

MATTER 9 – TIER 3 AND OTHER SETTLEMENTS

- **Do the sites identified in the DPD represent the best strategy when considered against reasonable alternatives, with particular reference to:**
 - **village form**
 - **number of dwellings in relation to local needs and the sustainability credentials of the settlement as well as site availability**
 - **the best balance between the development of greenfield sites and previously-developed land**
 - **the promotion of vibrant and sustainable rural communities**
 - **effect on wildlife particularly at ALD1 and BID1**
1. The starting point for the strategy adopted in this DPD on the distribution of development within the so-called 'tier 3' settlements is policy CS6 of the Core Strategy.
 2. Policy CS6 requires the DPD to make the detailed housing site allocations based on a hierarchy of settlements suitable for limited expansion. The Council's position on allocations in Tenterden and the 'tier 2' villages of Charing, Hamstreet and Wye are covered under other matters to be discussed at this Examination.
 3. Policy CS6 also identified a provisional list of medium-sized 'tier 3' settlements which was to be confirmed in the Tenterden & Rural Sites DPD. These settlements, between them, would allocate the remaining residential development that could not suitably be accommodated in Tenterden and the tier 2 villages.
 4. As a first step towards establishing which settlements should form the group from which site allocations should be made, the Council reviewed the Sustainability matrix in line with the Core Strategy Inspector's suggestions. (Para 6.7 of the Core Strategy CD5). This process effectively confirmed that, in sustainability terms, the provisional list of 'tier 3' settlements in policy CS6 remained appropriate and no additional settlements should be included. Therefore, the Council did not consider sites in other settlements to be acceptable, in principle, for residential site allocations. Any sites promoted in such settlements, such as Smarden (TPV248) should not be allocated in the DPD as they would be inconsistent with policy CS6 of the Core Strategy.
 5. Paragraph 6.19 of the Core Strategy deals with the potential status of Pluckley in 'tier 3'. Since the publication of the Core Strategy, it has become clear that the local Parish Council do not seek additional development, as para. 6.19 suggests (TPV310 and TPV312). Nevertheless, due to Pluckley's place in the sustainability matrix, the Council has considered potential sites

in or adjoining the village but as is discussed below, no site is considered to be suitable for allocation in Pluckley.

6. Similarly, paragraph 6.18 of the Core Strategy deals with the status of Challock and Hothfield. The sustainability matrix assessment confirmed that Hothfield should not be considered as a location for site allocations, whilst in Challock, despite its modest sustainability credentials, potential sites for allocation were considered. This is discussed in more detail below.
7. In considering an appropriate distribution of allocated sites across the 'tier 3' settlements, the Council has had the objective of ensuring that no single settlement should be unreasonably burdened by a significant residential allocation, either on a single site or a combination of sites. Although policy CS6 would, in theory, enable the whole 'tier 3' quantum of residential development to be allocated in just one or two settlements, such a strategy would be perverse under a hierarchical allocation policy where it resulted in more development being allocated in a 'tier 3' settlement than in a 'tier 2' settlement.
8. Therefore, the Council has followed a strategy for 'tier 3' allocations where residential development is reasonably dispersed across a range of villages and no village is proposed to accommodate as many as the 45 dwellings proposed in Wye (the lowest of the 'tier 2' settlement allocations).
9. Having established the group of settlements from which site allocations should be made, the Council embarked on a thorough and comprehensive assessment of potential sites, which is set out in the Sustainability Appraisal (CD2 a&b). This exercise, coupled with the local community workshops, helped to establish the most appropriate sites within the 'tier 3' settlements for residential allocation. The indicative capacities attributed to the proposed allocations reflect the size of each site, its relationship to the character of the surrounding area and the form and density of residential development that would be appropriate on the site.
10. The Council considers that the sites proposed to be allocated in the third tier settlements represent the most suitable locations in which to deliver the quantity of housing attributed to the tier as a whole in the DPD. As such, they represent the best strategy compared to other reasonable alternatives. This is set out in more detail for each village below.

Aldington

11. ALD1 (originally ALD02 in the Sustainability Appraisal (SA)) is located at the entrance to the village along Calleywell Lane and provides a natural extension to the existing developments of Celak Close and Quarry Wood cul-de-sac. Celak Close is a well established local needs scheme that currently adjoins open countryside and is visible on the ridgeline due to insufficient screening.
12. In deciding if any sites would be suitable for development within Aldington considerable weight has been given to sites that would have a minimal visual impact on the character of the surrounding landscape as Aldington sits on top of a prominent ridgeline that forms part of the Greensand Ridge. Quarry Wood naturally screens part of ALD1 to the east and small woodland copses west of Calleywell Lane provide natural screening to the site from the west.
13. In addition, developing ALD1 will help to minimise the visual impact of development on the open aspect north of the village as Policy ALD1 requires substantial landscaping along the northern boundary. The Council considers one larger site that is less visually intrusive to be preferable over a number of smaller sites which, in combination, may be detrimental to the character of the surrounding countryside.
14. ALD1 is deliverable as it is owned by two individual landowners that have confirmed their land is available for development. The site is divided into two parts which will enable the development to be gradually integrated into the village over a suitable period of time. Calleywell Lane provides a straightforward access onto Phase 1 which can accommodate up to 20 dwellings. Once released for development, Phase 2 would be accessed from the Quarry Wood cul-de-sac in the south-eastern part of the site.
15. Aldington village is linear in built form running along Roman Road. The village amenities are scattered throughout the village but are all within walking distance of ALD1. The site lies adjacent to a large area of neutral grassland which fronts Quarry Wood and is used as public open space and links to an open village green which is in the heart of the village. Developing ALD1 will help to maintain and promote use of this public open space. The site is outside of the conservation area and so will not alter the historic character of that part of the village.
16. Although the site is considered by Kent Wildlife Trust (TPV218) to be situated in an ecologically sensitive area, they do not object to the site being developed as Quarry Wood is not designated and data held on the Kent Landscape Information Systems (KLIS) shows the grassland to be species poor. Paragraph 6.102 of the DPD (CD1) requires a buffer to be provided between the new development and Quarry Wood to ensure any landscape

proposals are ecologically compatible with existing woodland. A buffer which links to the substantial screening along the northern boundary of the site, as well as retaining the existing public footpath between Quarry Wood and the Quarry Wood cul-de-sac will provide mitigation measure for any increased human activity in the immediate area caused through new development.

17. A representation was received from the Parish Council (TPV54) supporting development at ALD1. They also consider the allocation of ALD1 to be consistent with the findings of the community workshops held in the parish.
18. The Council have received a representation (TPV84) which objects to ALD1 as it is '*considered to adjoin the village*' as Celak Close was built as a local needs scheme in 2003 and in their opinion '*cannot form part of the village confines*'. It is the Council's view that this site, now that it is built, forms the new built-up confines of the village, and so can be considered as such in the sites assessment.
19. Southern Water raised an objection to wording in Policy ALD1 (TPV429) regarding an existing sewer under Phase 2. We have sought to resolve this through revised wording in the Regulation 30 version of the DPD (CD1), as recommended by Southern Water.

Alternatives

20. Land south of Roman Road (originally ALD06/14 in the SA) has been proposed for allocation by Jarvis Homes (TPV144), instead of ALD1. It proposes land for residential development with an indicative capacity for 30 dwellings. Although this site is in a central village location the site is an important green space that provides the only substantive break in the ribbon development along the southern side of Roman Road to allow limited views out into the countryside.
21. The proposed allocation south of Roman Road would also lead to the loss of an existing employment site which is in active use (the abattoir). This would normally be contrary to Policy TRS7 of the DPD, unless replacement premises of the same size or larger can be found within or adjoining Aldington. The objector has not provided any evidence as to whether there are any alternative sites available for the relocation of the Abattoir. Therefore, although, it might be argued that this site would involve the re-use of a brownfield site, it would also result in the loss of an active employment site in the village.
22. The objector also stated (TPV144) that the Sustainability Appraisal (CD2) assessed only part of the proposed allocation (ALD02). The Council can confirm that ALD1 as a whole was assessed as part of the SA process, as explained in an addendum to the Sustainability Appraisal (CD2b). Site ALD

02 on the Aldington Map (p158) was drawn incorrectly and didn't reflect the area which was actually assessed in the findings of the appraisal. Nor did it reflect the land promoted by the relevant landowners. An amended map was redrawn to reflect the area assessed in the appraisal.

23. Land off Goldwell Lane (originally ALD09) has been proposed for allocation by Environ Communities Ltd. (TPV170) as a substitution for ALD1 Phase 1, and in addition to, ALD1 Phase 2. It has been submitted as a residential development with an indicative capacity for 20 dwellings, as well as employment and community buildings.
24. Although Goldwell Lane was a supported site at the community workshops, the Sustainability Appraisal (CD2) found the site to be less suitable than ALD1. The site lies on the eastern edge of the village and is highly visible from open countryside to the north and east towards St. Martin's Church.
25. The objector's site (TPV170) at Goldwell Lane proposes employment uses and new community/medical facilities if developed. Following evidence set out within the Employment Land Review (CD7) it is the Council's strategy not to make employment site allocations but to follow a windfall approach to employment development in the rural areas, (refer to Matter 11). ALD1 will also deliver community facilities as part of the policy criteria which requires development to provide a financial contribution to community projects established under the Section 106 Agreement from the former Aldington Prison site.
26. The objector (TPV170) claims that 'land to the south fronting Roman Road and opposite the Primary School can be made available for the setting down, picking up and associated parking for school trips including sufficient turning and parking for buses'. The Council considers the area identified on the objectors map for setting down/picking up and associated parking to compromise children's safety as they would be required to cross Roman Road to get to the parking area. There is also no evidence that traffic calming measures will ease congestion at 'school run' times along Roman Road.

Bethersden

27. At the north eastern corner of the village, linear frontage development extends from the village centre along the western side of Mill Road towards the crossroads known as 'Bateman's Corner'. At the end this row of development there is a small development of bungalows which breaks the mould by occupying a deeper site so that the rear two bungalows and their gardens occupy land rearwards of the existing line of development.
28. The site BETH 1a (originally BETH06 in the SA) is part of a field between these bungalows and the listed cottages at Bateman's Corner. The depth of

the development site would follow the line of the rear gardens to the adjoining bungalows, The Poplars, on its south western border.

29. There are trees along the roadside boundary of the BETH 1a site most of which may be able to remain to on the site in accordance with policy BETH 1a to help the new development fit in with the landscape. These do not form a dense screen and there are views into the site. Development here will have an impact upon the landscape but will infill a relatively small gap in the existing line of development and will therefore easily be assimilated into the landscape. As the field slopes upwards away from the road it is likely that views through the new development to the countryside at the rear can be maintained.
30. The small copse in the corner of the field next to the adjoining listed buildings can provide a useful buffer to soften the transition between the new development and the listed buildings at the crossroads. Policy BETH 1a requires the provision of landscaped screening to the north west boundary so that the site will be contained within the lower part of the field in line with the rear boundaries of the adjoining bungalows.
31. The site is conveniently located for the recreation ground, which is virtually opposite the site and development here can contribute towards its improvement or maintenance. The site is just over 400m from the village shop. The distance from the school is rather greater being in the order of 800m but is still a reasonable walking distance for most people. There is a grass verge in front of the houses between BETH 1a and the village centre so that there is space for the provision of a footpath.
32. The site is large enough to contribute to the affordable housing needs of the village, which is something that the residents have emphasised as being one of their priorities. It is envisaged that there would be in the order of 15 dwellings on the site and these can be built at an appropriate density to reflect the edge of village setting and the adjoining listed buildings.
33. The site is strongly supported by village residents and in particular members of the Bethersden Consultative Committee consistently voted this as the most favoured site for development. It is important to realise that residents consider this site to be well located for village facilities and services and that it would have a limited impact upon the surrounding landscape character which can be mitigated by a sensitive layout and landscaping scheme.

BETH 2

34. The desire for an additional area of public open space more easily accessible to the larger part of the village than the existing recreation ground was something which was strongly expressed at the village workshops and through the Bethersden Village Design Statement.

35. BETH2 (originally BETH 02 in the SA) would be an enabling development that would consist of a small number of dwellings and would provide a considerable area of public open space as one of the desired outcomes. The site BETH 2 occupies part of the open area between the two historic core parts of the village. The policy BETH2 for the development of this site would bring forward an area of public open space on land that is open but not publically accessible at present whilst ensuring that the prevailing character of this part of the village remains largely unchanged.
36. The new dwellings would have access from the cul-de-sac development at Forgefield and the proposed small residential development would be towards the southern and western boundaries. As the development would be at the lower end of this sloping field, their intrusion into the open space and their impact upon the built form of the village and the landscape would be limited.
37. Both the village centre to the north and the A28 to the south are easily accessible from this site via the footpath. The site scores well in the sustainability appraisal (CD2a) particularly with regard to accessibility.
38. Whilst the 5 new dwellings would be within the Conservation Area, they would be at its outer edge and would relate more closely to the 1960s Forgefield Development which is outside the Conservation Area. This site would therefore both preserve village form and secure the provision of an additional area of public open space for the village and has the support of village residents.
39. Concern from one resident, Mr Nigel Millen (TPV109), was expressed with regard to the likelihood of flooding and the situation being made worse in Forgefield by the proposed new development of BETH 2. Policy CS20 of the Core Strategy (CD 5) requires all development schemes to include appropriate sustainable drainage systems. As a minimum, the scheme will be required to avoid any net increase in run-off rates. As this is only a development of 5 houses, complying with this requirement will not be too onerous and avoiding worsening the flooding issues should be achievable by means of a SUDS scheme. The new development may also give some scope to alleviate existing problems.

Alternatives

40. The site BETH 14/17 in the SA is the large field to the west of the village school development promoted by Mr James Gibbons (TRSC 97), who considers that his site should be allocated. Development here would encroach into the open countryside, have access from narrow country lanes and change the character of one of the most rural gateways into the village. It would not conserve the form of the village and would project out

into open countryside on the western side of the village. Whilst conveniently close to the school, it would involve an uphill walk to the shops and the local recreation facilities.

41. Hobbs Parker, on behalf of Mr G Crabtree, are promoting land north of Church Hill (TRSC115), as an alternative to BETH1a. It should be noted that this proposal was only submitted in response to the proposed changes to the Publication version of the DPD and not in response to the Regulation 27 consultation. Three different schemes for 15, 33 or 54 houses are proposed on different sized sites.
42. Existing development in this part of Church Hill is very low density and sparsely laid out frontage development between the school and the church and this sets out a very clear character to this part of the Conservation Area.
43. In principle, a scheme of 54 dwellings in Bethersden would be unacceptable. Such a scale of development would be out of proportion with the nature of the settlement and would be greater than the scale of allocation in Wye in tier 2. In any event, this scale of development in this location would have a very significant impact on the character of the Conservation Area in this part of the village. Similarly, a scheme of 33 dwellings here would also have a significant impact on the Conservation Area and encroach into the adjoining countryside to the north-west of the village.
44. Whilst a scheme of 15 units would be more in keeping with the appropriate scale for Bethersden, this too could not be achieved without fundamentally altering the character of this part of the Conservation Area, whether delivered as frontage development or in a cul-de-sac style. The latter would be particularly damaging as all the modern cul-de-sac developments in the village that lie between Church Hill and the A28 all fall outside the Conservation Area.
45. It is noted that the representations from Hobbs Parker include their critique of the Council's Sustainability Appraisal in respect of the allocated site BETH1a (BETH06 in the SA), the previous allocation in the Regulation 27 version of the DPD (BETH09 in the SA) and BETH19 in the SA. Whilst the Council does not accept the criticisms made, it should be noted that no appraisal or assessment has been of the precise area of land now being promoted for allocation as BETH19 only covers a part of the proposed site – and in the case of the schemes for 33 and 54 units, it covers less than half the extent of the proposed site.
46. Therefore, the promoter has not carried out a proper Sustainability Appraisal of the proposed sites as they are required to do so, and in such

circumstances, notwithstanding the unsuitability of the sites in the Council's opinion, it would be unsound for the Plan to be amended to include them.

Biddenden

47. Development of BID1 (originally BID11b in the SA) would constitute an extension of the built form of the area and would merge the existing built up boundaries that are present here. Therefore, there would be no visual intrusion caused by development here. The site is well located in the village, within walking distance of many of the village services and adjacent to the play area and recreation field.
48. It is considered that a small allocation of residential units here is in keeping with the character of the surrounding area and provides the opportunity to create an attractive west-facing aspect for dwellings overlooking the countryside.
49. The site allocation has received objections from Kent Wildlife Trust (TPV252) and the Milton Group (TPV27) on biodiversity grounds. KWT state that BID1 is part of a larger complex of lowland meadow with a large network of ponds that contains BAP protected species. TPV27 refers to the application of 04/2204 that was granted for the existing housing in Sandeman Way, which highlighted that Great Crested Newts had been recorded in the area.
50. The Council accepts that this is correct but this was not regarded as a reason to prevent development going ahead in that instance and should not be regarded as a reason not to allocate BID1 now. There are no ponds on the allocated site but further ecological survey work should be carried out before the site is developed. If this results in protected species being located in the area, appropriate mitigation measures should be sought in line with policy CS11 of the Core Strategy. Policy BID1 and its supporting text could be amended to make reference to this issue if the Inspector felt that would assist in clarifying the situation.
51. Representation TPV27 infers that Southern Water object to housing on this site due to the potential for odour pollution from their nearby waste water treatment plant, as this was their position when the 04/2204 scheme was submitted. However, Southern Water was consulted on this DPD and have not raised a formal objection to this site. In any event, the treatment plant lies downwind (assuming prevailing winds) of the site and there is existing residential development that is much closer than BID1.
52. The representation also objects on the grounds that BID1 lies within a SLA and is therefore unsuitable, but the whole of the village falls within this designation, including the site they are promoting (BID25 in the SA).

53. BID1 was favoured by the members of the community workshop and has support from the Parish Council, although they have indicated a preference for a reduced allocation of 8 dwellings. The policy does not need to be amended as the capacity of 10 is only indicative.

Alternatives

54. The Milton Group's proposed site (BID25 in the SA) does not score well in the Sustainability Appraisal as it lies within the local Conservation Area and is surrounded by a number of listed buildings. It has a very large pond in the centre and is scrubland behind existing housing. The access to the site would be via the access to the electricity substation that is located on the site. EDF Energy has confirmed that they have not been contacted regarding the development of this site, or using their access point. This site is therefore not considered to be suitable for allocation.
55. Alan Bishop has proposed site BID03/17 in the SA (TPV136) but this was considered to be unsuitable for allocation as it would significantly affect the landscape setting of the village and would be clearly visible from the wider countryside. The site has no clear vehicle access point and it would be backland style development.

Chilham

56. The village of Chilham is a village of particular historic character, with a large Conservation Area containing a number of historic buildings. The centre of the village is also an important local tourist attraction, which has been used as a period film set. The village is largely contained in the AONB, which envelopes around the main village and extends out to Bagham Lane in the east. The village has a number of key attractive entrances including the tree lined avenue which extends the length of Bagham Road and which forms part of the Conservation Area.
57. The former Chilham Sawmills site (CHIL1), (originally referred to as CHIL01 in the SA) has been selected as the preferred site for allocation. The site is not located in the AONB and it is considered that development here will have the least impact on the character of Chilham and the setting of the village, including the Conservation Area and its key entrances. The site also avoids developing in the 100 year floodplain which can be found to the south of the village.
58. The site lies in close proximity to the Chilham railway station, making it a particularly accessible location in terms of access to public transport. Accessibility to the site is further improved by the proximity to the A28, which is key link between Ashford and Canterbury.

59. The site has been developed in the past and has a long planning history. It was allocated in the Local Plan for roadside facilities, including a pub/hotel and restaurant. Employment uses would also have been acceptable. The site also had an outline planning permission granted in 2007 (07/00422/AS) for employment development comprising 4,125 sq metres of office and light industrial development, within use class B1. Therefore, although the site is not considered to be currently brownfield, the principle of development has long been established on this site.
60. Two representations have been received against the decision to change from the Borough Local Plan allocation of the site to a residential allocation. However, the site has failed to come forward for any viable employment or roadside facility use in the years since the adoption of the Borough Local Plan, even after a continued and sustained attempt to advertise the site for such purposes. Furthermore, the site currently offers the most suitable residential development site in the village.
61. The owners of CHIL1, Stour Valley Estates, represented by Lee Evans Planning (LEP), support the allocation of the Sawmills site for residential development. However, they have highlighted the following points as objections to the policy.
62. The provision of the rail users car park (TPV354) as part of CHIL1 is considered by LEP to be an unsound approach because the need for the car park is not quantified or assessed and a survey has not been undertaken to assess whether this is the best location for the facility or how many spaces would be needed.
63. However, the station currently has virtually no dedicated parking and vehicles are parked along the station access road which also provides access to other adjacent businesses. As Chilham lies on the direct line to Ashford (and its high-speed services to London), it is reasonable to anticipate that the station may enjoy extra patronage and additional pressure for convenient car parking. It is agreed that discussions with the relevant railway operators should take place in due course to establish a reasonable quantum of spaces and this is reflected in para. 6.127 of the DPD but it will be important in creating a successful residential layout for the site that commuter parking is controlled.
64. LEP also request that the decision to include on-site equipped open space (TPV367) should be considered as one of two alternatives. It is suggested that the policy should indicate an alternative, the provision of a commuted sum to improve open space elsewhere given the requirement to improve the links from the site with the rest of the village.
65. The Council considers that provision of some equipped open space as part of the development is the preferred option as this would help to promote a

more sustainable and inclusive development, specifically providing for the needs of younger residents, and obviate the need to get to the existing facilities that are located across the A28. However, the Council accepts that, if sufficient improvements linking the site to the main village are provided, then an alternative off-site provision could be considered. Such a reference could be added to the supporting text of CHIL1 if the Inspector considered that this would constitute a more flexible approach.

66. Finally, LEP (TPV356) outline that the indicative housing numbers specified in paragraph 6.37 and Policy CHIL1 do not appear to have been based on an appraisal of the sites development capacity and therefore suggest that the capacity should be expressed as a range, between 30 and 40 dwellings, rather than an indicative number.
67. On this, the Council has appraised the potential site capacity and given the other requirements of the policy, 30 housing units, is considered reasonable. However, the exact number of dwellings, and the design and layout of the site should be examined further at the planning application stage. Stipulating a range of residential units, as suggested, would provide no greater flexibility than the indicative figure set out in the policy.

Alternatives

68. Spiller Associates (TPV33) on behalf of Mr and Mrs JFE Smith has put forward four sites that could be utilised individually or in combination, as an alternative allocation to the CHIL1 site. These sites are located in the Bagham Road area of the village and labelled Chil02a&b and Chil03a&b in the Sustainability Appraisal.
69. Spiller Associates consider that the CHIL03 and CHIL02 sites are located in a more suitable location because they are better connected to the main village core and due to the nature of the smaller land parcels, the development would be more in-keeping with the existing development, more piecemeal in design and clustered around open spaces. It is also identified that in recent years new development has come forward either side of Bagham Road.
70. However, it is considered by the Council that development of the sites either side of Bagham Road (CHIL03a&b) would have a detrimental impact on a key entrance to the village which forms part of the Conservation Area. Bagham Road is currently lined by an avenue of mature trees and due to the relatively close spacing of these trees the Council believes that some would need to be removed if development were to take place here.
71. It is also considered by the Council that the alternative options offered by Spiller Associates (CHIL02a&b) provide a key part of the rural setting to the village, making it inappropriate for a residential allocation. These areas lie

within the designated AONB which wraps around the eastern part of the main village and form the gap to the Bagham Lane properties and the development alongside the A28. Part of the CHIL02a site also lies within the 100 year floodplain. The northern built-up part of the village has a distinct boundary, which is clearly separated from the A252 road by CHIL02b.

72. All of the sites proposed by Spiller Associates are contained within the AONB and all lie within or adjoining the Conservation Area. Development in any of these areas would have a damaging effect on the setting and character of the village

Rolvenden

73. Development at ROLV1 (originally ROLV04 in the SA) will complement the nature of built development which falls to the east and west of this site and will also help to integrate Gatefield Cottage into the main body of the village.
74. The whole of Rolvenden lies within the High Weald AONB. However, it is considered that ROLV1 will have limited visual impact on the surrounding countryside given its relatively enclosed nature. In addition, the existing tree line along the northern edge of the site provides natural screening from the open countryside to the north.
75. ROLV1 provides an opportunity to phase the release of land that will respect the existing built form and densities along Tenterden Road. Similar densities can be achieved on ROLV1 to that of Gatefield Cottage which is a similar size and has dwellings that front onto Halden Lane. The site is of a reasonable size and through Policy 12 of the Core Strategy **(CD5)** will deliver a reasonable level of affordable housing for the village.
76. Rolvenden is an attractive settlement with many listed buildings which contribute towards the village's distinct historic character. ROLV1 lies outside the village conservation area and so developing the site will not directly impact from the historic character of the village centre.
77. ROLV1 has potential to create an attractive entrance to the village along Tenterden Road and the services present in the villages are all within easy walking distance. Developing the site also provides an opportunity to improve public open space including play facilities and footpath/cycleway provision which will create better linkages to the village.
78. It is important to note that ROLV1 is not designated as open space. The site is currently a football pitch which, although private, has an important role within the community of Rolvenden. Therefore the policy requires the relocation of the football pitch to a suitable alternative location within the village.

79. ROLV1 was a favored location by participants at the workshop. Paragraph 13.25 of the 'Issues and Options Report' (CD13) states that it '*was a logical extension of the village and effectively filled the gap in the frontage, drawing the Gatefield Development into the village*'.
80. A written representation (TPV358) from the landowner of ROLV1 states that other substantial areas of land adjoining the village are within their ownership and may be suitable and available for the relocation of the football pitch. More recently, a letter from the agent of the landowner has been received by the Council (see Appendix 1) that highlights an area of land available for the delivery of both a senior and junior football pitch that adjoins existing sporting facilities and was supported by locals as a suitable site for the relocation of the football pitch (originally ROLV8 in CD13) at the community workshops.
81. The Council have received an objection to ROLV1 (TPV189) which sets out the DPD should make reference to the importance of the ponds close to, and adjoining the site, which they consider enhance the local ecology. On this, representation (TPV255) has been received from the Kent Wildlife Trust that states that the site is likely to have a low biodiversity value and the Trust do not object to development on ROLV1. In addition, the site has a substantial boundary hedge along the southern edge fronting Tenterden Road which must be retained by policy criterion ROLV1(d) which will help support wildlife migration. Furthermore development on this site will also need to conform to Policy CS11 of the Core Strategy.
82. In addition, representation (TPV189) sets out that policy ROV1 fails to ensure that the listed buildings, situated on the periphery of the site, are taken account of.
83. In response, the Council considers that as Core Strategy Policy CS9 requires developments to be designed to fully respect the site context, with reference to the historic built environment (paragraph 9.12), including listed buildings, this issue is adequately dealt with.

Alternatives

84. No alternative sites have been submitted at Rolvenden by objectors, through the formal consultation process.

Woodchurch

85. The village extends in a north-south direction and the extents are separated by a sporadic, linear style of development along Front Road. It has a Conservation Area, located in the northern part of the village and contains development of varying styles and form.

86. Development at WOOD1 (referred to as WOOD7 in the SA) provides the opportunity to provide frontage development which is consistent with the existing linear built form that fronts Front Road, and will help compliment the prevailing character of the Conservation Area in this location – a deeper, or cul-de-sac layout would be inappropriate and out of keeping.
87. The small number of units proposed (10), although falling below the threshold for affordable housing, will ensure that any new housing can be properly integrated into the sensitive surroundings and would complement the existing varied housing styles.
88. WOOD1 also lies centrally within Woodchurch providing the optimum accessibility to the local shops and services that are located at either end of the village. This includes the shops, play areas and village hall at the northern end of Front Road as well as the doctors surgery located at the southern end of Front Road. It also has good access to the local bus service, which runs along Appledore Road in the south.
89. An objection to WOOD1 has been raised by Spiller Associates (TPV29), on behalf of Mrs L Barnes relating to its impact on the Conservation area. The key element cited relates to the break in the frontage along Front Road but since the Conservation Area Appraisal was carried out 14 years ago, the hedge that bounds the WOOD1 frontage has grown significantly in size and now effectively prevents views out to the open countryside.
90. Spiller Associates also query the wording of the supporting policy text which states that development in this area would make a positive contribution to the character of the Conservation Area (para. 6.138). The objector queries why this would be the case and how the Council can justify this wording. The Council in response feels that this wording can be justified because new development on this frontage would enable the built character of this part of Woodchurch to be replicated and for the existing linear characteristics of development along Front Road to be continued.

Alternatives

91. Spiller Associates are promoting the land to the rear of Rectory Close (originally WOOD12 in the Sustainability Appraisal) as an alternative to WOOD1. WOOD12 is proposed for housing development although it does not identify the number of dwellings proposed.
92. WOOD12 is considered by the objector as a better site because it is not located in the Conservation Area and because it is closer to the services provided in the settlement, which are argued to be largely in the northern part of the village. However, WOOD1 has greater proximity to a wider range of services as described above.

93. The objection from Spiller Associates also queries the criterion in the policy regarding screening WOOD1 by planting to protect the views when looking from the south (Brook Street). They argue that the same planting principle could be applied to the land off Rectory Close and therefore the site would not be obtrusive in the landscape. However, WOOD12 is on much higher ground, and located in a more prominent position and so the Council does not consider that the impact on views and is similar to WOOD1.
94. Finally, it hasn't been fully demonstrated by the promoters of WOOD12 that the site is deliverable. The sole access to the site is located via a small parcel of land between the properties 11 and 12 Rectory Close. This parcel of land is not under the ownership of Mrs Barnes and is currently used as a garden by 11 Rectory Close. It was stated by Spiller Associates, that this piece of land was owned by KCC and leased to the residential occupiers. However, a map of adoption and ownership status from Kent Highways Services has identified that this is not the case, see Appendix 2. Spiller Associates have offered no further evidence as to how the site could be accessed.

Pluckley

95. Two sites have been the subject of representations to the DPD seeking inclusion as residential allocations in Pluckley. Neither site is suitable for allocation for the reasons set out below.
96. The area of Pluckley Green has been proposed as a site for inclusion in the DPD (Rep TPV89), for 47 residential units, a village hall and parking. It is referred to as PLUC02/07 in the Sustainability Appraisal (CD12).
97. This area currently contributes to the setting of the adjacent Conservation Area. The sites undeveloped nature allows for clear views of the Church, churchyard and associated stone wall which, combined, adds to the attractive historic character at this central point of the village. Development on this site would significantly diminish these qualities.
98. In addition, the topography of the land means that the northern part of this site enjoys long and attractive views out over the countryside. Development here would have a harmful impact on these views.
99. It is also unclear how a suitable vehicular access could be achieved on this narrow lane and, given the turn in the road, there are doubts about whether appropriate vision splays could be accommodated here. Achieving a vehicular access here is likely to cause significant harm to the character of this area. The site is therefore not considered to be suitable for development.

100. In addition, a site has also been proposed that lies at Pluckley Station, which lies approximately 1.5 miles south of the village of Pluckley itself (Rep TPV23). Pluckley oil storage depot is not suitable for residential development due to its remoteness from the main village, its poor access and its impact on the landscape. It also lies within the Pluckley Station Conservation Area. This site has been refused planning permission 3 times (residential and mixed uses) and has been dismissed at appeal each time.

Challock

101. One site has been the subject of representations to the DPD seeking inclusion as a residential allocation in Challock. This site is not suitable for allocation for the reasons set out below.
102. Land to the northwest of Clockhouse Farm has been promoted for residential allocation in the DPD for 8 units (TPV303). This site is referred to as CHAL06 in the Sustainability Appraisal (CD12).
103. This area forms a green gap in the building frontage along Canterbury Road that offers glimpses into the wider countryside. These breaks in the built frontage are a common feature of the character of this part of the village. Development here would harm this quality. The site, in common with the rest of Challock, lies within the AONB.
104. The objector seeks to compare the proposed site in Challock with the proposed allocation of ROLV1 in Rolvenden, on the basis that both lie within AONBs. However, in the context of choosing the most appropriate site allocations across all the 'tier 3' settlements, such a comparison is misleading. Crucially, Rolvenden is judged to be a more sustainable location for new development than Challock and this is confirmed by the respective scores in the sustainability matrix and the fact that Rolvenden is identified as a local rural service centre in Figure 1 of the Core Strategy, whereas Challock is not. As such, even assuming both sites were suitable for development, it would be more appropriate for the Rolvenden site to be allocated in the DPD.
105. The revised sustainability matrix shows that Challock still remains below all the other tier 3 settlements, with the exception of Aldington (which does not lie within the AONB and is an identified rural service centre in the Core Strategy). As this Response Paper has demonstrated, there are sufficient suitable sites within other tier 3 settlements to avoid the need to allocate additional land in Challock.
106. Representation TPV4 supports CHAL06 as they believe it can provide affordable housing for local people. However the site is too small to meet the requirements of the affordable housing policy CS12 as the proposal is only for 8 dwellings and the site area is less than 0.5ha. It therefore appears

difficult to see any link between the Taylor Review and allocation of this site for affordable housing proposed by representation TPV303. Local needs housing could be bought forward here, if such a need exists, but the Plan does not allocate sites for such purposes. This can adequately be dealt with through Policy TRS4 and the development control process.

Conclusion

107. The robust and thorough assessment process undertaken through the preparation of the DPD and the Sustainability Appraisal, coupled with the input from local communities and stakeholders through the community workshops, has provided a comprehensive evidence base for deciding the most appropriate sites to allocate for residential development amongst the tier 3 settlements.
108. The Council considers that the proposed allocations in Aldington, Bethersden, Biddenden, Chilham, Rolvenden and Woodchurch represent the most suitable sites for residential development, compared with any of the proposed alternatives.