under CS12 sets out that in the Ashford Urban area, the affordable housing target of 35% applies to schemes with a threshold of 15 or more units or a site in excess of 0.5 ha. These figures are based on the findings of an up-to-date local housing needs survey and as such represent a sound policy approach. The Council

acknowledges that the provision of affordable housing on a site, along with a whole range of other related infrastructure should be carefully balanced to ensure that the development is not made unviable – this is particularly relevant on brownfield sites. The Planning tariff approach set out in policy CS8 sets out certainty about the way forward for developer contributions but acknowledges that where abnormal circumstances apply the policy will be applied flexibly.

1300: Tenterden has always had pressure on it to accommodate more housing, both large scale and smaller scale due to its highly attractive setting and location. This pressure will no doubt continue into the future. This pressure does not however mean that Tenterden will accept disproportionate or unsustainable levels of growth. This would not represent sound planning policy and goes against existing established policies. The Preferred Option 6 Chapter, contained within this report, covers the topic of the delivery of sustainable levels of growth in the rural areas more fully and policy CS13 in the Core Strategy will enable there to be a degree of control over the type and mix of housing provided in Tenterden.

## **Vibrant Communities**

### Main Issues Raised:

1699 considered that there needs to be an emphasis on a mix of housing and the right community facilities that help to generate vibrant communities with a focus on self help and prevention. Adaptable accommodation that can provide homes for life. Independent living for the elderly encouraged and supported by broadband connected to all homes to services like telecare and telehealth with available and related sheltered housing facilities.

345, 1316, 1567 and 1645 wanted to see a greater emphasis on specific provision for the growing elderly component of the population through sheltered accommodation.

404 noted there is a lack of provision for supported accommodation for the mentally ill.

### Council's Response:

1699: The provision of a wide range of community infrastructure in the right places and at the right time is fundamental to the creation of sustainable communities which is a key underlying principle of the planning system in general. The LDF has a critical role to play in bringing forward appropriate levels of community infrastructure to meet both the needs of existing and future communities. Policy CS18 reflects the Council's stance on meeting the community's needs.

345, 1316, 1567, 1645, 404: The Council will deliver a wide range of housing types to meet the requirements for all sections of the community. The need for such provision will be established through local level assessments. The provision of housing to meet the particular needs of different sections of the community has been considered as part of the Housing Needs assessment. The needs assessment specifically identifies a need for sheltered accommodation for the elderly and this can be addressed in the consideration of the make up of individual social housing schemes.

## Preferred Option 15: Provision for Gypsies and Travellers

Representations were received from the following organisations:

235 – Churches Together in Ashford	1128 – Mersham & Sevington Parish Council	1646 – Save Great Chart Action Group
322 – Mr R Shrubbs	1270 – Ashford's Future	1665 – Kent County Council Strategic Planning
387 – Boughton Aluph & Eastwell Parish Council	1328 – CPRE Kent	1700 – Ashford Partnership
422 – Shadoxhurst Parish Council	1568 – Great Chart with Singleton Parish Council	1733 – Boughton Aluph & Eastwell Parish Plan
458 – Kingsnorth Parish Council	1615 – South Ashford Parishes Partnership	1743 – Government Office for the South East
476 – Aldington & Bonnington Parish Council	1628 – Kent County Council	

### Provision for Gypsies and Travellers

#### Main Issues Raised:

There was considerable support for the grounding of policy on this issue in the current Gypsy & Traveller Accommodation Needs Survey jointly commissioned by Ashford Borough Council, Maidstone Borough Council, Tonbridge and Malling Borough Council and Tunbridge Wells Borough Council (458, 476, 422, 1615, 1665, 1270, 1328, 1128, 1628).

322 broadly supported the policy but considered that if gypsy communities are to have a right to provision they must also take on responsibilities to accompany those rights.

A number of representations raised concerns about the future of the Chilmington Green gypsy site (235, 1700, 1628) should it be redeveloped as part of the Chilmington 'urban extension'.

The importance of careful public consultation should any additional gypsy sites be proposed was emphasised in three representations (1128, 387, 1733). One respondent requested that a more positive statement on this issue be included in the Core Strategy so that a further DPD can be related to policy (1743).

1568 and 1648 say that gypsies' and travellers' rights will have to fall into line with the rest of the population and ask who will decide on their classification and will not living on permanent sites deprive them of that classification?

#### Council's Response:

322, 422, 458, 476, 1128, 1270, 1328, 1615, 1628, 1665: The support for the overall approach of the Preferred Option is welcomed.

In order to ensure adequate provision of sites for gypsies and travellers across the country recent government guidance encourages Councils to undertake up-to-date assessments of the level of housing need within existing gypsy and traveller communities. Work is therefore currently underway on a Gypsy and Traveller Accommodation Needs Survey in the Borough. This work has been commissioned to ascertain the extent of the housing needs of gypsies and travellers who are currently living on both authorised and unauthorised sites in this and neighbouring boroughs. The results of this work will confirm whether or not there is a need to provide additional permanent provision for gypsies and travellers in the Borough.

235, 387, 1128, 1628, 1700, 1733, 1743: Any additional provision of sites for gypsies and travellers within the Borough will be included within the most appropriate site specific DPD. The preparation of that DPD will have to follow that statutory consultation process set out in the Statement of Community Involvement. Consultation on the location and scale of any additional provision required will be held with representatives of the gypsy and traveller community.

1568, 1648: The needs of gypsies and travellers has been assessed through a needs survey. That has been carried out in accordance with prescribed guidance which has dealt with the precise definitions of gypsies and travellers.

## Preferred Option 16: Key Principles for the Natural Environment

Representations were received from the following organisations:

229 – Ashford Green Party	1129 – Mersham & Sevington Parish Council	1569 – Great Chart with Singleton Parish Council
323 – Mr R Shrubbs	1190 – Mr R Fletcher	1622 – Kent Wildlife Trust
385 – Boughton Aluph & Eastwell Parish Council	1271 – Ashford's Future	1625 – Kent Wildlife Trust
423 – Shadoxhurst Parish Council	1280 – Churches Together in Ashford	1631 – English Heritage
459 – Kingsnorth Parish Council	1301 – Tenterden Town Council	1647 – Save Great Chart Action Group
477 – Aldington & Bonnington Parish Council	1328 – CPRE Kent	1667 – Kent County Council Strategic Planning
801 – South Ashford Parishes Partnership	1353 – Boughton Aluph and Eastwell Parish Plan	1672 – Kent County Council Strategic Planning
809 – Kent Wildlife Trust	1388 – Orlestone Parish Council	1701 – Ashford Partnership
810 – Kent Wildlife Trust	1452 – English Nature	1712 – Environment Agency
817 – Kent Wildlife Trust	1494 – Ward Homes	1754 – Ms H Blanshard
1063 – Kent Downs AONB Unit	1509 – Lydd Airport Action Group	1761 – English Heritage
1072 – Kent Downs AONB Unit	1538 – Ashford Rugby Club	1762 – English Heritage

### Overall Approach

#### Main Issues Raised:

Many representations expressed general support either for whole Core Strategy or the principles behind this specific preferred option (1072, 1271, 1280, 1301, 1452, 1701, 1712).

Some representations expressed specific support for equal weight being given to economic, social and environmental concerns (459, 1328). However, others disagreed that "equal weight" should be given, arguing that only the environment is of strategic importance (229) and that development should not be driven by economic principles which harm the environment (385, 1353).

Many representations suggested that the wording of PO16 is too weak and/or lacking in clarity, definition or detail (229, 477, 801, 809, 1129, 1494, 1538, 1569, 1647). Examples for improvement include dealing with water supply, energy issues, traffic pollution etc (229). Some representations felt that many of the necessary environmental principles exist in the CS Options document but need to be drawn together to form a coherent whole (459, 801, 1328, 1388, 1701).

Others suggested that PO16 should take account of the Countryside Agency's Rural Policy Review of March 2004 (1328) and the biodiversity policies in the Kent and Medway Structure Plan and South East Plan (809).

#### Council's Response:

1072, 1271, 1280, 1301, 1452, 1701, 1712: Support for the preferred option is welcomed.

229, 385, 459, 1328, 1353: The LDF must balance different concerns in order to guide development. Support for equally weighting economic, social and environmental concerns is welcomed and it is recognised that a high quality environment is important for the economic and social success of the borough and so strong protection for the environment is an important aspect of the LDF. The Core Strategy policies will provide guidance on the circumstances when one or more of those factors may be of a higher priority in accordance with national and regional planning policies but in most cases, it is considered that the "equal weight" approach is the right one as it will ensure that the growth and regeneration of Ashford will be encouraged whilst ensuring that adequate protection is given to the environment.

229, 459, 477, 801, 809, 1129, 1328, 1388, 1494, 1538, 1569, 1647, 1701: The Preferred Options report set out the principles to be incorporated in the Core Strategy. The Submission version of the Core Strategy has been worked up in response to the concerns raised in the Options consultation to provide greater clarity in policy for different aspects of the natural environment. These are now covered in the sections on Guiding Principles (CS1), the Countryside (CS7), Sustainable Design (CS10), and Development and Flood Risk (CS19). Together these provide a comprehensive strategic policy approach to the natural environment although many of the more detailed information sought by respondents would be better included in the Generic Development Control Policies DPD.

809, 1328: There is no need to repeat existing policies from the KMSP or the emerging South East Plan in the Core Strategy but links to these documents are clearly expressed. Detailed policies should not be the Core Strategy but in other DPDs or SPD.

### Biodiversity

#### Main Issues Raised:

This section was criticised for giving no sense of priority to biodiversity (1667, 1672). Biodiversity should be clearly stated as a Core Policy if not expressly part of the Overall Vision (PO1) (1667, 1672). Others considered that biodiversity should be an integral part of good design, construction and development (459, 1328, 1701). No direct link is made to Guiding Principle GP4 of the Local Plan (1667).

Some representations considered that more detail should be provided in the supporting text on national, regional and local Biodiversity Action Plan priorities and aims (809, 817). The text should address positive action to protect and enhance habitats and species; especially those identified in PPS9 paragraph 16 as being of principal importance for the conservation of biodiversity in

England (809, 817, 1622, 1712). The text also needs to identify sites or areas for the creation or restoration of habitats as required by PPS9 paragraph 5ii (809, 817, 1622). Rivers and riverside habitats should be managed sympathetically and all development should protect populations of rare or protected species (1712). PO16 should be further developed to make it a requirement for all developments that targets for habitat protection are clearly stated before planning consent is given (423). The text should make clear that the natural environment is to be enhanced as well as preserved (1625). Policies should protect key sites and habitats, identify areas and mechanisms for habitat restoration, and use tariff contributions to fund biodiversity improvements (1622).

Reference should be made to the final version of PPS9, which came into effect in August 2005 (817, 1190), with which policy must be consistent (1667, 1672). The LDF must also be consistent with the Natural Environment & Rural Communities Bill 2004, which places a duty on local authorities to consider biodiversity within all of its activities (1672).

Concern was expressed that there is no mention of the relationship of biodiversity to the landscape other than as an "overall objective" – the KMSP requires the LDF to review Special Landscape Area boundaries and Community Forests and Woodlands (1667, 1672). Reference also needs to be made to KMSP Policy CC1 requirements to protect the open countryside in the M20/A20 corridor and to maintain the separate identity of rural settlements (1667, 1672).

#### Council's Response

459, 1328, 1667, 1672, 1701: Biodiversity has been recognised in the Core Strategy as a key element of ensuring that new development is sustainable and policy CS11 deals specifically with biodiversity and the need for the protection, restoration or creativity of areas of biodiversity value. The principles set out in Guiding Principle GP4 in the adopted Local Plan are included in Appendix C of the Preferred Options Report and have been carried forward into the Core Strategy as described above.

423, 809, 817, 1622, 1625, 1712: The supporting text to policy CS11 refers directly to the Kent BAP and the 2003 Kent Habitat Survey and the requirement to consider biodiversity issues within the policy itself means that these documents will need to be given due weight in assessing biodiversity impacts. The key principle reflects the overarching aims of PPS9, whilst more specific locational impacts have been considered in the SEA of the Core Strategy and helped to shape the spatial strategy and should properly be dealt with through more detailed policies and guidance in other DPDs and SPD. PPS9 paragraph 5(ii) refers to identification of such areas in LDFs, not necessarily in Core Strategies, and this can be adequately dealt with a detailed spatial level in area-specific DPDs. It should be noted that PPS9 advises that specific policies in respect of protected species should not be included in local development documents where these species already receive statutory protection. It is agreed that habitat protection should be considered as part of the application determination process although this can be dealt with in detail as part of the Generic DC Policies DPD.

817, 1190, 1667, 1672: The reference to PPS9 has been updated to reflect the final draft and it is considered that the Core Strategy is consistent with the advice within that document. The proposed references to biodiversity in the Core Strategy show that the Council's policies are consistent with the provisions of Section 40(1) of the Natural Environment and Rural Communities Bill 2004.

1667, 1672: The comments in respect of the KMSP policies are noted but a review of the Special Landscape Area boundaries is not necessary at the current time and is an issue which cuts across District boundaries in many cases. A review of the potential for Community Forests and Woodlands should take place as part of the Council's Cultural Strategy taking account of the location and scale of future development and availability of land, as well as potential impact on the landscape and any biodiversity or habitat issues. These may be better dealt with in area specific DPDs in the LDF, where they are more specifically related to the delivery of new sites. The requirements of KMSP Policy AS1 (formerly CC1) to protect the open countryside and maintain the separate identity of settlements are taken account of policies CS1 and CS7 in the Core Strategy.

#### **Landscape Protection**

##### Main Issues Raised:

All development proposals should be required to give consideration to the potential impacts on the natural environment (810).

A core principle of the LDF must be to respect and enhance the character of all landscapes (1072). The local landscape designations in BLP Policy EN27 should be retained to protect the remainder of the Borough from further development (385, 1353). The first overall objective for the environment, as set out in the Preferred Options report, should be amended to refer to the protection and enhancement of the countryside and important landscapes, and it should apply to all habitats, not just scarce ones (1452).

One representation considered that the LDF Core Strategy should contain a specific AONB policy due to the national importance of these protected landscapes (1063). It will also help ABC to demonstrate that it is fulfilling its legal duty of regard under the Countryside & Rights of Way Act 2000 (1063). The representation listed 11 key points which should be addressed in AONB policies, many of which are already addressed in adopted Local Plan policies (1063). Concern is expressed at the lack of reference to the importance of landscape character and the enhanced status of AONBs introduced in the Countryside & Rights of Way Act 2000 (1072). The CS should also refer to the Kent Downs AONB Management Plan (1072). The mission statement in PPS9 on the protection of ancient woodland should be written into the LDF (1190).

Two representations considered that green belt/gap areas should be designated to protect the adjacent rural areas from any greater expansion of Ashford's urban area (385, 1353). Another considered that emphasis should be given to working with other boroughs and SEERA/KCC in setting Green Corridors or buffers as development on the scale proposed at Ashford will have a major impact on other areas (1509). The same representation considered that Romney Marsh flood plain should not be given priority for housing development - the emphasis should be on preserving its rural persona and promoting green tourism (1509).

##### Council's Response

810: Agreed – the Core Strategy makes this clear as a key principle at policy CS1.

385, 1072, 1353, 1452: The requirement to protect and enhance important landscapes is set out in the Countryside section of the Core Strategy Submission document. Expanding this to refer explicitly to all types of designated landscape is not considered appropriate since this would fail to distinguish between landscapes which are of different quality and designation. Such a blanket approach would be inconsistent with Government guidance in PPS7. Thus AONBs are only specifically referred to in the supporting text to policy CS7. The local landscape designations set out in BLP Policy EN27 are considered worthy of retention, and this policy is 'saved' at present until superseded by the Generic DC Policies DPD.

1063, 1072, 1190: The AONBs in the Borough represent the highest quality landscapes we have. Therefore, it is appropriate that the Council sets out its principles for development in, or affecting AONBs in the Core Strategy, in accordance with the principles contained in PPS7. This is done at policy CS7. More detailed criteria-based policies on AONB development are inappropriate for this document and should be in other DPDs if necessary. It is accepted that ancient woodlands are a particularly rich source of biodiversity and development should avoid damaging that natural richness. A suitable reference in the context of the consideration of biodiversity has now been included.

385, 1353, 1509: It is not agreed that there should be a 'Green Belt' designation of land around Ashford as suggested. However, it is accepted that the treatment of the rural / urban fringe areas, particularly in the context of the proposed new urban extensions south of the Ashford, is a key issue for the LDF taking forward policy EN11 of the KMSP. The detailed treatment of these areas should be through detailed DPDs that can deal with such issues in detail including the identification of any land for planting or landscape management and not in the Core Strategy, though references to this issue are made in section CS5 on the urban extensions. Neither the GADF masterplan nor Core Strategy propose any significant development on Romney Marsh, the majority of which lies outside Ashford Borough.

## **Conservation and the Historic Environment**

### Main Issues Raised:

Whilst PO16 concentrates heavily on the natural environment, it is felt by some that comparable guidance is required for the historic environment (1761, 1762). Such guidance should have regard to the evolving South East Plan with its renewed emphasis on the need to take account of the character of areas (1761). One representation comments that Ashford has a wealth of natural historic and archaeological resources which most of the population are not aware of and which must be conserved and promoted for future generations (323). The need to safeguard and enhance the historic environment and seek to utilise its role in developing character, sense of place and identity and in assisting regeneration should become part of a specific Core Policy (1672).

The overall environmental objectives should be broadened to take account of the wider historic environment beyond those elements with designations so that historic landscapes and locally important features are taken into account (1631). Historic parks and gardens should be added to the list for protection and enhancement (1631). Reference to preservation and enhancement in the fourth Overall Objective should include the words "historic environment" whilst the heading on p48 should be amended to "Key principles for the historic and natural environment" (1672).

The outline reference to previous policies EN15 to EN32 should be strengthened and supported by clear policy statements (1190). It should explicitly incorporate the wording of the Borough-wide Guiding Principle GP4 on limiting the impact of development (1672).

The paragraph headed "Environment – Conservation" in GADF p89 should be amended to make clear that where a number of Listed Buildings are affected by a major development proposal, the impact on them will be considered as a whole, rather than on an individual basis (1754). The Core Strategy should meet all the requirements of KMSP Policy QL7 on Conservation Areas (1672).

One representation supports the reference in Appendix C to Guiding Principles GP2, GP4 and GP6 relating to environmental protection and the need for good design but states that these should be included as part of the principles set out in Appendix A, which set out the Council's approach to the Government's growth agenda (1631).

### Council's Response:

323, 1672, 1761, 1762: The importance the Council attaches to the historic environment is reflected in the references to in the overarching planning principles in policy CS1 which take forward the aims of GP4 of the BLP and more specifically within the supporting text to policy CS9 as a key aspect of ensuring new development respects and where possible, enhances its surroundings. Therefore, the policy is compliant with the emerging South East Plan.

1631, 1672: It is considered that specific reference to historic parks and gardens and other important historic landscapes and buildings is too detailed for the Core Strategy although clear reference is made to important landscape and habitat features is made in the Countryside section.

1190, 1672: The LDF will continue to incorporate the aims and objectives of Local Plan policies EN15 to EN32. The Core Strategy will contain the overall strategic aims and objectives which will be supplemented by more detailed policies in the Generic DC Policies DPD which will eventually supersede the 'saved' policies referred to. The aims and objectives of Guiding Principle GP4 of the adopted Local Plan are reflected in the Core Strategy at CS1.

1754, 1672: This objection now relates to policy QL6 in the adopted KMSP. The LDF will provide protection for Listed Buildings and Conservation Areas, though the level of detail sought by representations 1754 and 1672 will be better dealt with in the Generic DC Policies DPD and not the Core Strategy.

1631: The Core Strategy sets out clear guiding principles which will be applied to all development proposals in the Borough, including those in growth areas. The need for environmental protection and good design is clearly set out in the Core Strategy.

## **Open Space and Green Infrastructure**

### Main Issues Raised:

Some representations felt the LDF should contain a clear set of planning and delivery principles covering green infrastructure (e.g. allotments, parks, village greens, play areas, historic parks and gardens) in urban and rural locations, which would require the co-operation of all organisations and stakeholders (459, 801, 1328, 1388).

Some representations set out the role of green infrastructure in contributing to the management, conservation and improvement of the landscape; the protection of historic buildings; maintaining and enhancing biodiversity; and being managed to accommodate wildlife (459, 1328, 1701). The policy should acknowledge that natural environment improvements could be delivered by new development proposals, especially on the urban fringe (1494).

The importance of local community, social and leisure facilities to local communities should be acknowledged (1538). The Core Strategy should reflect opportunities for improvements to open spaces and the natural environment and opportunities for complementary uses alongside them (1538). New recreational facilities should be created, particularly where they link urban and rural areas (459).

Support exists for a policy of expanding green corridors (229). Where necessary, some representations considered that a review of the physical extent of designated areas should be undertaken (1494, 1538).

### Council's Response:

459, 801, 1328, 1388, 1494, 1701: The importance of open space and green infrastructure is expressly mentioned throughout the GADF and this is taken forward into the Core Strategy through a combination of reference to proposals for strategic areas of open space in section CS4 and the general principles of delivering adequate quality open spaces through policy CS18. A more detailed approach will need to follow in other LDDs as the more localised outputs of the Council's PPG17 survey work are assessed and detailed area-specific proposals brought forward as appropriate.

459, 1538: The importance of local provision of community-based social and leisure facilities is a recognised aspect of providing a sustainable form of development. The need to plan for local as well as strategic green infrastructure is acknowledged through the distinction within the proposed strategic tariff (policy CS8) between on-site and other infrastructure and the method of delivery. The opportunities for the creation of suitable local recreation facilities should be highlighted within the appropriate site-specific policy or DPD in line with the detailed standards the Council will propose in a forthcoming DPD based on the PPG17 survey outcomes.

229, 1494, 1538: The Green Corridor Action Plan is a current SPG document to the Local Plan. The designated Green Corridors largely follow the river corridor and the floodplains and so potential development within them is very limited indeed. The concept of Green Corridors is carried through into the green infrastructure proposals for Ashford with these areas playing an important connection role between the strategic areas of public open space across Ashford and providing a local recreation facility and habitat zone in their own right. A review of the Green Corridor Action Plan will be appropriate once the green infrastructure proposals for Ashford are confirmed through the Core Strategy and if relevant at that stage, detailed changes to the area designated as Green Corridor would be made.

## **Natural Resources**

### Main Issues Raised:

The Core Strategy should help to maintain water resource balance; provide protection for groundwater; increase River Quality Objectives; meet Water Framework Directive objectives; and maintain the integrity of the floodplain (1712). Flood defence measures should be sympathetic to fisheries issues (1712).

### Council's Response:

1712: Some of the EA's concerns raised here are detailed issues that would be better dealt with in a Generic DC Policy DPD but the key principles on development and flood risk and the quality and quantity of water supply are contained in policies CS19 to CS21 of the Core Strategy.

## Preferred Option 17: Leisure

Representations were received from the following organisations:

183 – Independence & Access Matters	807 – Kent Wildlife Trust	1492 – Ward Homes Ltd
278 – Churches Together in Ashford	887 – Mr C Dugard	1539 – Ashford Rugby Club
306 – Ashford Green Party	965 – Taylor Woodrow Developments Ltd	1570 – Great Chart with Singleton Parish Council
308 – Ashford Green Party	975 – Taylor Woodrow Developments Ltd	1610 – Future Ashford Community Infrastructure Group
341 – Robert Brett & Sons Ltd	1077 – Kent Downs AONB Unit	1617 – Ashford Borough Council Cultural Services
345 – Mr R Shrubbs	1132 – Mersham and Sevington Parish Council	1619 – Network Rail
346 – Mr R Shrubbs	1153 – Mr A Curtis-Baker	1648 – Save Great Chart Action Group
347 – Mr R Shrubbs	1157 – Mr A Curtis-Baker	1668 – Kent County Council Strategic Planning
351 – Mr R Shrubbs	1158 – Mr A Curtis-Baker	1702 – Ashford Partnership
379 – Countryside Agency	1203 – Mr R Fletcher	1719 – Ashford Borough Council Tourism and Heritage Manager
381 – Countryside Agency	1273 – Ashford's Future	1734 – Boughton Aluph & Eastwell Parish Plan
384 – Boughton Aluph & Eastwell Parish Council	1293 – Tenterden Town Council	1738 – Mrs S McGeever
424 – Shadoxhurst Parish Council	1328 – CPRE Kent	2077 – Pentland Jarvis Holdings
460 – Kingsnorth Parish Council	1329 – CPRE Kent	
478 – Aldington & Bonnington Parish Council	1397 – PAR Property Development Ltd	
751 – Arts Council England, South East	1407 – Mr K Blanshard	
799 – South Ashford Parishes Partnership	1408 – Hillreed Developments Ltd	
	1422 – English Partnerships	
	1453 – English Nature	

Although entitled 'Leisure', this section of the Preferred Options report considered several topic-related sections of the existing BLP and hence the responses received covered a number of different issues. For ease of reference, these have been sub-divided by topic in the table below.

### Overall Approach

#### Main Issues Raised:

There was some broad support for the LDF proposals (478, 1273, 1610).

However, many representations considered that the current wording of Option 17 is inadequate and too vague for such a large raft of subjects, that it is lacking in substance, clarity and transparency and needs to be fleshed out (478, 799, 1132, 1570, 1648). Some felt that particular effort needs to be given to employment (1570, 1648). Another considered that more reference should be made to local issues, consultation with local communities and parish wish lists (1132).

#### Council's Response:

478, 1273, 1610: The support for the overall approach is welcomed.

478, 799, 1132, 1570, 1648: The topics covered in Preferred Option 17 have been broken down and worked up further and are covered by several of Core Policies in the Part C of the Core Strategy. More detailed policy guidance on those topics will follow in the Generic DC Policies DPD.

### Employment & The Rural Economy

#### Main Issues Raised:

379 felt that the overall objective to stimulate the rural economy whilst protecting the landscape and settlement character was a sound approach. 379 also felt that whilst it is helpful to consider the economy as a whole, the policy should not be so broad brush that it fails to reflect the very different issues and degree of encouragement/resistance required for the rural economy.

346 & 965 noted that there is no preferred option for employment or the rural economy, which they considered to be a significant weakness in the report. Others stated that it is not sufficient to indicate retention of existing policies (345, 351). Another assumed that the lack of Preferred Option is because the Council is satisfied that the key strategic policy content of the existing BLP is adequate for the LDF with detailed matters to follow in subsequent DPDs (1328).

One respondent noted that there is a role for a more positive encouragement of small-scale employment space in rural areas to support appropriate diversification and the viability of the rural economy (379). Another also welcomed small-scale businesses in villages and rural areas but urged the control of the inappropriate expansion of premises in these areas (1328).

Some felt that the focus for employment development should be on the town centre and existing urban area of Ashford – less sustainable sites should not be allowed to be developed to provide a 'range' of sites as patterns of development should be highly rather than just relatively sustainable (384, 1734).

Another considered that the Core Strategy should seek to increase the flow of goods from rural to urban areas and increase the

number of visitors from Ashford to the surrounding countryside (379).

Council's Response:

379: The support for the overall objective is welcomed.

345, 351, 965, 1328: The Submitted Core Strategy now contains a section on rural employment under the Tenterden and the Villages chapter. The policy approach set out in this chapter relates to the location of **new** employment opportunities within the rural area.

With regards to the smaller, more detailed issues regarding rural employment, such as the expansion of an existing business, the diversification of a rural business or the re-use of rural buildings etc, it is felt prudent that the existing Borough Local Plan policies remain a sound policy approach. These issues are not considered strategic and therefore should not be contained within the Core Strategy Document. They will be dealt with under subsequent detailed DPD's within the LDF.

346, 379, 965, 1328: It is agreed that the nature of rural employment issues are significantly different to those in and around Ashford itself. The supporting text to Policy CS6 covers the topic of the rural employment separately and therefore increases its prominence within the Core Strategy document. The policy approach seeks to strike an appropriate balance between supporting small-scale employment opportunities within the villages and rural areas and the need to protect the integrity of the rural character. The policy, and in particular the detailed policies in subsequent DPDs, will ensure that the necessary protection is provided.

384, 1734: It is agreed that employment development should be in sustainable locations. In order for the growth strategy to be successful, there does need to be flexibility to allow a range of sites that will serve a range of different employment sectors. Higher density office based development will be focused in the town centre in particular whilst larger, manufacturing or distribution uses will require more peripheral locations. Tenterden and some of the larger villages should also be considered for new employment allocations to balance additional residential development and support their local service centre roles.

379: The Core Strategy is not the right document to influence the flows of goods, although detailed policies in subsequent DPDs can allow appropriate visitor facilities in rural areas.

## **Shopping**

Main Issues Raised:

One representation assumed that the lack of a Preferred Option is because the Council is satisfied that the key strategic policy content of the existing BLP is adequate for the LDF with detailed matters to follow in subsequent DPDs (1328). Another considered that a viable shopping base is an important part of providing a sustainable economy, suggesting that a clear policy statement must be made as just indicating retention of existing policy is inadequate (345).

There was support from one respondent for the provision of a wide range of retail, education and community and leisure infrastructures aligned with the scale of house proposed (1408).

One respondent considered that the Council should adopt a policy of resisting supermarket development or expansion and instead favour community-based independent enterprises using s106 agreements, planning constraints and any other methods available (308).

Council's Response:

345, 1328: Broad retail policy for the Borough is now included as part of the Retail Provision section of the Core Strategy (Policy CS16) as it will have a key part to play in job creation in the Borough and its economic and cultural vitality. Detailed provision for retail expansion will be made in site allocation DPDs.

1408: The support for the provision of infrastructure proposed is welcomed.

308: The LDF will continue to ensure that a range of retail facilities are provided and local shopping facilities will certainly be encouraged. However, supermarkets also have an important and useful role in retail provision and there is no national planning policy justification to adopt a policy of resisting appropriate development or expansion where this will meet the tests in PPS6.

## **Transport**

Main Issues Raised:

One representation considered that the existing BLP contains a number of excellent policies which should be retained and strengthened, but transport issues need to be given greater weight in the CS (807). No policy statement is made yet one is required (347). Whilst it is recognised that detailed policy matters will follow in DPDs, these should be forthcoming without delay (1329).

In seeking to secure sustainable development, one respondent considered that the LDF should aim to reduce the total amount of travel by motorised transport stating it is not enough just to have an objective to reduce the need for people to travel (807).

The international platforms at Ashford should be used also for domestic services (1619). There is no objection to the new station at South Ashford but it would need to be shown to be operationally, technically and commercially viable, and it will not assist the aspiration to reduce journey time between Ashford and Hastings (1619). The LDF should favour use of rail freight for the importing of construction materials (1619). Another representation expressed support for the objective to improve the integration of interchange facilities of different modes of transport, especially in its application to the Park Farm Rail Halt which they considered could function

well as a public transport interchange at the heart of a new District Centre (975).

There was some criticism that the approach set out on p50 relies too heavily on existing policies that were not written with the GADF objectives in mind – Halcrow report requires significant shift in modes of transport to be used. In particular, there is a need to set out how shift in travel patterns will be achieved, set out parking standards, approach to congestion, role of park and ride, Smart Link etc and mention the need to monitor and review changes in travel patterns (1422).

The general policy approach is supported but the rural roads policy should be reviewed to ensure that rural areas do not suffer as a result (384, 1734). The proposal to give Policy TP17 more teeth is supported as rural roads will be affected by the GADF proposals (384).

Nowhere in the document is the word “accessible” linked to public transport – any transport proposed must be public transport with low floor buses and an integral flat ramp (183). The LDF fails to take account of the needs of the aged and infirm – how will invalid cars or cars for the disabled be catered for? (1203)

Three representations referred to detailed local matters such as safety provision for cyclists on the A28 (1153), the reinstatement of a footpath at Old Wives Lees (1157) increased levels of rail service at Chilham, where further development is proposed, and general traffic management to decrease congestion (1158).

#### Council's Response:

347, 807, 1329: The Transport section has been worked up further and is now covered in a separate section in the Core Strategy to reflect the crucial role of transport in delivering a sustainable pattern of development (chapter 11). More detailed transport policies that will supersede those in the BLP will follow in the Generic DC policy DPD according to the timetable set out in the Local Development Scheme.

807: Having an objective of reducing the need to travel is considered appropriate since reducing the need for all types of travel will have environmental benefits. However, it is agreed that the Core Strategy should promote the encouragement of alternative modes of transport to the car in order to achieve a modal shift and this is reflected in the policy through requirements for Travel Plans, etc.

975, 1619: The use of the platforms at the International station is a matter for the rail operators and the Local Transport Plan. The comments received on the rail halt indicate the developers aim to use it as the basis for a further extension to Park Farm and Network Rail's hesitation about the achievability and usefulness of the halt (see the supporting text to Section 5 of the Core Strategy). The use of rail freight for the movement of construction materials is not an issue for the Core Strategy. The objective of integrating interchange facilities is supported, although this is a detail better suited to the Area Action Plans.

1422: The transport section of the Core Strategy now sets out fully the key transport principles and key infrastructure necessary to deliver the proposed growth in phased and sustainable way. More detailed policies and guidance will be required and will be produced in subsequent DPDs and SPD.

384, 1734: The support for the overall approach is welcomed. The main aspects of policy TP17 of the BLP are included as part of policy CS15 in the Core Strategy.

183, 1203: The references to the new Smartlink bus service in the transport section includes accessibility for the mobility impaired. More detailed references to the needs of the aged and infirm will be set out in subsequent DPDs through the Town Centre AAP and the associated Parking strategy.

1153, 1157, 1158: The detailed matters referred to are too detailed to be considered in the strategic Core Strategy document. Chilham is identified as being suitable for limited development in the Core Strategy which may influence the level of service the rail operator decides to run to the station.

## **Leisure**

### Main Issues Raised:

Provision for leisure is not simply about different types of open space – more emphasis required on indoor and outdoor sports activities, whilst account should be taken of the requirements of KMSP Policy QL16 (1668).

One representation considered the leisure section to be a wholly inadequate policy statement – it needs a proper description of deficit of performance arts space in town centre and formal statement of intent to tackle the situation (1407). Comparing Ashford to Reading and Exeter in GADF is unrealistic – Ashford cannot expect to draw theatre programmes of that scale. Policy should make better use of what Ashford has, e.g. Mecca Bingo building and Church of St Mary the Virgin (1407).

One respondent suggested that the heading for this section should be “Culture and Leisure”, not just Leisure and that it should include the DCMS definition of culture (1617). Further paragraphs are suggested to explain the importance of culture to regeneration, making Ashford an attractive and well-loved regional cultural centre and the importance of cultural and community facilities, together with overall objectives for culture (1617).

The Leisure section should adequately address the importance of meeting all the leisure and recreation needs of rural communities (381, 1077).

The option should consider specifically the role of sport and how particular shortfalls and targets for improvement can be met. In particular, the Julie Rose stadium should be the subject of consultation at this stage (341).

The surrounding countryside should be recognised as a leisure asset (381, 1077). The proposed growth of Ashford will increase the need/demand for leisure and recreation in the countryside – adequately resourced and maintained facilities such as country parks, rights of way, nature reserves etc to meet additional needs must be considered (1077).

The 1st bullet point under Leisure should be expanded to refer to an integrated network of public spaces offering a wide variety of options and activities to meet the needs of the whole community (278).

There is a need to protect Tenterden as the jewel of the Weald to encourage visits by groups and individuals and make parking and other facilities such as the tourist information centre available throughout the year (1293).

The Leisure section of the LDF should reflect the proposal for a replacement golf course on the NW side of Ashford and the opportunity to provide a world class championship golf course (1397).

#### Council's Response:

1668: It is agreed that leisure refers to more than just open space provision. Chapter 14 of the Core Strategy covers different forms of leisure requirement and reference is made in the supporting text to the potential role of Conningbrook for water-based recreation which picks up the reference to KMSP policy QL16.

1407, 1617: The importance of cultural development is now referred to in the Core Strategy at chapter 14 and specifically in the town centre as part of policy CS3. The nature of the cultural 'deficit' and steps needed to address it including the detailed delivery of 'cultural projects' should be dealt with through the Council's Cultural Strategy with the land-use elements of that incorporated into site specific DPDs of the LDF.

341, 381, 1077: Policy CS18 of the submission Core Strategy addresses the principles of how new development should meet the leisure and recreation needs of rural and urban residents. More detailed matters, such as precisely how shortfalls and targets can be dealt with, are best addressed in greater detail in the Generic DC Policies DPD or in SPD. The same section makes reference to the role of sport and in particular the Julie Rose stadium and the area around it at Conningbrook, though any detailed proposals would be more appropriately dealt with in a subsequent DPD.

381, 1077: The countryside is recognised as a leisure asset in the supporting text to Policy CS18. If increased demand for rural visitor facilities arises, these will be encouraged where they are appropriate. This can be dealt with through the more detailed Generic DC Policies DPD.

278: The Core Strategy refers to an integrated network of open spaces in several places through the 'green and blue grid' of connected public open spaces.

1293: Tenterden's tourism role is acknowledged in the Core Strategy in the supporting text to Policy CS17. These suggestions are primarily management issues rather than planning issues for the Core Strategy.

1397: Since this representation was made last year, the proposal has been shelved (see response to reps 1400, 1401, 1402 in the Site Specific section). In any event, a proposal for a new golf course would be better dealt with in a Site Allocations DPD.

#### **Open Space**

##### Main Issues Raised:

There is general support for the overall objectives for open space and leisure (381, 1077, 1453) providing that the surrounding urban fringe and wider countryside are acknowledged as a leisure and cultural asset (1077).

Two representations object to dealing with public open space in SPD rather than DPD as public open space must be strongly protected from development and new public open space must be provided in the right quality, quantity and location (384, 1734).

All new development must include provision for the needs they will generate, especially open space (460). No-one should live more than 300m or a five minute walk from their nearest accessible greenspace (1453).

Policy is unclear – policy should reflect a degree of flexibility to creation of new open space – new development on land not previously developed may be required to deliver investment in environmental, social, community and leisure facilities – such proposals should be judged on merit and encouraged where benefits accrue (1492, 1539).

If land set aside for a particular purpose is not eventually needed for that purpose, it should not be handed back to the developer for housing but should instead be used for community use, with the Parish Council involved in decisions (460).

The document does not adequately explain the nature and purposes of the designations on the maps on pp15-17 e.g. green necklaces, protected green spaces, etc. (1668). These designations should be the subject of consideration of options given the importance of green infrastructure (1668).

There is a need to provide a range of countryside-like open space close to Ashford easily accessible to the urban population (1077).

A proper assessment is required to show the need for new open space to be created (2077)

The LDF does not sufficiently define how rural access to open spaces and in particular via byways can be protected and enhanced (424).

The primary park off Magpie Hall Road does not serve any useful purpose and is in the wrong place (1738).

Council's Response:

381, 1077, 1453: The support is welcomed. The importance of the urban fringe and wider countryside as an asset are recognised in the Core Strategy, particularly in the context of the proposed urban extension areas dealt with in chapter 5.

384, 460, 1453, 1734: Policy CS18 of the Core Strategy provides overall policy protection for existing public open spaces, but more detailed policy will be provided in subsequent DPDs. Provision for new areas of public open space as part of new development is longstanding planning policy and this principle is continued in policy CS18. Details on the precise standards of provision of public open space can be adequately dealt with in SPD provided the key strategic policy in the Core Strategy is in place. Specific locational requirements for public open space may be dealt with site allocation DPDs.

1492, 1539: The Council will take a pragmatic approach to provision of public open space in the particular local context of a development site, based on the existing level of provision and any additional needs generated by a development. The Core Strategy's role is to set out the overarching principles guiding open space provision and retention but matters relating to flexibility or negotiation over specific standards would be more appropriately dealt with in a subsequent DPD or SPD.

460: If land is not needed for its original purpose, the nature of any alternative development on it will be dealt with according to the specific circumstances of that site. Any decision will be based on, amongst other things, the needs of the community at that time.

1668: Definitions used in the Core Strategy are explained further in the Glossary to the Core Strategy submission document. Detailed policies relating to development in or adjoining these areas will be included in the Generic DC Policies DPD.

1077: It is not clear what the objector is suggesting here. The Core Strategy proposes a network of new areas of strategic public open space but the countryside itself is a potentially vast local recreational resource that lies within easy reach of Ashford's population.

2077: An Open Space strategy will be produced to inform the precise quantum and location of open space. Nevertheless, it is clear that the expansion of Ashford on the proposed scale will inevitably result in a need for increased open space within the growth areas.

424: Protection for byways should normally be dealt with through other legislation. The retention of public rights of way in developments is important and can be dealt with through detailed policy guidance in a Generic DC DPD.

1738: The position of the proposed Discovery Park was decided after consultation through the GADF process and will be well located to serve large areas of southern Ashford including the proposed growth area at Chilmington Green. Therefore, no change is proposed.

**Tourism**

Main Issues Raised:

There is no preferred option for tourism – policy should refer to updated policy in KMSP policies FP10, FP11 and FP12 (1668). Assume that the lack of Preferred Option is because the Council is satisfied that the key strategic policy content of the existing BLP is adequate for the LDF with detailed matters to follow in subsequent DPDs (1328).

Tourism should come under the overall heading of Cultural but still be a topic in its own right (1719).

The tourism section should be set in context in a similar but updated way to the existing Local Plan and with details on the various sectors, updated facts and figures, and links to the draft tourism framework (1719). Will the overall objectives be fleshed out, to explain what is meant by a centre for tourism (1719)? The different propositions for Ashford, Tenterden and the rural area also need to be explained as in the existing Local Plan (1719). Should we be specifying that a major/large scale development should be encouraged in the urban area with a different approach in the rest of the borough, showing links to the cultural section of GADF (1719). Are BLP policies TM1 and TM7 the only ones to be retained in the LDF or is it just that these are the core policies as other policies, e.g. those relating to B&Bs, caravans etc, all need to be included (1719).

Objection to proposals for further hotel creation in Ashford as this may damage existing facilities, whilst additional conference facilities could compromise greater use of Wye College for conferences (306).

Council's Response:

1328, 1668: A section on tourism has been included in chapter 13 of the Core Strategy, which accords with the main principles behind the relevant KMSP policies.

1719: Tourism is a cross-cutting topic that touches several other topic areas of planning policy. It is accepted that it has a significant cultural role in the context of tourist attractions but it also has a significant role to play within the local economic base both within Ashford itself and across the whole Borough. The Council is producing a tourism development framework that can better deal with the detailed context of various tourism related sectors in the Borough, including the prevailing needs and demands, and provide a detailed strategy on which to base suitable site allocations and detailed tourism policies in the rest of the LDF.

306: The Borough needs a range of hotel accommodation to serve the needs of a growing tourist industry. It is not the role of the LDF to provide unjustified commercial protection to existing hotels through a policy of constraint. No change is proposed.

## **Community Facilities**

### Main Issues Raised:

There is inadequate reference to social infrastructure and community facilities (1610). Community facilities should be provided locally – the current wording is vague and ambiguous (1702). The Core Strategy has omitted much of the ethos outlined in the GADF for Culture (p.160 and subsequent sections). 'Lateral and innovative thinking is required. Much of this is covered in the GADF, little is evident in the LDF' (751). New communities and neighbourhoods should receive pro-active support as they develop through an integrated Community Development programme (1702).

Objection to the proposal to deal with additional community facilities in area-based LDDs as often the needs to be addressed as result of development will arise beyond boundaries of area based LDDs, e.g. employment sites on edge of Ashford will put pressure on community facilities in adjacent rural areas (384).

There should be more provision for churches in particular (887), village halls, libraries, sports facilities etc which can usefully serve as social hubs for the community (1738). Developers should fund (including salaries) a young people's meeting place with facilities for computing, sport, meeting up, etc (1738). Would also like to see a new theatre (1738).

### Council's Response:

751, 1610, 1702: Meeting the community's needs for community facilities is a key principle contained within chapter 14 of the Core Strategy. Some facilities with a local catchment should be provided locally whilst others will have a wider catchment and serve the needs of Ashford or the wider Borough. There is a clear relationship in this section with the aims and objectives of the Community Strategy and the greater role local communities should play in defining the facilities they want. For this reason, specific community facility requirements should be considered at a more detailed spatial level within appropriate site-specific policies in site allocation DPDs under the wider policy umbrella of the Core Strategy and the Community Strategy. The suggestion of Community Development programme is an issue for the Community Strategy rather than the LDF.

384: See the response above. It should also be recognised that such impacts can be beneficial to the viability of a local community facility. There is no reason why LDDs cannot deal with this appropriately, even if needs arise from beyond the LDD boundary. No change is proposed.

887, 1738: The requirements for developer funding of specific new facilities will need to be fully justified and take account of the viability of the development. It is acknowledged that a wider range of community and voluntary infrastructure and services than has been covered in the current Local Plan should be provided in order to create more cohesive and sustainable new developments and this is reflected in policy CS18 in the Core Strategy and the justification for the strategic tariff.

## Preferred Option 18: Supply, Wastewater and Flooding

Representations were received from the following organisations:

161 – Cllr P Bartlett	889 – Bellway Homes Thames Gateway South	1571 – Great Chart with Singleton Parish Council
176 – Mr S Fermor	1065 – Kent Downs AONB Unit	1611 – Future Ashford Community Infrastructure Group
216 – Ashford Green Party	1134 – Mersham and Sevington Parish Council	1612 – Future Ashford Community Infrastructure Group
259 – Mr & Mrs Issett	1187 – Mr R Fletcher	1616 – Southern Water
292 – Ashford Rural Trust	1198 – Canterbury City Council	1649 – Save Great Chart Action Group
301 – Churches Together in Ashford	1254 – F Dorsett	1686 – Quintain Estates and Developments
307 – Ashford Green Party	1272 – Ashford's Future	1669 – Kent County Council Strategic Planning
320 – Mr R Shrubbs	1328 – CPRE Kent	1703 – Ashford Partnership
344 – Robert Brett & Sons Ltd	1371 – Westwell Parish Council	1709 – Environment Agency
365 – Ms H Silk	1390 – Orlestone Parish Council	1716 – Environment Agency
425 – Shadoxhurst Parish Council	1405 – Mr K Blanshard	1740 – Ms S McGeever
461 – Kingsnorth Parish Council	1439 – Mr F Acott	
479 – Aldington & Bonnington Parish Council	1454 – English Nature	
798 – South Ashford Parishes Partnership	1491 – Ward Homes Ltd	
	1540 – Ashford Rugby Club	

### General Support

#### Main Issues Raised:

1065, 1272, 1454 and 1611 broadly support the details contained in this option. 1454 develops this further and raises support for the proposals in this option to promote surface water run off management measures.

#### Council's Response:

1065, 1272, 1454, 1545, 1611: This support is welcomed.

### Development on Flood Plain

#### Main Issues Raised:

161, 176, 216, 292, 307, 320, 461, 1134, 1198, 1740: These representations all raised concerns and highlighted caution about building development in areas that are at risk of flooding. These areas include the growth area in general, north of Magpie Hall Road, Bushy Royds, East Stour Valley and the Kennington area. Issues that arose regarding flooding were the effect on house insurance; suggestions that money would be better spent on water conservation measures as opposed to spending money on flood defence; and the issue of a pungent aroma generating from over development. 1405 said the Council should seek expertise from the insurance industry and this information should be taken in account when making decisions on potential development areas.

#### Council's Response:

161, 176, 216, 292, 307, 320, 461, 1134, 1198, 1405, 1740: An Integrated Water Management Study (IWMS) has been developed in collaboration with the Environment Agency, which examines issues such as flood risk management, water supply and water quality issues together with development in the flood plain. A Strategic Flood Risk Assessment has been carried out and this has assisted in the preparation of the Core Strategy and the proposed spatial distribution of development. As such, areas of high probability of flood risk and the functional flood plain have generally been excluded from proposed built development areas. In addition, the Core Strategy now also contains a policy (CS19) strictly controlling development in the 100-year floodplain that is based on the latest emerging Government guidance on planning and flood risk in draft PPS25.

It is agreed that water conservation is also important. Policy CS9 requires the efficient use of natural resources, including water in new developments whilst Policy CS10 also requires water efficiency.

Policy CS21 requires adequate water supplies and wastewater treatment facilities to be in place to serve new developments, which should address the concerns raised in many of these responses.

The Council uses official data from the Environment Agency to determine flood risk areas, which is the same data used by the insurance industry to make their own assessments.

### Water Shortage Issues

#### Main Issues Raised:

259, 292, 307, 425, 1328, 1371, 1571, 1649: Major concerns were raised regarding the fact that there was a significant shortfall of water supply in the SE region and development of the scale of the Growth Area will only exacerbate this problem and make the whole development of Ashford unsustainable.

Council's Response:

259, 292, 307, 425, 1328, 1371, 1571, 1649: The Council recognises that water supply is an important issue to be addressed in considering the Ashford Growth Area. This topic has therefore been examined closely by the Integrated Water Management Study (IWMS). The IWMS was commissioned because local water supply resources currently meet Ashford's needs, but will soon need to be supplemented from new sources, especially if the proposals for Ashford's growth are to be achieved.

Proposals for increasing the capacity of Bewl Water reservoir and the commissioning of a new reservoir at Broad Oak near Canterbury, both outside the Borough, are required to come into operation during the LDF period in order to serve the significant growth planned. Without this or alternative suitable infrastructure to provide an adequate water supply, new development will be restricted from coming forward during the LDF period, as is set out in Policy CS21.

**Canal District**

Main Issues Raised:

889 broadly supports the possible development of the Canal District as it would make the best use of Brownfield land, would promote high density public transport and provide good access to open space. Conversely 798 & 1254 raised objections to the proposed development of the Canal District.

Council's Response:

798, 889, 1254: It is agreed that development of the Canal District would make good use of brownfield land and provide the other benefits identified by 889. However, there are significant risks involved with the development of this area due to its location in the flood plain, as detailed in pages 128 to 131 of the GADF report. Significant additional modelling will be required and a firm solution found to address the need to provide compensatory floodplain storage before this area could be brought forward for development in an acceptable manner. As a result, only a limited area of the Canal District is proposed for development during the LDF period.

**Bybrook**

Main Issues Raised:

292 raised the concern that Bybrook was near to capacity and couldn't be expanded. Conversely 1616 stated that expanding Bybrook would represent most feasible option to deal with water treatments as there are serious concerns with regard the cost assumptions of the three wastewater treatment option in the IWMS.

Council's Response:

292, 1616: It is recognised that the Bybrook treatment works are near to capacity and that additional waste water treatment facilities will be required to serve the Ashford Growth Area. This may be either through an expansion of the Bybrook works, or through the creation of a new wastewater treatment works elsewhere in Ashford. The Borough Council will liaise with Southern Water to establish the best short and long term solutions and a planning application has already been submitted to expand the Bybrook site. Core Strategy Policy CS21 requires adequate wastewater treatment facilities to be in place to serve new development.

**Broad Oak and Brabourne Leas**

Main Issues Raised:

365 & 1328 objected to plans to take water from Bewl Water from an unconstructed reservoir at Brabourne Lees and from Broad Oak. It was felt that this would significantly reduce the water level at protected areas of Stodmarsh and Grove Ferry. 1328 stated that there would need to be in-depth assessments of the capability of Broad Oak as it is feared there would not be enough flow in the river to sustain the required levels. 161 raised the issue that further detail and examination would be required before they could support the proposal.

Council's Response:

161, 365, 1328: The plans for a reservoir at Broad Oak are being promoted by Mid Kent Water and will be required to go through the full planning process. As a result, in-depth assessments will be required to support any planning application, which would be subject to detailed scrutiny. The proposed site is outside the Borough, and is identified in the draft South East Plan as a water resource option that may be required during the Plan period.

The proposed Brabourne Lees 'reservoir' is a tank and is not intended to be a strategic water supply infrastructure to serve the whole Growth Area. Normal development control policies on siting, visual impact and traffic impact would apply should a proposal be submitted.

**Water Mitigation**

Main Issues Raised:

320, 365, 1187, 1328, 1491, 1540, 1616, 1716: The following were all raised as possible water mitigation procedures which should

be incorporated as policy in the Core Strategy as development targets. 1328 & 1616 raised concerns that the any proposed water mitigation methods would not actually be enough to improve the status of the water supply.

- Water meters on all properties
- Water economy utilities on all new houses
- River surcharge facilities
- Utilizing Sustainable Urban Drainage Systems
- Wastewater re-use options
- Policies in Core Strategy should reflect national policy in relation to water resources management

Council's Response:

320, 365, 1187, 1491, 1540, 1716: Core Strategy policy CS10 states that all major development must incorporate positive sustainable design features, including efficient water use. Developments are required to meet certain standards using the recognised EcoHomes/BREEAM assessments which including an assessment of water use. In practical terms, this is likely to include many of the items referred to by respondents such as water metering and water economy utilities. Policy CS20 also identifies sustainable urban drainage systems (SUDS) as a requirement, where appropriate, within new developments.

As set out in the Core Strategy, the proposed Strategic Tariff will also be used to facilitate, amongst other things, major off-site sustainable drainage projects, flood protection, supply improvements and water efficiency schemes which might include retro-fitting existing properties. As a result of the above, it is considered the Core Strategy policies are entirely consistent with national planning policy in relation to water resources management.

1328, 1616: It is recognised that water mitigation methods alone are unlikely to be sufficient to provide the required water supply. However, together with methods stated elsewhere to provide additional water supply, efficient water use will make a significant contribution to achieving an adequate water supply for new and existing development.

**Lack of Clarity**

Main Issues Raised:

479, 798, 1134 & 1198 raised strong objections to wording of this option and the lack of significant reference to how important the issue of water is to the successful growth of Ashford. 301 raised an objection to Community Facilities being in the same section of the Core Strategy as wastewater, etc. 1669 felt that the Core Strategy places too much emphasis on flood management issues and doesn't supply enough detail about other areas of water management.

Council's Response:

479, 798, 1134, 1198: References to water management issues have been significantly strengthened in the Submission Core Strategy. The importance of the issue of water supply to the successful growth of Ashford is now also clearly recognised in the Core Strategy.

301: The Core Strategy has been reorganised; Community facilities are now dealt with in a separate section, Policy CS18.

1669: The Core Strategy refers to a wide range of water management issues throughout the document. It is however a strategic planning document and further detail can be found in background documents, such as the IWMS, whilst further detail will also be supplied in subsequent DPDs.

**Increasing Flood Risk**

Main Issues Raised:

1703 raised concerns that improving the river flow through Ashford would severely affect the storage function of Canterbury and the river Stour in general. 1198 considers that reducing flood risk in Ashford by improving flood flows through Ashford is a flawed idea.

1716 recommends that all development areas should have SUDS measures to reduce storm runoff below that of the site before the proposed development, in order to prevent increased flood risk in Ashford and downstream towards Canterbury.

1709 considered that water efficiency is a regional issue and therefore policies and targets should apply to the whole borough. Development outside Ashford town should also maintain or reduce storm runoff to prevent increased flood downstream. Where policy allows, consideration should be given to the pollution risk to groundwater and surface waters. The strategic flood risk assessment for the LDF needs to include the whole borough.

Council's Response:

1703, 1198: It is recognised that should flood flows through Ashford be increased, this should not be at the expense of increased flood risk downstream on the River Stour, in accordance with the key principle proposed in policy CS19 of the Core Strategy. Proposals should be discussed and endorsed by the EA from a strategic perspective before being agreed and implemented.

1716: It is agreed that all new major developments should have SUDS measures to reduce storm runoff, and this is reflected in the wording of the Core Strategy.

1709: Policies and targets on water efficiency measures in the Core Strategy will apply across the whole Borough as will the key principle of not making flood conditions worse elsewhere. Suitable runoff rates will vary from site to site depending on its scale and

the proximity to areas of higher flood risk and will need to be taken into account in assessment against policy CS19. The Strategic Flood Risk assessment covers the whole Borough.

#### **Services & Infrastructure Provision:**

##### Main Issues Raised:

1439 objects to the proposals as the document fails to indicate how sewage, electricity, gas and water infrastructure are to be incorporated in the scheme and paid for. 1187 adds that there has been little consideration for electricity provision issues such as time, owners permission and clearance which are not dealt with in this document. 1686 asks for clarification whether better waste water and supply infrastructure will have to be met by the strategic tariff.

1612 considers that there is relatively little acknowledgement of the importance of local social strategic infrastructure including healthcare and education provision.

##### Council's Response:

1187, 1439, 1686: The Core Strategy explains that strategic infrastructure will be partly funded by developers through the strategic tariff. However, it is recognised that substantial improvements and investment will be required by the utility companies as well to achieve the scale of infrastructure improvement necessary to serve the whole Ashford growth Area proposals to 2031. This was considered in some detail in the GADF report. Major pieces of utility infrastructure where they lie within the Borough boundary will need to be allocated in site specific DPDs when decisions are taken by the utility companies. It is recognised that further details need to be developed as the planning process moves forward and this has been allowed for through the phasing of development.

1612: The importance of providing schools, healthcare and other community services provision is recognised as being essential to the success of future Ashford. Policy CS1 requires the delivery of community services and recognises their importance. The need for such facilities to be delivered is also recognised in Policies CS8 and CS18. In addition, there are numerous other references throughout the document.

#### **Miscellaneous:**

##### Main Issues Raised:

1716: Space should be retained in southern Ashford, near Discovery Park to give the option for a southern works to service long-term development. Some sections of the river Stour may benefit from improving the physical characteristics of the river channel.

344: There is no consideration of how waste will be dealt with at Ashford or how bulky materials will be distributed in the town in order to facilitate the development required during the LDF proposals.

1390: Hamstreet has flooding problems which would not be helped by excessive further development.

##### Council's Response:

1390: Hamstreet is identified for relatively limited development (only 70 houses over the LDF period) in policy CS6. The impact of development upon flood risk will be an important consideration when sites are allocated for development in the Tenterden & Rural Areas DPD.

1716: The allocation or safeguarding of specific sites is not a matter for the Core Strategy but can be considered in the Urban Sites and Infrastructure DPD. The Council recognises that options for future wastewater treatment may require a new facility to be built.

344: The distribution of construction materials is not a matter for the Core Strategy. Proposals for waste facilities will be considered in the same context as other strategic infrastructure requirements. It is not appropriate to allocate specific sites in the Core Strategy.

## Great Chart

Representations were received from the following organisations:

142 – The Godington House Preservation Trust	733 – Ms J Durrant	1054 – Mr G Santo
203 – Mr C Young	735 – Mr D Dury	1058 – Mrs L Maylam
242 – Ms M Young	737 – Mrs B Dryland	1060 – Mr E Maylam
310 – Ms S Lacon	738 – Miss H Dryland	1073 – Mr D Rump
431 – J R Carpenter	740 – Mr B Nestel	1078 – Mrs S Roberts
632 – Mr C Creedy	743 – Mrs G Tate	1091 – Mr R Roberts
634 – Ms S Creedy	746 – Mr D Hammett	1098 – Ms J Pye
636 – Great Chart Society	863 – Mrs C Madsen	1105 – Ms C Prior
639 – Mr R Charlton	865 – Mr C Madsen	1112 – Mrs L Powlesland
641 – Mrs L Garrabos	867 – Mr J Madsen	1113 – Mrs L Powlesland
643 – Mr N Garrabos	869 – Mr M Madsen	1116 – Mr G Powlesland
644 – Ms A Daines	871 – Ms T McTaggart	1123 – Ms S Pilling
647 – Mr R Daines	873 – Ms W McClintock	1131 – Mr S Parsons
652 – Mrs G Denice	875 – Ms S McClintock	1137 – Mr D Paris
654 – Great Chart Society	877 – Mr I McClintock	1141 – Ms B Parritt
658 – Miss M Brissenden	879 – Ms B Lynch	1145 – P M Parritt
659 – Mrs L Briscall	881 – Mr T Light	1148 – Mr D Parfitt
663 – Mrs E Bingham	926 – Ms H Light	1151 – Ms K Parfitt
666 – Miss S Bingham	929 – Mr C Yates	1154 – Great Chart Society
669 – Mrs P Bridwell	931 – Mr I Wolverson	1159 – Mrs R Oram
672 – Mr P Bridwell	933 – Ms J Williamson	1170 – Mr D Oliver
674 – Save Great Chart Action Committee	963 – E G Houston	1172 – C W Miller
679 – Mr D Denice	974 – Mrs B Jarvis	1175 – Ms S Marshall
681 – Mr M Baker	978 – Mr M Jarvis	1180 – Warehorne Parish Council
684 – Mr F Anderson	986 – Mrs S Jones	1230 – Mr & Mrs Kerr
687 – Mrs E Anderson	992 – Mrs A Jones	1326 – CPRE Kent
689 – Mr M Bidwell	996 – Mr P Jones	1365 – Pentland Homes/Jarvis Homes Ltd
691 – Ms G Rump	1001 – Mr E Jones	1403 – Mr & Mrs McGlinchey
693 – Mr M Hooley	1008 – Ms L Hopper	1455 – Mr N Barnett
695 – Ms T Hassell	1012 – Mrs M King	1457 – Ms M Barnett
697 – Mr S Harding	1016 – Ms K Lewis	1552 – Great Chart with Singleton Parish Council
701 – Ms B Gray	1018 – Mr D Williamson	1555 – Great Chart with Singleton Parish Council
704 – Mr K Gray	1020 – Ms C Williamson	1633 – Save Great Chart Action Group
708 – Mr H Fulton	1022 – Mr P Tate	
710 – Mr N Ellis	1025 – Mr M Stoddard	
712 – C L Ellis	1029 – Mrs J Smith	
730 – V M Dury	1037 – Mr G Smith	
	1042 – Mr M Smith	
	1051 – Mrs I Shorter	

### Principle of Development

#### Main Issues Raised:

The majority of representations received were in the form of a standard letter making similar points. The following representations came in this form: 203, 242, 318, 632, 634, 636, 639, 641, 643, 644, 647, 652, 654, 658, 659, 663, 666, 669, 672, 674, 679, 681, 684, 687, 689, 691, 693, 695, 697, 701, 704, 708, 710, 712, 730, 731, 733, 735, 737, 738, 739, 740, 743, 746, 863, 865, 867, 869, 871, 873, 875, 876, 877, 879, 881, 926, 929, 931, 933, 963, 974, 978, 986, 992, 996, 1001, 1008, 1012, 1016, 1018, 1020, 1022, 1025, 1029, 1037, 1042, 1051, 1054, 1058, 1060, 1073, 1078, 1091, 1098, 1105, 1112, 1113, 1116, 1119, 1123, 1131, 1137, 1148, 1151, 1154, 1159, 1170, 1175, 1230, 1326, 1455, 1457, 1152, 1555 and 1635.

These representations generally accepted the principle of the planned development at Chilmington Green within phases 1 and 2 (i.e. during the LDF period), albeit with reservations, not least the fact that the parish of Great Chart with Singleton appeared to be receiving “more than a fair share” of the housing proposed for Ashford. The stated aims of these respondents was to retain the integrity of Great Chart village, and it was proposed that the phase 3 development to the west of the A28 should be relocated to the south / west of Magpie Hall Road. They stated that this proposed relocation of the housing could retain the same number of proposed dwellings and would avoid the need to build expensive crossings over the A28. It was suggested that more people could live within a 5-minute walk of the neighbourhood centre, whilst development here would be compatible with the Great Chart Village Design Statement. Furthermore, the proposed area would not affect any listed buildings.

1141 and 1145 submitted the same standard letter, agreeing with most of the points above except that they objected to relocating the housing south and west of Magpie Hall Road, which they considered would be a form of “urban creep” towards Bethersden. 1180 also objected to development to the south of Magpie Hall Road.

Of the remaining responses, 142, 310 and 1403 also objected to the principle of development on the Great Chart side of the A28. 310 agreed with others that Great Chart was receiving more than its fair share of development, that the proposals could prevent a real community emerging and was concerned about the impact on listed buildings. 1633 was concerned about the impact on the area if some urban extension areas experience time slips, whilst others do not.

431 and 1403 objected to development at Chilmington Green altogether. 431 suggested that future development should be contained within the natural boundaries of Ashford, as formed by the North Downs and Greensand Ridge. They argued that development at Chilmington Green would extend the town into the Weald for the first time. 1403 was concerned about the impact on listed buildings suggested that other sites are available which would be less damaging to the landscape than Chilmington Green, and which would be better placed in terms of linkages to infrastructure. In particular, greenfield sites at Park Farm, Cheeseman's Green, Waterbrook and Eureka were considered to have a less detrimental effect on existing development and heritage.

It was suggested that in Preferred Option 5E that if development at Cheeseman's Green goes beyond that set out in the GADF masterplan area, other areas should be reduced in compensation. The representation suggested that the development area at Chilmington Green should be reduced to provide such compensation. 1403 also suggested that development should take place on brownfield land instead. 1403 also raised the concern that development in the Chilmington Green area would add further problems for the A28, noting that rush hour access to Ashford from the west is already notoriously difficult.

1515 supported the proposals for Chilmington Green.

#### Council's Response:

The broad distribution of development around Ashford should remain broadly as proposed in the GADF / Preferred Options report, which has been the subject of significant research and consultation during its development. Nevertheless, some amendments are justified to the proposals at Chilmington Green and Great Chart.

The general principle of an urban village development at Chilmington Green appears to be accepted by the majority of respondents, with or without reservations. In response to those issues raised by representations objecting to the principle of development at Chilmington Green, it should be noted that a Sustainability Appraisal has been carried out which shows that Chilmington Green compares well to other potential development sites in terms of the overall environmental impact, and performs much better in that it avoids building on the flood plain.

Preferred Option 5E referred to Cheeseman's Green because the Council has already granted outline planning permission but not all of this area has been shown for development in the GADF masterplan. The Preferred Option therefore stated that if the permission is implemented, a reduction should be made in a masterplan development area elsewhere in the south east area of the town. The development has not yet been implemented and so it is not yet appropriate to make such a reduction but it is envisaged that this would take place in the Sevington area.

Whilst the respondent's views about extending development to the Weald are noted, it is considered that development at Chilmington Green will not have a significant adverse impact on the quality of the local landscape compared with other potential development areas. Indeed, the principle of development in this general area has been widely accepted throughout the GADF process and the Preferred Options consultation.

It is agreed that development should be directed to brownfield land as far as possible. However it will not be possible to develop all of the new houses and jobs required on brownfield land which is why the urban extensions such as Chilmington Green have been promoted – this is dealt with in some detail in the Spatial Strategy chapters of the Core Strategy.

Any development at Chilmington Green would need to be accompanied by appropriate transport infrastructure works to ensure that it does not adversely affect the local highways network. In addition, infrastructure scheme 1C in the GADF (Victoria Way), which is due to be implemented during the early stages of the LDF period, will require improvements to the Matalan roundabout, which will improve traffic flow along the A28. In later stages, GADF scheme 2C (Roman Way Corridor) will provide a link between Romney Marsh Road and the A28.

The concerns expressed by the majority of objectors relate specifically to the planned development to the west of the A28. The A28 is currently proposed to pass through the Chilmington Green development, although it is not proposed to form its main 'High Street'. The southern entrance to Great Chart itself is largely free of development and does give the village more of a physical separation, and thus separate identity. The proposed relocation of part of the Chilmington Green extension from this area to an area east of the A28 and south of Magpie Hall Road would help retain this identity. The vast majority of respondents would support the relocation of this development to land south of Magpie Hall Road and it is felt that this is the correct approach. Therefore, it is agreed that the Core Strategy promotes an amended footprint of development deleting any residential development west of the A28

#### **Impact on Great Chart**

##### Main Issues Raised:

Those issuing the standardised response, together with 142, 310, 1141, 1145 and 1403 were concerned about the impact on Great Chart. Many considered that the area proposed for development to the west of the A28 was formed a strong natural barrier between the town and countryside, which protects the setting of Great Chart. Respondents were concerned that the proposal to develop 25% of the houses proposed for Chilmington Green on this land would result in the village of Great Chart being swallowed up in Ashford's "urban sprawl". They expressed their aim that the integrity and distinct character of the village should be retained.

Furthermore, it was suggested that development here would be severed by the A28 from the new neighbourhood facilities on which it would depend. This would not be compatible with the Compact Growth Model principles. Development here would require expensive crossings to be installed over the A28, which would not be needed if development was moved to the south of Magpie Hall Road.

##### Council's Response:

The proposed relocation of this part of the Chilmington Green development to land south of Magpie Hall Road as set out above will

address these concerns.

### **Impact on Listed Buildings**

#### Main Issues Raised:

Those issuing the standardised response, together with 310, 431, 1141, 1145 and 1403 were concerned about the impact of development on the setting of existing Listed Buildings, particularly in Great Chart. A couple of representations also raised concerns about the impact on Listed Buildings within the Chilmington Green area. It was felt that swallowing these buildings into modern housing development would spoil their character and importance, which might lead to existing residents moving out and jeopardising the future of the buildings. There was further concern that development might have adverse structural impacts on Listed Buildings.

#### Council's Response:

The relocation of development away from Great Chart will help to protect the setting of Listed Buildings from development.

The Council recognises that there are some Listed Buildings within the Chilmington Green development area. It will be necessary to ensure that the setting of these buildings are treated with appropriate respect during the detailed design process. This is a detailed issue which is more appropriately dealt with through a Chilmington AAP that will set out a detailed layout for the urban extension area.

### **Ecological Impact**

#### Main Issues Raised:

1403 expressed concern that the natural habitats for a range of wildlife including moorhens and badgers would be destroyed by new development.

#### Council's Response:

It will be necessary to protect the ecology of this area from the effects of development. Core Strategy policies, particularly CS1 and CS11 will provide the framework for this protection which will be supplemented by other DPD policies.

## Kennington Circle

Representations were received from the following organisations:

131 – Mr A Priestley	399 – Boughton Aluph & Eastwell Parish Council	1080 – Mr C Newman
149 – Mrs J Bain	406 – Mr B Woolgar	1081 – Mrs S Houps
150 – Mr R Bain	407 – Mrs C Woolgar	1082 – A Benson
151 – Mr R Bain	426 – Mr J Fassum	1083 – Mr C Newman
152 – Mr R Bain	427 – Ms R Fassum	1084 – B J Hargrove
153 – Ms J Bain	428 – Mr S Manning-Press	1085 – Mr C Newman
154 – Ms J Bain	432 – Mrs R Bailey	1087 – Mr C Newman
155 – Mr R Bain	615 – Mr & Mrs Healey	1090 – Mr C Newman
156 – Mr R Bain	616 – Mr D Dobson	1107 – Mr P Burton
175 – Mr S Fermor	617 – Mrs P Dobson	1147 – Mr P Newson
187 – Ms S Fowler	618 – Miss L Setkova	1164 – Mr P Newson
188 – Mrs S Watson	619 – Mrs B Pilkington	1167 – Ms D Reeves
189 – Mr A Masters	620 – Mr K Pilkington	1169 – Mr & Mrs A Cripps
190 – Mr D J Watson	621 – Ms E Davies	1181 – Mr M Hopkins
191 – Mr J Fenning	622 – Mrs B Watts	1182 – Ms L Hopkins
192 – Dr & Mrs Hurst	706 – Mrs D Setek	1183 – Ms L Hopkins
193 – Mr & Mrs Watkins	728 – Mr F Setek	1184 – Mr M Hopkins
194 – Mrs Pratt	729 – Mr M Setek	1185 – Mr M Hopkins
195 – Mr R Dayman	754 – Mr & Mrs Phillips	1186 – Mr M Hopkins
196 – Mrs B Harper	756 – N & F Jell	1188 – Mr M Hopkins
197 – Mrs B Stanford	761 – Mr P Miller	1191 – Mr E Manning
198 – Mr L Harper	769 – Mr & Mrs Ellis	1209 – Mr J Kirk
199 – Mr F Brake	773 – Ms A Lines	1213 – Mr & Mrs Bray
201 – Mrs M Dayman	774 – J A Longman	1228 – Mr & Mrs Bray
202 – Mr H Angus	776 – M S Longman	1229 – Mr & Mrs Bray
205 – Mrs B Sinclair	820 – Mr & Mrs Bray	1240 – Mrs E Tweed
207 – Mrs R Douse	821 – Mr & Mrs Bray	1245 – Dr S Korn
221 – H F Smith	825 – Mr & Mrs Bray	1248 – Mr J Peters
248 – Mrs S Franklin	826 – Mr & Mrs Bray	1250 – Mr M Caulfield
249 – Mr J Wigmore	827 – Mr & Mrs Bray	1251 – Mr M Caulfield
250 – Mr S Murton	829 – Mr & Mrs Bray	1252 – Mr M Caulfield
251 – Mr D Franklin	830 – Mr & Mrs Bray	1253 – Mr M Caulfield
252 – Ms M Ferguson	831 – Mr & Mrs Bray	1255 – K Owen
255 – Ms S Willis	832 – Mr & Mrs Bray	1282 – Ms S Willis
256 – Mrs M Moir	834 – Mr & Mrs Bray	1283 – Ms S Willis
260 – Mrs L Riley	835 – Mr & Mrs Bray	1284 – Mr K Blanshard
261 – Mr D Riley	836 – Mr & Mrs Bray	1288 – Ms H Blanshard
262 – Mr & Mrs Gaffney	837 – Mr & Mrs Bray	1289 – Ms H Blanshard
263 – Mrs N Burden	838 – Mr & Mrs Bray	1338 – Mr B Summers
264 – Mrs P Beswick	839 – Mr & Mrs Bray	1345 – Mr M Barnes
267 – Mr J Waite	846 – Mrs V Howland	1348 – Mrs S Dunn
268 – Mr A Waite	847 – Mrs J Spilstead	1391 – Ms L Hopkins
271 – Mr M Hothersall	851 – Mr S Knights	1436 – Mr F Acott
293 – Ashford Rural Trust	860 – Mr B Summers	1462 – Mr G McKenzie
297 – Mr S Weller	861 – Mr E Mills	1463 – Mrs I Austin
298 – Ms J Weller	862 – Mr K Mills	1464 – Ms R Boucher
303 – Ms J Lewis	903 – Mr W Bray	1468 – Ms D Benson
309 – Ashford Rural Trust	904 – Dr N Horn	1470 – Mr J Oughton
313 – Mr G Harvey	905 – Mr P Kynot	1473 – Mr K Dyer
314 – Mr J Elliott	906 – Mr & Mrs G Burgess	1474 – Ms M Dyer
315 – Ms J Elliott	907 – Mr W Bray	1475 – Mr M Bruty
316 – Ms C Elliott	908 – Mr S White	1477 – Mr T Scholfield
318 – Mrs J Adamson	909 – Mr & Mrs Pratt	1488 – Mr J Tattersfield
354 – Mr R Woollven	910 – Ms K Owen	1549 – Mr R Hyam
355 – Mrs M Woollven	911 – Mr R Lane	1550 – Mrs M Hyam
357 – Mr G Adamson	912 – Ms A Coltham	1551 – Kennington Community Forum
359 – Ms J Calver	913 – D W Coltham	1621 – Mr S Parks
360 – Mr G McKenzie	943 – Mrs P Kaczykowski	1623 – Mrs G Back
364 – Mr G Lawrence	944 – Mr M Kaczykowski	1723 – Boughton Aluph & Eastwell Parish Plan
366 – Ms K Burden	1052 – Ms B Boucher	
383 – Mr K Dove		

### General Comment on Kennington Issues

A very large number of responses were received in relation to Kennington, many of which referred to similar issues. All of the representations received are listed above, whilst all of the issues they raise are summarised below. However, because many respondents raised several of the points listed below, we have not specifically identified which comment was made by each representation in order to avoid over-complicating this section.

### Proposed Relief Roads – General Issues

#### Main Issues Raised:

125 representations (67%) specifically objected to the proposed relief road, many of which questioned the need for the road. 23 representations suggested that the relief road proposals at Kennington, together with the associated residential development, could make congestion worse rather than better. Some questioned the need for the roads, and in particular the East relief road, in order to relieve congestion.

There was significant opposition in particular to the Kennington Circle East relief road. Whilst there was also some opposition to the North relief road, some representations did recognise that such a link could provide strategic transport benefits.

A high proportion of the representations (105) had concerns about the safety of the proposed relief road. Frequently raised concerns included the junction of the relief road with Willesborough Road, just before the railway bridge, which was considered to have potential for congestions and accidents at this narrow point. The humped-back railway bridge was also considered to be likely to obstruct visibility in both directions.

The road was also considered to intersect with the A28 at its most dangerous point. Some respondents pointed out that the junction with Ball Lane has been closed off for several years due to the poor visibility and a number of serious accidents. Several responses objected to the diagrammatic implication that Ball Lane itself would be used as a strategic through route linking the A28 and A251. Others objected to the northern route running through the curtilage of properties on Ball Lane and in some cases through buildings themselves.

Some concerns were expressed at the potential effect of the construction process and operation of the road on the Towers and Downs View schools as well as local residents.

Some representations expressed concern that the new housing estate would generate excessive traffic. There was concern that the increased population created by the new housing would lead to increased traffic congestion and air pollution locally.

#### Council's Response:

In order to address concerns raised about the benefits or otherwise of the proposed link road, the Borough Council commissioned further work from Urban Initiatives and its transport advisors to examine this issue in further detail. This further work has concluded that from a strategic transport perspective, the case for the Kennington Circle East relief road is not as strong as was originally thought. Of all the aspects of the Kennington Circle proposals, the East relief road and associated development appear to have raised the most concern amongst local people, with the majority of responses objecting specifically to this part of the route. As is explained further below, several people are particularly concerned about the potential impact of such proposals upon the local landscape and ecological framework. Since the case for delivering this route as a strategic link is not as strong as once believed, the Council proposes to delete the proposal for the Kennington Circle East relief road and the associated residential development on the eastern side of the A28.

However, the same research reinforced the case for providing a Kennington Circle North relief road. This route was found to have significant strategic traffic benefits in providing a route for traffic heading towards the M20 junction 9 as set out in the GADF report. It would also relieve "rat running" through the Boughton Lees, Kennington and Bybrook areas. As a result, it is proposed to retain the principle of delivering a route between the A28 and A251 in the Core Strategy, although as explained below, the details of this route may be subject to amendments from that set out in the Preferred Options report.

Several representations raised concerns about the potential safety of the proposed link roads. Many of these related specifically to the junction of the Kennington Circle East relief road with Willesborough Road and have therefore been overcome by the deletion of this proposal.

The other main safety concern related to the intersection of the relief road with the A28 near the Golden Ball public house. It should be noted that the masterplan was intended only as a diagrammatic indication of potential routes and development areas. It was never intended that the Kennington Circle link should follow the alignment of or make use of Ball Lane given the character of this road, although the Council recognises that the masterplan may have led to confusion on this point.

Detailed route alignment analysis would be required as part of future masterplanning work in order to determine the most appropriate route. It is recognised that the junction of the Kennington Circle North relief road and the A28 would need to be to the north of Ball Lane. Further work would also need to be carried out to determine whether the alignment of the road should be to the north or south of other isolated Listed Buildings to the northwest of Ball Lane.

Clearly, Ball Lane is totally unsuitable for use as a new link road and an alternative alignment north of the Ball Lane / A28 junction is the best alternative. This should be reflected in a revised Core Strategy diagram, although it should be noted that this diagram will remain indicative only, with the precise route to be determined following detailed survey work. The alignment of the proposed North link road would be chosen so that it would not have significant impact upon Listed Buildings or the Conservation Area. The detailed design process will also ensure that the impact upon local schools and residents would be minimised, including during the construction process.

Highway testing of the strategic road network has taken place in the Ashford Highways & Transportation Study (AHTS). This confirms that the housing development proposed in the Kennington area can be accommodated with the improvements to the network proposed in the Core Strategy.

#### **Alternative Routes for the North Relief Road**

#### Main Issues Raised:

Eleven representations made suggestions for alternative routes for the relief roads. Some of these proposed an extension to the East relief road to reach the proposed Junction 10a. However, since the East relief road has now been deleted, this section will concentrate on suggestions for alternative routes for the North relief road, which is to be retained. Objections to the existing route were made on the basis that it is too close to Ball Lane and would run through existing sports facilities.

All of the suggestions for alternative routes proposed routes further to the north of that proposed in the Preferred Options report. These included:

- **Alternative Route A:** A route running in a more north-easterly direction from the A251/Trinity Road junction to avoid the schools, running parallel with the A251, then running east to join the A28 to the north of Wilmington Farm;
- **Alternative Route B:** Similar in many respects to Alternative Route A, running to the north of Ulley Farm and joining the A28 to the south of Wilmington Farm;
- **Alternative Route C:** A much more northerly route, leaving the A251 at Boughton Lees and running west to Kempe's Corner.

Others suggested that the congestion could be dealt with better by designing Trinity Road as a high capacity traffic thoroughfare or by removing the traffic island on the A28 motorway bridge, to allow a separate lane for traffic turning into Simone Weil Avenue.

#### Council's Response:

The further analysis undertaken has demonstrated that a Kennington Circle North relief road would result in benefits and alleviate congestion for traffic using the A28. As a result, it is proposed to retain such a link in the Core Strategy.

Of the routes suggested by respondents, route B appears to require the least land and to have the lesser impact on the wider landscape but a detailed route alignment should be worked up through the Urban Sites & Infrastructure DPD.

It is therefore proposed to amend the indicative route of the Kennington Circle North relief road to create a greater buffer between the route and the existing schools, and to join the A28 further north than was suggested in the Preferred Options report.

#### **Agricultural Land, Ecological and Landscape Issues**

##### Main Issues Raised:

Just over three quarters of the responses (142) raised objections on the basis of concerns relating to the loss of Grade I agricultural land and/or damage to the local landscape and ecological habitats.

In particular, some respondents felt that the proposals would be unacceptably visible from the Area of Outstanding Natural Beauty at Challock and Wye. The eastern development was considered to be particularly intrusive when viewed from the Wye Downs. Others were concerned that much of the development area falls within a Special Landscape Area, in which case residential development would be contrary to Policy EN27. Some representations also suggested, incorrectly, that the land was in the Green Belt, which it is not. Others were concerned about the views from Sites of Special Scientific Interest and Sites of Nature Conservation Interest.

Several representations referred to the ecological value of the flood plains around the proposed Kennington Circle East. Others were concerned with the ecological impact of development around Ulley Farm.

Conflict was also alleged with Preferred Option 5B on the basis that the proposal would result in loss of a transition zone of suitable scale between urban and rural areas.

##### Council's Response:

Many of the responses were particularly concerned with the impact of the proposal for the residential development associated with Kennington Circle East on the landscape and ecology of this area. It is proposed that this area is no longer developed, thus protecting the landscape and ecology in this location.

The development area is affected by the location of the 100 year floodplain and would result in the loss of Grade I agricultural land. The revised proposal will result in the deletion of the Kennington Circle East development and a small extension to the Kennington Circle North development, which would be at a higher density than originally planned. As a result, the total amount of high quality agricultural land lost to development would be reduced.

Adopted Local Plan Policy EN27 gives long-term protection to Special Landscape Areas. However, the policy recognises that landscape considerations carry less weight in SLAs than in AONBs and that due regard also needs to be given to the economic and social well being of the area. The impact of proposals on the landscape is clearly an important consideration in selecting the location for new development and the detailed design process will ensure that the landscape is protected so far as is possible. The GADF process has identified the need for a strategic road link in this area and, on balance, the Borough Council considers that that the proposal is the most appropriate in the circumstances.

The proposal will not impact upon the nature conservation value of the SSSIs and SNCIs to the north and east. The deletion of the eastern element of the proposal will reduce the impact when viewed from the AONB and SLAs, particularly from the Wye Downs. A green edge to development is proposed along the northern side of the Kennington Circle North development which will help to soften its impact on views from the north.

It will be necessary for developments to take account of the ecological value of development land by conducting ecological surveys

and implementing appropriate mitigation measures to protect ecological diversity.

The Borough Council do not agree that the proposal would result in conflict with Preferred Option 5B. This option requires careful planning and adequate resources to enable the proper planting and provision of appropriate facilities in a transition zone between urban and rural areas. Such a transition zone is proposed along the northern edge of the proposed development which is considered to accord with the aims and objectives of this preferred option.

### **Unsustainable Development**

#### Main Issues Raised:

A total of 126 representations objected to development at Kennington Circle on the basis that it was unsustainable compared with proposals for other growth areas in Ashford. Several respondents felt that greater priority should be given to brownfield development rather than greenfield sites like Kennington. Many considered that the proposals do not accord with the aims and objectives of RPG9, the Halcrow report [the initial study brief into Ashford's growth] and the Compact Growth Model since the development at Kennington would not provide the facilities of a new urban village and would take the form of a more traditional suburban housing estate. Many suggested that the development would not benefit from the public transport improvements being made in the town centre and in the new urban villages to the south.

Some representations were concerned that development in this area would take the form of a "characterless" housing estate which would contribute to urban sprawl.

Others considered that the proposal would conflict with Guiding Principles GP2, which aims to protect the countryside, and GP9, which guides necessary greenfield development to "the least environmentally constrained sites".

#### Council's Response:

Whilst the proposed housing development is not highly strategic in quantitative terms, it would provide an opportunity to help deliver the new road link and to boost the potential for this area of Ashford to be better served by public transport and community facilities. It is therefore considered to be appropriate in the context of the Compact Growth Model.

The realignment of the Kennington Circle North link allows development between the link and existing development to be slightly extended and the density increased. This will enable all 450 homes which were previously identified in the Preferred Options report to be provided just in the western part of the development area. The increase in density will improve the viability of public transport services to this area. In combination with the existing housing, it may also improve the viability of a neighbourhood centre for facilities and services which could benefit existing and future residents.

There is no reason to consider that the residential development at Kennington Circle should be characterless. The same high standards of design that will be required in all new developments across Ashford will apply equally here, whilst the higher density now proposed will help to ensure that development does not waste land by taking the form of "urban sprawl".

The Council does not consider that there is a significant conflict with Guiding Principles GP2 or GP9. Whilst the development of brownfield land is clearly a priority for the Council, it must be recognised that some development of greenfield land is necessary in order for the Council to fulfil the growth targets set by the Government. It is considered that the development of this relatively modest area of land at Kennington is fully justified given the strategic transport network, public transport and community benefits that will result.

### **Flooding**

#### Main Issues Raised:

A high proportion of responses (115, 62%) objected to the proposals on the basis that part of the site is shown on p.31 of the GADF report as being at risk of flooding. Particular concern was expressed in relation to the area of the A28 around the Golden Ball pub. Some representations suggested that flooding in the Kennington Circle East area is a bigger problem than is currently recognised in the reports.

#### Council's Response:

The main flood risk concerns related to the Kennington Circle East development which has since been deleted from the Core Strategy. Only a small part of the area proposed for the Kennington Circle North development is considered to be at risk of flooding. The Council will require this to be addressed in the detailed design of development in this area.

### **Need for Clear Edges to Development**

#### Main Issues Raised:

One representation noted that Willesborough Road had previously formed the clear edge to development in Ashford and questioned why this needed to change.

Concern was also expressed that whilst housing is currently proposed only on one side of the relief road, pressure would grow in time for it to expand onto the other side.

#### The Council's Response:

As the Kennington Circle East proposals have now been deleted from the Core Strategy, Willesborough Road will continue to form

the clear edge to development in this area of Ashford. The proposed revision would retain a strong edge to new housing development to the north of Kennington.

There is no proposal to expand development further north from the Kennington Circle North link road. Any future proposal would need to be dealt with on its own merits; however, the need to maintain a clear edge to development would weigh against such proposals for further expansion.

### **Residential Development**

#### Main Issues Raised:

Some representations said that Kennington Circle proposals should be removed from the Core Strategy altogether. In particular, some questioned the need for the residential development proposed, arguing that adopted Local Plan sites have often been developed at higher densities than originally envisaged; as a result, they argued that fewer houses would be required in future. Others argued that 400 empty homes exist in Ashford and should be brought back into use, whilst others suggested that no account has been taken of windfall sites in allocating development. Some suggested that since the Core Strategy over-provides housing by 15% and Kennington Circle represents only 2.5% of housing, it might not be necessary to provide it.

Some representations specifically objected to the infill housing associated with the Kennington Circle East relief road.

Some suggested that there should be no further building in the Kennington area unless or until congestion at Bybrook is relieved.

It should be noted that several representations referred to the development of an additional 1,000 dwellings at Kennington Circle. (This is incorrect as the Core Strategy proposes just 450).

One respondent suggested that there should be a greater concentration of housing along the major road "towards Brenzett" instead of at Kennington Circle.

Another suggested that the Kennington Circle development should be phased to take place in the final (post-LDF) phase because it involves greenfield rather than brownfield development.

One respondent suggested that the residential development at Kennington Circle would be unviable due to the financial contributions required and the need to overcome flooding issues.

#### Council's Response:

Following the deletion of the Kennington Circle East link road and associated residential development, and the realignment of the North link road, it is proposed that the 450 dwellings originally proposed for Kennington Circle can all be accommodated around the proposed realigned Northern link road. These will be provided at a higher density than previously suggested, therefore reducing the amount of greenfield land that needs to be released.

The GADF report sets out clearly how the Council can achieve its growth targets by 2031 and the Kennington Circle development forms part of this. The fact that some adopted Local Plan sites have been developed at higher densities has already been taken account of in arriving at the housing requirement calculations. Whilst the Council agree that every effort should be made to bring empty homes back into use, the fact remains that these are often privately owned and the Council cannot compel the owners to bring them back into active use. As a result, it is necessary to make additional provision. It is recognised that some development will result on windfall sites and assumptions have been made based on past trends.

The 15% housing oversupply has been introduced in order to provide flexibility. This common practice reflects the inevitable uncertainty surrounding developments coming forward in the timeframe envisaged. The oversupply figure is an estimate of the level of planned supply needed to actually deliver the growth targets set by the Government. It is clear that the oversupply is there for a good reason so deleting the Kennington Circle development simply to reduce the oversupply is not an appropriate option.

The proposal for the Kennington Circle East link road has now been deleted along with the associated infill housing. This has addressed the objections raised by many representations.

The proposal for the Kennington Circle North link will help to relieve congestion at Bybrook.

It is assumed that the reference to the major road towards Brenzett is the A2070 in south Ashford. Some residential and commercial development is proposed along this road, although much land adjacent to it also falls within the proposed Regional Wetlands Park and is not suitable for housing.

Whilst the Council agrees that the development of brownfield sites should be prioritised, it also recognises that a range of growth opportunities need to be offered to enable the market to respond to the growth targets set for the town. Kennington Circle is phased to take place during phase 2, after many of the key brownfield sites. It will be necessary to bring forward the strategic road proposals at Kennington Circle within a reasonable timeframe and the associated residential development would be necessary in order to help fund these links.

The Council does not believe that the development at Kennington Circle would be unviable. No evidence has been supplied by the respondent which would cause the Council to consider that the development would not be viable.

### **Community Facilities**

#### Main Issues Raised:

One respondent expressed concern that a school, originally envisaged for this site, had disappeared in the plans.

A number of objections related to concerns about the impact of new housing on existing services such as schools, doctors and dentists, and other infrastructure.

Council's Response:

The plans shown in GADF and the Core Strategy are indicative and only show broad areas for development. Detailed information such as school sites are not shown on the plans. However, if the detailed masterplanning process reveals the need for a school to serve the new development, this will need to be provided. However, this is not a matter for the Core Strategy.

The Council are concerned to ensure that there is adequate infrastructure to meet the needs of new development. Where appropriate, developers will be required to make contributions to improve or provide new facilities through the Ashford strategic development tariff.

**Loss of Privacy**

Main Issues Raised:

Some representations were concerned that residents of Ball Lane and Ulley Farm might suffer from a loss of privacy as a result of the new developments. There was also concern that school playing fields could be overlooked by the residents of new houses.

Council's Response:

It is not possible to judge the impact of the new developments on the privacy of existing residents at this stage. Clearly the privacy of existing residents is an important consideration which will be an important factor when considering more detailed plans in due course. However, there is no reason why an acceptable level of privacy cannot be maintained.

**Conservation and Archaeology**

Main Issues Raised:

The impact of the proposals on Listed Buildings, the Conservation Area and archaeological sites was raised as a concern in 11 of the responses. In particular, some representations were concerned about the impact of the proposed northern bypass on Listed Buildings and houses on Ball Lane within the Conservation Area and also on Listed Buildings around the proposed A28/Kennington Circle junction at Golden Ball.

Various representations also made reference to Roman archaeological finds in the area.

Council's Response:

The Council are equally concerned to protect Listed Buildings and to preserve and enhance the conservation area. It is not intended that any Listed Buildings should be demolished in order to create the new road link although it is recognised that this was not made clear on the map in the Preferred Options report. A new alignment is now proposed and the revised map clearly shows that no Listed Buildings will be destroyed. Similarly, there will be no adverse impact on the conservation area since the proposed area of secondary green space will create a buffer between the conservation area and the new development. The secondary green space between the existing residential development and proposed new housing area would also be extended along the full length of Ball Lane and the Green Edge would be extended along the A28.

Any concerns about potential archaeological finds in the area can be addressed by the requirement for developers to provide an archaeological impact assessment. This is a detailed matter which is not appropriate for inclusion in the Core Strategy.

**Other Issues**

Main Issues Raised:

Four objections were received on the basis that they considered public transport services would not be improved or would be inadequate to serve the proposed developments.

Four objections were received on the subjects of inadequate consultation/information; a lack of detail in the proposals; and impact on property values.

The current shortage of water in Kent was raised as a concern.

Two representations of support were received. One of these also proposed an extension to the residential area to incorporate land at Orchard Farm.

Council's Response:

The Council believes that the additional development at Kennington Circle will help create additional demand which may lead to improved bus services in the area. This will be a benefit for new and existing residents. In addition, the creation of the new link road will enable improvements to public transport services along the A28 corridor.

The Core Strategy Preferred Options report was placed on public consultation for 8 weeks in 2005 which is considered to be an acceptable level of consultation. The Core Strategy is, by its nature, a strategic document which doesn't deal with detailed matters.

These will be considered by other DPDs in due course. There is no evidence to suggest that the proposals at Kennington Circle will result in a reduction in property values.

The issue of water supply has been carefully considered from the outset in relation to the growth of Ashford. An Integrated Water Management Study (IWMS) has been commissioned to address this issue, to ensure that there will be adequate water supply to meet the needs of new development.

The representation seeking an extension to development at Orchard Farm is being treated as a "site submission" and is dealt with in the responses to those issues.

## Site-Specific Representations

Representations were received from the following organisations:

137 – Mr N Miaoulis	1222 – Pentland Homes Ltd & Jarvis Homes Ltd	1764 – Pentland Jarvis Holdings
140 – Godington House Preservation Trust	1223 – Jarvis Homes Ltd	1765 – Pentland Jarvis Holdings
144 – The Godington House Preservation Trust	1225 – Pentland Homes Ltd	1766 – John Floydd & Associates
145 – The Godington House Preservation Trust	1303 – Westbury Homes (Holdings) Ltd	1768 – Robert Brett & Sons Ltd
157 – Mr N Miaoulis	1349 – Mr E Dodd	1769 – Berkeley Community Villages
158 – Mr N Miaoulis	1350 – John Floydd and Associates	1770 – Hillreed Developments Ltd
340 – Brett Group Ltd	1366 – Ashford Cricket and Hockey Club	1771 – Hillreed Developments Ltd
433 – Mr M Smith	1400 – PAR Property Development Ltd	1772 – FDC Homes
486 – John Bourne & Co Ltd	1401 – PAR Property Development Ltd	1773 – John Floydd & Associates
883 – Central Police Training and Development Authority (Centrex)	1402 – Par Property Development Ltd	1774 – The Crown Estate
884 – Central Police Training and Development Authority (Centrex)	1410 – Mr & Mrs Brown	1775 – Hillreed Developments Ltd
900 – Bovis Homes Ltd	1423 – E P R Boorman Settlement	2078 - Landowners at Oxenturn
962 – Taylor Woodrow Developments Ltd	1465 – Malcolm Jarvis Homes Ltd	
970 – Taylor Woodrow Developments Ltd	1466 – Malcolm Jarvis Homes Ltd	
1003 – Persimmon Homes	1471 – The Lee Family	
1045 – South Kent College	1516 – Berkeley Community Villages	
1055 – South Kent College	1525 – Headley Brothers Ltd	
	1529 – Ashford Rugby Club	
	1584 – Capel House Property Trust	
	1587 – Capel House Property Trust Ltd	
	1614 – Pentland Homes Ltd	
	1763 – Pentland Jarvis Holdings	

It is not appropriate for the Core Strategy to allocate specific sites for development since it is a strategic document. Allocations will be made in subsequent DPDs. As a result, it is not appropriate to respond in detail at this stage in relation to individual sites. However, for clarity, the section below does indicate whether some of the more significant proposals below would fit into the broad Core Strategy approach.

Many of the representations listed below also refer to broad issues which are relevant to the Core Strategy. The section below therefore sets out where the responses to these issues can be found.

### **Kingsnorth**

- 1584 and 1587 consider that land at Kingsnorth should be brought forward into the LDF period.
- 1764 and 1765 sought the development of land at Kingsnorth.
- 1303 sought the allocation of land at Finn Farm, Kingsnorth for residential development.
- 137, 157 and 158 sought the allocation of land at Court Lodge, Kingsnorth.

### **Council's Response**

The GADF report was produced following considerable detailed work by a team of consultants with a wide range of expertise. The process was subject to substantial public consultation. The GADF consultants recommended the masterplan and phasing set out in the report after taking account of all of the relevant information.

The Council has adopted the GADF report as the blueprint for the future development of the town. Whilst the Core Strategy process provides an opportunity to continually re-evaluate the phasing and extent of development, any major departure from its findings will require an exceptional case to be made.

Objectors have identified in their submission many of the advantages that they say have led it to be recommended for development in the past, including its apparent deliverability and lack of planning constraints. However, by following a robust and clearly documented process, the GADF consultants considered that, taking the available evidence into account, Kingsnorth does not form the most sustainable option for early development during the LDF period.

There are several planning disadvantages to creating an expanded Kingsnorth in an earlier phase. The phasing proposed will help to ensure that development is directed initially to the principal urban extensions at Chilmington Green and Cheeseman's Green / Waterbrook in order to create sufficient development to support the SMARTLINK services and emerging community facilities. Developing three major urban extensions at the same time will hamper opportunities to create sufficient community and public transport services which are an integral part of the overall plan. This would also result in the unnecessary take-up of greenfield land at an early stage, which could damage chances of developing more sustainable brownfield sites and the demand for sites in the town centre. Moreover, it would result in over-development at an early stage, which would mean too much housing coming forward in advance of the increase in jobs and improvements to infrastructure.

The location of Chilmington Green makes it the least reliant on the junction 10/10a improvements compared with the other growth areas, and so it may be brought forward in the initial stages of the LDF. Cheeseman's Green is very well located in relation to the proposed employment area at Sevington and mixed-use area at Waterbrook and development there has been identified in the adopted Local Plan. There is clear planning logic to the phasing approach suggested in GADF and objectors' claims about the omission of Kingsnorth for the first two phases of development are therefore rejected.

Objectors propose that the amount of development at Kingsnorth should be increased from that set out in the GADF report. GADF Option 4 proposed a scenario where a Canal District of 3,500 houses and 2,200 jobs could be provided within the flood plain between Kingsnorth and the town centre. This would have generated a strong, continuous public transport corridor between the town centre and development to the south. However, the option carried significant risks, which were considered in detail on pages 128 to 131 of the GADF report. Later development options therefore reduced the extent of the Canal District to provide 1,800 units and 750 jobs. Because the reduction of the Canal District was shown to impact on the viability of the Kingsnorth arm of the proposed SMARTLINK service, the role of Kingsnorth was subsequently reduced at the same time. The objectors' justification for earlier and increased phasing at Kingsnorth would only appear to work if the public transport proposals were amended in line with their suggestions, which would be to the detriment of proposals for Chilmington Green and Cheeseman's Green.

The GADF consultants advise that beginning to develop the Kingsnorth area too soon could adversely impact on the viability of public transport services to early phase growth areas. It is principally for this reason that Kingsnorth is phased to be developed in Phase 3, which falls outside the current LDF period. As a result, land at Kingsnorth should not be allocated for development in the LDF.

The Council's view is that the broad phasing of the major areas of development set out in GADF provides an appropriate solution for the high quality, sustainable growth of the town. There is no reason, contrary to objectors' suggestions, that other growth areas cannot produce diverse and highly active neighbourhoods in the same way as Kingsnorth. Whilst it may be the case that parts of Kingsnorth would be slightly closer to the town centre compared with other proposed growth areas (at least in terms of "as the crow flies" distance rather than journey time), the disadvantages created by the reduced role of the Canal District inevitably weigh against its early development. Whilst other growth areas such as Chilmington Green may be slightly further from the town centre, parts of these areas are also within walking and cycling distance and are capable of being served by a viable, high quality public transport link, which will also benefit existing developed areas of the town. As a result, existing areas such as Stanhope will certainly benefit economically and socially from the growth of Ashford as proposed in the GADF report.

The Council does not agree with the suggestion that Cheeseman's Green would not form a sustainable settlement. The proposals for Cheeseman's Green have been designed to create a growth area of a sufficient size to support public transport and community facilities. The Core Strategy proposes the linking of Cheeseman's green and Waterbrook areas as a comprehensively designed and planned urban extension that is also very well located in relation to the proposed employment areas at Sevington. There is no reason to consider that development at Cheeseman's Green would overwhelm the proposed junction improvements on the M20; indeed, the improvements are designed to accommodate the new development in Ashford as a whole. If development was to take place at Kingsnorth, either in substitution for Cheeseman's Green or especially, if alongside it, any impact on junctions 10 and 10a would be likely to be similar or greater since Kingsnorth is also dependent, to a major extent, on these junction improvements.

Furthermore, Cheeseman's Green has historically been allocated for development in the Ashford Local Plan and outline planning permission has been granted for residential and employment development at Cheeseman's Green.

The Council also disagrees with the claim that development at Cheeseman's Green and Chilmington Green would undermine improvements such as the high speed rail link. Both growth areas are to be connected to the station by the proposed SMARTLINK service to encourage public transport use. In any case, the journey times to be achieved by the high speed rail service to London will be far quicker than could be achieved by road. Furthermore, few commuters to London choose to drive there as a result of restricted parking and the congestion charge. It should also be noted that whilst an element of out-commuting is inevitable, one of the aims of the Ashford growth area project is to provide an increase in local jobs alongside new housing to create a more sustainable pattern of development.

Whilst certain objectors suggest that they are co-operating with Canal District landowners to find a technical solution to help deliver greater development in that area, albeit without prejudice to its own position that Kingsnorth works in its own right, the fact remains that there are significant risks associated with the development of the Canal District as set out in detail in the GADF report. No evidence has been provided to indicate that such a solution has been found and so there is no overriding reason to depart from the current strategy for development.

#### **Sites in and around the Ashford urban area**

- 1525 seeks the development of the Invicta site for high quality residential development.
- 1045 and 1055 seek the allocation of its current Jemmett Road site for housing if it becomes surplus to requirements.
- 340 promotes the residential development of brownfield land at Chart Leacon at the earliest opportunity.

**It is not appropriate to comment here on the suitability of these individual sites for residential development. However, as these sites are brownfield sites within the established urban area, there may be a case for residential development subject to any conflict with other LDF policies. They will be considered for inclusion in the Urban Sites & Infrastructure DPD.**

#### **Kennington**

- 1465 and 1466 sought the incorporation of land at Orchard Farm within the draft allocation for Kennington.
- 900 sought the allocation of land at Kennington for residential development.

- 883 and 884 sought the redevelopment of the whole Centrex site.

**It is not appropriate to comment on the merits of these individual sites. However, in respect of objections 1465, 1466 and 900, the Council's general approach to development in Kennington is set out in detail in the Kennington Circle section of this response document, with the conclusion that the area of land east of the A28 should not be considered for development in the LDF. In respect of representations 883 and 884, this is a brownfield site that should be considered for inclusion in the Urban Sites & Infrastructure DPD.**

#### **Redevelopment of existing sports facilities**

- 1529 suggests development to help support facilities at Ashford Rugby Club. Specific comments are made which are addressed in the response to Preferred Option 2.
- 1366 seeks the removal of the designation of Ashford Cricket and Hockey Club as public open space and its allocation for residential development to fund the acquisition, relocation and development of new facilities elsewhere in Ashford.
- 1400, 1401 and 1402 stated that Ashford Golf Course should be allocated for residential development with the golf club relocating to a new course to be sited at Castle Farm, west of Sandyhurst Lane. It should be noted that the Council understand that this proposal has since been withdrawn.

**It is not appropriate to comment here on the suitability of these individual sites for residential development. In principle, there is a presumption in the LDF against the loss of existing public open spaces and sports facilities but the sites may be considered for inclusion in the Urban Sites & Infrastructure DPD.**

#### **Ashford - edge of town Sites**

- 1471 promotes the residential development of land adjacent to Lees Farm, Willesborough. The use of this land is not a strategic consideration and should be dealt with in the forthcoming Land Allocations DPD.
- 140, 144 and 145 consider that the Nicholas Toke Field should be allocated for residential development.
- 1763 sought the development of a park and ride facility and associated development at The Warren. The park and ride element of this proposal is broadly in line with the strategic public transport vision set out in the Core Strategy.
- 1350 and 1766 sought the development of land and property east of Bucksford Manor.
- 1768 proposes sports/leisure-led mixed-use development at Conningbrook.

**It is not appropriate to comment here on the suitability of these individual sites for development. These sites are generally outside the existing developed area and so may be unsuitable for residential development when considered against the existing Local Plan. However, being on the edge of the existing urban area, there may be arguments in favour of allocating some of these sites for future development, subject to consideration of several factors including the availability of alternative brownfield sites or whether they may help to deliver a key piece of infrastructure to serve the wider interests of the sustainable growth of Ashford. The sites may be considered for inclusion in the Urban Sites & Infrastructure DPD.**

#### **Canal District**

- 899 sought the development of land at the Canal District.

**The Council's approach to the potential future development of the Canal District is set out in the Core Strategy in chapter 4. If fundamental floodplain issues can be resolved in the future to the satisfaction of both the Council and the Environment Agency, then this area may be released but given that key constraint and its greenfield nature, the area of land shown in the submission documents for built development are not proposed within the LDF.**

#### **Chilmington Green**

- 1516 and 1769 promote the development of land at Chilmington Green and Discovery Park.

**The general principle of development at Chilmington Green and Discovery Park, as indicated in the GADF report, is supported in the LDF and set out in chapter 5 of the Core Strategy. Some detailed issues relating to the extent of the Chilmington Green urban extension are set out in the 'Great Chart' section of this response document. A detailed AAP for the Chilmington area will determine the precise nature and boundaries of the development in this location.**

#### **Sevington**

- 1410 sought the allocation of land at The Dean, Sevington for a housing-led development.
- 970 considered that, subject to detailed assessment, the triangle of land between the Southern Orbital Road, the M20 and the proposed J10a link road should be included in the Sevington employment allocation.

**Whilst no comment is made on these individual sites, land at Sevington and Waterbrook continues to be identified in the**

**LDF for mixed-use development. The detailed boundaries of these areas will be considered in a future site allocations DPD.**

#### **Cheeseman's Green**

- 1003 sought the allocation of land at South Stour Apiary and Munday Farmhouse, Cheeseman's Green for residential development.

**Whilst no comment is made on this individual site land at Cheeseman's Green continues to be identified in the LDF for residential-led mixed-use development.**

#### **Park Farm**

- 962 identifies a number of inaccuracies in the GADF report which they suggest may have influenced the public consultation process. It considers that additional development should be allocated to the south east of Park Farm and in conjunction with this, Cheeseman's Green should be reshaped, firstly to the north, to be more in line with the Local Plan allocation and secondly, to the south to remove part of the potential development area proposed in GADF. The final element of this proposal is the reduction of the proposed Kingsnorth Growth area to ensure the overall quantum of development remains in line with that of GADF. These comments relate primarily to the GADF report rather than the Core Strategy Preferred Options and the Council is confident that if there were any errors in the GADF report these have not adversely affected the promoted site.

#### **Council's Response**

The proposal to extend the Park Farm development area in addition to the existing extensions already allocated in the current Local Plan is not considered to be strategic in its own right but taken with the existing parts of Park Farm, would constitute a significant area of growth.

Park Farm is relatively isolated from the large development areas proposed to the East and West of the Ashford Growth Area. Expanding this node would constitute a significant move away from the compact growth model which incorporates large scale growth at each end of a linear public transport spine, providing high frequency, reliable, quality transport in the Ashford area. Large nodal piecemeal development, such as the proposed by the objector, does not represent the most sustainable growth model.

The SMARTLINK service is a vital strategic transport route which will link the developments to the south-east and south-west of the town in a sustainable way, allowing the maximum number of people to have the opportunity to travel on public transport. Early delivery of the SMARTLINK service is fundamental to the growth area's future success.

Adding Park Farm as a destination to the proposed route of SMARTLINK would result in a less frequent service for the whole town, as the distance of the new SMARTLINK route would have to be substantially increased to incorporate Park Farm. This could seriously reduce the attractiveness of the service to potential passengers thus encouraging more car trips and affecting the overall viability of the SMARTLINK service. Alternatively, more SMARTLINK vehicles would need to be purchased to achieve the same frequency, thus also affecting the viability of the service. The proposed rail halt at Park Farm would not provide enough frequency of movements to justify a SMARTLINK service there.

With regard to the perceived environmental constraints referred to in this objection, it is not considered that these have seriously prejudiced or pre-judged the approach to land at Park Farm in the strategic masterplan for Ashford. Park Farm is less suitable for significant growth within the context of a compact growth model than the approach to urban extensions set out in chapters 2 and 5 of the Core Strategy. It is still open to the objector to promote a limited extension to Park Farm as an 'urban site' in the Urban Sites & Infrastructure DPD.

Reshaping the Cheeseman's Green proposed development area towards the flood plain area moves some of the development away from the centre of the urban extension area. This will dilute the compactness of the area and reduce the amount of development within walkable distance of the central area. This point is dealt with in chapter 5 of the Core Strategy and in response to representations by the Church Commissioners.

With regard the issue of development in the Canal District, it is not felt that departing from this proposal is justified at this point. Firstly there are many aspects of developing the Canal District that need to be resolved. The Council are working in partnership with the Environment Agency to fully understand the flood storage capacity and scope for developing the proposed Canal District in the future. It would be inappropriate to prejudice that potential development or the proposed wetland park proposal in the Core Strategy through making the changes sought by the objector, particularly as there is more than adequate alternative development land available around Ashford that would result in a more sustainable pattern of development.

#### **Rural Area**

- 1225 proposed a new residential development of 50 dwellings at Westwell Court, Tenterden
- 1423 proposed a residential development on land north-west of Rogersmead, Tenterden
- 1775 proposes residential development on land north of Appledore Road, Tenterden.

**Tenterden is identified in Policy CS6 as being an appropriate settlement to make residential allocations. Site allocations will be made through the Tenterden & Rural Sites DPD – it is not appropriate to comment on the suitability of these specific sites at this stage.**

- 1223 proposes a new hotel in the St Michaels area of Tenterden.

**Tenterden is identified as a key local service centre in CS6. Policy CS17 provides general support for appropriate tourism**

**development. It is not appropriate to comment on the suitability of this site for the proposed use – any allocation for hotel development would be made through the Tenterden & Rural Sites DPD.**

- 433 proposes affordable residential development on a 0.54 hectares of land at the former Goods Yard, Wye.
- 1771 proposes residential development at land south of Burleigh Road, Charing.
- 2078 proposes residential development of approximately 270 dwellings on a site at Oxenturn, Wye.

**Both Charing and Wye are identified in Policy CS6 as being suitable to receive allocations. Site allocations will be made through the Tenterden & Rural Sites DPD. It is not appropriate to comment on the suitability of these specific sites at this stage.**

- 1772 proposes residential development at Ransley Farm, High Halden.

**High Halden is identified in Policy CS6 as a village which may be suitable for receiving residential allocations. Site assessments will be carried out and allocations will be made through the Tenterden & Rural Sites DPD – it is not appropriate to comment on the suitability of this specific site at this stage.**

- 486 proposes residential development on a site at Lossenham Lane, Newenden.
- 1222 proposes residential development on a 21 hectare site at Shadoxhurst.
- 1770 proposed development on land east of Woodland View, Wittersham for residential development.
- 1773 and 1349 propose and support minor development of a single dwelling on land at Kimberley Farm, Brabourne.
- 1774 proposed development on land at Court Lodge, Appledore for a residential-led mixed use development.

**Appledore, Brabourne, Newenden, Shadoxhurst and Wittersham are not identified in Policy CS6 as villages which are appropriate for residential allocations in the LDF. If an exceptional planning case is justified for small-scale development in these settlements, further interaction and dialogue would be necessary between the Borough Council and Parish Council, in line with the reasoned justification set out under CS6.**

## Miscellaneous Representations

Representations were received from the following organisations:

178 – Ms S Powell	352 – Mr R Shrubbs	1357 – Mr D Goldfinch
218 – Mr G Hewins	367 – Countryside Agency	1459 – Government Office for the South East
226 – Ashford Green Party	485 – Mr R Jenkins	1469 – Charing Parish Council
254 – Stagecoach in East Kent	980 – Taylor Woodrow Developments Ltd	1472 – Ashford Landowners Group
288 – Smeeth Parish Council	1211 – Mr R Whiteley	1487 – Biddenden Parish Council
338 – Mr R Shrubbs	1340 – L Wratten	1626 – Mr D Hammett
348 – Mr R Shrubbs	1341 – L Wratten	1746 – Mr R Goodenough
350 – Mr R Shrubbs	1343 – Mr J Tattersfield	1776 – Robert Brett & Sons Ltd

### Support

#### Main Issues Raised:

254 supports all plans that will promote access to public transport within the proposed residential and commercial development. 367 supports the approach taken to sustainability appraisal and strategic environmental assessment with the suggestion that the approach also include consideration of rural proofing. 1487 gave general support to the LDF.

#### Council's Response:

254, 367, 1487: Support for these key elements of the Core Strategy is welcomed.

### Objections

#### Main Issues Raised:

1459 considers the maps showing the three phases of the proposed development at Ashford are too detailed for a Core Strategy key diagram and that it is inappropriate to include the 2001-2031 map as it goes beyond the period of the strategy. It is also suggested that a key diagram should be more closely related to the core strategy text. Objection is also raised to the impression given in the options report that the Core Strategy is subservient to the GADF. The Core Strategy should set out proposals at the appropriate level of detail rather than just refer to what is in the GADF.

338 seeks opportunities for the existing communities of Ashford to be involved in the issues which affect them.

1211 seeks an increased role of the voluntary sector, the appointment of a church-based community-development officer and the provision of 5 new churches and facilities for other faiths in each of phases 1 and 2 and provision of facilities for under 18 mental health needs.

1746 raises a number of questions on various aspects of the Core Strategy – why the preferred options report is not subject to an SEA, why settlement boundaries are described in text rather than by drawing a boundary, the link between new housing and employment provision and why there is little mention of solid waste disposal provision.

352 seeks improvements to Junction 10 to be started now not in 2016 as set out in Appendix B.

288 expresses concern over the apparent lack of adequate health facilities being planned for the expanded Ashford. It seeks major improvements to the William Harvey and the car park or the construction of a completely new hospital, as well as a new police station with custody holding facilities.

485 objects to the principle of building more houses before significant improvements in the highway infrastructure. 178 raises concerns that the need for a joined up public transport system, particularly trains, for the villages is not addressed and is concerned that the increased demand for water consumption which will result from the new development has not been adequately addressed.

1472 raises concerns on issues of process. These consist of objections to the unwieldy nature of the LDF process, the lack of transparency resulting in the concern that the core strategy is more a statement of political will than a workable masterplan, a lack of focus on delivery (in part as a result of enhanced opportunities for community involvement), and the need for a properly funded Development Corporation to deliver the growth agenda.

350 objects to the poor level of publicity on the Core Strategy. 348 objects to the format of the representations form which prevents multiple representations being made on the same form which would be a more sustainable use of resources. 1626 is concerned that the consultation process is not sufficiently accessible to a large enough proportion of local residents due to the complexity and volume of documentation, corporate jargon and difficult to interpret maps (black background with black signifying post 2021 development) for example. Issues which are important to local residents, such as water supply, do not form part of the discussion at meetings held.

1341 objects to the long-winded and jargon laden reports, believes the maps are indistinguishable and states that the official response mechanism is convoluted. 1343 objects to the lack of details in the Preferred Options report particularly with regard to social facilities. 1357 objects to lack of paragraph numbers, the lack of scales on maps, incomplete cross references in the report and that the flood risk areas identified by the Environment Agency are not shown.

980 requests the addition of an extra bullet point defining Sustainable Development on page 6 as the concept of sustainability should apply equally to providing an adequate stock of housing for the people of Ashford as it does to objectives associated with

employment, social progress, environment and use of natural resources.

226 objects to the nature of expansion proposed and the assumptions upon which the idea of expansion rests and calls on the Council to adopt a policy which leads to a 'managed retreat' from the scale of expansion being planned. 218 and 1340 also object to the level of expansion proposed.

1469 wishes to see the village envelope defined in the Wish List of Charing Parish Council maintained and included in the Strategy for the Borough.

1776 would like to see an additional policy which addresses how waste will be dealt with at Ashford and how bulky building materials will be distributed into the town in order to facilitate the development programme which will be required in order to deliver the LDF proposals.

Council's Response:

1459: It is accepted that the maps included in the Preferred Options Report are presented at a more detailed level than is expected for such documents. However, a more detailed level of background analysis has been required for the preparation of a Core Strategy for this national Growth Area, entailing arriving at a preferred spatial model of growth. Such a growth model is contained in the GADF key background document and it is this that is included in the Core Strategy.

It was also considered appropriate to include in full the endorsed Growth Model, which is already in the public domain, in the Core Strategy, although its final phases postdate the time-span of the Core Strategy. The time scale for the masterplanning for the Ashford Growth Area covers the period to 2031 and is based in part on the development of three new urban communities. The level of development proposed at these three new peripheral settlements to the south of the town of between 4 – 6,000 homes has been carefully set to create a sustainable critical mass of residents to support employment, retail and community facilities and to anchor the new SMARTLINK public transport system proposed for the town. Although the delivery of these new settlements will take place in part beyond the lifespan of this Core Strategy it is concluded that the principles of such an approach to the growth of the town should be made clear in this Core Strategy document which establishes the principles for development in the Borough.

The GADF is not subservient to the Core Strategy as suggested in 1459. It has been broadly endorsed as a key background document to the Core Strategy.

338: Opportunities for the existing communities of Ashford to get involved in planning of the borough are set out in detail in the Council's Statement of Community Involvement, submitted to Government in February 2006.

1211: The importance of community facilities and support of this kind are recognised as the Council plans for the development of successful, vibrant, sustainable communities. The provision of places of worship will be given consideration when new developments and their infrastructure, including social and community facilities, are addressed and land is being allocated. Land allocations and infrastructure provision are not the remit of the Core Strategy and will be the subject of the Urban Sites and Infrastructure DPD to be drawn up in due course. Non land-use based services and assistance for existing and planned communities is addressed by the Council's Community Strategy.

1746 and 1469: The preparation of a Sustainability Appraisal, incorporating an SEA (Strategic Environmental Assessment) is now a statutory requirement. One was prepared and formed part of the consultation process for the Core Strategy Preferred Options Report.

It is Council policy not to delineate settlement boundaries on the Proposals Map but to rely on a written description which can be applied to all settlements.

352: Improvements to Junction 10 are scheduled to begin in August 2006.

288: Improvements to and expansion of the facilities at the William Harvey hospital (including parking and access links to the hospital) are recognised as critical to cater for the health needs of an expanded town. Expansion of the facilities at the hospital are currently included in the Local Plan and improvements due to start shortly to Junction 10 of the M20 will address some of the access issues but this is acknowledged as a key facility within an expanded town and will therefore form an important element of the Urban Sites and Infrastructure DPD to be released later this year. Health services provision along with the policing of the town is also a matter for the Community Strategy, which is produced by a range of key local agencies – including the police, the Primary Care Trust, the Borough Council and the voluntary sector.

485: The importance of ensuring that infrastructure does not lag behind the provision of new houses as it has done in the past is acknowledged and is reflected in the work currently being progressed by the council on a Strategic Tariff on new development in the borough. Such a tariff was discussed in Option 10 of the Preferred Options Report and will form part of the submission Core Strategy.

178: A new public transport system is proposed as part of the sustainable expansion of the town – issues affecting the provision of train services to the villages of the borough served by the railway system are beyond the remit of the core strategy. Small scale new development proposed at a number of the villages in the borough with railway stations will help to enhance the viability of such services. The constraints imposed on Ashford's growth by water supply shortages were addressed in the Halcrow report into Ashford's capacity to grow. An Integrated Water Management Study has been prepared to address issues in regard to water supply and wastewater treatment and is feeding into Core Strategy policies. The adoption of the Building Research EcoHomes Standards will be promoted in the Core Strategy. These promote the sustainability credentials of developments including water consumption reduction measures.

1472: The publication of a preferred options report stage is a statutory requirement of the new planning system. It is not accepted that the production stages of the Core Strategy involve a lack of transparency, rather the introduction of public consultation opportunities at this early preferred options stage serve to enhance the transparency of the process and the opportunities for members of the public to make representations on emerging policies for the borough. Objections to both the delivery mechanism for

the growth agenda and the LDF process itself are beyond the scope of the Core Strategy.

350: objects to the presentation of the Core Strategy to the public, the level of the publicity attached to the Core Strategy, the content of the leaflet and criticised the content of the exhibition. These views are not accepted. Every effort was made to involve all sections of the community in the consultation on the Core Strategy Preferred Options Report. This resulted in over 1,500 representations being made by local groups, organisations and members of the public. Consultation letters together with the Core Strategy Preferred Options Report were sent to all 'specific consultation bodies'. A consultation letter and summary leaflet was also sent to all 'general' consultees on Ashford's LDF database. A statutory public notice was published in the local newspaper prior to the start of the consultation period, and articles also featured in the local press and in Ashford's Voice, the Council's magazine. Summary leaflet was produced which outlined the main issues and proposals. It provided details on how to get involved including where to access the Core Strategy report. The summary leaflet was widely distributed to principal libraries throughout the borough and the civic centre. There were two static exhibitions, one located in the Civic Centre and the other in the Ashford Library. There were also 11 staffed public exhibitions held around the borough where members of the public could discuss proposals with planning officers. Exhibitions were advertised in the local newspaper and on the council's website, with well over 500 people attending the staffed exhibitions.

348 and 1626 also object to elements of the procedure for making representations on the Core Strategy. These objections are also not accepted. Each individual representation made on the Preferred Options report needs to be addressed and responded to and therefore it is important that each representation is made on a separate form. Opportunities were also available to access the representation form online and to email representations as an attachment. The level of documentation was kept to a minimum within the framework for the preparation of a Core Strategy for a national Growth Area and every effort was made and will continue to be made to reduce incidences of 'corporate jargon.'

1341, 1343 and 1357 object to the format, design and content of the report. As stated earlier every effort will be made to ensure 'corporate jargon' does not occur. The Council will endeavour to ensure that the submission Core Strategy is easy for people to understand. It is not considered appropriate to include flood risk area maps in the Core Strategy as such information is readily available elsewhere.

980: The provision of adequate housing to meet the future needs of the borough is a key role of the housing allocation and LDF processes and residential site allocations are based on planning for sustainable development across the borough. The sustainability principles set out on page 6 of the Core Strategy Preferred Options Report have been reviewed and a series of key sustainability objectives contained in the Core Strategy submission document in policy CS1.

226, 218 and 1340 all object to the level of expansion. This is set at national level in RPG9 and therefore must be accepted as the basis for the preparation of the Core Strategy.

1776: The Core Strategy promotes minimising resource use during the delivery, including construction, operation and maintenance, of the building programme proposed to meet the national growth area agenda at Ashford. It is not felt that a policy addressing waste and building materials distribution is required over and above policies endorsing the adoption of Eco-Homes and BREEAM standards.