

**Issue 16 Natural Environment Policies Unsound / Not effective**

**Statement introducing the Landscape Protection Policy (Note: this was also submitted for Issue 10)**

1. There is no question raised on this topic as the concept was rejected by ABC, however we consider that the Local Plan will be unsound without the addition of a **Landscape Protection Policy (LPP)**.
2. Shadoxhurst Parish Council supports the work and submission by the **Saxon Shore Parishes** and their Planning Agent, Peter Brett Associates (PBA) with respect to the creation of an LPP.
3. Each Parish is different and evolved and developed in their own unique ways through history. Whilst we each may have specific idiosyncrasies and needs, we acknowledge that there must be a degree of basic words that cover the majority of aspects, but yet have the flexibility of adaption when testing a planning application against the policy.
4. We submit **Appendix 1** headed "**Landscape Protection Policy as it would apply to Shadoxhurst**" to this statement which summarises the reasons and rationale behind Shadoxhurst's need for an **LPP**. It is detailed and lengthy as it also demonstrates the depth of detail required to having an effective **LPP** in place. It also shows the commitment we have to summarising the many aspects that characterises Shadoxhurst.
5. We anticipate that for an **LPP** to be effective across the Borough each Parish Council must provide evidence, perhaps along the lines that we and others such as Aldington have done. We need to know what there is to protect.
6. We are disappointed that ABC chose not to introduce an **LPP** to the Local Plan to address in one place all the necessary requirements. Their reply was indicating that key elements have been incorporated. However, these are hard to find, some are watered down, others missing.
7. One key feature of losing an existing viable and cohesive village community is the likely damaging cumulative effect of developments, both in and close to, the Parish. When the village infrastructure is not improved with developments, as is so often the case, the pressures on it grow exponentially. We particularly see this with our village roads.
8. We are not anti-development and I am sure that most Parishes are similarly minded, but what is required is **measured and appropriate growth** as well as the **right type of dwellings in the right places** to cater for local need.
9. Shadoxhurst is in a challenging location. With 7,000 plus houses due to be built over the next 20 years within two miles in the two neighbouring Parishes of Kingsnorth and Great Chart, this will push Ashford's urban growth close to our boundary.
10. We are not being arrogant when we say that this point alone means that we are a special case.
11. **Appendix 1** will expand further on this.
12. Further to Point 2 above concerning other **LPP** submissions, we offer below our own version of an LPP that will cover the special case of Shadoxhurst, adding **paragraph 7 f)** as the Aldington Model in our view did not cover us sufficiently regarding green buffers and the closeness of the south Ashford developments.
13. In forming this **paragraph 7 f)**, we acknowledge the inclusion **SP7**, but in another statement on that Policy, we consider that **SP7** is not currently effective without amendment and thus is unsound.
14. **Page 135 Appendix 2 Responses to Main Changes Representations** gave an inconclusive answer to seven representations. It did introduce **SP7** and amended **ENV3** to **ENV3a**, but there

are three particular elements that for us give incomplete protection and therefore make the Local Plan unsound and why an LPP must be included:

15. The first is the cumulative impact developments will have on the village roads taking account of the 7,000 dwellings at Chilmington and Kingsnorth that will considerably affect our residents. This factor has never been considered in the recent applications in the village.
16. The second is taking account of the cumulative effects and impact on the village character and features. This is coupled with the speed of growth of each settlement which directly affects loss of ruralness with urbanisation already taking place in the village. Settlements need to grow in a measured way.
17. The third is the impact on the green buffers and green corridors that we have identified and need to protect not only the views and character but will maintain wildlife routes and habitats.
18. **Appendix 2** shows these key areas graphically as well as the closeness of development in adjoining parishes of Kingsnorth and Great Chart. This appendix will be used to demonstrate that **SP7** is also not strong enough to protect the outer buffer areas. We also have inner areas around the Conservation Area and the Local Wildlife Sites that require their own protection.
19. Paragraphs 14-16 are three missing points that make the Local Plan unsound.

#### **How can the Plan be made sound?**

20. SPC would like ABC to talk to the Parishes through the Ashford Area Committee of Kent Association of Local Councils (KALC) to acknowledge and accept wording of a **LPP** that serves to give greater protection to all Parishes.
21. SPC is not alone and there is a growing weight of opinion that once Parishes draw up their own Character and Impact Assessments, then a defensible position will be in place.
22. **Measured growth and cumulative effects** must be incorporated in the Plan. Although through Government pressures, ABC will have a demand for newly built houses annually, this will place undue pressure on small communities to grow in potentially damaging ways and inappropriate places. If there is a rush of landowners and developers to build in a particular settlement, growth will be uncontrolled and irreparable harm caused.
23. Shadoxhurst and those other small communities on the edge of Ashford's fringes are the ones in the greatest danger at the moment, as Ashford grows outwards, the settlements themselves could grow outwards and without a **Landscape Protection Policy** that complements the other policies, suddenly the village will become part of greater Ashford town.
24. We include here the proposed wording for an LPP:

#### **Proposed Policy Wording: Landscape Protection of Shadoxhurst Village**

Taking into account the characteristics of the area, the quantitative and qualitative assessment undertaken in transport and landscape assessments, and the evidence collected, an area specific local plan policy to address new development in the Shadoxhurst Wooded Farmlands Area is proposed to be worded as follows:

*'Proposals for land use changes and development in the Shadoxhurst Wooded Farmlands Area (as defined on the Proposals Map) will only be permitted provided that all of the following criteria are met:*

*a) The land use change or development respects the landscape setting of the area and can be demonstrated to be in keeping with the form and style of existing development as a sensitive transition between the Ashford Urban and Shadoxhurst Wooded Farmland areas. Particular emphasis will be placed on the visual effects of development in the context of views into and out of the site, and the historic disposition of development relative to the surrounding topography.*

*b) The land use change or development respects the historic and archaeological reference points and sites of biodiversity value, and in particular, can demonstrate that it will not exacerbate current impacts to the character and function of existing highway corridors and lanes, and the street amenity in the village settlements areas.*

*c) The development will have no impact on the pursuance of rural activities on the adjacent lanes and highways that may be considered sensitive to development impacts;*

*d) It can be demonstrated that the development will not on its own or cumulatively as a result of other previously implemented, permitted, committed or planned schemes within or adjacent to the Shadoxhurst Wooded Farmland Area generate a type or amount of traffic that would be inappropriate or detrimental to the rural road network that serves it; and*

*e) There would be no impact either individually or cumulatively as a result of other previously implemented, permitted, committed or planned schemes within or adjacent to the Shadoxhurst Wooded Farmlands Area on the character of or important features within the area including the rural lanes, verges and hedgerows which cross the area.*

*f) The land use change or development will not be permitted on the green corridors or outer green buffer areas identified in the proposals maps to ensure that the settlement areas are sufficiently separated and wildlife is able to move between settlements.*