

ITEM (1) Alan Bishop

ITEM (2) Alan Bishop

ITEM (3) Alan Bishop

ITEM (9) Alan Bishop

Ashford BC – Tenterden and Rural Sites DPD

Matters and Issues for the Examination

Thank you for the opportunity to make comments on the main issues which the Inspector Stephanie Chivers, Chartered Town Planner, is shortly to consider.

Matters relating to soundness of the DPD

1. A short statement making comments on and criticising the approach taken by the DPD was set out on 7 August 2009 and nothing has altered those views expressed – APPENDIX A.
2. It remains my view that the DPD fails the tests of soundness set out in PPS12. It is not, of course, just my view. Comments submitted to the Borough Council during consideration of the DPD, from a range of eminent local bodies with a genuine interest in good rural planning, testify to the shortcomings of the DPD in terms of its justification and effectiveness.
3. The Inspector sets out her main issues relating to the soundness or otherwise of the DPD. In effect the Inspector is crystallising the concern that the Inspector Phil Grainger BA (Hons) MRTPI expressed about the 'adequacy and appropriateness of the treatment of the rural parts of the Borough' when he set out his final report on the Core Strategy on 17 June 2008.

4. He says among his many findings that ‘the rural area could, potentially, be of considerable significance for a spatial strategy. In this context the treatment of the rural areas is weak and unconvincing.’ (Refs Issue 9 paras.4.183 – 4.186 and conclusions at pages 100 and 104)

To my mind the Borough Council has, despite the Inspector’s comments, failed to grasp the spatial nettle in the DPD.

5. Turning to some of the issues set out by the DPD Inspector, in particular the issue of Visions and Objectives, there is in my view no firm or ‘clear’ vision reflecting the needs and distinctiveness of the rural area.
6. Policies are dictated by the need to allocate land for housing to meet a target number rather than being moulded by a sustainable approach to development. This may be a fault of the system rather than the Plan makers but the result does not lead to any satisfaction that proper rural planning is taking place.
7. It is abundantly clear that the DPD does not carry forward the vision set out in the Council’s Sustainable Community Strategy. Spatial planning means that all manner of issues which makes places work and function well, including of course rural settlements, should be considered.
8. Planning as I understand it has always been about striving for the environmental, social and economic well being of people and where they live (an old fashioned way of describing spatial, perhaps). The catch-all approach of the DPD, driven by the issue of housing numbers, has failed to deliver proper spatial planning in my view. The requirement established in the Core Strategy that the rural economy needs to be encouraged and stimulated has not been pursued with vigour.

Soundness and sustainability matrix

9. Policy should be founded on a robust and credible evidence base. The Sustainability Appraisal and the Matrix deriving from this are essential elements of the evidence base in establishing a hierarchy of rural settlements.

In my view the Matrix is too basic in its form and is arguably not flexible enough.

It does not take account of change and a range of factors that might influence the future well being of a settlement. There is no reference to employment and no analysis of the number of rural businesses that exist and where.

10. Further, the weighting in the Matrix of a primary school, post office, village hall, shop and public house provides no qualitative structure to what is being looked at.

I therefore question the soundness of the Matrix as a basis for determining sustainability in determining where houses and related infrastructure are to be distributed.

11. If the Matrix had been more refined, encompassing all relevant issues relating to where new development would most benefit the economic and social well being of rural settlements and their residents, a bolder approach to village planning might have been taken, most particularly at Biddenden.

Biddenden – Tier 3 settlement

12. Biddenden is identified as a rural service centre and in terms of its population size (c.2500 residents) is second only to Wye in Ashford Borough. It is fourth in the list of rural settlements in terms of its sustainability in the Revised 2009 Rural Sustainability Matrix.
13. On the question of its basic form, for Biddenden the Matrix gives a nil score in relation to the provision of a train service.
14. In reality Biddenden has an excellent bus route link with the main line Headcorn Station 4 miles to the north with services running specifically to serve peak time users. Its relationship to a main line station is superior to that of Tenterden, which is 4 miles further away, and in accessibility/sustainability terms is far superior to that of Pluckley (with its remote Pluckley Road station) and arguably superior to Appledore whose station is somewhat remote and enjoys a lesser rail service.

In my view a fairer assessment of the train link would have led to Biddenden scoring higher in the Matrix.

15. Biddenden prepared a Parish Plan in 2005. We refer to this in our submission of 7 August 2009 and enclose a copy of the questionnaire results and key findings as APPENDIX B. The high response rate to the questionnaire gives an illustrative statement of the environmental, social and economic status and vision of the settlement at that time.
16. This indicated a 'strong support for further limited residential development especially where the Parish receives planning gain.' It also indicated a desire for some commercial development and community facilities. There is a clear acknowledgement from Parishioners that sound village planning, embracing all those elements of what we understand to be spatial

planning, is required in order to promote, going forward, a sustainable and balanced rural community.

17. The landowner of the submission site is a local Biddenden resident. Together we recognise, along with many other local residents who responded to the Parish Plan but were not necessarily a part of the 'invited cross section of the local community' forming the Community Workshop, that the only strategy which will provide a range of housing choice and promote vibrant and sustainable rural communities lies in a bold approach to village planning.
18. The DPD approach to development in the Tier 3 settlements does not represent the best strategy and none more so than in the case of Biddenden. The development of BID 1 will do nothing for the sustainability of the village as the site is limited in its scope and character and is unlikely to generate meaningful investment in the village.
19. A much bolder approach to development and site selection is needed in the village. As an illustration of spatial planning we have put forward a thoughtful proposal for the land at BID03 and BID 17 which embraces housing choice, employment, social and community infrastructure. We believe this to be a sound strategy when considered against the alternatives.
20. As set out in my response dated 7 August 2009 the notes on the Biddenden Community Workshop for 12 February 2009 say that:

'both groups felt that BID03 and BID17 had some merit and shouldn't be ruled out at this stage. ...The groups felt that this area could be a location where a cul-de-sac type development could be located. They felt the access could be achieved and appropriate sight lines would be possible from this side of the road.. One group referred back to the Parish Plan which stipulated a desire to see cul-de-sac development coming forward in Biddenden'.
21. For the reasons outlined above I do not consider the DPD to be sound and look forward to discussion of the issues at the Examination.

Alan Bishop 25.05.10