

Cllr Jane Martin Comment ID MCLP 1172/1173/1174/1175

Examination of the Ashford Local Plan to 2030

Inspectors issue 10

Representation on behalf of Saxon Shore Ward- the villages of Aldington, Bonnington, Bilsington, Brook, Hastingleigh, Ruckinge, Brabourne and Smeeth

1.1.1 Representations made in July 2017 refer to HOU4 – this has now been superseded by Policy HOU3a, and to avoid lack of clarity, it is to this policy that I now refer.

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1.1.2 iii) With the exception of 2 settlements all villages in the Borough have been included within this policy for residential development /infill. Given that the policy as a windfall policy, cannot offer a ceiling on the number of such developments that may come forward, settlements could be faced by considerable cumulative effects of multiple developments one after the other. This can be seen in villages such as Aldington, that have already grown more than 67% in less than 15 years. This is unsustainable in terms of the NPPF, particularly because the scale of such developments are not large enough to deliver any measurable financing for infrastructure. The effects of one development after another without proper infrastructure has a profoundly damaging effect of the rural setting. In Aldington the current local Plan allocated 40 dwellings, but in reality 186 have been delivered in the same plan period from exception and windfall. Policy HOU3a, presents hamlets and small villages, therefore, with the real prospect of substantial explosions in population and dwellings, without infrastructure improvements, that will irrevocably alter the character of their rural existence.

1.1.3 Policy HOU3a was originally presented to permit “minor residential development and infill” and has now been amended to “Residential development” Minor development as I understand it, means a development of up to 10 dwellings – residential development is unlimited. I consider that the wording needs to be addressed in order to limit the scale of permitted development, in particular in the smaller villages and hamlets listed such as Ruckinge, Hastingleigh, Shottenden, Old wives Lees, Crundale, Brook etc, that would be unable to absorb uncapped large scale development.

1.1.4 This policy should in fact, differentiate clearly between accepted size of development based on current settlement size, in order to manage the pace and scale of growth in a sustainable manner. A development of 10 homes in a village such as Bilsington, increases the number of dwelling by around 10%; Three such developments within the plan period, which would now be possible with this policy, would dwarf the existing settlement and deliver no infrastructure improvement whatsoever, making it wholly unsustainable.

1.1.5 Policy HOU3a permits development and a potentially constant supply of possible housing through the windfall element, but it does not do this sustainably- small Hamlets and villages lack a good supply of affordable shops for much of the population, have little or no public transport (Hastingleigh, Brook, Shottenden) and limited school places, meaning car transport is a must.

The reliance on car transport as a form of travel is part and parcel of life today, but in alignment with the NPPF, we should be looking to limit reliance on this form of travel, in favour of public transport. Brook Policy S53 is more than 3 miles from the nearest shops and is wholly inappropriate therefore for development other than infill.

- 1.1.6 All the above examples suggest the policy is too broad and needs to differentiate clearly which settlements can by nature of existing infrastructure, deliver sustainable development- such as Charing, Wye, Tenterden. The current Core Strategy and Tenterden DPD made this clear by the heirachy structure which policy HOU3a no longer offers.
- 1.1.7 I propose the Landscape Protection Policy (LPP) as presented in earlier submission in July 2017, as a policy which would seek to support HOU3a by requiring cumulative impact assessments when and area is the subject of a number of small developments consecutively in order to mitigate the negative impacts this can have on the area in terms of pollution, wildlife damage , quality of life damage and to altering the value and setting of a rural area. The NPPF refers to cumulative effects in Paragraph 120 :
- “to prevent unacceptable risks from pollution and land instability, planning policies and decisions should ensure that new development is appropriate for its location. The effects (including cumulative effects) of pollution on health, the natural environment or general amenity, and the potential sensitivity of the area or proposed development to adverse effects from pollution, should be taken into account.”
- 1.1.8 The LPP will permit development in the rural areas, but will add an additional layer of assessment which will consider , habitats, natural environment , historical buildings, landscapes and include people and communities, all things considered in the NPPF as good practice, by riaing the bar for developers, requiring them to be more creative and innovative when approaching development in rural areas, and requiring a different approach. The current topic based polices fail to address the issue of cumulative impact and the LPP delvers this for residents of rural areas.