

Bethersden Neighbourhood Plan

10th August 2015 Draft Neighbourhood Plan
Regulation 14, 6 week Consultation from 10th Aug 2015

Summary of key Comments and Answers

The following Comments were received from Residents, Ashford Borough Council (ABC) and, Brian Whiteley RTPI, of Planning Aid England, in the period immediately following the Consultation.

This summary does not include comments/answers on grammar, punctuation and other minor matters, and has concentrated on providing answers to the key issues raised within the August 2015 Draft Plan.

Notes:

- . Black type - original Comments
 - . Green type - answers up to June 2016
 - . Blue type - updated answers, affecting the Final version of the Plan, dated 27th November 2017. Reference to page numbers relate to this version.
 - . BNHP - Bethersden Neighbourhood Plan
 - . ABC - Ashford Borough Council
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A) Brian Whiteley Planning Aid England – Comments

12. Page 4 / Policy R3 - Are these already given effective protection by existing local plan policies or other legislation?

Should keep R3 despite being covered under other legislation.

No change, R3 retained

13. Page 5 / Policy R4 - Will there be a map showing existing public rights of way be included in the plan to help explain what is involved?

We have a map showing existing footpaths in the village. This could show the proposed link between Village hall and George field. Relationship between R4, H3 and H11 need to be decided. R4 refers to footpaths generally.

This is now included only as part of Site A justification on page 29 BNHP

14. Brian W = Page 6 / Policy Justification R 6 Recreation Areas & Community Use - Interesting history - but does it add anything to the plan and if it goes on to be "made", won't this text date quickly if the plan then stays in effect for a full 15 years?

Using the conclusions of a consultation of residents regarding the recreation ground in 2012 many improvements were made to the games & children's play areas.

Recreation needs have been drawn from conclusions of the 2012 Parish survey so a simple reference to that fact is probably sufficient.

18. Page 7 / Policy R7 – (Drainage), is this within the remit of the plan - or is it already a requirement through other legislation? Would it be better to address this in the introduction to the section as a key local concern, which should be addressed in all new development? Ref Drainage.

Included in site design brief 27th April 2016. Given the importance of this issue - to be included in the Red section page 36, Policy H14 (20th Aug 2017) and reference left in Green section.

Section 5.7 (Drainage) added page 13 BNHP introduction (Orange Section)

22. Page 8 / Policy R8 (Energy), (second para) - Is this really part of the policy or part of the supporting explanatory text? How does it fit in with EIA and other development management requirements enforced by Ashford Borough Council?

(Note – August Existing R8 para 2 - Evidence shall be provided at a scale commensurate to the development to demonstrate the potential impact of such proposals and proper assessment made by a suitably qualified professional).

R8 para 2 requires a rewrite. Suggest – Para 2 Technical requirements for energy Provision shall be in accordance with local authority requirements. Installations shall not conflict with the existing quiet tranquil setting and local rural character. R8 Introduction needs to be re written (not all about energy).

R8, page 23. "ABC advise we do not need to refer to EIA or ABC management responsibilities for Energy systems"

Housing

25. Policies H1, New Residential Development & H2, Housing Site Allocations - Are they too prescriptive - should the numbers be quoted as a range for each site's total capacity – so as to give some flexibility - e.g. if different tenure types of housing came forward on each site?

Indicative numbers, to be agreed with developer.

Following extensive consultation with ABC and consultants, both policies rewritten to include detailed Assessments of Housing Provision H1 (page 26) and Housing Site Locations H2, and Numbers and type of housing (page 28)

26. Policies H1(Residential Development) & H2 (Site Allocations). Is there evidence to support the requirements for open space provision in each case?

No, it is a judgement based on public consultations.

No change made. Pages 26 and 28.

27. Public benefits, Page 4 - Is this simply repeating national guidance on S106 agreements?

No relates to benefits we wanted.

Benefits identified for each site A, B & C, pages 29 to 31.

32a. A public footpath shall be provided connecting the village hall to the footpath in the George Field.

As in Benefits: Site A, and on the text box on the site plan (page29)

36. Page 7 / H6, Local Needs Housing - If this simply repeats existing policy, why include it?

Following meeting with ABC will be re-written to refer to Local Plan June 2016.

37. Page 7 / H6, Local Needs Housing If this reflects proposed Local Plan policy, what are the justifications/underlying? evidence supporting the proposed 35% & 80% figures in the Bethersden case?

Will be re-written to line up with the developing Local Plan.

H6 Re-written to reflect discussions with ABC regarding the developing Local Plan. page 31.

38. Page 8 / Policy H7 - Housing Design Standards Two concerns here:
(A) The VDS dates from pre-2004 and has never been subject to a SEA. As suggested elsewhere above, it might be preferable to have a design policy/policies instead here which distils the key criteria for future house design I the plan area, and then use the VDS as an accompanying Supplementary Planning Document, accompanying the plan.

ABC have advised Bethersden Neighbourhood Plan does not require an SEA. Policy H7 Housing design standard will reflect emerging local plan'

November 2016, Note from ABC "Following comments made by Historic England in their letter dated 30th November 2016, including their request that a SEA is carried out on the Plan. Whilst we do believe that they were consulted on the need for SEA (contrary to the suggestion in their letter), the fact that they appear to only now be raising this as an issue may not, in itself, be sufficient reason to dismiss their request"

March 2017 Following the above an SEA was commissioned from Consultant Catherine Hughes RTPFI Funded and approved by ABC.

(B) Rather than include the photographs of different house types in the plan, update the VDS (Village Design Statement)?

38b.VDS update not practical or required - possibly provide codicil instead.

Photographs left in.

39. Page 9 Policy H8 Housing Layout - Following a Ministerial statement last March 2016, you

may wish to discuss this policy with the Borough Council as you can no longer require adherence to internal design standards such as Building for Life through a neighbourhood Plan.

Following meeting with ABC it will be re-written to refer to Local Plan.

Policy H8 External Design Standards, page 32 re-written to reflect above.

40. Policy H8 Housing Layout, (includes ref. to parking) Where is the accompanying text justifying this policy - and how does it relate to the later policy H12?

ABC confirm that as a rural area we can specify our own parking standards as in Policy

H8 para 1. Second para on building standards needs further clarification.

Policy H8 and the Justification substantially rewritten following discussions with ABC Re parking - key wording carried forward from H8 to H12. Page 35

41. Page 10/Policy H9 Windfall Housing - How does this relate to emerging local plan policy on development in the countryside?

H9 needs to be re-written to align with NPPF & ABC Local Plan.

Policy H9 amended to take account of ABC comments and Local Plan. Page 34

42. Page 10/Policy H9, Windfall Housing - What justification will be acceptable here? - a justifiable annex to existing housing stock.

Policy H9 amended to take account of ABC comments, and Local Plan. Page 34

43. Page 10/Policy H10 --Other Housing Development - Is this a sustainable approach? (Included Infill and sub-division of larger properties)

H10 Re-written to prevent development in conservation area gardens.

H10 page 34/35 - Now "Development of Residential Gardens" completely re-written following consultations with ABC. Page 34/35

44. H10 Other Housing Development. What is the second half of the policy H10 trying to achieve? What types of sub- division will be acceptable?

41/42/43/44. H10 needs to be re-written in two parts to cover.

a) Within the Village which should identify local spaces that are to be retained as material to the open character of the village. If we have specific open spaces we should identify them as such to avoid Windfall.

b) Given recent Government guidelines on the conversion of agricultural buildings to dwellings and subdivision of larger properties. We should adopt Local Plan guidelines.

See Q43 above.

45. Page 10/Policy H11 New Cycleways - Not clear wording - e.g. does this policy require every proposal to build a new house in the plan area to consider providing new cycleway?

No - needs amending

Policy H11 Aug 2015 draft, references to cycleways etc removed on recommendation of ABC.

46. Page 10, Policy H11 - Rather than have a specific policy, would a better approach here be to have this as a general design objective - supported by policy R4?

Yes needs amending

Policy R4, Public Rights of Way, page 20 amended to be non-site specific.

Economy, Communications, Transport & Infrastructure

There were no significant Comments.

Community Feedback from Fete & Village Hall Exhibitions and Newsletter

49. Councillor Clair Bell - Policy H12, "Parking" at Aug 2015 - What does the phrase "Where possible, developments should link to Ashford (etc.)... In the Justification " mean?

Original text does not make sense Justification and policy needs to be re written, Disconnect between policy and justification Ref Clair Bell.

Original first sentence referred to Ashford rail link etc., but was not relevant to parking, so omitted in later edits – current policy H 12, page 35 now deals only with parking.

57. Aug 3 Yes G Feaver, 3 St John's Cottages, The Street, We need affordable homes and with the population living longer we require more retirement homes.

Included in the BNHP Plan.

Policy H7 page 32, amended to provide for retirement/ageing population.

63. Aug 24 Colin Duncan, 3, Prospect Cottages, The Street, not happy with size/location of house proposed on the Village Hall site.

The prescriptive site layout has been cancelled in favour of a Developers Site Design Brief, which explains the vistas to be protected, and general constraints and requirements with which a developer must comply.

Site A page 29, Policy H3 substantially amended. Housing numbers reduced from 14 to 10.

Type specified to be mainly single story or "chalet type". The Plan now provides a green corridor to the north of the site to facilitate visual and physical links to the countryside.

65. Joan Clark-Hall, 1 Prospect Cottages, The Street (south side) Aug 26 Yes/But (south side) Verbal Comment to BM – WC 3 Village Hall site; houses at top of site will

overlook and obstruct the existing views of houses on the south side of The Street. Is it be

possible to exchange these for some of the bungalows at the back of the village hall?

The prescriptive site layout has been cancelled in favour of a Developers Site Design Brief, which explains the vistas to be protected, and general constraints and requirements with which a developer must comply.

Site A page 29, Policy H3 substantially amended. Housing numbers reduced from 14 to 10.

Type specified to be mainly single story or "chalet type". The Plan now provides a green corridor to the north of the site to facilitate visual and physical links to the countryside.

65a. WC5 School site – Car parking should be available to parents delivering collecting children from school.

Actioned – Now included as a requirement in Developers Site Design Brief Site B

Policy H4 page 30 amended to include a public car park.

66. Aug 31 Yes/But, at Fete - Support, positive step forward in our village, with control over

Many aspects of the village, as long as an answer can Be found for excess water run-off (rain). I would also like there to be less houses built, with no "town houses"

Major investigation and work being carried out to correct drainage issues.

Following a review of housing numbers these have now been revised down from 40 to 34.

Plan does not include tall town houses, overall numbers reduced from 40 to 34. Para 5.7 page 13 orange section inserted to emphasise drainage requirements.

67. Let's have mixed new housing – the best of contemporary & traditional.

Noted

68. People have got to live somewhere. As neighbours (adjoining site B) we ask that:

a) Rooflines are in keeping with existing housing

b) The pink and green areas in the Plan (culvert near the school notwithstanding) be reversed, or at least "mixed-up" a little.

a) Has been added to the Developers Design Brief & b) with a revised site layout.

Site B Policy H4 page 30

Comment a) Accepted and actioned.

Comment b) Site layout amended to reduce impact on existing housing.

69. Favoured option contemporary housing design, on one level.

Noted

70. No mention of allotments. Otherwise it seems quite comprehensive.

Area for allotments identified but no demand so far.

71. No mention of static or mobile homes

ABC have no firm policy at present, we will align with Local Plan.

72. R Saxby, Hillside, The Street Site B – Height of housing is important to maintain the feel of a rural community. Preserve tree lines at top of plot. ECO Medley design. Contemporary if sensitive to village characteristics

Tree lines will be preserved. Design brief defines vertical scale of ridge and eaves heights.

See policy H4 page 30 which reflects this requirement.

73. Site A, Forge Hill (Village Hall) Plan states that there is a need for low rise housing (single storey or chalet), then quotes an eaves height of 5 m. This should be made clearer, maybe by saying that any low rise developments should have an eaves height not exceeding 2m.

The prescriptive site layout has been cancelled in favour of a Developers Site Design Brief, which explains the vistas to be protected, and general constraints and requirements with which a developer must comply.

Site A page 29, Policy H3 substantially amended. Housing numbers reduced from 14 to 10.

Type specified to be mainly single story or "chalet type". The Plan now provides a green corridor to the north of the site to facilitate visual and physical links to the countryside.

Site B (next to school) - is the car park a public one or for the sole use of the properties on the site? Will any houses have their own parking spaces?

The car park is for public use. Houses will have their own parking

Site C (Lovelace) – a) Is this to be POS or a car park?

b) Local Needs Housing – Where retirement homes are built for over 50s only to purchase, could Local needs Homes be available to buy only by under 30s (at time of purchase)

a) Parking for ten cars to be included for public use within the POS.

b) Not provided for in ABC Local Plan.

74. Site A – Please confirm that the trees/hedging on the left/western boundary will be retained (between the site and the George Field).

No plan to remove hedging or trees but some pruning & tidying up will take place.

75. Sep 3 YES/BUT The Plan is very well thought out and so far a huge effort has

been made to involve local people, including inviting views on the plans as they evolved. A negative comment would be that as much emphasis should be placed on noise levels and safety on roads as well as congestion.

Plan policies include comment on noise levels, roads safety and congestion.

It has been assumed that noise levels and road safety standards will be to national standards.

76. Sep 3 Yes/But I hope the parking areas on the proposed sites near the school will be available to the public as well as residents of those sites in order to relieve the on road parking near the school at peak times.

They will be.

77. Sep 3 Yes/But I feel the village needs to keep up with the times, any improvement that does not detract from the rural atmosphere will be a good thing – But speeding through the village is an issue.

CT5 Page 44/45 First part noted, locally operated Speed Watch introduced and in action.

78. Sep 3 We do not support the building of any more new houses in the village. We did not agree with the houses built on Mill Road – preferred the lovely meadow.

The public survey identified the need for more houses.

The 2014 public surveys identified a 73% support for housing growth.

79. Sep 3 Not - I feel the government driven desire to build, build, build – forcing Borough and Parish Councils to cram in houses wherever they can, has led to far too many properties Being considered/built on fields that are far too small to accommodate them reasonably and the field behind Beacon House is a fine example. Too many houses in the Street near beautiful old buildings.

Noted

See attached " Objections to 6 houses on site A (those proposed on the north of the site)"

The prescriptive site layout has been cancelled in favour of a Developers Site Design Brief, which explains the vistas to be protected, and general constraints and requirements with which a developer must comply.

Site A page 29, Policy H3 substantially amended. Housing numbers reduced from 14 to 10.

Type specified to be mainly single story or "chalet type". The Plan now provides a green corridor to the north of the site to facilitate visual and physical links to the countryside

80. Sep 4 Not supported because over the past few years we have had several housing developments. More development will gradually destroy the village, which is precious.

There is to be a large development at Chilmington Green making the A 28 road busier.

Endless house building is destroying the Villages throughout the country – purely for the benefit of greedy developers

Noted

81. Sep 4 Yes/But (next to WC 5) Support the Plan because it keeps the village aware of future developments and needs. I would like to emphasise the need for more "affordable three bedroom" houses in order that families may stay in Bethersden and support our local school and other local activities. Our children are our future for a thriving village.

One of the key drivers of the Plan.

"affordable three bedroom" Houses are a key part of the plan, see Numbers and Type of Housing chart page 28 and site specific policies pages 29,30 & 31.

Having now attended the Fete on the 31st Aug and studied the plan for houses in School Road, we are very concerned and alarmed that houses may be built close up to the side and rear of our property. We have a very narrow strip of land between our bungalow and our rear boundary wall/hedge, at one point only 52"/132 cm, therefore any dwelling must be built well away from our property in order to maintain our privacy and enjoyment of our garden Also close building would reduce the value of our property.

Developer made aware. Site plan amended to cover this point

Site B page 30 Developers current approved layout reduces the impact on existing housing. The existing agricultural building, which is hard up against boundary, is to be removed, significantly improving the outlook.

82. Sep 5 Yes I Support the Plan because what is best for the village will be under the control of people who live here. I do not agree with everything, nobody will, but admire the hard work done by all concerned. Thank you all.

Noted

ABC Comments, Brenda Fazzani
Orange Section – Introduction

85. Page12 ref to the 'Basic Conditions Statement' - not yet seen.

This sets out the legal framework and can only be completed at the end of the Process, requirements are for example:

- details of people and organisations consulted about the proposed neighbourhood plan
- details of how they were consulted
- a summary of the main issues and concerns raised through the consultation process
- descriptions of how these issues and concerns were considered and addressed in the proposed neighbourhood plan
- they must have appropriate regard to national policy
- they must contribute to the achievement of sustainable development
- they must be in general conformity with the strategic policies in the development plan for the local area
- they must be compatible with EU obligations.

Consultant Clare Wright will produce this document when NHP is completed.

See final Basic Conditions Statement dated August 2017

88. Policy Statement MRE 5 (Now R5) Local Green space designations Map needs adjusting to reflect new development.

See map page 21 BNHP item C

Amended current map now page 22 reflects public open spaces.

Red Section - Housing

93. Page 5 All 3 housing policies need to refer to the open space in words as well as the diagrams or say as indicated in diagram ...and say when it needs to be provided.

Developers Site Design Brief

All three site policies H3, H4, & H5 amended to refer in words to green open or undeveloped public space.

H3 Site A - Public footpath to be provided ? Policy needs to specify when it must be provided.

Site brief amended. Footpath connection to Village Hall & Village centre via George Field prior to occupation of first dwelling

To be part of site requirements

94. Page 6 H4 Site B - A car park for 20 cars and the area of public open space shall be made? Again, no time limit for this.

Site brief amended to include Car Parking to be provided prior to occupation of first dwelling.

To be part of site requirements

- 95b. Need to refer to the Nationally Described Space Standards and optional Building regulations Part M4 (2) and Part M 4(3) which if adopted in the Local Plan, Bethersden can choose to have or reject.

Local Plan Guidelines to be adopted where relevant.

To be added to Para 5.7 orange section of the Plan as suggested by ABC.

Page 13 Para 5.8 now reflects this requirement – Relationship to national and local planning policy

96. Page 7 H6 The wording of policy H6 may need further consideration. The term 'Local Needs Housing' should strictly speaking, only be used to refer to homes on an exception site. Similarly, the words 'made available to those with an identified local need' is not something that the Council could ensure as it could conflict with the Council's lettings policy It would be better to say 'giving priority (or preference)' to those with an identified local need.

The Local Plan will likely have a requirement for sites of 10 or more houses to include a large percentage of affordable houses, a significant number of which will be starter

homes.

Local Needs Housing on exceptional sites will under new government guidelines allow the first occupant to use the right to buy. Making Local Housing Needs, as we know it of no benefit to the original landowner or a key objective of the BNHP.

Definition of starter homes falls within affordable.

In policy H6 the requirement for rental properties to be offered for rent at 80% of market rate is not acceptable to ABC;

H6 to be re-written to reflect the above. Done

Example might be: a site with 100 houses would consist of 40 affordable of which 20 would be Starter Homes aimed at those under 40 years of age and have the affordable price discounted by 20%. Houses defined as affordable outside London less than £250k.

Of the remaining affordable houses 10 would be social & 10 Shared ownership giving total of 40 houses in all.

Above follows ABC Meeting April 2016

H6 page 31 Affordable and Local Needs Housing Policy, re-written to reflect ABC Local Plan and local needs.

Brian Whiteley – General Comment

104. If opportunities to increase recreational activities e.g. through providing additional meeting hall space are being pursued, does this need making more explicit e.g. by appending a list of community projects which the Parish Council would wish to pursue via CIL funding when that comes on stream in future?

Agreed see benefits document.

Benefit statement for each site included. Pages 29, 30 & 31.

Comments made anonymously

108. There is no proven need for more housing in the village, other than perhaps smaller homes for the elderly.

The 2014 public surveys identified the need for more houses.

109. The release of housing by the elderly as they relocate or die has not been taken into account.

It has through predicted growth rate.

110. Statistics can easily be skewed depending for example on the window of time over which they are calculated.

True, but we believe this has been done over a reasonably representative period.

111. The Chilmington development will have a detrimental effect on Bethersden only two miles away. The A28 and road to Pluckley Station will be even more clogged up with traffic. Building yet more houses in Bethersden will exacerbate this. The Chilmington new town will provide plenty of new homes in the area.

But not local enough and does not help the viability of a local school, shops and other amenities essential for a sustainable community. A community is about making living possible for families in the same Village; it's not just a cold means to an end.

112. I understand the ABC does not require more houses in Bethersden.

At the moment that is true because Bethersden has a draft Plan which covers the next 15 years, so who is to say what might be required in the future. We believe it is better to have a Plan that we dictate than to leave a blank canvas that could in the future be challenged by the local authority &/or developers, as is happening in other local villages.

113. There will be sufficient homes built in the place of old farm buildings with out more in Bethersden, which will detract from the character of the village.

This meets a different need. Done sensitively the rural character of the village can be protected. Forge Field, Chester Avenue and Orchard Field etc. Where would people be living if these had not been built? They had a much greater impact on the rural nature of the village than any of the current proposals.

General Comments Received

114. It would help if the rural environment section showed their recommended built areas for each site before we get onto the housing section. It would help to clarify what we are considering before we get too caught up with housing numbers

Developers Site Design Brief should answer this comment.

See Part 7, Housing, page 24, and the Developers Site Design Brief, Consultation Statement, page 35.

115. How did the housing group come up with their numbers? We weren't surveyed outside of the original survey?

The Housing Group were responsible for determining the housing numbers following the General Survey. They did this based on Local & National

housing

demand stats. Membership of this group was open to all.

See Part 1 para 5.4 page 11 Orange section and Part 7 para 7.4 page 26

Housing

116. What does bed space mean and how does it relate to bedrooms and house sizes? 6 bed space could mean 3 double bedrooms in a small terraced, semi or large detached?

Explanation of bed spaces to be made available in Glossary.

Term bed spaces dropped.

117. Will the changes made to the plan be made known to the public before the Ashford review?

Yes, through exhibitions at Village Hall, Fete etc., Newsletters and the 8 week public consultation managed by ABC Planning, before submission to the Examiner.

118. Can we build retirement housing, which allows independent living but with communal facilities and warden care?

We have decided against this as not financially viable in Bethersden

Robert & Lesley Todd, Mannering House

119. What is current/future-projected demand? Last Para H1 needs clarification.

See H2 as amended

See Chart para 7.4 page 24 item 7. Demand beyond 2030 not part of this Plan.

120. On what basis is future demand calculated.

See tabulated data chart.

Demand beyond 2030 not part of this Plan.

121. Why more housing, when Chilmington can satisfy the demand.

Chilmington not local enough and does not help the viability of a local school, shops and other amenities essential for a sustainable community. A community is about making living possible for families in the same village It's not just a cold means to an end.

Noted – Chilmington not local enough.

122. Less homes on Site A - put them on Thorne land opposite Village Hall & solve drainage issues.

Thorne Site rejected partly due to flooding issues among others.

Site A page 29, Policy H3 substantially amended. Housing numbers reduced from 14 to 10.

Type specified to be mainly single story or "chalet type". The Plan now provides a green

corridor to the north of the site to facilitate visual and physical links to the countryside.

123. What about the site opposite village hall after drainage issues solved.

Thorne Site rejected partly due to flooding issues among others.

See 122 above

124. Policy H4 where is the car park & its entrance proposed. Is it for general use or development only.

Entrance is off School Rd and is for public use.

125. Policy H6 housing exception clarify please.

Exception sites may no longer be relevant under NPPF and ABC Local Plan.

H6 Page 31 Reference to exception sites removed from the Policy and completely re-written to align with NPPF and ABC Local plan but still includes reference to Local Needs Housing.

126. Policy R2 should this policy be more specific regarding rural views.

R2 requires some modification to reflect the wording in the policy justification.

Justification & Policies R1 and R2 (closely related) amended by working Group which included Lesley Todd.

127. Should site levels be mentioned for all sites only site A currently.

Site brief amended to include this requirement.

See Consultation Statement, Page 35 Developers Site Design Brief, General Conditions Item 5.

128. New buildings too close to existing do we need a generic policy to cover this.

Developers Site Design Brief will state Proximity of new to existing dwellings The distance from any first floor window within the development to an adjacent private area shall be a minimum of 30 meters.

See Consultation Statement, Page 35 Developers Site Design Brief General Conditions Item 6.

129. Site A confine development to upper part of site, to maintain open aspect

The prescriptive site layout has been cancelled in favour of a Developers Site Design Brief, which explains the vistas to be protected, and general constraints and requirements with which a developer must comply.

See Consultation Statement, Page 35 Developers Site Design Brief.

130. Do we need building lines on plans to make it clearer.

No - aiming for unstructured layout to preserve rural character.

Retained.

131. H3 last Para should this be the intro either just before or after the map.

It has been included in the inset text box Site A, page 29

132 H7 VDS needs explaining

"VDS" equals the Village Design Statement, which can be found on the Bethersden Website. Will put in Glossary – The VDS describes the distinctive character of the village and its rural environment. It includes Design Guidelines for new developments.

Comment now in Policy H8 justification Page 32 also Glossary

133. Policy H9 Does agricultural/industrial building conversion need to be in this policy. As it stands H9 does not appear to allow for increase in housing stock.

H9 needs re writing.

H9 has now been substantially re written by the Working Group under guidance from ABC.
Page 34

Mr & Mrs J & A Green, Melville House, The Street – General Objections (key points)

134. Supporting documents not available, Village Design Statement, Delivery Strategy (Plan),

Basic Conditions Statement & Housing Paper, Tenterden & Rural Sites DPD, Sustainability Report, Map xx in policy R6, Glossary.

- a) VDS - Available on Bethersden/ABC website
- b) Delivery Strategy - should read Delivery Plan & can only be completed when we have the final version of the Plan
- c) Basic Condition Statement - Not required at this stage, confirms that legal requirements have been met when Plan is finalised.
- d) Housing Paper – Evidence Base for Housing Numbers 11th April 2016 Updated 18th May 2016
- e) Tenterden & Rural Sites DPD – ABC Website
- f) Sustainability Report - Not required at this stage, completed when final plan has been agreed.
- g) Map needed policy R6 – Map to be provided Done
- h) Glossary of Terms – Available

Above comments unchanged except:

Item c) Basic Condition Statement completed August 2017.

Item d) where a Data Sources & Caveats Summary was produced on 2nd Nov 2016 and included in the Consultation Statement page 43.

Item f) See Bethersden Neighbourhood Plan, Sustainability Appraisal Incorporating the requirements of the Strategic Environmental Assessment (SEA) Directive

Item g) New map included, Page 22

135. Reason for 40 additional dwellings across three sites between 2015-2030 is unclear we do not believe the plan justifies this number.

Numbers to be reviewed with a likelihood that numbers will be reduced.

Numbers reviewed and reduced to 34 see Assessment of Housing Provision, page 26

136. The data used in the yellow section is inconsistent in that population & household info dates back to 1991 but dwellings only to 2001.

Best statistics available where used, as per Consultants & ABC.

No change

137. There is little analysis for the underlying reasons for the trends in the historical data in the yellow section. Without this these, trends are of limited value in predicting future growth.

There is no absolute when trying to judge future housing demand. For this exercise we believe that, with ABC support, we have used the best available.

Current evidence supports that there is no let up in the demand for housing.

138. No detailed analysis of future trends has been undertaken in the yellow section. The assumption seems to be what happened in the past will happen in the future at the same rate.

There is more to it than that but it is one of the reasonable considerations to employ.

There is no absolute when trying to judge future housing demand or most other future activities. For this exercise we believe that, with ABC support, we have used the best available information.

However subsequent data shows a continuing demand for additional housing, in line with national trends.

139. Justification for the number of new houses in the red section is unclear -3 surveys are

referred to but the latest of these in 2014 states that there was a demand for 27 homes.

This was conducted prior to the Mill Road development, which released new 27 homes.

Despite this, the Plan continues on the basis that the new houses needed has taken this

into account. But no explanation provided on how this has been calculated.

Mill Road was based on the 2009 ABC Plan i.e. before the BNP was started.

Note: The above statement re demand for 27 homes is incorrect insofar as this demand was generated by surveys carried out from 2008 to 2010. Particularly relating to Local Housing Needs. The 2014 surveys relate to the current BNHP.

More detailed Explanation provided in Consultation Statement Appendix M in particular Pages 46 & 48.

140. The analysis of the data in both the yellow and red sections does not clearly conclude with any particular figure for the number of extra houses required up until 2030 – the figure of up to 40 additional dwellings is simply stated in policy H1 on page 3 of the red section. It is certainly not clear how the analysis has been translated into the 120 – 240 bed spaces proposed (40 houses with between 3 & 6 bed spaces each)

May need further words and work.

See Current Plan Policy H1, Page 26.

141. In relation to the statistics no account seems to have been made of housing that becomes available from natural turnover given the number of older people in the village.

Include in historical data.

No change

142. There are references to other surveys Page 11 yellow and pages 2 & 3 red section but these are not available. This makes evaluation of the plan impossible.

a) Page 11 relates to the Jan 2014 Parish wide survey the results of which were Displayed at the February 2014 public consultation. Summary available on request.

Page 2 & 3 The survey conducted in Aug 2013 refers to possible sheltered housing demand. Results available if required.

This is not true they were made available as noted above.

Again it was made clear that we were not proceeding with sheltered housing as not seen as viable.

143. The windfall policy does not give any indication of how many might be built over the plans life. This source could meet the proportion of homes needed & avoid building on Green Sites.

The nature of windfall sites will not provide affordable housing. They are often placed in areas that infill open space; our aim is to protect these as best we can.

These are largely random and rural in nature and outside the control of the BNHP.

144. Subdivision policy H10 does not give any indication of how many additional

dwellings this might add.

See 143 above

No change.

145. In relation to site "A" this was originally rejected under the Sustainability Appraisal Tenterden & Rural sites DPD, as it provides important open space. No discussion of this fact.

This area is seen as a significant planning gain for elderly accommodation and will also provide in perpetuity a green corridor and right of way for a footpath linking the Village Hall, George Field and village shops etc.

The previous criteria, at the time of the Tenterden & Rural sites DPD were not the same as applied in 2014.

146. Parish Plan page 28 quotes the VDS talking about the rural character, this plan seems to go against this particularly in respect to Site "A"

Published 2003 but it does not oppose future housing.

No change

147. Drainage issue is not discussed in any detail in relation to the three proposed Sites.

Action being taken

A General comment on page 13, para. 5.7 drainage and Page 36 Policy H14 Drainage.
Deliberately not site specific.

148. The car parks mentioned in H4 & H5 on page 6 of the red section are not shown on sites B & C on the same page. Without this info these sites cannot be evaluated properly.

Site B has proposed car parking and C also in text. Precise position dependent on housing proposal.

Dependent on Highways and planning requirements

149. No access routes shown to the three sites.

Site B has proposed car parking and C also in text. Precise position dependent on housing proposal

Dependent on Highways and planning requirements

149a. The outline of map Site A page 5 red section appears inconsistent with both map which was part of the owners submission & the ordinance survey map of this area.

Site outline map & areas to be re-drawn

General location and layout shown, as recommended by ABC not overly specific.

149b. Options only to 'support' or 'do not support' the Plan. Thus no option to support part of the Plan or support with reservations. This could lead consultees feeling under pressure to support. Given the statement. No supported Plan = minimal influence on future development.

NOTED – but many people said "Yes but..." And made comments both written and verbal.

A whole range of views submitted - it did not constrain comment.

Mr & Mrs J & A Green – Objections to six houses on Site A

150. Policy R1 & policy H3 are in conflict as it refers to vistas across to the George Field. Proposal to build six houses at the top of site A will block these views.

The prescriptive site layout has been cancelled in favour of a Developers Site Design Brief, which explains the vistas to be protected, and general constraints and requirements with which a developer must comply. In addition housing numbers reduced from 14 to 10.

Site A page 29, Policy H3 substantially amended. Housing numbers reduced from 14 to 10.

Type specified to be mainly single story or "chalet type". The Plan now provides a green corridor to the north of the site to facilitate visual and physical links to the countryside.

151. Justification H3 Similar comments as above.

The prescriptive site layout has been cancelled in favour of a Developers Site Design Brief, which explains the vistas to be protected, and general constraints and requirements with which a developer must comply. In addition housing numbers reduced from 14 to 10.

Site A page 29, Policy H3 substantially amended. Housing numbers reduced from 14 to 10. Type specified to be mainly single story or "chalet type". The Plan now provides a green corridor to the north of the site to facilitate visual and physical links to the countryside.

152. Again similar to above

The prescriptive site layout has been cancelled in favour of a Developers Site Design Brief, which explains the vistas to be protected, and general constraints and requirements with which a developer must comply. In addition housing numbers reduced from 14 to 10.

Site A page 29, Policy H3 substantially amended. Housing numbers reduced from 14 to 10.

Type specified to be mainly single story or "chalet type". The Plan now provides a green corridor to the north of the site to facilitate visual and physical links to the countryside.

153. Again similar issue

The prescriptive site layout has been cancelled in favour of a Developers Site Design Brief, which explains the vistas to be protected, and general constraints and

requirements with which a developer must comply. In addition housing numbers reduced from 14 to 10.

Site A page 29, Policy H3 substantially amended. Housing numbers reduced from 14 to 10.

Type specified to be mainly single story or "chalet type". The Plan now provides a green corridor to the north of the site to facilitate visual and physical links to the countryside.

154. Density of site A greater than B or Georgefield development.

The prescriptive site layout has been cancelled in favour of a Developers Site Design Brief, which explains the vistas to be protected, and general constraints and requirements with which a developer must comply.

Site A page 29, Policy H3 substantially amended. Housing numbers reduced from 14 to 10.

Type specified to be mainly single story or "chalet type". The Plan now provides a green corridor to the north of the site to facilitate visual and physical links to the countryside.

Fiona Summers-Smith, Bateman Corner, Mill Road

155. The plan does not clearly state how the figure of 40 dwellings was arrived at or the configuration.

Numbers to be clarified.

40 reduced to 34 – see Housing policies, pages 24 to 28

156. The plan does not consider bungalows

Single story accommodation is being considered.

Site A has been specifically nominated for this type of dwelling due to its proximity to the Village Hall and path to the shops.

See Developers Design Brief – Consultation Statement, page 35

157. No allowance for the elderly – only active retired. This is also not defined.

Single story accommodation is being considered. Specialist elderly care accommodation has been dismissed as not economically viable for a small number of dwellings.

As above but not purposed built.

158. The plan ignores the green policy, ref Site A

The prescriptive site layout has been cancelled in favour of a Developers Site Design Brief, which explains the vistas to be protected, and general constraints and requirements with which a developer must comply.

Not so, it specifically details the green corridor. Today the view is severely restricted due to the high earth mound; the development of this site will actually improve the vista.

159. Why must development be within the village it ignores the rest of the parish?

The National and Local Government Policy is against this form of housing

expansion.

Also the demand is for accommodation within walking distance of general village amenities.

160. The plan does not take into account mobile homes & caravans that have been erected in the fields.

This is not within the remit of the Parish Plan

161. I did not receive any communication - did the caravan dwellers.

All on the electoral roll were sent letters.

One of our Steering Group members personally delivered to this house, and recalls doing so.

162. Why do all Local Needs Housing have to be for rent.

They do not, you can also buy and part rent and buy.

163. The plan does not mention land owners/developers buying the houses and reducing availability to the public.

Not in our power to dictate who buys the properties.

164. Will it be limited to 40, Mill Fields was increased from 15 to 27.

The number has now been modified to on developed sites this does not include windfall.

Mill Fields was always 27 and at no time was it increased.

165. The plan makes no mention of flats or bungalows with wet rooms big enough to wash disabled persons.

Single story accommodation is being considered. Specialist elderly accommodation has been dismissed as too limiting for a small number of dwellings.

Site A has been specifically nominated for this type of dwelling due to its proximity to the Village Hall and path to the shops.

166. I disagree with the white weather boarding it is not the predominate style in Bethersden.

Not able to view supporting documents.

Weather boarding comment noted

Supporting documents - See Q134

167. H6 where did the 35% affordable come from - can you clarify affordable.

Definition & quantities relating to affordable housing will follow ABC guidelines, due June

2016.

168. Bateman corner very dangerous what can be done.

Parish Council Highways day-to-day issue.

169. Can the Cricket Pitch be moved to an extended field.

This has been suggested but Cricket Club is not in favour at the moment