

Ashford Borough Council

Regulation 19 Consultation Statement

July 2017



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Regulation 19 Consultation on Ashford Local Plan 2030, Sustainability Appraisal, and Community Infrastructure Levy

Introduction

This Consultation Statement describes how Ashford Borough Council has undertaken community participation and stakeholder involvement in the production of the Local Plan at its Regulation 19 stage only, setting out how such efforts have shaped the Plan and the main issues raised by consultation / representations. It is produced to respond to and therefore fulfil requirements set out in the Town and Country Planning (Local Planning) (England) Regulations 2012, and specifically Regulation 22(1) part (c).

This requires the submission to the Secretary of State of a statement setting out:

- (i) which bodies and persons the local planning authority invited to make representations under Regulation 18;
- (ii) how those bodies and persons were invited to make representations under Regulation 18;
- (iii) a summary of the main issues raised by the representations made pursuant to Regulation 18;
- (iv) how any representations made pursuant to Regulation 18 have been taken into account;
- (v) if representations were made pursuant to Regulation 20, the number of representations made and a summary of the main issues raised in those representations; and
- (vi) if no representations were made in Regulation 20, that no such representations were made.

Under previous Regulations most of the work in preparing the Local Plan was referred to as Regulation 25. In the 2012 Regulations the equivalent stage is referred to as Regulation 18.

At the outset it is also considered pertinent to note that consultation has been taken within the context of Paragraph 155 of the National Planning Policy Framework (NPPF) which states:

“Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

Aside from demonstrating compliance with the aforementioned Regulations this statement also highlights how the Council has met the requirements of paragraph 155 of the NPPF and its own Statement of Community Involvement (SCI) (October 2013).

A previous report has been prepared showing how representations were covered during the Regulation 18 stages of the preparation of the Local Plan.

Context

The Ashford Local Plan to 2030 (the Local Plan) sets out a planning framework for guiding the overall spatial strategy, including the location and level of development, in the borough. It also establishes number of principles that will shape the way that the whole borough will develop.

With a drive for the borough to strengthen and grow its economy, in a sustainable manner which does not prejudice those things that are specifically important, such as its rich heritage and high quality natural environment, the Plan identifies a number of sites to accommodate new homes, new employment premises, new community facilities and the infrastructure required to support this growth. In these regards the Local Plan will be a key guide for growth within Ashford Borough, and amongst the most influential strategies at play across the coming years.

Work on the preparation of the emerging Local Plan in its current form, as a comprehensive suite of strategic policies, topic-based development management policies and site allocations within a single document, commenced as a result of the introduction of the NPPF in March 2012.

Throughout the preparation of the Plan the Council considers that it has succeeded in 'front-loading' consultation as far as has been possible. This statement details how the Council has engaged and encouraged involvement with local communities, businesses and stakeholders throughout the entirety of the process both pre and post NPPF) and ultimately how these interests have helped shaped the draft of the Plan now submitted.

Compatibility with the Statement of Community Involvement

The Council's Statement of Community Involvement (SCI) was adopted in October 2013. It outlines who should be consulted at each stage of the Local Plan's production and the types of methods that will be used for effective involvement. In addition to the methods of engagement set out in the SCI, the Council also has a "Duty to Cooperate" to work with a number of public agencies and service providers in the plan making process. These bodies are set out in the Localism Act 2011. The Council has prepared a separate paper confirming how it has discharged its duty in this respect.

The SCI provides details of how the Council will communicate with the local community and ultimately how they can get involved in the preparation of planning policy. It identifies the key groups that the Council seeks to consult with; the underlying intention being to engage with anyone who has an interest in the future of the borough, as a place to live, work or visit.

The Town and Country Planning (Local Planning) (England) Regulations 2012 prescribe a series of "Specific and General Consultation Bodies" that the Council should consult with during each consultation stage. The list, provided in Appendix A,

names the specific organisations and other bodies that the Council consider to have an interest in the preparation of planning documents within Ashford.

Consultation summer 2016

This section sets out the main consultation/community engagement events that have taken place during the exhibition of the Regulation 19 (Publication Version) of the Local Plan.

As per the requirements of Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, the local planning authority must make a copy of each of the proposed submission documents and a statement of the representations procedure available in accordance with regulation 35, and ensure that a statement of the representations procedure and a statement of the fact that the proposed submission documents are available for inspection and of the places and times at which they can be inspected, is sent to each of the general consultation bodies and each of the specific consultation bodies invited to make representations under regulation 18(1).

The Regulation 19 consultation took place between 15 June 2016 and 5pm on 10 August 2016, for an eight week period.

Drawing on its own database of groups who have expressed an interest in the evolving Local Plan in the past (including those consulted during the Regulation 18 stage) and its obligation to identify specific and general consultation bodies, the Council notified those organisations detailed in Appendix A, including statutory bodies, parish and town councils within the borough, and adjoining local authority areas, statutory undertakers and a range of social and environmental groups, industry and trade bodies in addition to local residents.

A copy of the statutory advertisement associated with this consultation can be seen in Figure 1 (below). Relevant representation forms used for the submission of online or paper representations are shown at Appendix D.

Having regard to its obligations under its SCI, the Council used the following methods of engagement:

“Formal consultation techniques for Local Plans”:

- Formal consultation documents
- Consultation notice
- News release/advert
- Electronic communication
- Consultation portal on website

“Informal consultation techniques for Local Plans”:

- Informal consultation documents
- Informal workshops and meetings
- Staffed and unstaffed exhibitions
- Radio advertising
- Informal adverts and newspaper articles
- Development update

Formal consultation documents

During the eight-week period the following documents were made available for public consultation:

- **Ashford Local Plan 2030 Regulation 19 Version**
- **Community Infrastructure Levy**
- **Statement of Representations procedure**

The documents were also made available for viewing online on the Council's website at www.ashford.gov.uk/consult

Hard copies of documents, including supporting documentation, were made available for viewing at the following deposit points:

- Ashford Borough Council, Civic Centre, Tannery Lane, Ashford, Kent, TN23 1PL
- Ashford Gateway, Church Road, Ashford, Kent, TN23 1AS
- Charing Library, Market Place, Charing, Ashford, TN27 0LR
- Tenterden Gateway, 2 Manor Row, Tenterden, TN30 6HP
- Wye Library, 6 Upper Bridge Street, Wye, Ashford, TN25 5AF

The whole suite of formal documentation was uploaded to memory sticks, with one sent to each statutory consultation body, each specific consultation body (as outlined in the SCI), each Parish Council and Community Forum, and each Ward Member. Each memory stick contained all documents listed in the Statement of Representations Procedure (Appendix C).

Means of representation

The Council encouraged comments to be made online via its Consultation Portal – 'Have your Say', at www.ashford.gov.uk/consult

It also gave the option of submitting representations in writing on a specific representation form (see Appendix D). This was made available to those who requested it from the council's offices or from any of the eleven public exhibitions. It was advised that forms should be returned to the Planning Policy Team, Planning and Development, Ashford Borough Council, Civic Centre, Tannery Lane, Ashford, Kent, TN23 1PL or via email to planning.policy@ashford.gov.uk

Consultation Notice and formal requirements

A formal advert advertising the consultation was placed in the Kentish Express (Ashford and District) on Thursday 16th June 2016, which also advertised the availability of documents as per Regulation 35(1) of the Town and Country Planning (Local Planning) (England) Regulations 2012.



Public Notice: Consultation 15th June to 10th August 2016

Ashford Local Plan 2030 – Consultation in accordance with Regulation 19: Town and Country Planning (Local Planning) (England) Regulations 2012

Ashford Borough Council is currently preparing a new Local Plan for the borough, which sets out the land that needs to be provided in the borough to accommodate new homes and jobs up to 2030.

The new Local Plan will allocate sites for development as well as establishing planning policies and guidance to ensure local development is built in accordance with the principles of sustainable development.

The Draft Local Plan 2030 and all proposed submission documents will be available for inspection between **15th June and 10th August 2016** at the locations below.

Consultation on a Preliminary Draft Charging Schedule in accordance with Regulation 15 of The Community Infrastructure Levy (CIL) Regulations 2010 (as amended)

The Community Infrastructure Levy (CIL) is a new mechanism introduced under the Planning Act 2008 which aims to provide a more consistent approach to determining financial contributions from new development towards local and sub-regional infrastructure provision. The Council is progressing the CIL proposals alongside the Local Plan to 2030.

The Preliminary Draft Charging Schedule will be available for inspection between **15th June and 10th August 2016** at the locations below

Online: www.ashford.gov.uk/consult

In Hard Copy, during the opening hours at:

- Ashford Gateway Plus, Church Road, Ashford TN23 1AS
- Ashford Borough Council, Civic Centre, Tannery Lane, Ashford TN23 1PL
- Charing Library, Market Place, Charing, Ashford TN27 0LR
- Tenterden Gateway, 2 Manor Row, Tenterden TN30 6HP
- Wye Library, 6 Upper Bridge Street, Wye, Ashford TN25 5AF

Comments on the draft local plan and preliminary draft charging schedule can be made:

- Online at www.ashford.gov.uk/consult
- By writing to Planning Policy, Ashford Borough Council, Civic Centre, Tannery Lane, Ashford, TN23 1PL. You may ask for a representation form by email or telephone (see below)

Comments must be received by 10th August 2016. When commenting you can ask to be notified of the submission of the local plan for independent examination, the publication of the recommendations of the inspector and the adoption of the local plan.

The Council will be holding a number of Public Exhibitions throughout the consultation period. Further information is available from:

www.ashford.gov.uk/local-plan-2030

www.ashford.gov.uk/cil

Email: planning.policy@ashford.gov.uk

Telephone: (01233) 330229

Figure 1: Public Notice placed in the Kentish Express on 16th June 2016

Consultee letters and emails providing details of the consultation were sent to the following groups:

- Specific Consultation Bodies
 - Parish Councils and Community Forums within and adjoining Ashford Borough
 - Statutory Organisations
 - Neighbouring District Authorities and County Councils
 - Infrastructure and Environmental Organisations
 - Telecommunications Operators
 - Other Local Authorities
 - Other Transport Consultees
 - Other Specific Consultees
- General consultees
- Site submitters
- Other landowners
- Development update subscribers
- Those who took part in previous consultations

A copy of this letter, with variations depending on the category of group addressed, can be found in Appendix B. The specific names of the bodies consulted is provided in Appendix A.

Local Plan Exhibitions

These were programmed to cover the whole of the Borough outside of designated Neighbourhood Plan areas, as follows

Location	Date	Time
Sandyacres Centre, Ashford	Tues 21/06/2016	15:30- 19:30
Kingsnorth School	Tues 28/06/2016	16:30 - 20:30
Hamstreet Village Hall	Weds 29/06/2016	15:00 - 18:45
Park Mall, Ashford	Weds 06/07/2016	12.00 - 16.00
Ashford Market at Orbital Park	Fri 08/07/2016	15:30 - 20:00
Charing Village Hall	Tues 12/07/2016	15:30 - 19:30
Julie Rose Stadium, Kennington	Thurs 14/07/2016	15:30 - 20:00
Tenterden Leisure centre	Mon 18/07/2016	16:00 - 19:30
Smeeth Village Hall	Fri 22/07/2016	15:30 - 19:00
Biddenden Village Hall	Tues 26/07/2016	15:30 - 19:00
Egerton Village Hall	Wed 27/07/2016	15:30- 19:00

At these events, which were well-advertised through multiple means in advance (as outlined in other sections of this statement), poster displays guided attendees through the process of production of the Local Plan and CIL schedule, and presented site allocations, capacities and policy text in a logical way. Each sessions was tailored to some extent to give primacy to development proposals in the immediate vicinity of the venue.

Copies of the Local Plan, Preliminary CIL charging schedule, and SA supporting the local plan were available for inspection.

A number of Planning Policy officers (never fewer than three) circulated at each session to answer questions, provide clarity and talk through the Local Plan process.

To assist the process, a number of other documents were available for inspection and completion at the exhibitions. These included the following:

- Local Plan Representation Form and Guidance
- Guidance Note 2 on Legal Compliance
- CIL Representation Form

Officers provided guidance, space and stationery to enable attendees to complete forms, and accepted these as representations.

News release and adverts (formal and informal)

Aside from the formal Public Notice and Statement of Representations Procedure, a number of additional media promotion activity was undertaken by the council to better disseminate the information and engage communities.

These were targeted to the following locations:

Resource	Date	Detail
Ashford Herald	11/07/2016	Article entitled, "15 massive changes coming to Ashford Town Centre"
Ashford Town Talk Website	29/06/2016	Article entitled, "Have your say on Ashford's new local plan with consultation taking place from 15 June to 10 August 2016"
Ashford Voice	July/August Edition	Article entitled, "Find out more about our local plan"
Kentish Express Website	From Early June 2016	Click-through billboards on online edition of local paper took users through to consultation pages
Kent Invicta Chamber of Commerce Website	15/06/2016	Article entitled, "Draft Ashford Local Plan 2030"

Ashford Borough Council sent out a series of media releases advising of the consultation, with the first released on 10th June 2016 to advertise the start of the consultation period. A follow-up release advertised the exhibition series, which was included on 23rd June on page 35 of the Kentish Express.

Further advertising and further dissemination of the consultation on the Local Plan 2030, along with details on how to respond, were carried out using the following means:

Posters advertising the consultation and exhibition dates were placed in the following locations:

- Park Mall, Ashford, Shop Window - 21st June
- Civic Centre Reception (and banner) – 22nd June
- Charing PC posting in shop windows and on website specific for Charing event – 30th June
- Smeeth, Westwell, Brabourne, Smeeth, High Halden, Willesborough PCs sent exhibition-specific advertising material and distributed to local residents – 29th June

Leaflets (A5 handouts – see Appendix E) advertising the consultation and exhibition dates were placed in the following locations:

- Civic Centre Reception – Tues 21st June
- Hamstreet Doctor Surgery – Wed 22 June
- Ashford Gateway – Wed 22 June
- County Square Leaflet Information Stand – Wed 22 June
- Stour Centre – Wed 22 June
- Julie Rose Stadium - Thurs 23 June
- Ashford Cattle Market Thurs 23 June
- Charing Doctor Surgery Thurs 23 June
- Tenterden Gateway / Tourist Information Centre Monday 27th June
- Tenterden Leisure Centre – Monday 27th June
- Cosy Kettle, Hamstreet – Monday 27th June
- Ashford Farmers Market – 3rd July

Kingsnorth Surgery would not let us leave any leaflets. Wed 22 June.

Parish Councils and Community forum contacts were emailed asking them to display and distribute (either physically or virtually), information promotion the consultation and associated exhibitions and events. Some (though not all) of those promoting the consultation included the following:

- Charing Parish Council
- Cllr P. Sims Website (Kennington Ward)
- Kennington Community Forum
- Kingsnorth Parish Council
- Mersham Village Alliance
- Newenden Parish Council
- Orlestone Parish Council
- Sandyhurst Lane Residents' Association
- Smeeth Parish Council
- South Ashford Community Forum
- Tenterden Residents' Association
- Tenterden Town Council

Electronic communication

Letters and emails were sent to statutory bodies and general consultees registered on the Local Plan database as per the "Consultation Notice and formal requirements" section above.

A significant amount of promotion activity and advertising was undertaken on electronic platforms, also including that detailed above, but complemented by the following:

- Carousel banner promotion on the Ashford Borough Council website home page.
- Email signature advertising the consultation added to all external emails
- Articles in Ashford Voice (monthly residents e-magazine sent to 2,000 subscribers each month and accessed by thousands more via the 'banner' on the carousel on the homepage of the council's website)
- Article in Business News (quarterly e-magazine sent to around 1,500 subscribers)
- Promotion of dedicated email address for any questions to be addressed from stakeholders during the course of the consultation period
- Advert in the Village Directories www.thevillagedirectorykent.co.uk
- Advert in the Ashford Advertiser www.ashford247.co.uk
- Branded memory sticks, containing all consultation documentation and response information
- Article in Root & Branch (staff monthly e-magazine)

Workshops and meetings

Given the stage of plan production reached, engagement events rather than more formal workshops and meetings were more appropriate for the broadest engagement of residents and stakeholders in the consultation process. Formal workshops and meetings as a community involvement technique were not used during this

consultation, but were key components of the previous Regulation 18 engagement process.

Radio advertising and Social Media

Radio adverts publicising the consultation were used to alert a wider audience of the opportunity to be involved. The following opportunities were taken:

- Radio Ashford commercial recorded and broadcast
- Interview slot on Webbo's Ashford Radio breakfast slot

In addition to the online activity detailed above, the council used the opportunities presented by Social Media to promote the consultation and associated events. Specifically, it established the following:

- Dedicated Facebook page www.facebook.com/Ashfordlocalplan
- Dedicated Twitter hashtag #ashfordlocalplan
- Promotion of the community events on social media (posts for each event, and general get involved messages)
- Weekly posts and updates of both Facebook and Twitter

Screenshots from the Social Media campaign, and a script of the radio commercial can be found in Appendix F, along with other media content.

Development update

The Development Update is a newsletter produced twice yearly to provide residents and other interested parties with an update as to the latest position on the main Local Plan documents and how they are progressing. The document also includes details of some of the major planning applications that have been received or approved within the borough.

The development update for April 2016 provided details of the forthcoming consultation process along with an explanation of its purpose and guidance on where to respond and to find further information. It also gave the timescale for representations to be made.

The October 2016 issue again explained the two consultations (Local Plan and CIL) following their closure. It explained that the council was in the process of assessing all representations raised, and stated that there could be a further round of consultation on 'main changes' during 2017.

The development update can be accessed at www.ashford.gov.uk/development-update.

Outcomes

Upon closure of the public consultation on the Local Plan 2030, a total of 2866 written representations had been received. These were analysed by officers over subsequent months. Representations against each policy were summarised and categorised by topic area addressed. The main points raised in representation were addressed in a responses document (attached as Appendix G).

A schedule of numbers of responses against each policy area follows:

Ref no.	Policy Name	No. of reps. received
	STRATEGIC POLICIES - Introduction	28
	Vision, Objectives, Guiding Principles	//
SP1	Strategic Objectives	33
SP2	The Strategic Approach to Housing Delivery	92
SP3	Strategic Approach to Economic Development	29
SP4	Delivery of Retail and Leisure Needs	4
SP5	Ashford Town Centre	10
SP6	Promoting High Quality Design	22
	SITE POLICIES - Introduction	24
S1	Commercial Quarter	6
S2	Land North-East of Willesborough Road, Kennington	1483
S3	Court Lodge	31
S4	Land North of Steeds Lane and Magpie Hall Road	40
S5	Land South of Pound Lane	18
S6	Former Newtown Works	8
S7	Former Klondyke Works	4
S8	Lower Queen's Road	7
S9	Kennard Way, Henwood	7
S10	Gasworks Lane	6
S11	Leacon Road	7
S12	Former K College, Jemmett Road	4
S13	Former Ashford South School, Jemmett Road	2
S14	Park Farm South East	18
S15	Finberry North West	16
S16	Waterbrook	12
S17	Land at Willesborough Lees	8
S18	William Harvey Hospital	9
S19	Conningbrook Residential Phase 2	20
S20	Eureka Park	25
S21	Orbital Park	4
S22	Chart Industrial Estate	1
S23	Henwood Industrial Estate	2
S24	Tenterden Southern Extension Phase B	11
S25	Pickhill Business Village, Tenterden	7
S26	Appledore - The Street	8
S27	Biddenden - North Street	31
S28	Charing - Northdown Service Station, Maidstone Road	9
S29	Charing - Land south of the Arthur Baker Playing Field	6
S30	Egerton - Land on New Road	6
S31	Hamstreet - Land North of St. Mary's Close	19
S32	Hamstreet - Land at Parker Farm	6
S33	High Halden - Land at Hope House	10
S34	Hothfield - Land East of Coach Drive	10
S35	Mersham - Land adjacent to Village Hall	4
S36	Shadoxhurst - Rear of Kings Head PH	23
S37	Smarden - Land adjacent to Village Hall	21
S38	Smeeth - Land south of Church Road	10

S39	Woodchurch - Lower Road	41
S40	Woodchurch - Front Road	34
S41	Chilham - Mulberry Hill, Old Wives Lees	15
S42	St. Michaels - Beechwood Farm	6
S43	Biddenden - Priory Wood	3
S44	Westwell - Watery Lane	38
	TOPIC POLICIES	//
	SECTION A - Housing	//
HOU1	Affordable Housing	28
HOU2	Local needs / specialist housing	11
HOU3	Residential development in Ashford urban area	10
HOU4	Residential Development in the rural settlements	43
HOU5	Residential windfall development in the countryside	24
HOU6	Self and Custom Built Development	13
HOU7	Replacement dwellings in the countryside	4
HOU8	Residential Extensions	8
HOU9	Standalone annexes	
HOU10	Development of residential gardens	7
HOU11	Houses in Multiple Occupation	2
HOU12	Residential space standards internal	6
HOU13	Homes suitable for family occupation	5
HOU14	Accessibility standards	6
HOU15	Private external open space	5
HOU16	Traveller Accommodation	21
HOU17	Safeguarding existing Traveller sites	3
	SECTION B – Employment and the Local Economy	//
EMP1	New employment uses	6
EMP2	Loss or redevelopment of Employment Sites and Premises	4
EMP3	Extensions to employment premises in the rural area	3
EMP4	Conversions of rural buildings to non-residential uses	4
EMP5	New employment premises in the countryside	5
EMP6	Promotion of Fibre to the Premises (FTTP)	11
EMP7	Primary and Secondary Shopping Frontages in Ashford Town Centre	2
EMP8	Primary Shopping Frontage in Tenterden Town Centre	1
EMP9	Sequential Assessment and Impact Test	3
EMP10	Local and Village Centres	3
EMP11	Tourism	7
	SECTION C – Transport - Introduction	8
TRA1	Strategic Transport Schemes	13
TRA2	Strategic Public Parking Facilities	11
TRA3a	Parking Standards for Residential Development	10
TRA3b	Parking Standards for Non Residential Development	
TRA4	Promoting the local bus network	6
TRA5	Planning for Pedestrians	4
TRA6	Provision for Cycling	9
TRA7	The Road Network and Development	10
TRA8	Travel Plans, Assessments and Statements	1
TRA9	Planning for HGV movements	12
	SECTION D – Natural and Built Environment	//

ENV1	Biodiversity	15
ENV2	The Ashford Green Corridor	21
ENV3	Landscape Character and Design	17
ENV4	Light pollution and promoting dark skies	14
ENV5	Protecting important rural features	9
ENV6	Flood Risk	6
ENV7	Water Efficiency	6
ENV8	Water Quality, Supply and Treatment	6
ENV9	Sustainable Drainage	4
ENV10	Renewable and Low Carbon Energy	9
ENV11	Sustainable Design and Construction - Non-residential	4
ENV12	Air Quality	7
ENV13	Conservation and Enhancement of Heritage Assets	10
ENV14	Conservation Areas	7
ENV15	Archaeology	2
	SECTION E – Community Facilities	//
COM1	Meeting the Community's Needs	14
COM2	Recreation, Sport, Plan and Open Spaces	15
COM3	Allotments	0
COM4	Cemetery Provision	1
	SECTION F - Implementation	//
IMP1	Infrastructure Provision	11
IMP2	Deferred Contributions	3
IMP3	Planning Enforcement	3
IMP4	Governance of public community space and facilities	0
	Appendices (General)	2
	Appendix 5 (Housing Trajectory)	1

As noted above, the specifics of each representation, and the Council's response, can be found in Appendix G.

Equality Impact Assessment

Although there is no legal requirement to do so, an Equality Impact Assessment (EIA) was carried out on the Regulation 19 Local Plan. This was done so that the Local Planning Authority could assess whether it would have unintended negative consequences for those people with protected characteristics as per the Equality Act 2010.

The Equality Act 2010 sets out nine protected characteristics for the purpose of the equality duty of regard. These are, Age; Disability; Gender Reassignment; Marriage and Civil Partnership; Pregnancy and Maternity; Race; Religion or Belief; Sex; and Sexual Orientation.

The council must 'have due regard' to these groups, meaning that in making decisions and in its other day-to-day activities the council must consciously consider the need to do the things set out in the general equality duty: eliminate discrimination, advance equality of opportunity and foster good relations. This can involve:

- removing or minimising disadvantages suffered by people due to their protected characteristics.
- taking steps to meet the needs of people with certain protected characteristics when these are different from the needs of other people.
- encouraging people with certain protected characteristics to participate in public life or in other activities where it is disproportionately low.

The assessment of the relevance of the Local Plan as a complete document to people with different protected characteristics follows:

Protected characteristic	Relevance to Decision High/Medium/Low/None	Impact of Decision Positive (Major/Minor) Negative (Major/Minor) Neutral
<u>AGE</u> Elderly	Low	Positive
Middle age	Low	Positive
Young adult	Low	Positive
Children	Low	Positive
<u>DISABILITY</u> Physical	Low	Positive
Mental	Low	Positive
Sensory	Low	Positive
<u>GENDER RE-ASSIGNMENT</u>	Low	Positive

<u>MARRIAGE/CIVIL PARTNERSHIP</u>	Low	Positive
<u>PREGNANCY/MATERNITY</u>	Low	Positive
<u>RACE</u>	Low	Positive
<u>RELIGION OR BELIEF</u>	Low	Positive
<u>SEX</u> Men	Low	Positive
Women	Low	Positive
<u>SEXUAL ORIENTATION</u>	Low	Positive

Glossary

Area of Outstanding Natural Beauty (AONB) - are relatively large areas of land designated under the National Parks and Access to the Countryside Act 1949 by the Countryside Commission. The primary objective of designation is conservation of the natural beauty of the landscape. AONBs differ from National Parks in that the promotion of recreation is not an objective of their designation, though these areas should be used to meet the demand for recreation insofar as this is consistent with the conservation of natural beauty and tranquillity, and the needs of agriculture, forestry and other uses.

Core Strategy - Development Plan Document as part of the Local Development Framework System to set out the vision, aims and strategy for spatial development within an area. This was replaced by the 'Local Plan' requirement in the NPPF.

Development Plan Documents (DPDs) - includes adopted Local Plans, neighbourhood plans and is defined in section 38 of the Planning and Compulsory Purchase Act 2004.

Duty to Cooperate - The Localism Act 2011 introduced a Duty to Cooperate, which is designed to ensure that all of the bodies involved in planning work together on issues that are of bigger than local significance.

Habitats Regulations Assessment (HRA) - assesses the likely impacts of the possible effects of a plan's policies on the integrity of the Natura 2000 sites (including possible effects 'in combination' with other plans projects and programmes).

Infrastructure Delivery Plan (IDP) - contains a list of all infrastructure needed to support sustainable growth, as set out in the emerging Local Plan. Infrastructure projects will be identified by location, cost and delivery timescale and funding. 'Infrastructure' has a broad definition and can apply to many projects including new roads, schools, community services, sports and leisure facilities and green infrastructure.

Local Development Framework (LDF) - Contains a portfolio of Local Development Documents, which will provide the local Planning authority's policies for meeting the community's economic, environmental and social aims for the future of their area where this affects the development of land.

Local Development Scheme (LDS) - provides information on how Ashford Borough Council intends to produce its Local Plan. It sets out the planning policy documents that form the development plan for the borough and its programme of preparation.

Local Enterprise Partnership (LEP) - locally owned partnerships between local authorities and businesses and play a central role in determining local economic priorities and undertaking activities to drive economic growth and the creation of local jobs. Ashford is part of the South East LEP.

Local Planning Authorities (LPAs) - is the local authority or council that is empowered by law to exercise statutory town planning functions for a particular area of the United Kingdom.

National Planning Policy Framework (NPPF) – sets out the government’s planning policies for England and how these are expected to be applied. It provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.

Statement of Community Involvement (SCI) - explains to the public how they will be involved in the preparation of local planning. It sets out the standards to be met by the authority in terms of community involvement.

Sustainability Appraisal (SA) - A statutory assessment undertaken on Local Plans to identify and evaluate the impacts of a plan on the community, economy and environment.

Appendix A: List of Specific and General Consultation Bodies contacted with regard to the Regulation 19 Consultation

Consultee letters and emails providing details of the consultation were sent to the following groups:

Specific Consultation Bodies

- Parish Councils and Community Forums within and adjoining Ashford Borough
- Statutory Organisations
- Neighbouring District Authorities and County Councils
 - Canterbury City Council
 - Dover District Council
 - Maidstone Borough Council
 - Rother District Council
 - Shepway District Council
 - Swale Borough Council
 - Thanet District Council
 - Tonbridge and Malling Borough Council
 - Tunbridge Wells Borough Council
 - Kent County Council
 - East Sussex County Council
- Infrastructure and Environmental Organisations
 - Ashford Clinical Commissioning Group (CCG)
 - Kent Community Health NHS Foundation Trust
 - East Kent Hospitals University NHS Foundation Trust Headquarters
 - NHS England South (South East Office)
 - Civil Aviation Authority
 - Office of the Rail Regulator
 - Highways England
 - KCC Highways, Transportation and Waste
 - Historic England
 - Environment Agency
 - Natural England
 - Kent Nature Partnership
 - Homes and Communities Agency
 - South East Local Economic Partnership (LEP)
- Telecommunications Operators
 - Hutchinson 3G Ltd
 - Mobile Operators Association (MOA)
 - O2
 - Orange
 - T-Mobile (UK) Limited
 - Vodafone
 - EE
 - Three
- Other Local Authorities
 - Medway Council
 - Sevenoaks District Council
 - Gravesham Borough Council
 - Dartford Borough Council
- Other Transport Consultees

- HS1 Ltd
- Southern Trains
- South Eastern Rail
- Network Rail
- London and Continental Railways - Eurostar
- Kent County Council
- Stagecoach Bus
- Stagecoach in East Kent and Hastings
- Other Specific Consultees
 - South East Water
 - Southern Water
 - Affinity Water (South East Region)
 - EDF Energy Asset Management
 - SGN
 - Amec (National Grid)
 - UK Power Networks
 - Kent Invicta Chamber of Commerce
 - High Weald AONB Unit
 - Kent Downs AONB Unit
 - Sport England
 - Kent Fire and Rescue Services
 - South East Coast Ambulance Service
 - Kent Police
 - Hutchinson 3G

General consultees

- Amec Foster Wheeler E&I UK
- Ashford College
- Ashford District Partnership Group (East Kent Mencap)
- Ashford and District Volunteer Centre
- Ashford International Chinese Association
- Ashford Museum
- Ashford Muslim Association
- Ashford Youth Forum Trust (Ashford Borough Council)
- Benefice of Bethersden with High Halden and Woodchurch
- British Geological Survey
- Carers Support
- Centre for Ecology and Hydrology
- Church Commissioners for England
- Community Action South East Kent (CASE)
- County Square Shopping Centre
- Campaign to Protect Rural England (CPRE)
- Crown Estate Office
- Design Council
- Disabled Persons Transport Advisory Committee (DPTAC)
- Education Funding Agency
- Equality and Human Rights Commission
- Fields in Trust
- Health and Safety Executive
- Home Builders Federation
- High Weald AONB Unit
- Independence & Access Matters

- Kent Association of the Disabled People (Ashford Branch)
- Kent Community Foundation
- Kent Invicta Chamber of Commerce
- Kent Wildlife Trust
- McArthur Glen Designer Outlet
- Mid & SE Kent Council for Voluntary Services
- National Grid
- National Trust
- Post Office Property Holdings
- Royal Mail
- Sagarmatha Gurkha/Nepalese Community (SGNCAK)
- Salvation Army Housing Association
- Skills Funding Agency
- Schools
 - The North School
 - Towers School & Sixth Form Centre
 - John Wallis Church of England Academy
 - The Norton Knatchbull School
 - Highworth Grammar School
 - Ashford School
 - The Wyvern School
 - The Caldecott Foundation
 - Homewood School & Sixth Form Centre
 - Sure Start (Ashford)
- Tenants Forum (Ashford Borough Council)
- Traveller Law Reform Project
- Weald of Kent Protection Society
- William Harvey Hospital
- Youth Organisations
 - HOUSE
 - Sk8side Youth Centre
 - Towers Youth Project
 - The Youthy - Ashford North Youth Centre
 - The Bridge Project, Waterside Youth & Children's Centre
 - Great Chart with Singleton Youth Club
 - Zimbabwean Youth Group (Awake Grace Ministries)

All site submitters

Other landowners

Ashford “Development Update” subscribers

Those who took part in previous consultations (as per the Inovem Database)

Appendix B: Letter advertising consultation sent to consultees

Planning and Development Services

Ask For: Ian Grundy



ASHFORD
BOROUGH COUNCIL

Civic Centre

Tannery Lane

Ashford

Kent TN23 1PL

(01233) 331111

Email: ian.grundy@ashford.gov.uk

Direct Line: (01233) 330213

Fax No: (01233) 330682

Wednesday 15th June 2016

Dear Sir / Madam

CONSULTATION ON:

ASHFORD LOCAL PLAN 2030 (in accordance with regulation 19 of the Town and Country Planning (Local Planning) Regulations 2012)

ASHFORD LOCAL PLAN 2030 SUSTAINABILITY APPRAISAL ENVIRONMENTAL REPORT (in accordance with regulation 13 of the Environmental Assessment of Plans and Programmes Regulations 2004)

COMMUNITY INFRASTRUCTURE LEVY PRELIMINARY DRAFT CHARGING SCHEDULE (in accordance with regulation 15 of the Community Infrastructure Levy (CIL) Regulations 2010 (as amended))

The Draft Ashford Local Plan 2030, Sustainability Appraisal, and Community Infrastructure Levy (CIL) Preliminary Draft Charging Schedule are available for public consultation from **Wednesday 15th June until Wednesday the 10th August 2016 at 5pm.**

I have a hard copy of the Sustainability Appraisal Environmental Report and a memory stick that includes all the other relevant documents and supporting material.

The relevant documents can also be viewed and commented on online through our consultation portal **www.ashford.gov.uk/consult**.

If you have any questions or requests for further forms please contact 01233 330213 and we will be happy to assist.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'S. G. G.'



2007-2008
Promoting Sustainable
Communities Through
the Planning Process



INVESTOR IN PEOPLE

Ashford
best placed in Britain
www.ashfordbestplaced.co.uk

Appendix C: Statement of Representations Procedure

ASHFORD LOCAL PLAN 2030 REGULATION 19 VERSION CONSULTATION COMMUNITY INFRASTRUCTURE LEVY JUNE 2016

STATEMENT OF REPRESENTATIONS PROCEDURE

Subject matter:	<p>Ashford Borough Council is now consulting on the draft Local Plan 2030. It is known as the Regulation 19 consultation, which relates to the last consultation planned before it is submitted to a Planning Inspector for consideration (through an Examination in Public). The Local Plan sets out the level of development the Councils are proposed for the period up to 2030 and where this is to be provided. It also includes policies that would be used to determine planning applications, should the plan be approved.</p> <p>At the same time as seeking views on Local Plan, Ashford Borough Council is consulting on The Community Infrastructure Levy (CIL). CIL is a new mechanism introduced under the Planning Act 2008 which aims to provide a more consistent approach to determining financial contributions from new development towards local infrastructure provision. It will work alongside the existing process of securing 'Section 106' which can only be used for site-specific infrastructure requirements.</p>
Representation period;	The period for representations begins on Wednesday 15th June and ends at 5pm on Wednesday 10th August 2016.
Documents can be viewed at:	<p>The Council's web-site at: www.ashford.gov.uk/consult</p> <p>Or during the opening hours at the following 'deposit points':</p> <ul style="list-style-type: none">• Ashford Borough Council, The Civic Centre, Tannery Lane, Ashford, Kent, TN23 1PL• Ashford Gateway, Church Road, Ashford, Kent, TN23 1AS.• Charing Library, Market Place, Charing, Ashford, TN27 0LR• Tenterden Gateway, 2 Manor Row, Tenterden, TN30 6HP• Wye Library, 6 Upper Bridge Street, Wye, Ashford, TN25 5AF
Representations to be sent to:	<p>The Council are encouraging comments to be made online, via the Consultation Portal www.ashford.gov.uk/consult</p> <p>However, should you wish to submit comments in writing please email planning.policy@ashford.gov.uk or call 01233 330 229 to request a representation form. Representation forms should be returned to: Planning Policy Team, Planning and Development, Ashford Borough Council, Civic Centre, Tannery Lane, Ashford, Kent, TN23 1PL or via email to planning.policy@ashford.gov.uk</p>
Notification Requests:	If you wish to be notified of future stages of the Local Plan 2030 or CIL Charging Schedule please specify in your submission. If you register your details at www.ashford.gov.uk/consult you will automatically be notified of all future Local Plan documents by email.

Supporting Documents

The following items are available for inspection at the 'Deposit Points' and the councils website www.ashford.gov.uk/consult

1. Sustainability appraisal and SEA of the Ashford Borough Local Plan – Regulation 19 Version
2. Ashford Strategic Housing and Employment Land Availability Assessment (2016)
3. Ashford Strategic Housing Market Assessment and Update (2014 and 2015)
4. Ashford Strategic Employment Options Report (2012)
5. Ashford Borough Council Viability Study - Local Plan and CIL Viability Report (2016)
6. Ashford Borough Infrastructure Delivery Plan (2016)
7. Ashford Employment Land Review: Site Assessments (2016)
8. Ashford Retail Leisure Needs Assessment (2015)
9. Ashford Borough Council and Wye with Hinxhill Parish Council - Rural Economic Assessment (2014)
10. Traffic Impact Assessment – Summary Report (2016)
11. Kingsnorth Strategic Link Road Ashford – Feasibility Study (2016)
12. Ashford Town Centre Parking Review (2014)
13. Ashford Cycling Strategy (2015)
14. Ashford Strategic Flood Risk Assessment (2014)
15. Habitat Regulation Assessment and Appropriate Assessment (2016)
16. Gypsy, Traveller and Travelling Showpeople Accommodation Assessment and Update Paper (2014 and 2016)
17. Ashford Draft Cultural Strategy (2015)
18. Ashford Draft Sports and Indoor Facilities Strategy (2013)
19. Ashford Tourism Strategy (2015)

Appendix D: Representation Form

Ashford Borough Council Ashford Local Plan 2030 Regulation 19 – Publication Version



Representation Form

For office use only

Reference No:

Date received:

The preferred method for receiving comments is on-line by using the consultation portal. You can register to access the consultation portal at: www.ashford.gov.uk/consult. If you are unable to use the on-line method of submitting comments you may still submit comments by using this form.

Please use a separate form for each comment you wish to make

Guidance Notes for submitting a representation can be found at the end of this form.. Please read these notes **before** completing the form.

Please return this form by 5pm on Wednesday 10th August 2016

Personal Details

Name of individual:

Organisation (*where relevant*):

Address:

..... Postcode:

Email address: Daytime Tel. No:

If an agent has been appointed to act on your behalf please give the agent's details

Name:

Address:

..... Postcode:

Email address: Daytime Tel. No:

Question 1 - Which part of the Plan does this representation relate to?

Please state clearly a chapter, paragraph number, policy number or a map/diagram title.

Question 2 -

To be "Sound" a Plan should be Positively Prepared, Justified, Effective and Consistent with National Policy*

***Please refer to National Planning Policy Framework (NPPF) Paragraph 182 (page 43) for full definitions**

Do you consider this section of the Plan is sound?

Yes No

Question 3 - If you consider the Plan is unsound, on which grounds do you consider the document unsound?

- Positively prepared
- Justified
- Effective
- Consistent with National Policy

Question 4 - Do you consider the Document is Legally Compliant in accordance with the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012.

Yes No

Question 5 - Please give details in the box below of why you consider the document is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.

(Attach additional sheets if necessary)

Question 6 - What changes do you suggest to make the document legally compliant or sound?

(Attach additional sheets if necessary)

Question 7 – Do you consider it necessary to participate at the oral part of the examination?

- Yes
- No

Question 8 – Does your representation relate to an omission sites (a site that has not been included), for example a site for housing, employment, travellers or local green spaces.

- Yes
- No

If Yes, please supply details of the omission site.

.....(Attach additional sheets if necessary)

Signature:

Date:

Print name:

Guidance notes for submitting a representation



Data Protection Statement: The information collected will be processed in accordance with the Data Protection Act 1998. Copies of representations will be made available for public inspection, and cannot be treated as confidential. They will also be available to view on the Councils consultation portal www.ashford.gov.uk/consult, once the consultation period has closed.

ALL RESPONSES MUST BE RECEIVED BY: Wednesday 10th August at 5pm
Ashford Borough Council may not accept your representation if it is received later than this date.

1. Using the representation form.

We are encouraging everyone to use the Consultation Portal www.ashford.gov.uk/consult as this has a number of benefits including being quick and easy to use and will save time as you only need to complete personal details once. Guidance is available on the portal that will assist you.

Representation forms can be requested by telephoning (01233) 330229. Photocopies of the representation form are also accepted.

2. Who should make the representation?

You may submit a representation yourself or on behalf of an organisation or company. Alternatively, you may appoint an agent to do it for you. If an agent is appointed their full details must be given and all future correspondence will be sent to them.

3. How do I make comments on a paper copy form?

You must use a separate form for each representation that you wish to make. Please use Question 2 of the form to state whether you think the Local Plan is sound (support/agree) or unsound (object/disagree/think information is missing). This will help us process your comment efficiently.

If you believe the Local Plan is unsound, please detail precisely why you are objecting, applying the 4 tests of soundness from paragraph 182 of the National Planning Policy Framework (NPPF) See section 5 below. You should try to support your objection with evidence showing why your objection and alternative approach is valid.

Continuation sheets can be used, but a summary of no more than 100 words should be included to assist in a prompt consideration of your representation. Continuation sheets must state clearly your name and which representation they relate to.

4. It is important that you state which part of the report your comment relates to.

Question 1 of the paper representation form should be used to inform us as to which part of the Local Plan your comment relates. Every paragraph, Policy or Map contained within the Local Plan has a reference and this should be referred to. Again, this will help us process your comments efficiently.

Question 8 of the paper representation form includes reference to Local Green Spaces. Advice on such designations can be found in the NPPF (paragraphs 76 and 77) The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used:

- where the green space is in reasonably close proximity to the community it serves;
- where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and

- where the green area concerned is local in character and is not an extensive tract of land.

Should you wish to nominate a site for consideration please submit the following:

- a site location plan,
- contact details of the land owner,
- information to support the local significance in which it is held.

5. In commenting on the Local Plan I am directed to address “soundness” issues, what does this mean?

There are four areas to think about when looking at whether or not the publication version of the Local Plan 2030 is sound:

1. Positively prepared

This is looking at whether our plan has been prepared to meet our objectively assessed development and infrastructure needs. It also covers how we have looked to meet the needs of our neighbours.

2. Justified

Our Local Plan must be set on a robust and credible proportionate evidence base. Making sure the choices made in our Local Plan are backed up by solid facts and research. Our Local Plan should be the best approach when considered against reasonable alternatives.

3. Effective

This means we must be able to foresee that the policies and proposals in our Local Plan can actually happen and are deliverable.

4. Consistent with national policy

Our Local Plan should be consistent with national policy and enable the delivery of sustainable development as set out in the National Planning Policy Framework (NPPF).

6. How will I know if my representation is valid?

If you make a representation through the portal you will receive an email notification of each comment received. Once your representation has been checked (after the consultation period closes) you will receive a further email to let you know it has been validated.

If you make a hard copy representation, you will receive an acknowledgement letter.

Please ensure hard copy forms are signed and dated otherwise they may not be valid.

7. How long do I have to make a representation?

Comments can be made any time during the eight week consultation period, which starts on Wednesday 15th June 2016. Please make your submission as soon as possible during this period.

Representations received after the end date cannot be accepted and will not be valid.

8. What will happen to my representation?

Your representation will be made available to view on the Council’s website through the portal, once the consultation period is closed. They will also be stored on the Councils database solely in connection with the Local Plan only.

It is a requirement that all representations are made available for public inspection. Therefore, your comments cannot be treated confidentially.

9. Where should I send my hard copy form?

Planning Policy Team

Planning and Development Unit

Ashford Borough Council

Civic Centre, Tannery Lane

Ashford, Kent, TN23 1PL

Email: planning.policy@ashford.gov.uk

Appendix E: Advertisement and handout leaflet

Ashford
local plan

Help shape our Local Plan to 2030

Local Plan consultation

Ashford Borough Council is currently preparing a new Local Plan for the borough, which sets out the land that needs to be provided in the borough to accommodate new homes and jobs up to 2030.

The consultation runs until 10th August. To get involved and have your say visit www.ashford.gov.uk/consult

Ashford
local plan

Local plan consultation

Help shape our Local Plan to 2030 visit www.ashford.gov.uk/consult for more details or come along to one of the following events:

Sandyacres Centre	Tues 21/06/2016	15:30 - 19:30
Kingsnorth School Hall	Tues 28/06/2016	16:30 - 20:30
Hamstreet Village Hall	Weds 29/06/2016	15:00 - 18:45
Park Mall – Town Centre	Weds 06/07/2016	12:00 - 16:00
Ashford Market – Orbital Park	Fri 08/07/2016	15:30 - 20:00
Charing Village Hall	Tues 12/07/2016	15:30 - 19:30
Julie Rose Stadium	Thurs 14/07/2016	15:30 - 20:00
Tenterden Leisure Centre	Mon 18/07/2016	16:00 - 19:30
Smeeth Village Hall	Fri 22/07/2016	15:30 - 19:00
Biddenden Village Hall	Tues 26/07/2016	15:30 - 19:00
Egerton Village Hall	Wed 27/07/2016	15:30 - 19:00

Appendix F: Media, Social Media and Radio materials

Cc:
Subject: Re: FW: Ashford Youth Theatre story

This e-mail, including any attachments, is intended for the named addressee(s) only and may contain marked material up to RESTRICTED and should be handled accordingly. Unless you are the named addressee (or authorised to receive it for the addressee) you may not read, copy or use it, or disclose it to anyone else. Unauthorised use, copying or disclosure is strictly prohibited and may be unlawful.
Precautions have been taken to ensure that this is a virus free message but recipients are responsible for carrying out their own checks. This Council accepts no responsibility for loss or damage to any hardware, software or data resulting from this e-mail
If you have received this transmission in error please contact the sender, and delete message.



Figure 2: Email signature

The screenshot shows a Facebook page for Ashford Borough Council. The main post, published on June 15 at 10:58, is titled 'Planning our future together – Local Plan to 2030 consultation begins'. The text of the post states: 'Ashford Borough Council is currently preparing a new Local Plan for the borough. The plan sets out the land that needs to be provided in the borough to accommodate new homes and jobs up to 2030. It also includes the policies that will be used to help decide planning applications. The Local Plan to 2030 aims to make sure that future development within Ashford is well planned, helping to create great places a... See more'. Below the text is a graphic with the 'Ashford local plan' logo and several small circular icons representing different aspects of the plan. The post has reached 324 people. On the right side of the page, there is a 'THIS WEEK' summary box showing 1,560 Post Reach, 103 Post Engagement, 0 Website Clicks, 0 of 3 Response Rate, and 1 day Response Time. Below this is an advertisement for Ashford Borough Council, which includes a small image of the council's buildings and the text: 'Ashford Borough Council Ashford Borough Council is a local authority which provides services to residents in Ashfo...'. At the bottom of the page, there are buttons for 'Boost post' and 'Promote Page'. The left sidebar shows 'PEOPLE ALSO LIKE' (Ashford Herald, Kentish Express, Amici Ashford) and 'LIKED BY THIS PAGE' (The Retreat Animal Rescue, Kent Police, Blissful Beauty by Clare).

Figure 3: Facebook campaign



Figure 4: Twitter campaign



Figure 5: Shopfront advertising, Park Mall, Ashford



Figure 6: Kent Online Digital Alert and banners

Copy for Radio Ashford commercial

(For a 30 second advert we have around 90 words)

Ashford Borough Council is preparing a new Local Plan for the borough.

This sets out the land that needs to be provided across the borough to accommodate new homes and jobs up to 2030.

An eight week consultation runs until 10th August and can be accessed at Ashford dot gov dot uk forward slash consult.

During this period a series of events will be held that will enable local residents to ask questions and find out more about the draft plan.

To find out more visit ashford dot gov dot uk forward slash consult for more details.

Word count 97

Ashford Borough Council

Responses to Regulation 19 representations

June 2017



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INTRODUCTION

The Ashford Local Plan 2030 Regulation 19 Version was published for public consultation in June 2016. The consultation ran from 15th June 2016 and the 10th August 2016.

2,866 representations were received. The following Report summarises these representations and provides a response to the main issues raised by consultees for each of the Policies of the Plan.

Standard responses have been made in instances where the same issue has been raised by multiple consultees or where the same issue has been made multiple times by the same consultee.

Where alternative sites were proposed for allocation in representations, these are listed as Omission Sites in Appendix A to this report and are addressed in the SHELAA Report.

INTRODUCTION

Representations have been received from the following consultees:

2 Kingsnorth Medical Practice	1599 Sims
728 Julian Green	1669 Stephen Cecil
733 Robert Everest	1681 Richard King
822 Linda Arthur	1855/1859 Home Builders Federation Ltd
852/1959 Tenterden Town Council	2477 Canon Woods and Orchard Action Group
962 Kent Invicta Chamber of Commerce	2503/2504/2505 Wye with Hinxhill Parish Council
988 Kennington Community Forum	2541/2550/2660 Kent County Council
1369/1371/1934 CPRE Kent (Ashford District Committee)	2675/2677 Gladman Developments
1463 Maidstone Borough Council	2859 Wheler Foundation
2168 Tunbridge Wells Borough Council	808 Kent Downs AONB Unit
1495 Newenden Parish Council	

Summary of Representations – Main Issues

Issue - Health 2 suggests that the Local Plan fails to properly plan for health provision and requests engagement with the Clinical Commissioning Group (CCG), the General Practice Federation and other health providers. Health's current model of provision needs to be recognised and planned for in terms of the provider's desire to move most of the non-acute services out of hospitals and into a more localised community setting, requiring new purpose built facilities and land to enable this to happen. Currently there are 3 such hubs proposed around Ashford and significant land of S106 monies will be needed to ensure suitable health provision is delivered to support the increase in population. The larger developments should recognise this fact.

988 is concerned that the health providers have not been adequately informed of the Local Plan process and that two key bodies – the Ashford Health and Wellbeing Board and the CCG – have not considered the potential impact of expected new development up to 2030. They therefore question whether the Local Plan is suitably evidenced in order to ensure that healthcare provision – a key concern of residents – is addressed. The plans of these groups should be embedded in a revised Local Plan.

Response: *The Council has consulted with the CCG and Hospitals Trust through its work on the Infrastructure Delivery Plan. Unfortunately neither has been able to provide detailed proposals for new health facility requirements in the Borough as they are still in the process of development strategies for future healthcare in Ashford and the wider area.*

The Hospitals Trust has indicated that there may be a need to expand the William Harvey in order to accommodate increased demand from housing development in Ashford, and also increased demand from outside of the Borough. The Trust are currently undergoing a

Clinical Strategy, which will require public consultation later in 2017, until then it is difficult to predict what the specific infrastructure requirements will be. However the Trust is confident that any expansion requirements can be accommodated on the existing site. The existing policy provides sufficient flexibility to enable this to come forward.

The Plan and supporting Infrastructure Delivery Plan includes information that has been provided by these bodies at the current time. The Council will continue to liaise with these bodies to ensure their requirements can be addressed appropriately in the Local Plan and Infrastructure Delivery Plan where possible, and developments are able to contribute appropriately to the delivery of the infrastructure.

Issue - Adequacy of consultation 1371 is concerned about the limited public involvement in the preparation of the Local Plan, citing the ability to read the evidence base comprehensively and the SA process. They feel that the plan has been disadvantaged by not having a Reg 18 stage. 1599 also raised concern about the adequacy of consultation, particularly with a number of key stakeholders such as KCC Highways, KCC education and Southern Water. Their view is that input from these bodies is often wrong.

Rep 1669 sets out that the Local Plan deals with an incredibly difficult subject matter and the Council should get out in the community more, targeting specific groups in order to get the message out in an understandable way.

Rep 2477 considers that the Council has not met its own SCI in preparing the Plan as residents were generally unaware of the proposals to allocate land at Kennington until the draft Plan was published.

Response : *The concern about limited public involvement in the preparation of the Plan is unfounded. The consultation statement that supports the Plan outlines numerous engagement events with local residents, communities and stakeholder interests going back to the initial 'Plan-it Ashford' events held to establish key issues in different communities. There has also been on-going and regular engagement with key local service providers to ensure that the Plan was deliverable and the supporting Infrastructure Delivery Schedule was accurate and up to date.*

The representation on behalf of the Canon Woods way residents refers to a legal opinion on the adequacy of consultation. The Council has sought its own legal advice on the issues raised and is content that the process followed has been sound. There is no requirement for a separate 'Regulation 18' version of a Plan to be published and the extent of local consultation and information since the start of the process has constituted a robust approach to meeting Regulation 18. There is little doubt that residents were aware of the sites submitted under the call for sites process as these were the subject of specific local events and were published on the council's website for information.

Issue - Duty to co-operate/ Legal Compliance

Support: 1463 Maidstone Borough Council (MBC) objects that the Local Plan refers to a Duty to Co-operate Statement, which is not available at this stage. However MBC submitted their own statement in support of their emerging Local Plan which records the 'Duty' events and discussions which have been held between the two parties. MBC's view is that the 'Duty' has been met with regards strategic matters between the two authorities.

2550 and 2660 are both from KCC and both are support reps. With regards the 'Duty' they confirm that the Council have actively engaged with neighbouring authorities and relevant bodies through the preparation of the Local Plan. They specifically mention the memorandum of understanding between the Council and East Kent LPA's and themselves as a means of facilitating such discussions.

With regards to 2660, KCC express the fact that they have been actively involved in the preparation of the Local Plan and are also a key partner on the Delivery Deal – a commitment to work closely on delivering the Borough Council's key big 8 projects.

Response: *These supportive comments are welcomed and noted.*

Objection: Reps 2859, 2675 and 1859 considers that the Council has not adequately demonstrated that it has met the Duty to Co-operate as no DTC Statement has been published and more specifically unmet needs from London or other locations in the south east have not been addressed in the Plan.

Rep 1855 considers the Plan period should be extended in order to meet national policy and Rep 1859 seeks clarification on the timing of the Plan review.

Response: *It is noted that the Duty to Co-operate is an on-going process but one year from the Draft Plan being published, no other District or the Mayor of London has raised any need for the borough to meet any aspect of unmet housing need in their areas. Prior to the publication of the draft review of the London Plan it would be premature and speculative for this Plan to seek to meet any potential unmet housing needs from Greater London as the scale and nature of any needs are not known. The SHMA sets out evidence on the extent of the local Housing Market Area – it is not for this Plan to consider any recognised unmet need within the rest of the wider south east.*

The supporting comments refer to the measures of agreement reached between Ashford and its neighbours and demonstrate the robustness of the council's approach. It is proposed to publish the Duty to Co-operate Statement alongside the proposed revisions to the Draft Plan this summer so objectors will have the opportunity to consider it in any further representations.

The Plan covers the period from 2011-2030 and housing needs have been based on the SHMA-based objectively assessed needs from the 2011 base date. The Plan highlights the strategy for delivering the balance of the housing need over the remainder of the Plan period and identifies land for meeting those needs in accordance with para. 47 of the NPPF. As housing needs change over time, there is no benefit in having a longer Plan period especially if, as the objectors seek, an early Plan review is also to be provided for. The provision for the Plan to be reviewed should be clarified to refer to the review commencing by 2023 with the intention to adopt by 2025 at the latest but retaining the caveat that a significant undersupply of housing delivery could trigger an earlier formal review.

2168 – Tunbridge Wells Borough Council refer to correspondence from early 2016 indicating that there may be a need in the future for discussions with adjoining boroughs in respect of meeting OAN for their housing market area, however they recognise that both their SHMA and the Ashford SHMA found relatively weak interactions between the respective housing market areas.

Response TWBC has recently published an 'Issues and Options' report for consultation as an initial stage of their new Local Plan. In this 5 options for accommodating growth in the Borough are suggested. No reference is made to a need for any adjoining authority to accommodate any of the Borough's housing requirement, although the need for continuing dialogue with adjoin districts is referred to. As it stands, there is no formal or informal request from TWBC to ABC to meet any of its housing requirements and its own Local Plan preparation process is at a very early stage. In any event, most of the area that borders the two districts is designated as AONB and so additional development in this part of the borough would be specifically restricted by the policy guidance in the NPPF.

Issue - Adequacy of the SA process 2677 makes several comments on the adequacy of the SA process.

Rep 1934 sets out that the SA which supports the Local Plan is not accurate enough and doesn't give due weight to climate change and mitigation and adaptation.

Response: An addendum to the SA is being produced to support the proposed revisions to the Plan but detailed points raised on the process are being addressed through that exercise.

The CPRE point is wrong and those matters have been given due weight. NE/EA supported our objectives as agreed in first round of the SA process and this is the key point. They also haven't objected which is a secondary point.

With regards to the scoring within the Sustainability Appraisal (SA) it should be noted that the overall 'score' on the sustainability appraisal process is not the only determining factor for site allocation selection, and the more detailed conclusions provide an overall analysis of the suitability and sustainability of the site, which takes into account other site and local factors which may not be covered by the scoring process and the deliverability and developability of the site. Therefore a higher 'score' in the SA assessment does not necessarily equate to the site being more suitable for allocation than an alternative site.

Comments received at Local Plan consultation events, have been taken into consideration where possible and are recorded in the pre-submission consultation statement, but must be weighted against the issues relating to borough wide housing needs outlined above in this report, and the results of the site assessment work undertaken. With regards to the planning application received on the site, the planning application process is distinctly separate from that of the Local Plan, and the comments made on the application will be considered as part of that process.

Miscellaneous comments: 733 pointed out that when new communities are planned they need to be adequately supported by infrastructure in order for them to be successful. 822 suggested that Priority 4 of the Council's Corporate Plan should be altered with more emphasis placed on the protection of historic villages and rural communities. It cited Mersham in this example. 2503 seeks a correction to Para 2.7 to read Area of Outstanding Natural Beauty instead of AONB as it is the first time the AONB is referenced.

808 Welcomes the incorporation of the protection of the identity and attractiveness of the rural area, including the AONBs, but consider the wording should be amended to refer to 'conserve and enhance' rather than 'protect and enhance' to more accurately reflect national policy as set out at para 115 of the NPPF and legislation set out in the 2000 Countryside and Rights of Way Act.

1369 seeks better quality maps as they are difficult to read in their present format. 1669 comments that they do not feel knowledgeable enough to comment on whether the Local Plan is legally compliant.

1959 sets out that all references to Ashford (not specific to the Town) should be changed to the 'Borough of Ashford'.

2504 sets out the Local Plan should insert the words 'with Hinxhill' after Wye when referring to the Wye with Hinxhill Neighbourhood plan, to give it the proper title. 2505 sets out the Local Plan should insert the correct date (September 2016) for the Wye with Hinxhill Neighbourhood Plan referenced. *[post consultation note – the Wye with Hinxhill Neighbourhood Plan referendum has now taken place].*

2541 recommends that consideration is given to the need to identify and safeguard mineral reserves and the infrastructure required to facilitate mineral movements. 728 makes a comment relating to other comments made by them on policy ENV14.

852, 962, 1681, raised supportive comments which are welcomed and noted.

Response: *Points raised by 733, 1369, 1669, 728 are noted. With regards to 822, it is not the role of – or within the scope of – the Local Plan to change the Council's corporate plan and its priorities which have already been agreed by the Council. Agree that wording of 3.11 be amended – see proposed change MC2.*

Grammatical/ factual amendments raised by reps 2503, 2504 and 2505 are accepted and will be altered through minor amendments to the Local Plan – see proposed change MC1.

With regard to use of Ashford to refer to both the borough as a whole and the town, this will be corrected in the final version to ensure that where the borough as a whole is the subject then the 'borough of Ashford' is used, with 'Ashford' referring solely to the town itself.

With regard to minerals safeguarding Kent County Council has confirmed that if the site is located within an existing urban area, the provisions for safeguarding of minerals do not apply, and these comments can be ignored.

For sites on the edge of Ashford and the villages – Ashford Town sits on a band of mineral deposits which run north-west to south-east through the Borough, meaning that the majority of land in and around Ashford Town, and at a number of other settlements, has safeguarded mineral deposits. Sites that are proposed for allocation in and around Ashford and at other settlements represent the most sustainable options to provide for the housing and employment needs for the Borough, as has been demonstrated through the Sustainability Appraisal. In order to meet the needs for housing and employment development it is the Council's view that it would not be possible to avoid allocations within these areas, and would create an unsustainable form of development if the mineral safeguarded areas were

not considered for development as a matter of principle. Kent County Council has requested that minerals assessments be carried out in order to identify the need for prior extraction of the minerals within the safeguarded areas. The Minerals and Waste Local Plan 2013 – 2030 which forms part of the statutory development plan for the Borough, includes policies which set out these requirements, and are therefore material considerations when in determining planning applications. It is not considered necessary to replicate these policies within this Local Plan.

POLICY SP1: VISION AND STRATEGIC OBJECTIVES

Representations have been received from the following consultees:

382 Paul Buggins	1928 Selden
383 Courtley Planning Consultants Ltd	1985 Tenterden Town Council
823 Linda Arthur	2039 Pickhill Business Development Ltd
851 Christine Drury	2150 Shadoxhurst Parish Council
1116 Jenny Mills	2172 Kingsnorth Parish Council
1139 Simon Richardson	2192 Barton Willmore on behalf of Hallam Land Management Ltd
1156 Lesley Wickens	2263 Persimmon Homes and Taylor Wimpey
1373, 1376 CPRE (Ashford District Committee)	2413 High Weald Joint Advisory Committee
1435 Caroline Jacksom	2506, 2507, 2508, 2509 Wye with Hinkhill Parish Council
1552 Elizabeth Kerr	2537 Kent County Council (KCC)
1732, 1815 Friends Life, AXA Real Estate and DMI Properties Ashford Ltd	2658 Charing Parish Council
1771 Christine Craib	2681 Gladman Developments
1863 Morgheew Park Estate	2862 Wheler Foundation
1889 Hopes Grove Nursery	808 Kent Downs AONB Unit

Summary of Representations – Main Issues

Issue - Role of rural service centres (Para 3.10) Representation 1435 raises objection as the plan fails to identify and recognise the importance of Chilham as a service centre, which is important in providing housing sites to sustain the village. Representation 2681 raise concern that this paragraph limits development in the rural areas, without consideration as to whether these areas could sensibly accommodate a greater proportion of the borough's housing.

Response *Although one of the larger and more sustainable settlements, Chilham is not considered to be one of the 3 main village service centres in the borough. When assessing the overall housing strategy distribution and the suitability of individual sites, a range of*

factors are considered through the Sustainability Appraisal process. This includes a wide range of issues such as access to services and environmental and heritage constraints in addition to ensuring additional development enhances or maintains the vitality of rural communities without being detrimental to local character.

However, additional housing is now proposed in a range of rural settlements, taking into account their relative roles and local circumstances. This includes Chilham. Full details of the new proposed sites can be located in the Main Changes consultation document.

Issue - Green corridor/Strategic Buffers 382, 823, 1116, 1139, 1552, and 1928 raise the need for strategic gaps/green buffers to be provided between Ashford town and the surrounding villages, in order to protect the villages from development encroaching out from Ashford. Land at Highfield Lane WE15 is specifically requested as an area to be protected. 1116, 1139 and 1156 suggest that the Vision and Strategic Objectives are too vaguely worded to be effective.

Response *Green corridor extension areas are proposed in these locations and a new policy is proposed to prevent settlements merging. See New Policy SP7 and Green Corridor Map at MC83.*

Issue - Use of brownfield land 382 and 1376 support for making best of use brownfield land. Representation 382 believes that more needs to be done to make development of brownfield sites viable and discourage use of new sites until all appropriate sites have been re-used eg by charging CIL at Chilmington.

Response *There are insufficient brownfield sites across Ashford to meet the level of new housing that needs to be delivered in the borough, the majority of growth will therefore have to be delivered on greenfield sites on the edge of the urban area and in the rural area.*

Many of the previously developed sites in the town already have redevelopment proposals underway. However, the Local Plan encourages the re-use of previously developed sites where environmental constraints allow and sites are sustainably located.

Issue - Housing Strategy (windfall policies) 383 state that other policies (HOU4 and HOU5) in the plan suggest significant restrictions towards achieving this objective. 851 states that this objective needs to be better supported by policies later in the document, commenting that a more liberal approach to development (no longer based upon hierarchy) must be supported by a sustainability framework so that impact of development can be fully examined and discussed, including roads, schools, surgeries, setting of designated assets, landscape areas, AONB, heritage assets. To ensure development is well integrated within existing communities.

Response *It is accepted that there may be suitable sustainable development opportunities that lie beyond the existing built up confines of the settlement and some adjustment to the policy should be made to bring it more into line with the policies set out in the NPPF. Similarly, there is no need for a specific reference to minor development as schemes can be judged on their own sustainability credentials. See proposed change to Policies HOU4 and HOU5.*

Issue - Historic and Natural Environment 808 suggests the use of 'conserve and enhance' rather than 'protect and enhance' in order to reflect para 115 of the NPPF and the Countryside and Rights of Way Act 2000.

Response *Agreed. SP1 b) wording amended see proposed change MC3.*

Issue – Landscape 808 requests that landscape is incorporated into objective b) to ensure accordance with paras 17, 109 and 110 of the NPPF. Representation 851 states that this objective b) needs to be better supported by policies later in the document. Representation 1376 requests that the historic and natural environment is split into 2 objectives and suggests specific wording.

Response *Agreed. SP1 b) wording amended see proposed change. See proposed change MC3..*

Issue – Design 2263 raised objection to the use of the word 'highest', due to it being an exceptionally high test that is not supported by the NPPF. 1156 suggests that the policy should state that ABC will follow a strict code regarding design quality, commenting that the design of the first building proposed for the Business Centre Area appears to be totally lacking in and design element. 1376 supports the reference to space around buildings and the contribution of this makes to the character of places. However suggests amending the end of the objective to 'and which responds to the designations, setting and assessed character of the area'.

Response *It is considered that the Plan appropriately prioritises design standards through the Vision, Strategic Objectives and Policy SP6, in accordance with the NPPF. It is a key aspiration of the Council to promote and encourage the highest possible design standards within new development.*

Issue – Infrastructure 1156 states that detailed areas of infrastructure have been omitted and this policy should be specific about what infrastructure will be required within planning applications.

Response *Other policies in the Plan, supported by the Infrastructure Delivery Plan, do this, as far as possible. It would not be appropriate to list specific infrastructure requirements in this policy.*

Issue - Specialist housing 1376 suggests 'older residents' should be removed from objective f), as specialist housing can support other people in the community, and insert the following: 'This objective applies to planning applications for new build and also management of existing housing stock in the borough whether public or private'.

Response

It is considered important to maintain reference specifically to older people given the ageing population of the Borough and the proposals in the Housing White Paper 2017. It is not possible for this to apply to management of existing housing stock. See proposed change MC3.

Issue - Mix of housing types 1376 requests recognition of needs of newly forming and downsizing households within objective f)

Response See proposed change MC3

Issue - Climate change 1373, 1376 and 2172 consider the need for climate change to be addressed in the vision and strategic objectives. 1373 recommends amends to para 3.13 and specific wording for a climate change strategic objective.

Response See proposed change MC2 and MC3.3

Miscellaneous comments 1156 states that Kent Downs AONB will be affected by the huge 16m high warehouses proposed for Sevington Park very visible on a high piece of ground. 382 comments on green corridors and on Policy S5. 383 comments on policies HOU4 and HOU5.

Response Noted. See new policy SP7, policies ENV2 and amended policies HOU4 and HOU5.

Support 382 supports the vision to regenerate Ashford Town Centre. 808 support the incorporation of the protection of the identity and attractiveness of the rural area, including AONB's 1373 supports protecting the countryside for its own sake. 1732, 1771, 1815, 2039, 2150, 2172, and 2263 provide general support for Policy SP1.

Response Support noted.

POLICY SP 2: THE STRATEGIC APPROACH TO HOUSING DELIVERY

Representations have been received from the following consultees:

19 Clive Wooton	1887 Hallett & Co, Trustees of the Colt Clavier Collection
43 Gareth Evans	1890 Hopes Grove Nursery
281 TG Designer Homes	1904 Lois Tilden
385 Paul Buggins	1988 Tenterden TC
409 Courtley Planning	2058 K Carroll
434 Winston Michael	2086 Castlefort Homes
816 Prima Paper Services	2112 / 2087 Geraldine Dyer
1167 Lesley Wickens	2122 R & S Holgate
1199 Rita Fassum	2151 Shadoxhurst PC
1245 Kent Downs AONB Unit	2168 Tunbridge Wells BC
1379 Telereal Trillium	2174 Kingsnorth PC
1395 / 1392 / 1388 / 1383 / 1380 CPRE Kent	2222 Hamlin
1397 Roger	2249 / 1879 A Clifton

1405 Central Ashford Community Forum	2255 GSE Waterbrook
1413 Mr Hopkins	2260 Persimmon Homes
1451 Caroline Jackson	2264 Persimmon Homes and Taylor Wimpey
1602 Sims	2283 Peta Grant
1649 Jacqueline Male	2414 High Weald AONB – JAC
1667 Ashford Access	2445 / 2446 / 2448 / 2449 Joanne Robinson
1706 Alan Vaughan	2458 Wates Developments
1737 Friends Life, AXA, DMI	2464 / 2466 / 2468 / 2469 Lee Robinson
1778 Mr and Mrs Jackson	2475 / 2480 / 2190 Hallam Land Management
1788 Christine Craib	2510 / 2511 / 2512 / 2514 / 2516 / 2519 Wye and Hinxhill PC
1795 Mr Summerfield	2530 Gatefield Estates
1825 Crabtree & Crabtree – Aldington	2531 / 2552 KCC
1834 Crabtree & Crabtree – Hamstreet	2532 / 2535 The Propane Company
1836 Crabtree & Crabtree – Smarden	2560 / 2569 Jarvis Land
1842 Clarendon Homes	2670 Charing PC
1862 AJ Fortescue	2678 / 2679 / 2680 / 2682 Gladman Developments
1864 / 1867 / 1907 Home Builders Federation	2713 /2720 Church Commissioners
1866 Morghew Park Estate (Morghew Park Estate)	2861 Wheler Foundation
1866/1877 Morghew Park Estate	

Summary of Representations – Main Issues

Issue - Housing Numbers 2861 - ABC's approach to housing supply and need are not supported by robust evidence. First, the combined effect on the target of net migration from London and any market signals adjustment is not clear. Second, the target is considerably lower than that anticipated by the South East Plan and there is no explanation provided on why ABC is now planning for lower economic and housing growth. In explaining the proposed minor market signals adjustment, it draws on 4 main indicators: significant increases in housing costs, affordability ratios well above national levels, significant increase in the proportion of private renters and an increase in overcrowding /shared homes. In the light of these indicators, the increase of just 9 units a year to the baseline target would seem to fall well short of the required adjustment. This anomaly requires explanation. On the question of housing need linked to jobs growth note that Kent County Council is critical of ABC's use of economic activity rates. The 2015 SHMA acknowledges that if higher growth

rates are planned for, necessarily this must be accompanied by higher housing targets and it is proposed that this might reasonably increase to between 883 dpa and 889 dpa.

2678 / 2679 / 2682 argue that the SHMA is not a justified or up-to-date piece of evidence, although the approach to defining Ashford as a standalone housing market area is reasonable. The starting point housing need figure should be 770 dpa to reflect the 2014 based SNPP and household projections. The current SHMA uses a figure of 718 dpa. The 9dpa assumed by the SHMA is inadequate. A modest uplift of the starting point projection giving an OAN of 850 dpa would be necessary to support jobs growth at 694 per annum. Therefore conclude that the minimum OAN for Ashford should be 850 dpa.

2458 - the effects of accommodating the additional needs of London as set out in the SHMA should be met in full, bringing the OAHN to at least 790dpa (727+8+55). In addition a contingency may need to be put in place to meet the unmet needs of adjacent boroughs. In addition to the above there is the issue of the potential imbalance between employment growth and housing growth that needs to be addressed in the ALP/ SA. The ALP is looking to accommodate a 'baseline' scenario of 12,600 new jobs over the plan period. Table 13 of the SHMA however only suggests a 12,360 growth in working population, so the plan either needs to provide for more housing to accommodate the shortfall in the working population (240 people over the plan period would generate a need for circa 17 additional dpa) or accept that there will be an increase in in-commuting to meet the economic aspirations of the area, in which case the implications of this strategy needs to be addressed in the SA. An increase of just 9dpa in the overall housing requirement to try and meet the affordability gap is inappropriate. Question why a detailed assessment of the merits of higher rates of housing growth has not been tested to establish if a higher rate of housing growth could help bridge the gap – especially in the rural hinterland. The Plan should be looking to promote an over-all housing requirement of circa 15,675 to 16150 dwellings over the plan period (825dpa - 850dpa); 52dpa - 77dpa more than proposed in the ALP at present.

2190 - The 'starting point estimate' is currently growth of 750 households per annum in Ashford Borough using the latest CLG 2014-based household projections from 2011- 2031. Applying a household/ dwelling adjustment of 3% (to account for vacancy and second homes in Ashford) the overall housing need is 776 dwellings per annum (dpa). However, growth of 776 dwellings per annum, does not make adjustments for suppressed household formation rates for 25-44 year olds. PPG states that adjustments may be required to the household projection estimate of need if rates have been suppressed historically (paragraph 15). Three scenarios for adjusting the household formation rates are presented in the review. These result in a demographic led housing need of 798-821 dpa. The full OAN should be in the region around 800 dpa, which is a total of 15,200 homes from 2011-2030. In terms of meeting this need, the plan is under supplying by 112 homes.

2475, 2260 and 2480- More recent evidence suggests that the OAHN of 727 dwellings per annum should be higher for the following reasons:

The adjustment to household formation rates does not fully address the issue of household suppression. The 2015 SHMA only applies an adjustment to the rates for 25-34 year olds. Appropriate to adjust the rates for 25-34 and 35-44 year olds. Furthermore, returning the 2012 rates to the 2001 rates by 2031 actually suppresses household formation for females

below the 2012 rates. Sensitivity testing of three different approaches to household formation adjustments applied to the most recent starting point estimate (the 2014-based SNPP) has shown that housing need could be as high as between 800 and 820 dwellings per annum (2011-2031);

The recent 2014-based SNPP are based on very similar migration trends to the average 10-year long-term trend (2005-2015). It is therefore considered the 2014-based ONS SNPP can be considered in preference to the long-term trend scenario;

The housing and job targets in the emerging Local Plan are not in balance. The 2015 SHMA considers the adjusted SNPP scenario will support growth of 12,700 jobs, 2011-2031 (630 jobs per annum). Sensitivity testing has found that this level of job growth assumes an over reliance on older workers (aged 65+) which is unreasonable. The 2014-based SNPP (which projects higher population growth than the Council's adjusted SNPP scenario) has been found to support growth of just 580 jobs per annum. Sensitivity testing has found that the Council's OAHN will only support growth of between 463 and 510 jobs per annum. Recommend further analysis of past employment trends and current employment forecasts to determine whether the level of supported job growth is in line with past trends and/or economic forecasts. If not, an uplift will be required to the demographic-led assessment of need to support economic growth. Note that the Council are pursuing a higher housing target than its OAHN evidence of 772 dwellings per annum (2011 – 2030), which given the low level of past completions will require the delivery of 871 dwellings per annum over the remainder of the Plan (2016–2030). It is important that the housing requirement is treated as a minimum.

2222 - The housing target fails to reflect the advice set out in the NPPF which is to significantly boost housing numbers. The housing target set out in paragraph 3.35 is not a maximum figure but should, instead, be made clear that it is a minimum figure. The schedule set out in Table 1 (paragraph 3.36) does not apply a 10% reduction on existing commitments and other proposals. There is a 25% reduction on windfall sites but no reduction in respect of other sites. It is now the accepted norm that there should be a 10% reduction applied to all commitments/allocations to reflect slippage. For a plan to be deliverable, there must be additional flexibility in respect of housing needs and supply. Therefore, the figures set out in Policy SP2 should note that there is "at least" a requirement for an additional 12,200 dwellings. The application of an offset housing trajectory (paragraphs 3.77 / 3.78) which is back-loaded to the end of the plan period will simply compound the lack of delivery of housing across the Borough. Past underperformance must be applied to the current requirements and must form part of the ongoing five year land supply requirement. This will require a greater emphasis upon delivery of smaller sites, predominantly in rural areas, in the short term.

1737 - Housing is the key priority, both nationally and locally and it is important to sufficiently allocate sites for residential development. Policy SP2 outlines that 12,200 dwellings will be delivered in the Borough between 2016 and 2030 through committed schemes, proposed allocations and windfall developments. This is based on a residual requirement, taking into account housing completions in the borough between April 2011 and March 2016, and equates to 871 units per annum. However, the adopted Core Strategy planned for 16,700 homes over a 15 year period equating to an annual requirement of 1,113 homes. This

current draft Plans annual target therefore represents a significant reduction. Since 2001, the Council has consistently underperformed in terms of housing delivery, with an average of 566 annual completions (between 2001 and 2015) and delivery has not exceeded the draft Local Plan's proposed rate (871 units) since 2004/05. The reduction in target units is therefore somewhat surprising given the growth objectives for the Council.

1866/1877 - The Draft Local Plan allocates land to accommodate a total of 14,680 dwellings from 2011-2030 which is slightly higher than the identified OAN for the same period which is 13,813. This in itself is supported. However, in view of this and the fact that the last five years have shown a persistent under delivery of the OAN it is considered reasonable that the Council should look to remedy the backlog in the first five years of the plan rather than spread this over the plan period which they have chosen to do the Draft Local Plan.

If the shortfall is to be dealt with in the first five years, there would be a requirement to demonstrate an additional 1,336 (5%) or 1,881 (20%) additional dwellings per year on top of the existing OAN requirement plus buffer. This could require between 5,153 and 6,243 new dwellings dependent upon which buffer is included. The Local Plan housing trajectory only identifies 4,547 dwellings by year 5 representing a significant undersupply if the backlog is to be dealt with in the early stages of the plan period. In view of this we consider that insufficient housing supply has been identified to ensure the Draft Local Plan meets OAN and the objectives of the NPPF to significantly boost housing and to remedy the negative effects of under delivery. The Council suggest that dealing with the shortfall over a five-year period would not present the most sustainable option given the level of housing required to meet the need. It is recognised that the OAN with shortfall added results in significant numbers to delivery over a short five-year period and that realistically not all of the need might be met. However, we consider that more could be done to meet this need earlier on if additional land in rural areas outside of the Ashford Urban Area were to be brought forward. Tenterden being a major service centre and the only other town in the Borough being an appropriate location to focus upon.

1864 - The housing requirement is positive but has a potentially unsound element in terms of the treatment of market signals. It is possible, therefore, that the requirement may not provide for the full objectively assessed housing needs of the borough.

On the issue of affordability, adjusting for a return to pre-recession household formation rates is only one way of dealing with the problem of affordability. The problem of housing affordability is not only confined to young people. It can be an issue for all ages. The section of the NPPG that discusses market signals and an adjustment for affordability does not explicitly refer to an adjustment in the headship rates as an approach for improving affordability. The adjustment to the headship rates resides within the demographic element of the assessment. The adjustment for affordability is a market signals adjustment, which, as the NPPG advises, is an adjustment to increase housing supply above the demographic projections in order to improve supply which will also assist with affordability and create more competition (to help counter a market undersupply relative to demand as the NPPG states at 2a-019-20140306).

Table 16 of the SHMA shows that the lower quartile house price to lower quartile earnings ratio in Ashford is 8.15. Paragraph 5.25 of the SHMA tells us that over the last 15 years the

lower quartile affordability ratio has increased by 104%. While Ashford may well be more affordable than elsewhere in the south east, it is still confronted with some big affordability challenges. If this was not the case, then the Council would not have such a high affordable housing need – 368 dpa according to the SHMA (paragraph 5.41) which represents nearly half of the total planned supply (which is 773 dpa). Moreover, the assessment of the affordable housing need is really only an assessment of those eligible for such products. It may represent a conservative picture of the affordable housing need.

We are aware that the market signals adjustment of the assessment of need have been a vexed issue – how does one know what would represent an appropriate adjustment? We are aware that some authorities have made adjustments of up to 20% (Cambridge has and Chelmsford is proposing to do this). We also note the Local Plans Expert Group has proposed a simple formula whereby a percentage increase is made depending on how big the lower quartile ratio is. It has recommended that where the lower quartile ratio is above 7.0 and less than 8.7, then a 20% uplift should be applied (see appendix 6 of its report). We consider that such an adjustment would be appropriate in Ashford. If such an adjustment was made in Ashford, then this would be made to the demographic baseline figure in the 2012-projection of 718 dpa. A 20% adjustment would add an extra 144 dpa, resulting in an OAN of 862 dpa. Such an adjustment would probably obviate the need for a separate and additional adjustment for London migration.

There is also another argument in favour of the 20% adjustment. That is the record of poor past delivery in Ashford. This will have influenced the rate of household formation in the borough. The NPPG says that “if the historic rate of development shows that actual supply falls below planned supply, future supply should be increased to reflect the likelihood of under-delivery of a plan”. (NPPG, ID 2a-019-20140306). This statement is saying that in areas where the local authority has performed poorly against its previous targets (like the SEP targets) then it may be necessary to boost supply to ensure enough plots are provided to avoid the possibility of this occurring again. The NPPG makes a related point in ID 2a-015-20140306 where it says: “formation rates may have been suppressed historically by under-supply and worsening affordability of housing. The assessment will therefore need to reflect the consequences of past under delivery of housing.”

1879 - In view of the scale of the past under-supply against target, we consider that an adjustment greater than 1% is required. It is arguable whether a trend-based projection, albeit one that makes a welcome adjustment for migration with London, plus 1% for affordability, would provide an adequate assessment of the likely future needs in Ashford. This is because the trend-based projections will reflect the consequences of past planning failure in Ashford.

We are fully aware of Ashford's former role as a growth point which resulted in the Borough being given a housing target under the SEP that was much higher than the projections at the time. However, this big allocation for Ashford was made as part of a strategic plan to relieve pressure elsewhere in the sub-region (recognising the environmental and infrastructure constraints that existed elsewhere). We have some sympathy with Ashford's position with regard to its former growth point status. After all, if Reigate & Banstead can abandon its role as a growth point and can plan on the basis of a housing figure that was very much lower than the trend-based projections (see its 2014 Plan) then why shouldn't Ashford? Even so, it

is important to acknowledge that the old role that Ashford had in acting as a pressure valve for the south east by providing a supply of housing over-and-above the projections available at the time was to help others. If Ashford was over-providing it was only to allow somewhere else to under-provide. This was also why Ashford had investment for HS1. Under the new NPPF-based plans that are being produced there are some major sized unmet needs appearing across the south east. In Sussex and Kent this is true of Brighton & Hove (10,000 home shortfall), Lewes (2,000 home shortfall), Hastings (4,500 home shortfall), and Crawley (3,000 home shortfall). Therefore, if people cannot find places to live in these areas, then this may well increase the demand for homes in Ashford.

This is why we consider it would be necessary to apply a 20% uplift to the basic projection of 718 dpa. This would result in a revised OAN figure of 860 dpa.

409 - The Council suggested a housing need for the Borough was 727pa (13,8130 total over plan period) but the SHMA made a suggested provision for 55pa additional units for London. i.e. total of 782pa or 14,858 over the plan period a shortfall of 1045. The Council have made only a modest adjustment to market factors contrary to NPPF requirement to significantly boost housing supply. Under the revoked SE Plan Ashford had a target of 1135 dwellings pa. Over the period 2001 to 2015 the average annual supply was 528pa only 46.5% delivery. Ashford Borough still retains the characteristics that promoted the site as a "growth area" i.e. its international links, new motorway connections and the HS1 to London

The Affordable need for the Borough is 368pa which represents 51% of the Councils projected growth in households i.e. 718pa. Over the period 2007-2015 the average annual affordable unit built was 137. The affordable figure for rural areas is significantly worse yet the Council haven't given a figure in its AMR or SHMA. In order to fully meet the affordable housing requirements identified in the SHMA through site allocations would necessitate an increase in the housing target. The Council claim that they have never achieved such a target is clear from the period of the SE Plan (1135pa) However, this maybe more due the "policy on constraints" of the Local Plan and the concentration of development at Ashford and dependency on large urban expansion sites not delivering.

409 - NPPF is about "positive growth". Paragraph 17 states "Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth" As Para 19 of the NPPF states "Therefore significant weight should be placed on the need to support economic growth through the planning system". It appears the reason for the Council to adopt a "modest growth" target is solely to reduce the need to increase its housing provision. This is the conclusion made in para 1.18 of the SHMA update report 2015. The Council should test the sustainability of meeting the higher workforce target of 16,700 and housing numbers and its distribution needed to meet this objective.

The Council recognise it does not and has never met its 5 year supply obligations. We would argue the Council needs to make up its unmet needs in the 1st period of the plan. If not the argument to increase significantly the housing target over the plan period is paramount otherwise all that happens is the housing need of the borough is continually deferred and unmet with the social and economic implications this brings not only to Ashford but to all its neighbouring authorities.

The Council has proved that it is capable of delivering over 900 dwelling pa (910 in 2004 and 962 in 2005) if an appropriate housing strategy is adopted with greater choice of housing sites the Council could deliver 17,100 units with a 30/35% affordable requirement delivering between 270 and 315 units pa. ie 5130 to 5985 over the plan period much closer to the affordable need of the Borough (368pa). Policy SP2 should set a housing target of 17,100 to meet both its current and past housing needs together with making a greater contribution towards meeting its boroughs affordable housing needs and that of its wider catchment area including London. The 17,100 would also support a much more ambitious economic growth target across the borough with a 16,700 additional workforce. Ashford Borough still retains the growth characteristics that set it apart from other authorities in the east of Kent. The Council have not properly explained why an annual housing target of 727 pa (some 36% below the annual S E Plan figure) is positively prepared, justified, effective or consistent with national policy.

2260 and 2264 – Having reviewed the Borough Council’s SHMA the following has been noted - despite historic under delivery (as detailed below) an ‘affordable uplift’ of just 1% has been used, it does not take into account the DCLG 2014 household projections which indicates a requirement for 835 dwellings per annum (the Local Plan currently proposes 773), the SHMA considers that the planned levels of housing will support the creation of 12,700 jobs between (2011-2031). However, this level of job growth assumes an over reliance on older works (65 years +) which is considered unreasonable. It is considered that there is an imbalance (not enough housing) to support levels of planned job creation.

Policy SP2, sets out the strategic approach to housing delivery across the Borough for the period 2016 and 2030 (14 years) and sets out that a total of 12,200 dwellings will be delivered (871dph). This is the remaining requirement following delivery of housing from the base date of the plan 2011 – 2016 (2,481 dwellings). It is noted that this figure is significantly below the Council’s currently adopted Core Strategy target of 16,770 dwellings, which is based on Ashford being identified as a growth area in accordance with the South East Plan (SEP).

Table 1 in the Local Plan (page 16) provides a breakdown of the Borough Council’s housing requirement. The total housing requirement for the plan period 2011-2030 is 14,680 dwellings (773 dwellings per annum). It further sets out that only 2,481 dwellings have been delivered since 2011-2016. It is not possible to confirm the accuracy of this figure as completion data for the year 2015/16 has not yet been published. However, after deducting published completions for the period April 2011 to March 2015 (total 1,459 units) it would mean there would have had to have been 1,022 completions for the period 2015/16. This would seem extraordinary considering for the previous 4 years total completions have only averaged 365 dwellings per annum.

In addition to the above, it demonstrates that the Local Plan is already failing to meet its published housing target in the first 5 years. The 5yr requirement is 3,865 dwellings (773 x 5). Against the delivery of 2,481 dwellings, there is a shortfall of 1,384 dwellings already. This is acknowledged at para 3.78 of the Local Plan and it is proposed that this shortfall is not made up until 2023/24, which is late on in the plan period.

2560 - Policy SP2 proposes a total of 12,200 new dwellings to be delivered within the District in the period between 2016 and 2030. The policy is based upon the assessment of Objectively Assessed Housing Need (OAN) identified within the Ashford Strategic Housing Market Assessment (SHMA) and Update (2014 and 2015). The OAN for the District is 13,813 dwellings within the Plan period and of this 45% should be affordable. The SHMA identifies and paints a very clear picture of the severe shortage of affordable housing within the District – in terms of both the backlog of provision and future need. This is made clear within paragraph 7.85 of the 2014 SHMA. Notwithstanding, the Council considers that the provision of 45% (6,253) of new dwellings as being affordable is not viable given the total numbers of new dwellings that would need to be provided (over 6,000 additional) within the District to meet this target. The National Planning Policy Framework is clear at paragraph 47 (bullet point 1) that Local Authorities should meet the full, objectively assessed needs for market and affordable in the housing market area. The approach currently being taken by the Local Planning Authority to not meet in full the overall need for affordable housing in the District (and consequently increase the overall housing requirement) does not meet the requirements of paragraph 47 of the NPPF. The draft Local Plan at paragraph 3.33 states that the meeting of affordable housing need in full is not considered to be a realistic or deliverable scenario, notwithstanding the significant environmental implications of this scale of growth over such a relatively short period of time. The Council's 'Strategic Housing and Employment Land Availability Assessment (SHELAA) 2015/2016 - APPENDIX 9: Potential Housing Capacity' evidence base document states clearly that there is total potential capacity for 24,158 new dwellings within the District. The capacity is clearly significantly above the current planned housing requirement of 12,200 new dwellings and therefore there is clear justification to support an increase in the overall housing requirement to meet in full the overall housing need. The Council have failed to provide sufficient evidence to demonstrate that the full objectively assessed housing need for affordable housing cannot be met utilising all land that is available for development.

434 - The NPPF calls for an objectively assessed housing number which the proposed plan fails to satisfy. An objective assessment would take into consideration past actuals in order to test the viability and deliverability of forecasts. Past annual built averages show for the past 5 years 403, 10 years 457, and 20 years 586; this is against the 734 per annum being proposed. The suggested trajectory in the Local Plan is considerably greater than what has been achieved during periods of economic growth and recession.

The Ashford Strategic Housing Market Assessment June 2014 includes a revision to the Cambridge Econometrics (CE) previous forecast under "PROJ 6 – Cambridge Economics Revised Baseline (2013)". This update was to take account of the release of 2012 Census Data and is based upon CE's November 2013 forecasts for economic performance at the regional level. CE's expectation that economic recovery will take longer and in the long term growth rates will be slower is supported by actual data. The CE revised baseline forecast for 2011 - 30 is 11.9% growth in housing need equating to 9,848 dwellings at an annual rate of 518. G L Hearn though it used the CE model as its baseline to calculate its housing number did so on a much larger labour supply of 12600 as opposed to the 6900 forecast by CE, and it is this that has yielded a high housing need of 735 dwellings per annum.

Both the labour supply and housing forecast by G L Hearn bears no resemblance to what was delivered during prior years and against this it is extremely high – it is completely

divorced from reality. To say the housing number in the Local Plan has been objectively assessed is flawed because it does not take account of what has and is happening on the ground and just like the current Local Plan will fail to deliver on housing number, posing considerable problems to meet the 5 year land supply with the consequence more land will need to be allocated on-going.

The CE forecast of 518 homes per annum is realisable because it is in line with what has been delivered on average over the past 20 years whereas the proposed Local Plan number of 734 is unsustainable throughout the plan period. It will deliver a successful Local Plan, one that has high probability to fulfil the on-going 5 year land supply.

1397 - The SHMA is based on projections made in 2014/15, housing projections that included continued inward migration from the EU. Following Brexit and with the government looking to reduce inward migration significantly, the SHMA is likely to severely overstate the number of houses that need to be built in the Borough. A new SHMA should be undertaken and the plan delayed until that can be produced. Central government agreement should be sought to agree this.

1405 - Any plans to reassess for a post-Brexit economic growth including on out of London housing? Does paragraph 3.72 still apply in respect of housing market confidence post-Brexit?

43 - Market signals have changed - Brexit has caused uncertainty, expected slower growth in GDP leading to recession, much lower immigration, lower house sales and lower house prices. The large losses in all house builders shares reflects the much lower number of house sales at lower prices now expected in future years. Therefore time has superceded the study on which this document decided 12600 houses are needed - a much smaller number of houses will be needed now. Therefore greenfield sites in unsustainable locations will not be needed. Reduce number of houses needed to 6000.

1167 - Do we really require this figure of housing development after Brexit?

Response

Since the Local Plan 2030 was consulted on in the summer of 2016, the Council has updated the Strategic Housing Market Assessment update of 2015, to take into account the 2014-based national household and population projections. This approach is consistent with national Planning Practice Guidance which encourages SHMA's to be produced and kept up to date.

This update indicates a higher objectively assessed housing needs to be planned for in the borough to 2030 when compared to the position reflected in the 2016 version. As such, a number of representations made on the 2016 position are, in effect, outdated.

This section of the response document seeks to summarise how the 2017 SHMA update has influenced the revised Policy SP2, proposed change MC4

Validity of the SHMA approach: The 2014 SHMA and the 2015, 2017 updates were produced in a way that was consistent with the approach advocated in the in NPPF and

PPG. The 2017 SHMA update was also subject to independent analysis and found to be robust. The Council therefore disagrees with the assertion that objectively assessed need (OAN) was only determined after other factors were taken into account. The outputs from the SHMA were the starting point and then the various layers of evidence were applied to determine the policy approach advocated in the latest version of the Local Plan.

The 2014 sub-national population projections: The 2017 SHMA update identifies a total housing need of 14,934 dwellings between 2011 and 2030 (786 dwellings per annum) for the borough. This is an increase of 59 dwellings per annum when compared to the 2015 SHMA update, the basis of which was used to formulate the housing target in the 2016 draft Local Plan approach.

Market Signals: The 2017 SHMA has revisited the issue of whether an increased uplift from around 9 dwellings per annum, as assumed in previous editions of the SHMA, is required. It concludes that affordability remains an issue for Ashford and, alongside historic housing delivery rates in Ashford, suggest that an uplift of 5% should be applied to the housing need figure. Higher uplift rates would result in significantly higher levels of housing development needing to be planned for with a consequent adverse impact on the overall sustainability of housing development across the borough.

Applying this increase results in the total objectively assessed need rising from 14,934 to 15,680. Annually this equates to 825 dwellings per annum from 2011 to 2030. This is the figure that the Local Plan 2017 proposes to deliver as its baseline housing target, before the issue of additional dwellings to cater for increased out-migration from London to the borough are taken into account (see below).

The 2017 SHMA update did not specifically revisit the issue of affordable housing needs as it was very clear from the 2014 SHMA that substantial levels of affordable housing are required to meet needs - around 368 dwellings per annum. The position has not substantially improved since 2014 and affordability remains an issue now.

The position on this aspect of meeting full objectively assessed housing needs remains as per the 2016 version of the Local Plan in that it would require very significant levels of additional new housing development to deliver. There is general consensus that seeking to meet full affordable housing needs through the Local Plan is unrealistic given viability levels of housing development in the borough, especially given this would place greatest pressure on the rural areas where viability is greatest but large amounts of new housing would not be sustainable.

Future proofing: Several representations have made comments about Ashford's excellent connectivity to London, most notably via High Speed 1. The Council recognise this relationship, as does the 2017 SHMA update which reflects higher levels of in-migration from London than the 2015 update within the OAN figure of 825 dwellings per annum.

However, this figure only takes into account a proportion of the 55 dwellings per annum that the 2016 Local Plan was suggesting to cater for in-migration from London returning to pre-recession levels. Therefore the 2017 Local Plan still promotes the residual figure (34 dwellings per annum) to cater for this position. This is added to the housing target identified in the Local Plan from 2017 in line with the assessment of the Greater London Authority in their evidence on the Further Alterations to the London Plan.

Economic considerations: In light of the increase in objectively assessed housing need, the housing target figure in the revised Local Plan is now at a sufficient level to deliver the preferred job creation scenario - in that the creation of jobs will return to pre-recession levels, referred to as the 'baseline trajectory' in the Council's 2012 economic forecasting work. This is still considered to be the most realistic rate at which jobs will be created up to 2030 and provides for a suitable and sustainable balance between new housing numbers and new jobs. As such no upward adjustment is now needed to the OAN for this reason.

Duty to Co-operate: This matter is addressed in responses to the Introduction section of the Plan. There is no requirement to meet any aspect of unmet need from other districts or London, as asked for by the Mayor.

Support 1864 - We have considered the SHMA Update of June 2015. We consider this to provide a robust assessment of the objective needs of the borough. Furthermore, we note and support the Council's decision to base its assessment of need on the London Migration Sensitivity Analysis, the explanation for which is provided in appendix A. This adjusts upwards from the baseline need of 727 dpa (718 dpa based on the 2012 Household Projections plus an additional 9 dpa to ease affordability) to 773 dpa. We consider this to be a positive step by the Council that rightly acknowledges to influences of London. We consider that the use of the DCLG 2012 Household Projections unadjusted is sound. The HBF strongly supports this approach. We note that the recently published DCLG 2014 Household Projections suggest that 14,000 households may form over the period 2011 to 2030, which equates to an average of 736 households per annum. We note that this figure is broadly similar to the Midpoint 2008 & 2011-based household projections (Table 11, page 47 of the SHMA) which shows a figure of 734 households per annum. By comparison the 2012 Household Projection of 718 households per annum (see the SHMA paragraph 1.5). There has been little material change between the 2012 and 2014 sets of projections, although the latest projections are hinting at a slightly higher rate of housing need – a figure closer to the 2008 and 2011 midpoint. It is possible that the higher level of need suggested by the 2014 projections is a reflection of the consequences of the housing shortages and costs in London and how this may be fuelling the pace of outward migration from, and decreased inward migration to, the capital. Because the Council has elected to adopt the London migration scenario suggested in the SHMA, it could be argued that the Council has already made an adequate allowance for a potentially higher rate of household formation as suggested by the 2014 projections. However, we consider that the adjustment of 1% that has been made to help improve affordability is relatively ineffective. Paragraph 5.54 of the SHMA acknowledges the moderate nature of the adjustments in the HMA as well as in Ashford.

The SHMA presents evidence to show that household formation among the young (the 25-34 age group is the typical measure) has been suppressed compared to the 2008-based household projections – projections that drew on data that largely pre-dated the effects of the recession. The SHMA reasons, with some fairness, that potential suppression among the young has not been as significant an issue in Ashford - either in the past or feeding through in to the new projections - as it has been elsewhere (see paragraph 5.55). The SHMA, nevertheless, models the effect of returning household formation rates of the 25-34 age group back to 2001 levels by 2031 (see paragraph 5.50). This would necessitate a 1% uplift, or 9 extra dwellings a year (see Table 18) on top of the demographic projection. This seems sensible.

1380 - Broadly agree with the baseline OAN of 727 dwellings per annum identified in the SHMA Update 2015 based on the 2012 SNPP, with modest affordability uplift. The draft Local Plan housing requirement indicates a target of 773 units per annum. The reasons for this uplift should be made clearer in the plan. CPRE does not object to this target and believes it makes a reasonable response to in-migration from London.

Response Support noted.

Issue – The supply of housing land up to 2030

1867 - The Local Plan is unsound because its approach to the housing land supply is unjustified and ineffective. The Local Plan proposes to allocate 4,445 dwellings in and around Ashford and 565 dwellings for the rest of the district. This adds up to 5,010 allocated dwellings (see table 1). The Council relies on windfalls and the allocation of other proposed sites to ensure that the full residual requirement for 12,200 homes is achieved by 2030 (see table 1). This residual requirement of sites is 7,190. Delivery will depend on the proposed allocations getting detailed planning permission in time for sites to be built-out by 2030. We are not convinced that this will happen in time.

Paragraph 48 of the NPPF requires plan-makers, where possible, to identify a land supply for years 11-15. The Council has a plan-period that is shorter than this - just 12 years. The Council, therefore, in choosing to have an end-date of 2030, would not satisfy this requirement of national policy, albeit we recognise that national policy does not explicitly require a plan to run for 15 years from the date of adoption. Nevertheless, there does appear to be a problem with electing an end-date of 2030 since we note that several of the proposed allocations will only yield completions in five year phase 11-15. This implies that some sites will only yield completions after the end of the plan in 2030 since year 13 of the Local Plan (assuming adoption in 2017) will be 2030. This is true, for example, of the Kennington sites (KE2, KE3, KE4. See SHLAA, appendix 5). Similarly sites WE21 and WE23 have completions anticipated in years 11-15 (SHLAA, appendix 5). It is unclear, therefore, whether some of the sites listed in the SHLAA will make a contribution to the housing requirement for the plan period.

We also have some doubts about the expected contributions from some of the larger sites. The Council is right to be cautious about the relying too heavily on a few large sites (as it states in paragraph 3.57 of the Plan). For the same reason we consider that the Council should provide more detail about the delivery timetable for some of the bigger sites. The *Local Plan and Community Infrastructure Levy Viability Report* (June 2016) indicates problems with the viability of the key strategic site of Court Lodge. Viability at Kennington also appears marginal (see Figure 5.3). This does not bode well for the delivery of the dwellings needed by 2030.

The Council should identify other sites in the borough as a contingency in case delivery in Ashford town falters. For example, it is striking that the Council has made an allocation for only 175 homes in the second largest settlement of the borough – Tenterden. This seems inadequate. The absence of allocations at Charing and Chilham is also surprising. These are villages with train stations and therefore they represent sustainable locations for development, especially if one takes into account the Government's intention to amend

national planning to support housing development around commuter hubs. We recognise that there will be built and natural environment character limitations associated with development at these settlements (as paragraph 3.61 of the Plan discusses), but the lack of any formal allocations via this Plan is striking. The Council appears to rely on the Neighbourhood Plan process (paragraph 3.64) but unless the Local Plan provides a steer in terms of an apportionment of housing numbers to each of the higher settlements (or category two settlements as they may sometimes be called) then it is hard to see how Parish Councils could plan properly. The Local Plan says in paragraph 3.64 that “The Council has worked closely with these parishes to ensure that their plans are consistent with the proposed strategy for development set out in this Local Plan and has encouraged them to include an appropriate scale of development allocations in their respective Plans”. It is hard to see how the Parish Councils could know what would be an “appropriate scale of development allocations” if the Local Plan does not provide a numerical allocation for each settlement. Making some other allocations would give the Local Plan some resilience. This is doubly necessary because of the tenuous nature of the Council’s five year land supply. Paragraph 14 of the NPPF requires local planning authorities to prepare Local Plans that meet objectively assessed needs, with sufficient flexibility to adapt to rapid change.

Response *The Council disagrees that the proposed new site allocations identified in the Local Plan won’t come forward as suggested. For all the main/larger sites identified in the Local Plan, the Council have been in contact with the relevant landowner/developer/housebuilder to ascertain what they consider to be a realistic rate of housing delivery on their sites. The proposed revised housing trajectory which supports the Local Plan reflects these assumptions. This information is more up to date than an initial assessment contained in the supporting SHELAA and therefore should carry more weight.*

In addition, the proposed changes to the Local Plan introduce a housing buffer – additional land to deliver houses in excess of what is needed to meet the Local Plan housing target. This approach gives the market choice and competition over the whole plan period and provides the flexibility to achieve the housing target even if some sites do not come forward as quickly as expected over the Plan period.

With regards to the overall timeframe of the Local Plan, there is no NPPF requirement to have a plan which covers 15 years from adoption. It is inevitable that the process of gathering robust evidence to support a new Local Plan takes some time and so a Local Plan period is likely into commence prior to the actual adoption of a Plan. The Local Plan will cover 12-13 years post adoption (in terms of future housing allocations) and provides for detailed site allocations to cover this period, rather than relying on more vague strategic future areas of search. This is considered to give more certainty to the housing market and the prospect of delivering the overall housing target. In any event, the Local Plan is intended to be formally reviewed by 2025, well before the end date of the plan which provides the opportunity to revisit the strategy based on what has been delivered by that point.

With regards the reliance on Neighbourhood Plans, the Council considers that it is entirely reasonable to rely on the neighbourhood plans that are far enough advanced to be reasonably certain that additional housing sites will be identified, for example at a Regulation 14 consultation. Where a neighbourhood plan is not at such an advanced stage it is again reasonable for the Council to provide more of a steer in these areas – certainly for the more

strategic decisions that are needed. This is reflected in the proposed amendments to the Local Plan regarding Charing and Hothfield.

- **Windfall delivery**

1867 - The windfall allowance of 1,000 dwellings up to 2030 may not be unreasonable in and of itself, but when this is combined with the plan's expectations for delivery of some of its larger sites, and the nature of the wording of the development management policies in the Plan, then we are more concerned. The HBF often does not comment on the size of the windfall allowance so long as it is supported by reasonable evidence. However, in the case of this plan, we consider that the balance of development between Ashford town and the rest of the district is disproportionate. There is too much reliance on Ashford town providing the necessary number of completions, but very few allocations in the rest of the district. As the rest of the development management policies in the plan are not especially conducive to enabling windfalls to come forward, it is necessary to scrutinise more closely the justification for the windfall allowance.

We have been unable to locate an analysis of the past composition of windfall applications. We have noted paragraph 3.44 but it is unclear what type of sites have come forward as windfalls and how many of these may have been in domestic gardens.

Furthermore, other policies in the Local Plan are not particularly conducive to helping to facilitate 100 windfalls a year. We note that Policy SP2 states that windfall housing development will be permitted only so long as it is consistent with other policies in the plan and cites conformity with policies HOU3, HOU4, and HOU5 in particular. On reading these policies our concern is that these policies impose a lot of conditions on development, providing plenty of scope for decision-takers to refuse applications. Therefore, rather than facilitating windfall delivery, we are concerned that the plan tends to militate against this likelihood. Policy SP6 – Promoting High Quality Design could also provide problematic in terms of facilitating windfall delivery. While we recognise the emphasis placed on design in the NPPF, the wording of this policy is imprecise and provide too many grounds to obstruct windfall delivery in the rural part of the borough. Policy SP1 – Strategic Objectives – also introduces uncertainty. A windfall site would need to satisfy all the core principles listed in this policy. If it fails one, then the application could be legitimately refused. Policy EMP2 – Loss of Employment Sites and Premises also tends to militate against the Council's ability to realise its windfall allowance.k2

1737 - The reliance on windfall sites is questionable in the light of clear guidance in the NPPF that states: "Local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens." (Para 48). We have not seen any such compelling evidence to demonstrate that such windfall provision is a reliable source of supply. With future economic uncertainty, further allocations should be created to help meet housing requirements in future years.

2112 - The reliance on windfall sites, both for housing and gypsy pitches, places the rural parts of the Borough under serious threat. Since this Council is seen not to have a 5 year supply, and since the NPPF favours sustainable development, particularly where the 5 year supply is lacking, the temptation will be to allow development which may gradually destroy the rural areas

2122, 1862 and 1887- The Plan through Policy SP2 continues to require a significant amount of residential development to come through windfall sites, (1000 units). Where suitable sites are available to be delivered, their allocation would provide greater certainty to ensure this target can be met over the plan period.

1907 - According to paragraph 3.44 of the Local Plan an average of 144 windfall dwellings have been completed each year over the last 10 years (2006?). The windfall rate has been reduced by 25% to take account of non-delivery. This discount is a wise precaution. However, we have been unable to locate an assessment of how many windfalls have materialised through the development of residential gardens. Paragraph 48 of the NPPF requires the Council to take this in account. We note that Policy HOU3 is opposed to the development of gardens. It would be useful to understand to what extent residential garden development has been a component of overall windfall delivery over the last ten years. If it has been a component, then the wording of this policy may well militate against the supply of completions from this source. The Council may need to reduce its windfall allowance by an appropriate amount in addition to the non-implementation discount.

2532 / 2535 – Need to reduce the reliance on windfalls by allocating additional suitable, deliverable sites to meet specific aspects of demand within the housing market and need to provide for a range of housing types.

1388 - A windfall allowance of 100 units a year for the final 10 year of the plan period seems pessimistic. It will be necessary to make available the monitoring records for windfalls, including the small and large site contribution. New and extended permitted development rights (including office to residential being made permanent), and Plan encouragement for minor development and infilling within village confines may mean this figure could reasonably be somewhat larger. Village envelopes established as part of the neighbourhood planning process may result further windfalls. This analysis should be carried out.

1795 - The Plan through Policy SP2 continues to require a significant amount of residential development to come forward through windfall sites (1000 units). Where suitable sites are available to be delivered, their allocation would provide greater certainty to ensure this target can be met over the Plan period.

1842 - The reliance on windfall sites should be reduced by identifying further appropriate housing sites.

385 - Given the Policy and Guidance that planning decisions should be "plan driven" there is an unacceptably high reliance placed on "windfall" sites and developments, for both mainstream and more niche areas such as Gypsy and Traveller pitches. Whilst appreciating there has been success in relying on this method of bringing forward sites historically if the practice is to be perpetuated then parameters should be set more rigidly. Action should be

taken to plan more developments, and reduce reliance on "windfall" and not expose the LPA to a need to reduce criteria to hit a specific number.

Response *The assumed contribution from housing windfalls to the overall housing target in the Local Plan as expressed in the Local Plan are considered to be entirely robust and reasonable. Of the current housing windfalls planning permissions which are extant, a 25% reduction has been applied to account for non-implementation. Of the future allowance, only 100 dwellings per year are assumed. This is substantially lower than the past 10 year completion average of 175 dwellings per year from windfall sites and constitutes the robust and compelling evidence required by para 48 of the NPPF. There is no reason to suggest this level of housing windfalls won't continue throughout the Plan period and a conservative approach to delivery from these sources has been assumed.*

Issue - Distribution of Housing Development

2713 – Policy SP2 is not considered sound; it would not be effective in the delivery of housing to meet the objectively assessed need of Ashford, particularly at the back end of the plan period. In order to be effective in providing an adequate supply of housing land, additional sites which can be more easily delivered, and have limited infrastructure costs and lead-in times should be allocated. This approach would create more flexibility and increase the likelihood of the Council meeting its housing need. The land at Steeds Lane, Cheeseman's Green and Swanton is deliverable within the plan period and do not have onerous infrastructure requirements or costs.

1867 - The persistent record of under-delivery does beg a question as to whether the Council's emphasis in maintaining the focus on Ashford town is still a realistic strategy in the short to medium term and whether a more dispersed strategy might not be appropriate to help lift delivery over the next few years while the big Ashford town schemes get underway. Appendix 1 shows that completions in the Ashford urban area from 2006-2015 have been well below target levels. The focus on Ashford has not worked in the past, so it is unclear why the Council believes it will work in the future. This is not a sound strategy for helping to boost housing supply in the short term. It is interesting to note that while the Council is anxious to disassociate itself from the old SEP growth point strategy with its associated higher housing numbers, it still adheres to its spatial strategy of distribution – a strategy that is partly responsible for such moribund levels of delivery.

2720 - it has been demonstrated how land to the south of Ashford could be developed in the longer term as a sustainable location to accommodate the development needs of Ashford, and meet the objectives of the NPPF to create sustainable, inclusive and mixed communities. Construction and operation of Junction 10a will create significant opportunities for the land south of Ashford. It is vitally important that the right strategic decisions are made in this Plan for South Ashford and the most suitable accessible housing locations and infrastructure requirements to support development are identified. This creates the framework to plan properly for sustainable growth in the future.

1649 - It appears that the bulk of the housing is being delivered in the parish of Kingsnorth; this seems unfair as this area has already been heavily developed. Although happy that a third large scale development was rejected and reduced to Court Lodge, instead; but even

here 950 seems to be too many houses for the area. Have the housing more evenly distributed throughout the borough. Could Chilmington Green take more houses?

1864 - note that the primary focus for development will be Ashford town. This seems appropriate given the town's transport links, not least HS1, and the availability of services and other amenities. Nevertheless, the Council should keep delivery under close scrutiny and consider altering its strategy to direct some housing development to other settlements in the Borough. We say this because the Council's track record in delivering sizeable numbers of housing completions in Ashford town has not been especially good. According to appendix 1 of the AMR for 2014/15 an average of 334 dpa have been provided in the Ashford urban area over the nine year period from 2006 to 2015. This is a figure that is well below the Core Strategy (1,135 dpa) and new Local Plan (727 dpa) annual average monitoring targets. House building in the rest of the district is heavily restricted so it is right to focus on completions in the Ashford urban area.

The overt focus on Ashford town is disproportionate, at least in the short to medium term. The allocation of 10,125 dwellings in and around Ashford, but just 1,030 dwellings for elsewhere in the district could result in worsening social polarisation in these other settlements. We are not convinced that an allocation of 565 dwellings coupled with the potential allocation of another 465 units by the new Local Plan would be sufficient to accord with paragraph 54 of the NPPF which relates to the need to plan for housing development in rural areas to reflect local needs. The allocation of just 175 dwellings for the second settlement of Tenterden seems especially small. We note from the AMR for 2014/2015 that only 248 dwellings received planning permission in the rural area, compared to 611 in the Ashford urban area and 195 in the town centre.

1667 - Consideration should be given to providing an overall integration of the widespread pockets of new housing development into a cohesive community, with an essential hub being the Town Centre.

2174 - The total housing requirement in the Borough is calculated as 14,680. Of which 2210 are proposed in Kingsnorth and Sevington. This is 66% of the total new allocations (3365) on new allocated sites. The Parish Council considers this to be an unfair proportion of the whole. Especially when the enormous quantity of houses, (approx.5000) already built in the Parish is considered. Kingsnorth Parish Council considers that Chilmington Green could deliver more than 2500 houses by 2030. We welcome that a third large scale area of development is rejected.

2516 - The small infill developments typical of rural settlements have not contributed pro rata to the supply of affordable housing. However para. 5.9 does address the shortfall with a minimum of 40% affordable housing across all tenure types.

2569 - The strategic approach to housing delivery within policy SP2 is heavily reliant on the delivery of significant development in the Ashford Urban Area to contribute to the overall housing requirement. There is concern that a delay in the delivery of a number of strategic allocations in the Ashford Urban Area will impinge upon the overall delivery of housing for the District. Additional strategic allocations at Tenterden would provide deliverable

development in an area of high demand. This would relief the pressure on the delivery of the significant amount of development proposed for Ashford.

1778 - The county's roads are already widely known to be badly congested. KCC have recently launched a public consultation document 'delivering Growth without Gridlock'. It is totally inconceivable to continue with massive expansion plans in the boroughs until this key issue is resolved and proven to be effective. Continued expansion can only compound the problems. What integration does this policy have with Shepway who also have plans to massively expand traffic on the A20 in the Sellindge area?

1890 - Land allocations to secure 4445 new dwellings are to be located in the Ashford Urban Area with allocations for only 565 dwellings to be located in the rest of the Borough including Tenterden. This is at odds with the Council's statement at Para 3.79 that in order to meet objectives a minimum proportion of new housing development in the Borough should be located in Ashford or on allocated sites on its periphery, with the balance being attributed to the rest of the Borough. The general distribution of housing allocations proposed does not reflect that approach. If the Council are to meet the requirements of the NPPF to deal with their housing shortage in the early years of the plan it would appear that the distribution strategy is imbalanced and the Council should be looking further to the rest of the Borough more to meet demand – particularly given the historic under delivery of housing in the urban area. Tenterden is the only other town in the Borough and is a thriving and sustainable urban settlement within the rural area. Whilst the town's landscape constraints, primarily the AONB, are recognised it is considered that additional development could be achieved at Tenterden which would be both sustainable and would not result in piecemeal development. Further growth could be achieved at the town and could assist the council in addressing the shortfall in OAN sooner. The Council is therefore urged to consider this as a modification to their spatial strategy as further development could and should be allocated at sustainable urban locations outside of the Ashford Urban Area.

1602 - As a result of the Planning Inspector's Appeal Decision concerning the Tilden Gill Planning Application the stated housing requirement for the Borough has been entirely rejected. The fact that this decision was published in April 2016, well before the Publication of this LDP, nullifies all projected housing requirements in this LDP and makes it Non Compliant.

1383 - CPRE is concerned that a reliance on large sites will make it more difficult to maintain a 5 year supply, resulting in speculative proposals becoming a more common feature of planning in Ashford Borough. It is essential that development decisions in the borough can be led by deliberate strategy that makes use of a detailed evidence base on infrastructure capacity and viability constraints, and is clearly directed by the Local Plan. There should be a proactive strategy to ensure brownfield urban sites are delivered. It is the view of CPRE that additional transport modelling is required to test the traffic impact of the additional and revised suite of proposed development sites. This will allow the council assess the impact on areas with capacity issues. It is essential that the impact on the network is identified so that decisions can be made in the public interest. The Council is failing to demonstrate that the strategy, policies and land allocations will ensure a reliable transport network, and support alternatives to the car.

1245 / 2414 - Para 3.55 Suggest that this paragraph includes reference to new development being accommodated without seriously undermining the wider environmental objectives of the Plan, providing appropriate mitigation is incorporated.

3.67 – Welcome acknowledgement of the national importance of AONBs and the intention that development that would have a significant adverse effect on the setting of the AONB will be resisted in this paragraph. We would like to see the protection of the setting of the AONB set out in this paragraph carried through into policy wording – at present policy ENV3 is silent on setting and without inclusion in the text of this policy, the setting of the AONBs remains unprotected. Also suggest that the wording of this paragraph is amended to refer to ‘conserve and enhance’ rather than ‘protect’ to more accurately reflect national policy as set out at para 115 of the NPPF and legislation set out in the 2000 Countryside and Rights of Way Act.

1199 - Ashford has many brownfield sites which should take priority and not good agricultural land. Once concreted over it is lost for ever and another part of The Garden of England lost.

1167 -This policy correctly limits the possibility of uncontrolled urban sprawl - however the plan proposes the largest areas of development to the South/ South East / East and North East of Ashford - all feeding into the A2070 and Jcts 10 and 10a. What about the west of Ashford? AONBs are affected by building outside their boundary. Plan should include a statement that the Council will adopt a requirement from Highways England regarding Strategic Road developments which will give the Council the means of being absolutely certain that the right schemes are being adopted by Government and that they will fulfill the needs of developments such as Sevington Park and therefore they will have correct data to allow any phased developments.

409 - A significant factor in the Councils under provision of housing delivery is their reliance on very large urban edge developments around Ashford e.g. Chilmington Green (2500 dwellings), allocated at the last Local Plan with no units as yet delivered from the site. The Councils AMR (2015) completion table show that borough is capable of delivering over 900 dwelling pa if the right sites are allocated. Indeed the Council granted consent in 2014/15 1054 dwellings (although a large proportion of these consents are on sites that will take over 3 years to deliver). What is needed is a greater selection of sites so more outlets are available across the borough. The Councils over reliance on large strategic housing allocations have not only led to a reduced housing supply but have restricted smaller house builders and self build in the borough contrary to NPPF.

19 - Ashford already has enough housing. The town does not need to expand further. To use good agricultural land, such as the proposed estate in Kennington is not acceptable. The roads in that area already cannot cope. 2058 - cannot see the need for 6500 houses in Ashford Kent. We baby boomers will have decreased in number by as much as 50% by the year 2030. The number of children being born will also go down year by year. The Northern Power house will have developed and less people will come South to live. So by 2025 the need for large scale housing schemes will have abated.

2445, 2446, 2448, 2449, 2464, 2466,2468 and 2469 - Becoming increasingly concerned about the level of development encroaching on the villages surrounding Ashford. Whilst recognise that Current Government Policy requires a certain level of Housing and Industrial/Employment provision, have to question the long term sustainability of these plans. Having examined the Local Plan can see that there are many Green field developments proposed. Applaud the Councils statement that most of the development should be located in or very close to Ashford Town and that as much as possible should be on Brown Field sites but do not feel that the Plan goes far enough in providing protection for the Countryside and for rural villages.

Small, considered development within the villages to provide additional housing should be encouraged with full consultation with the local population and absolute transparency on any decision making processes. I appreciate fully that villages should not stagnate. However forced, large scale housing, road networks and employment development is not the way forward. Appears to be a free-for-all approach to land use at the moment and there are many inappropriate planning applications that do not address local housing needs but simply provide high profit return for unscrupulous housing developers wishing to exploit the areas proximity with the International Station/fast train to London. This needs to be addressed.

2151 - We note the unfortunate situation that the economy of this country is based largely on house building, which in itself is unsustainable in the long term. It is appreciated that Ashford Borough Council has a large number of units to find land for and this is likely to be spread into rural areas as well as the urban ones. It should be noted that Shadoxhurst is close to the urban edge, and indeed with Chilmington Green and the Site Proposals in neighbouring Kingsnorth, the urban edge will come very close to the Parish. There is a disproportionate amount of housing allocated to the south of Ashford which impact on Shadoxhurst through the use of the roads through the village. There is genuine worry that the village will be adversely affected by any further housing within the village. It is estimated that within the life of the plan something like 3,900 houses will be built in close proximity of the village (this does not include all of the proposals for Kingsnorth Parish). Whilst it is likely that windfall sites may come forward within the village during the life of the Plan, 62% of residents in a survey recently said they would not support any further housing developments in the village. We ask that the views of the majority are both taken into account and respected.

2530 - There is a need to allocate more residential sites within the rural area to achieve compliance with national planning policy. This should also include the recognition of sites within the rural area that have already been granted planning permission and will be delivered within the next five year period. This will assist in helping to recover the shortfall during the first five year period of the plan or at least reduce the time taken to achieve this recovery, which, as currently proposed, stands at 8 years.

2670 - In addition to affordable houses and starter homes, Charing is in need of smaller and mid-market open market homes (for younger people and also for those downsizing) and also bungalows. We believe site policies should be framed accordingly to prioritise the type of housing needed. This would be consistent with paragraphs 50 and 54 of the NPPF as well as point f) in SP1.

1451 - Paragraph 3.63 suggests that the local planning authority, in allocating development in other villages in previous plans now wants to share out newly arising development needs to villages that have not been previously selected. Whilst this approach does pay some credence to the national policy in paragraph 55 of the NPPF it does not identify the need to select the most sustainable sites and locations over those with less sustainable credentials. In this respect it is noted that some of the draft allocations are located at villages which are not served by railway stations. Such a selection procedure leads to a failure of the plan to seek positive improvements in the quality of the environment of the borough, reducing the ability to achieve a net gain in bio diversity and improving living conditions as set out in paragraph 9 of the NPPF.

It also goes contrary to the settlement hierarchy policy adopted in previous local plans which were established using a sound evidence base. Furthermore the basis for the distribution of housing allocations in the rural area take no account of and are not backed by an evidence base on the marketability and desirability of the locations. The strategy for development at villages needs to be reconsidered using a more detailed sustainability appraisal which assesses on a more comprehensive basis the relative sustainability of rural and local service centres.

1392 - CPRE agrees that smaller settlements may be able to contribute to meeting the housing requirement. However, it is still important that the size of allocation has a relationship to the services available in the settlement, constraints relevant to the settlement and the transport links available to residents. It is inevitable that these measures of sustainability will result in a hierarchy of settlements, and it is reasonable to expect settlements that are more sustainable to make a proportionally bigger contribution to the housing requirement. Cannot identify a settlement hierarchy based on the level of services at each settlement. An evidential base is essential to determine how much development can reasonably be directed to a settlement. It is a basic sustainability principle to direct allocations (and assess planning applications) based on availability of services and infrastructure.

1413 - This plan is an opportunity for ABC to reinvigorate rural communities within the Borough. Whilst Wye, Charing and Hamstreet have been identified as rural locations with good access links because of mainline train stations for limited development, one of the criteria in the site assessment should surely have been is their capacity at the local primary school, not how close is it. Where there is capacity, why not build nearby to make such a facility more sustainable, rather than see small schools deteriorate and potentially close.

Greater numbers of small sites across the Borough's villages are more likely to ensure vitality and vibrancy are retained in the countryside, rather than see struggling rural pubs close because they end up being surrounded by retirees who simply want to keep things the way they are and who no longer use the facilities. Downside may well be larger villages, but if you can develop sustainability, surely this is better than soul less large scale housing estates mushrooming across the countryside.

2086 - Paragraph 55 of the NPPF states that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Within the NPPG, guidance outlines that it is important to recognise the

particular issues facing rural areas in terms of housing supply and affordability, and the role of housing in supporting the broader sustainability of villages and smaller settlements.

A thriving rural community in a living, working countryside depends, in part, on retaining local services and community facilities such as schools, local shops, public houses and places of worship. The NPPG is clear that allocating sites should be considered at a strategic level through the local plan process.

281 – A restrictive figure of dwellings on allocated sites within villages could restrict housing development and prevent sustainable settlements expanding which is contrary to national planning policy advice. Increase the figure for new land allocations within the villages to enable other sites which are within the villages which are also available, suitable and deliverable.

816 - supports the approach of Policy SP2 towards development in the villages, but questions whether the new land allocations for 565 dwellings is sufficient. Suggest that there may be other sites within the villages which are also available, suitable and deliverable. By placing a figure on the proposed number of dwellings that can be delivered on allocated sites within villages that are outside of the Ashford urban area, this could restrict housing development in some settlements and prevent sustainable settlements expanding, which is contrary to national planning policy advice. Furthermore, whilst windfall development is referred to in Policy SP2, the policy restrictions on this type of development in rural settlements are considerable. Increase the figure for new land allocations within the villages to enable other sites which are within the villages which are also available, suitable and deliverable.

Response *The housing distribution strategy of the Local Plan is based on the application of evidence which takes account of local circumstances and the need to promote a sustainable model of housing delivery across the borough – a key requirement of the NPPF.*

One important strand of evidence is the Strategic Housing and Employment Land Availability Assessment (SHELAA) which identifies areas of land that are available for development. This information has been used to inform and test the reasonable alternatives in terms of the merits of different development profiles across the borough, assessed through the Sustainability Appraisal (SA) process. In broad terms the findings of the SHELAA show that:

- *Significant land was promoted in and around Ashford which shows that the market are interested in bringing forward development here,*
- *No new, significant, brownfield sites in Ashford - other than those already with planning permission or identified in an existing Local Plan - were put forward by the market for consideration,*
- *Many sites were promoted in the rural area, most of which was unsuitable on account of their isolated nature or small scale (i.e. below a reasonable threshold for allocation),*
- *No suitable sites were promoted within the confines of any rural settlement which requires sites on the periphery of these settlements to be allocated for new housing development.*

This information fed into the supporting Sustainability Appraisal (SA). In broad terms, the SA sets out that the overall housing target identified in the Local Plan can be delivered by 2030, in locations that are sustainable in terms of meeting an acceptable balance between social, environmental and economic factors.

The SA clearly shows that there are two distinct areas within the borough in terms of their ability to accept new housing growth in a sustainable way. Ashford and its periphery is clearly the most sustainable location within the Borough on account of its size, range of services and facilities, access to jobs, access to sustainable modes of transport, availability of suitable brownfield sites and where significant investment in traffic infrastructure has occurred (and is planned) to cater for the additional housing growth.

In contrast, the rural parts of the borough exhibit very different characteristics. The SA concludes that, in general, the rural area is far more sensitive to change and too much development can quickly lead to an adverse social and environmental impact that is harmful to the character of the area. The SA is very clear that any new housing development in the rural area needs to be proportionate in scale – i.e. it can be adequately accommodated by the rural settlement, taking into account its size, character, environmental considerations, level of services, facilities and infrastructure provision.

Within this wider context, the SA recognises that a hierarchy of settlements exists in the rural area and this should be the starting point in establishing proportionate levels of growth that may be planned for certain settlements. The rural town of Tenterden clearly sits at the top of this hierarchy, followed by the rural service centres of Charing, Hamstreet and Wye. This is then followed by a range of smaller and medium sized rural villages which offer a more basic level of services and facilities on account of their size and population. It is then appropriate to consider local factors such as accessibility by road and public transport, landscape sensitivity, heritage assets, etc, which help to refine the ability of particular settlements to absorb new development without significant adverse effects.

This context was reflected in the Local Plan (June 2016) and is reinforced through the Proposed Main Changes to that document through the additional site allocations identified and the revisions to the housing windfall policies.

Based on the above, the Council considers that the distribution strategy identified in the Local Plan is robust and based on sound planning principles. It is also consistent with the need to promote sustainable development as expressed through the NPPF.

Turning to more detailed points raised above:

- *The Council do not agree that the focus on Ashford is incorrect, as has been suggested. Evidence is very clear that Ashford remains by far the most sustainable location to accommodate substantial levels of new housing growth and there is no reason to doubt that developers in the town have a clear desire to deliver this housing growth in the future. This position is reinforced through liaison the Council has had with the key landowners/developers/housebuilders of these sites.*

- *It is unclear why the SE Plan position is being raised by objectors. The SE Plan is now revoked and has no planning weight. The distribution strategy outlined in the Local Plan is consistent with the prevailing government policy that is in place now.*
- *The Council accepts that housing in the rural areas has tended to come forward quickly and this trend will no doubt continue in the future. This position has been reinforced through the proposed amendments to the draft Plan which now seeks to allocate more rural housing sites and envisages that these sites will almost entirely come forward in the early years of the plan. The Council believes this provides the right balance between urban and rural housing growth in the borough whilst also reflecting the desire to deliver new housing growth early in the Plan period where it can be done in a sustainable way.*
- *The Council do not agree that the approach in the Local Plan is too heavily reliant on large sites, as has been suggested. The Local Plan provides an appropriate balance and variety of site allocations and in doing so gives the market a full range of choice. This variety includes sites within the Town Centre for primarily higher density flatted schemes near to the railway station, large sites on the periphery of the town that can deliver important supporting infrastructure for residents such as new schools, small to medium sized sites within Ashford, sites along the A20 strategic corridor and primarily smaller sites in the rural parts of the Borough in a variety of village locations. In addition, a number of large sites are already under construction or have planning permission and it is entirely reasonable to rely on these sites delivering housing numbers over the plan period.*
- *The Council disagrees that housing numbers in Tenterden are too low. Over the Plan period, Tenterden will accommodate 250 dwellings from the Tent1a site which is currently under construction. It will also accommodate 100 dwellings at Tilden Gill Road – a scheme won on appeal, largely on the grounds of delivery within 5 years. In addition, Tent1b is now identified to deliver a further 225 dwellings over the plan period (policy S24 as proposed to be revised). Combined, this amount of new housing growth is substantial for a town of Tenterden's size and acknowledged environmental and heritage-based constraints, and is well in excess of that planned for in any other rural settlement.*
- *The Council disagrees that the balance of site allocations across the town is incorrect. The sites selected for inclusion in the Local Plan are justified through the sustainability appraisal process which demonstrates that they are the most suitable locations for development at this time based on a range of social, environmental and economic considerations.*
- *With regards to the concerns about greenfield land being used and the impact on the rural road network, the Council understands and sympathises with these views. However, the requirement to deliver the borough's objectively assessed housing needs whilst maintaining a 5 year housing land supply inevitably requires greenfield land to come forward for development. Where it is realistically able to, the Council has identified brownfield sites in Ashford for future housing development. It is also accepted that new housing growth will lead to increased*

traffic movements, putting pressure on the road network. However this will be mitigated by improvements that new housing will be required to help fund.

- *With regards the need for certain housing stock to come forward at Charing, the 2017 version of the Local Plan proposes to introduce a new policy that will require a suitable mix and range of dwelling types to come forward, please see new Policy HOU18*
- *The position regarding the AONB is noted and is responded to elsewhere in this document.*

Support 2531 - KCC notes the identification of Ashford as the Borough's principal settlement due to its relatively recent expansion, increasing role in the sub-regional economy of East Kent and its key strategic transport links. This combined with the limited development opportunities in the Borough's other existing urban areas, demonstrates the town, and its periphery, as a sustainable location to accommodate the majority of housing development proposed and planned economic growth of 11,100 jobs (between 2014 and 2030). The County Council supports the Borough Council's aspiration and commitment to strengthen the role of the Ashford Town Centre as the Borough's key facilitator of growth. KCC is also supportive of the Borough Council's objective to deliver the majority of the Borough's strategic growth in the key locations of Kennington, Kingsnorth and Eureka Park.

Overall, KCC supports the pragmatic approach taken by the Borough Council to setting development targets. The targets should provide an increased level of certainty in the short term and assist the Borough Council in identifying a five year supply of deliverable housing sites – reducing the risk of inappropriate development and uncoordinated infrastructure provision.

Response *Support noted.*

- **Meeting the 5 year housing land supply**

1867 - The Council's proposed approach towards the housing land supply is unsound because it is: a) unjustified; and b) ineffective. The Council is faced with a large deficit in supply that has accrued since 2011 (1,384 by our calculations, on the basis of the annual average monitoring target of 773 dpa x 5 for each year since 2011). If this undersupply is added to the five year land supply for the next five years (in line with the advice in the NPPG), then this would result in a figure of 5,249 (773 x 5 = 3,865 plus the deficit of 1,384 accrued since 2011 = 5,249). If one adds the 5% buffer to this, this would require a five year supply for a total of 5,301 homes. We note from the trajectory in appendix 5, that the Council anticipates 4,547 completions in the five year period 2016/17 to 2020/21. This would indicate a considerable undersupply. On the basis of the Sedgfield approach with a 5% buffer the Council would only be able to show a 4.3 year land supply.

The Council, however, considers that the Liverpool approach towards dealing with the deficit is the appropriate course to follow (see paragraph 3.78). If one adopts the Liverpool method then the annual average requirement for the remaining plan period is 871 dpa (12,200 divided by 14 years on the basis of a remaining plan period of 2016 to 2030). Multiplied by 5 = 4,355. Plus a 5% buffer (+ 218) = 4,573. This indicates that the planned supply indicated

by the trajectory (4,547) is still marginally lower than the five year need (4,573). Using this best possible case, the Council's ability to demonstrate a five year housing land supply is tenuous. It would not take much for the Council to slip into arrears.

We would not support the Council's argument in favour of the Liverpool approach because this would effectively absolve the Council from responsibility for the faults inherent in the spatial strategy pursued in the past (under the SEP) which is also the strategy that the Council proposes to adhere to. We would contend that healthier rates of delivery could be sustained if a more dispersed strategy of housing provision was followed in the short to medium term. This would create more competition, allowing more new entrants and it would help to build capacity among smaller house builders.

The NPPG says that "if the historic rate of development shows that actual supply falls below planned supply, future supply should be increased to reflect the likelihood of under-delivery of a plan". (NPPG, ID 2a-019-20140306). While this statement from the NPPG really relates to the objective assessment of housing need – the need to increase planned supply above the demographic projections to compensate for the possibility that a council will continue to under-deliver in the new plan – this statement is also relevant in the context of dealing with the under-supply accrued since 2011. Because the Council has already performed poorly against its previous targets, it needs to increase the supply of plots in the short-term to avoid the risk of under-delivering against the timetable of the new plan.

There is also a legitimate question to be asked about the consequences of the under-performance against the SEP target (1,135 dpa) for the period 2006-2010 and how this will have affected household composition in the borough. If Ashford was to have performed the strategic role of a growth point for London and the South East by providing more homes than its own local assessed need might have indicated but it then failed in this task (for whatever reason – the recession for example. This is not necessarily a criticism of the Council staff) then this will have had consequences for the rate of household formation in Ashford. This is question that more properly relates to the OAN. However, because that performance has been poor, it is necessary to compensate for that by providing more homes than just the projected level of need. It is for this reason that we think a 1% affordability adjustment is inadequate.

2283 - The estimated number of dwellings to be completed by 2030 is realistic at up to 12,600, including 566 in the rural villages. We accept the target figures, but the failure to supply deliverable sites over a five-year period in recent years, and continuing into the forthcoming period is deeply concerning. We urge the Borough to take steps to avoid this situation, otherwise the area will continue to be at the mercy of predator developers.

1890 - Para 3.35 confirms the Council's intention to meet the full objectively assessed housing need (OAN) of 13,813 dwellings over the plan period 2011-2030. This commitment is fully supported as being consistent with the presumption in favour of sustainable development as well as meeting the specific requirement of para 47 of the NPPF to significantly boost the supply of housing whilst ensuring the local plan meets the full objectively assessed need of housing. However, it is stated at para 3.78 that the Council intends to address the current shortfall in OAN over a much longer period than 5 years. This is not consistent with the NPPF and is not consistent with the requirement to significantly

boost housing. There is also concern about the robustness of supply presented which is also covered in detail in the following chapters but combined point to a need to employ a spatial development strategy that is both certain and able to deal with the existing shortfall and ongoing requirements earlier in the plan to avoid persistent under delivery.

Response *The comments reflect the position in June 2016 and both the SHMA and the Council's response to the implications of additional housing needs and the issue of the 5 year housing land supply have moved on. However, the Council disagrees in principle that the intended approach for rectifying the existing housing shortfall is not appropriate.*

The objectors appear to be suggesting that the only way of dealing with the existing housing shortfall is to deliver substantially more development in the rural areas, although it is unclear from comments as to whether this should be instead of urban housing sites, or in addition to. This is to purely cater for the parts of the NPPF and PPG which refer to the need to significantly boost housing supply and deliver a 5 year rolling supply of housing land.

However, adopting such an approach would clearly lead to a level of development in the rural areas which is unsustainable. This is clear from the findings of the sustainability appraisal. Therefore adopting this approach would be contrary to the NPPF as a whole, in that development is required to be sustainable. This is not referenced at all by respondents who appear to be suggesting that housing supply is the only consideration.

The Council's position is that a more balanced approach is needed, one which takes account of local circumstances and is consistent with the NPPF. This was reflected in the 2016 version of the draft Local Plan but has been re-affirmed in the proposed revisions to the draft Local Plan. The proposed revisions to policy SP2 justifies the overall approach to dealing with the housing shortfall in respect of applying the 'Liverpool' method (i.e. spreading the existing shortfall across the plan period), albeit that the shortfall in delivery since 2011 should be rectified well before the end of the Plan period if allocated sites proceed at the anticipated rate. This can and should be achieved within the context of delivering a sustainable phasing strategy over the plan period.

In adopting this approach it should be recognised that the proposed revisions to the draft Local Plan:

- *Identify a range of deliverable housing sites, in excess of what is needed to meet the OAN requirement,*
- *Take into account the proposed delivery of Junction 10a in 2019 which will alleviate a key strategic highways constraint to development in Ashford and thus allow a number of urban housing sites to be delivered,*
- *Indicates the housing shortfall will be met by the mid 2020s,*
- *Applies a 20% buffer to the annualised housing figures within the first five years of the plan (based on the Liverpool method for meeting housing shortfall),*
- *Assumes a realistic level of annualised housing completions in the early years of the plan and then proposes a step change of delivery of housing in the urban area (a position supported by the relevant landowners/developers/housebuilders).*

These factors must be balanced against a strategy of attempting to meeting all of the housing shortfall in the first five years of the plan. This would require a huge short term

increase in housebuilding on sites wholly within the rural parts of the borough and way in excess of that which could be genuinely considered as sustainable in respect of the NPPF. Overall, the Council believes that Local Plan revisions adopt a far more practical and sustainable approach to phasing and delivery – one which takes account of local circumstances, whilst boosting housing supply in a sustainable way.

- **5% or 20% buffer**

1867 - The Council should clarify whether it will operate a 5 or 20% buffer. This is not clear from the Plan. We consider that there is a strong case for applying a 20% buffer based on past performance. In terms of assessing the Council's past performance in housing delivery the most recent AMR is not especially helpful because it does not provide a cumulative figure for the Borough as a whole. However, table 1 indicates that since the beginning of the plan period an average of 496 dpa have been completed. This would represent persistent under-delivery against both the Core Strategy target (1,135 dpa) and the new local plan annual average requirement (773 dpa). The AMR in appendix 1 also states that the average number of completions for the past five years is lower at 403 dpa. Unfortunately, whatever measure one adopts to judge the Council's performance all the figures point to a record of persistent under-delivery. As such we consider that it is appropriate to apply the 20% buffer. This is necessary to ameliorate past failures and "provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land" (NPPF, paragraph 47).

It is acknowledged that the Borough Council has chosen to step aside from its growth area status as identified in the SEP and its adopted Core Strategy which is based on the SEP. However, notwithstanding this, against the current adopted housing requirement the Borough has significantly undelivered against requirements. There is therefore a very strong case that a 20% buffer should be applied to the Borough Council's housing land supply (NPPF, para 47). The housing trajectory attached at Appendix 5 of the Local Plan identifies a planned total of 4,547 dwellings over the next 5 years (at an average of 910 dpa). However, based on the annual requirement of 871 dpa (12,200 dwellings between 2016 and 2030) this equates to a 5 year requirement of 4,572 (inc. a 5% buffer). The housing trajectory therefore falls below the current requirements based on shortfall year on year since 2011. This position is significantly worse if a 20% buffer is applied.

Response *It is unclear why respondents feel it necessary for the Local Plan to set out whether the Council intends to operate a 5% or 20% buffer. The extent of any buffer will be determined by housing delivery rates over the plan period and may change over time. A prime example of this is housing completions in the borough over the last two years which have shown that, on average, the Council have exceeded the OAN requirement of 1,650 dwellings (825 dwellings per year). It is therefore questionable whether the Council are currently persistently under-delivering within the context of the NPPF and as such whether we continue to be a 20% authority. In any event, this matter should primarily relate to the phasing of development within the Plan period rather than necessarily making additional allocations, as para. 47 of the NPPF makes clear.*

Nevertheless the proposed amendments to the Local Plan make it clear that, at the current time, it is assuming a 20% buffer to the annualised housing figures over the first five years of

the plan, accepting that these figures adopt the Liverpool method of meeting housing shortfall.

Of course, it should be noted that, fundamentally, it is private sector housebuilders who are responsible for delivering the large majority of housing on the ground. The Council's evidence from housebuilders and developers supports the predicted levels of housing growth set out in the revised housing trajectory on key sites.

- **Need for a Strategic Gap/ Buffer**

2445, 2446, 2448, 2449, 2464, 2466, 2468 and 2469 -The Proposed Junction 10a is the not-so-thin end of the wedge in allowing/encouraging further developments South/South East of Ashford Town. I would like to see special protection put onto the villages of Mersham, Brabourne, Smeeth and others in the vicinity, with the creation of a large area of rural Green belt between Folkestone and Ashford. These villages are becoming sandwiched between major unsustainable, ill considered and short sighted developments in Sevington towards Mersham and, on the Shepway side Stanford Lorry Park and Otterpool Garden Town to name a few. The basic characters of the villages and surrounding countryside are being eroded to a point of no return. Folkestone and Ashford should remain completely separate with the villages in between forming a rural green corridor.

1904 – need to mention "green buffers" between villages or communities to ensure that they do not merge with each other. They should help to maintain a healthy and pleasant environment and prevent urban creep.

1199 - Smaller rural settlements such as Mersham have all the characters and facilities listed in paragraph 3.61 but are you protecting it?

1167 – there is a requirement for a Green Buffer/ Strategic Gap to sustain the character of many key villages (eg Mersham, Aldington, Sellindge, Brabourne etc) Include the phrase that you will scale developments close to or within villages to that which could be considered as organic growth (advice from Parish Councils) .

Response: *The Council are now proposing to introduce a new policy to deal with these points, as part of the proposed amendments to the Local Plan, see new Policy SP7*

Miscellaneous

- **SHELAA**

2680 – Argues that the SHELAA is not an up to date, robust evidence base with regards to underpinning the site policies within the Local Plan. Published in 2016, the SHELAA is based on data and sites subject to representations going back 9 years. Some of the assessments were carried out in 2007 and 2010, and the last call for sites was in 2013, in the time period there would be considerable change in the land circumstances of a range of sites, and a number of new sites being identified as available. It is clear the council have not considered additional sites they may have been made aware of in this time. In addition, the reasons provided for site suitability are not contained within a clear audit trail, and we would expect

each site to contain a full site assessment. The council should therefore undertake a new call for sites and SHELAA update.

Response *At the time of being published, the SHELAA contained data and site assessments which were considered to be the most up to date data available. Data on extant planning permissions was taken from the 2015/16 HIA, and the 2013/14 call for sites. It is explained in the SHELAA that the 2013 call for sites ran informally for a number of months into 2014, where a number of late additional sites were identified and included.*

Old data referenced only relates to site submissions received in 2007, agents/owners of which were written to as part of the 2013 new call for sites but did not respond. Therefore the site is still identified within the process but marked as 'not available'. With regards to older data within the Urban Capacity studies, this was re-analysed as part of the SHELAA assessment work and is an assessment of ABC owned land, so is also considered up to date for the purposes of site identification.

The SHELAA site assessment process and methodology is clearly explained within the main body of the document, and each site conclusion states why a site may not have been suitable to move to the next stage, if that applied. The detailed site sheets are not required as the SHELAA is not an SA, and therefore only contains factual assessment data rather than officer opinion, and the methodology explains the context of this factual output.

This local plan consultation has enabled site promoters of new sites to submit their site to the Local Plan process for consideration, and all new 'omission' sites have been added to a revised 2017 SHELAA document published alongside the main changes consultation, and new and updated planning application and deliverability data has been included. The updated SHELAA does now include the complete site sheets and updated site maps for transparency and ease of reference.

Site specific matters

1737 - The Court Farm site has characteristics that would fit between three of these areas. It is currently located adjacent to a small village, surrounded by open countryside, but located within a sustainable location on the edge of Ashford. In consideration that the planning permission has now been granted for the redevelopment of Sevington West, and the draft Local Plan identifies a number of strategic development sites to the east and south of the town, the site will, in the future, be located in a built up area.

1887 - The Old Sawmills, Bethersden would meet the requirements for the provision of a small number of Exclusive Homes, or a small residential scheme, given the location and size of the available plot and the current character and scale of development in this part of Bethersden.

2569 - Policy SP2 should be amended to provide an additional 100 dwellings for the rest of the District allocation to allow our client's land off Sandy Lane and Hope's Grove Farm to be allocated for the development of 100 dwellings.

Response Omission site representations have been addressed through detailed site assessment work in the updated Strategic Housing and Employment Land Availability Assessment and The Sustainability Appraisal Addendum, both published as supporting background documents. .

2530 - Land South of Tilden Gill Road (TS2) should now be included as a firm residential allocation within Chapter 3 of the draft plan and within The Housing Trajectory at Appendix 5. Delivery of the 100 proposed units is likely to occur between 2018 and 2020.

Response This site is now included within the Housing Trajectory, amended as proposed change MC84

1988 – the Plan should contain a specific policy stating that Tent1b should be the only major housing development allowed in Tenterden.

Response In accordance with the NPPF, blanket policies restricting development are not included within the Local Plan.

Support 1788, 2255, 1706, 2511, 2519 and 1886 support policy SP2. 2514 supports paragraph 3.67.

Response support noted.

POLICY SP3 - STRATEGIC APPROACH TO ECONOMIC DEVELOPMENT

Representations have been received from the following consultees:

2501 Peter Davison	2520 Judy Cohen
2502 Mersham and Sevington PC	1511 Kennington Community Forum
2522 Jonathon Mayes	1396 CPRE
2533 Kent County Council	1406 Central Ashford Community Forum
2398 Chilham PC	1480 Jennifer Taylor
2447 Joanne Robinson	1248 Kent Downs AONB Unit
2256 GSE	1247 Christian Byron
2467 Lee Robinson	2415 High Weald JAC
2173 Village Alliance	1173 / 1144 Lesley Wickens
1637 David Nutley	1119 Jenny Mills

1700 / 1817 Friends Life, AXA Real Estate and DMI Properties Ashford Ltd	479 Paul Buggins
1895 Hopes Grove Nursery	432 Courtley Planning
2041 Pickhill Business Development	18 Clive Wooton
2175 Kingsnorth Parish Council	

Summary of Representations - Main Issues

Issue - Overall approach 2533 considers that a review is required to determine which scenario has the greatest potential given the current economic conditions, predictions for economic growth and anticipated economic performance and the impact on employment. In light of this, it is recommended that a review is undertaken earlier than specified.

Response *The draft Plan makes it clear in paragraph 2.26 that there should be a formal review of the Plan by 2023 and this accords with the recent HWP which specifies that Plan reviews should be undertaken every 5 years. This is deemed adequate to enable enough time to elapse to allow the policy framework to be implemented by the market whilst providing an appropriate level of certainty. If circumstances change significantly however then the plan indicates that an earlier formal review will be undertaken.*

2398 - The employment growth target of 11,100 between 2014-2030 is inadequate in the context of the target of providing 12,200 dwellings between 2016 and 2030 - wish to see a clearer relationship between the proposed employment supply and identified housing need. The employment supply being sought should be credible in particular recognising the fact that the borough has not created significant numbers of white collar jobs in the recent past despite the commencement of the high speed rail service to London and the continent. There is concern at the emphasis being placed on employment growth in these sectors in view of recent under-performance.

Response *The identified job target is based on the GL Hearn Strategic Employment Options Report (SEOR) that indicated a job target for the period 2010-30 of 12,600 jobs. This represented a "baseline" scenario. Job growth since between 2010-14 of 1500 jobs gave a Plan target of 11,100 jobs. The Council's view is that this level is aspirational but also realistic.*

1511 - 3.85 states that the impact of a HS1 38 minute journey time to London, Kings Cross / St Pancras will result in companies moving operations out of London to Ashford, but will also result in Kent companies locating to Ashford to take advantage of its central location within Kent and proximity to London." HS1 at peak hours AM to London and PM from London is at full capacity and no further Javelin rolling stock has been procured. The plan should not

have any dependency on expansion of HS1 capacity to serve a growing population, as it has, at best, "influence" over railway services.

1817 supports paragraph 3.84 which identifies the critical investment in transport infrastructure as they key driver for employment growth within the borough and contributing to Ashford being the number one place for business location within Kent and paragraph 3.102 which states that a primary location for business demand are those with excellent access to the motorway network to support operational needs, noting that delivery of J10a will provide such excellent access to the motorway network that Sevington West will benefit from.

Response *The Plan is not dependent upon the expansion of HS1 services and capacity but it is clear that the HS1 service has had, and will have, an impact upon the economic development of the Borough and this is acknowledged in the Plan.*

Supportive comments noted.

1396 - In 2012 GL Hearn report suggested that the 'downside risks' jobs scenario had the greatest probability of playing out. Since then the Council has assessed the employment target as too pessimistic, and suggest that the 'baseline' scenario of 12600 new jobs target would be more appropriate. Given the creation of 1500 new jobs between 2010 and 2014 and the likelihood of the continuation of a low growth economy in the years following 'Brexit' believe the appropriate realistic and aspirational scenario is the 'downside risks' jobs scenario.

Response *The GL Hearn Strategic Employment Options Report was prepared in 2012 and it set out four potential economic scenarios for the Borough and at that time they indicated that the "downside risks" scenario had the greatest probability of playing out. Bearing in mind that economic conditions have improved since 2012 it was considered that the "downside risks" scenario (9,600 jobs 2011 -30) was too pessimistic and that the "baseline" scenario of 12,600 jobs was a more appropriate response for the Local Plan to take.*

1396 believes that delivery of high speed broadband infrastructure across the borough must be a priority. Cellphone and broadband are equally successful to the success of the rural economy as anywhere else. Insert additional criterion (g): in SP3 - New workplaces, including those in rural locations should include the provision of high-speed broadband access. 2175 - consider that the provision of high speed broad band access should be available to all new workplaces in rural areas as a priority.

Response *The Housing White Paper February 2017 sets out the governments support for full fibre connectivity for the UK. As 5.159 of this Plan clarifies the delivery of advanced, high quality communications and broadband infrastructure in new developments in the borough has been a priority since the Core Strategy 2008. As a result all of Ashford's exchanges are now fibre enabled. Policy EMP6 of this Plan reflects the importance given to this matter by this planning authority.*

1406 queries whether French companies will continue to relocate to Ashford post-Brexit and what allowances the Plan has made for the impact if they do or do not. Support for the importance of place making and important to provide adequate parking for all new workers.

Response *At this stage the implications of Brexit are not clear. The Council's view is that it can only continue to proceed on the current basis. The Plan makes it clear in para 2.26 that should circumstance dictate then there will be an earlier formal review of the Plan.*

432 argues that the GL Hearn Strategic Employment Options Report (SEOR) was produced in 2012 when the economic conditions in the UK were significantly worse than they are now. The report also concentrated on the Ashford economy and based its recommendation upon a "downside risks" scenario and revised assessment based upon a "baseline" trajectory which now suggests a "modest growth" scenario. Neither of these options would appear to comply with the NPPF objective of "positive growth" or "respond positively to wider opportunities for growth" (para 17), nor indeed has any "significant weight" been placed on the need to support economic growth. With 3% economic growth in the Borough between 2010-2014 this is still below the growth figure of the south East and 2.2% less than the 5.2% national growth over this period. The Council are still reliant upon an out of date economic evidence base which was undertaken in a different economic climate than today to advise the strategy for growth in their Local Plan. It has not been positively prepared or with wider opportunities in mind and the NPPF doesn't appear as a reference in the report.

The sole reason for rejecting the "enhanced" scenarios was an assumed over reliance on office-based sectors and the inevitable need to increase housing provision over the plan period. The "wider opportunity for growth with the borough was never rely explored. The GL Hearn commission in 2016 was undertaken as an Employment Land Review without any update on their 2012 SEOR. It therefore only reinforced its employment need based upon a flawed assessment of the boroughs modest economic outlook. The Council should update and revise its SEOR in line with the government directive for "positive growth" as set out in the NPPF.

Response *It is acknowledged that economic conditions are better at present than they were when the GL Hearn SEOR Report was prepared and this is acknowledged within the Local Plan. The Council's view is that it is planning for positive growth by adopting the stance it has taken in preferring the "baseline" scenario rather than the "downside risks" scenario – this was in response to changing economic circumstances since the SEOR was prepared. This is a prudent approach bearing in mind any future uncertainty and the Plan acknowledges the possibility of an early Plan review if circumstances change significantly.*

1173 - Companies locating to Ashford will find a lack of high skilled workers. Any company that offers low skilled jobs such as warehouse operatives (Sevington park) is not going to raise the level of low wages in fact it does the opposite, leading to other local employers matching their low wages. Make provision to positively attract higher wages in the area with quality developments. In the changing economic climate currently would the target of 11,100 jobs be feasible? Any target figure should be subject to the current economic situation prevailing at that time

Response *The SEOR report indicates that the projected job target is a feasible target and indeed is presented as a “baseline” scenario that is deemed to be deliverable within the economic climate prevailing at the time of the report and economic conditions have changed since the publication of that report.*

Issue – Sevington 1173 queries whether, as outline planning consent has been granted at Sevington for a strategic employment site, the policies in this draft Plan will apply to the detail submissions. 1144 also requests clarity on the situation with this site which has already approved in outline before this plan is adopted, in particular whether the policies within this plan would apply to the details plans in the 3 phases not yet submitted.

1817 welcomes the recognition of ‘Sevington’ (in Para. 3.104) as being as one of the four key strategic sites for employment in Ashford, noting that para 3.110 provides some commentary on delivery of the development and refers specifically to triggers for development thresholds. It is important to note that these triggers are in place only to control the amount of development pre delivery of J10a. Highways England are progressing the DCO for J10a and it is currently expected that it will be open in 2019. There will at that time be no constraints on delivery of the permitted development on the site.

1173 is concerned that planned landscaping of the site referenced in 3.109 suggests planting outside the zoned site relying also on HE scheme planting, considering that TPOs and planting protection should be part of the planning not a potential requirement and be firmly adhered to within the phasing. Phased development will rely on HE's access timings. Please make sure this wording reflects a very firm policy with regards to the site access and impress this upon HE.

Response *With regard to whether the policies of this Local Plan will apply to the detailed applications coming forward on the Sevington site, this will depend to a large extent on progress with both processes. Until adoption the policies in the Local Plan will carry less weight in the determination of planning applications. Adoption is currently programmed for mid 2018. Phasing of development is conditioned on progress with the delivery of highway improvements associated with the J10a project.*

[An objection to the failure to allocate Sevington East is considered as an omission site (see Appendix A of this Report) and this matter is therefore addressed in the SHELAA.]

2501 objects to the Sevington proposal (Para 3.107) on ground of light, noise and CO2 pollution. Large overbearing buildings that would dominate the area damaging the environment and blighting the western side of the village. It would be an eyesore when viewed from the North Downs and elsewhere.

Response *Policies ENV4 and ENV12 of this Draft Plan, which paragraphs 2.2 and 4.2 of the Plan make clear should be read and interpreted as a whole, address light and air pollution issues.*

It is acknowledged that the proposed development will result in the loss of views of the site across open countryside, and this will result in a change in landscape character on this edge

of Ashford. However the site itself does not have any national or local landscape designations which restrict the development of the site in principle. The impact upon landscape character is one of a number of factors which need to be considered and balanced against each other in deciding which are the most appropriate sites to allocate for development. Full assessment of all of the factors has been carried out through the Sustainability Appraisal, and overall this site has been considered suitable when considered against the other reasonable alternatives, taking into account all relevant factors.

2502 says the sheer scale of the buildings already proposed for U19 will inevitably lead to the loss of some of the character of the historic village of Mersham, as well as the near destruction of the setting of the community at Sevington. The land to the east of Highfield Lane, including WE15, lies within Mersham and Sevington Parish and forms the major part of the countryside buffer between Mersham village and Ashford town. As a historic Kent country village it is imperative that the rural nature of the Parishes is protected. This land to the east of Highfield Lane is therefore the key residual countryside buffer for Mersham and as such we would request that the WE15 site is recognised in the 2030 plan as fundamental to maintaining the character, individuality, and setting of the village of Mersham. Proposes a formal designation for Site WE15 as a green buffer zone or strategic gap in perpetuity and that Site U19 be screened with trees on its eastern edge.

1637 - The plan needs to positively prescribe a green corridor between the urban sprawl of Ashford and the villages of Mersham and Sevington. This should comprise WE15 and a swathe of land to the East of Cheesemans Green Lane. Planning policies should be positively formed to protect the identity and authenticity of all villages. The attractiveness of the villages in the Ashford area is well recognised and should be maintained by careful planning policies which enhance rather than destroy village environments.

2522 supports protection of the area between Blind Lane and the proposed warehouse development. 1247 also delighted to see that further development of the U19 site particularly the land between Highfield Lane and Blind Lane is not included in the plan and requests that this land is protected in perpetuity as open countryside as it is so important to protect the integrity of Ashford's village communities. 1119 believes that it should be clear that the area of land abutting this site between Highfield Lane and Blind Lane (WE15), will never be available for development and allocated in this and future Local Plan Reviews as a strategic gap/green buffer to protect the ancient rural settlement of Mersham. There should be a specific policy to protect all the rural villages in this way by limiting the extension of greenfield development around Ashford.

2520 believes it is important to prevent development between Highfield Lane and Blind Lane to prevent Mersham village being swallowed up in an industrial estate. HGV traffic must be prevented from blocking country lanes around Mersham and the old Sevington church should be protected. 1480 states that the development of WE15 must not be allowed to go ahead and land at Cheesemans Green should also be protected to make sure that lower Mersham is protected from being joined to Ashford by inappropriate development.

Response *The separate and distinctive identity of individual settlements forms part of the particular character of much of the borough, helps to define communities and is an important*

feature in maintaining the quality and attractiveness of the borough for residents and visitors alike.

As Ashford in particular has grown in recent years, some of the open space between the edge of the town and the closest surrounding villages has been eroded. In some locations, such as at Park Farm, specific features such as the buffer zone with Kingsnorth village have been implemented. But as pressure for additional growth to the south of Ashford continues (which is reflected in the proposed allocations in this Local Plan), the need for such protective features is likely to increase with more settlements potentially affected.

The Council is concerned that this could occur in a variety of locations across the borough, for example by the large scale expansion of villages to encompass nearby hamlets; through progressive 'ribbon' or linear development along roads that joins up settlements, or through the expansion of Ashford itself.

A new policy SP7 Separation of Settlements has therefore been added to the Plan in order to prevent unplanned erosion of countryside between built up areas which would have a serious and significant adverse impact on the character and individual identity of villages through loss of their setting or through coalescence.

2447 / 2467-would like to see the proposed warehouse and any further development of the WE15 site and Cheesemans Green rejected.

Response *WE15 is an omission site and a response to this representation is therefore found in the SHELAA Report and the Council is not supporting the inclusion of this new location in the Local Plan. The Cheesemans Green site is Policy S15 (Finberry North West) and the proposals for that area remain as per the draft Plan with minor amendments.*

Waterbrook 2256 supports strategic approach however question the need and rationale to place 20ha of commercial floorspace at Waterbrook.

Response *The Waterbrook site is one of the key strategic employment sites identified in the Local Plan. It is well connected to the major road network and has been identified for some time a key location for commercial development. The site includes the Truck Stop lorry park that is proposed to be re-located and expanded within the site. The Council has now included an element of residential development on the whole site and is now promoting a mixed use development .*

Rural areas 2173 argues that the intention to take a positive approach that reflects a presumption in favour of sustainable economic development is not appropriate if it is not tempered with other considerations such as the impact on the environment of any development proposed. The term 'sustainable' should be defined more closely to reflect the fact that any economic development proposed is sustainable in environmental and community terms as well as economic terms.

479 is concerned there seems to be little mention of agriculture. Historically agriculture was a big part of the growth of Ashford and therefore suggest that there should be positive policies that safeguard existing agricultural activities and support expansion and development. Whilst appreciating central government guidance in supporting change of use

of redundant agricultural buildings to residential dwellings I believe within the borough we should look to retain agricultural activities.

Response Paragraphs 2.2 and 4.2 of the Plan make clear that the Local Plan should be read and interpreted as a whole. Policies in Section D, including ENV1, require that all new development over the time period of this plan are sustainable in environmental terms and conserve or enhance the natural and built environments, while Section E requires that new development support the needs of and the creation and maintenance of sustainable communities.

With regard to agriculture, this sector is defined as rural employment for the purposes of this policy and is therefore supported by this policy.

Tenterden 1895 considers that on the strength of the evidence base supporting the Draft Location Plan there is scope and need to allocate additional land for employment needs particularly in an around Tenterden. The identified lack of employment land in and around Tenterden reinforces the requirement to retain existing employment sites and to supplement these where appropriate.

Only one single employment allocation has been put forward in Tenterden which is at the Pickhill Business Centre site under Policy S25. This site is an established business site with premises already accommodating a range of B1- B8 businesses. In land use planning terms however this site is located much further away from the centre of Tenterden and is of a size that can only continue to provide limited employment floorspace. If there is a need to identify additional land for employment use as we consider there is, the site at Hopes Grove Nursery is a clearly preferable option. The site has the capacity to provide meaningful levels of housing and employment floorspace which could be mixed with community or recreational facilities to bring enhanced facilities to the town. The SA clearly details the Council's conclusion that intensifying the existing employment use of the site would be acceptable and seemingly the only reason for its rejection as an allocation site is its current location which, as noted is likely to change significantly under the Council's development projections.

Response *The allocation of the Pickhill site for additional employment development was a specific site submission for employment uses and as an established site provides the opportunity to increase employment provision in the vicinity of Tenterden. The overall approach to provision of additional employment floorspace in the Tenterden and rural settlements is set out in policy EMP 1 which promotes additional employment premises in appropriate locations. The Council considers that this approach will enable suitable employment sites and premises to come forward as appropriate. Hopes Farm Nursery is addressed in the SHELAA as an omission site.*

Support 18 supports this part of the Plan. 1700 support the Strategic Objectives of the Local Plan including Policy SP3 which outlines that 11,100 new jobs will be achieved in the borough between 2014 and 2030, including through the maximisation of town centre opportunities and promoting rural employment opportunities. Consider that 'edge of centre' sites, such as the Ashford DOC, are major employers and contributors to Ashford as evidenced by the recent planning permission for Phase 2 which will deliver an additional 537

new jobs in addition to the circa 900 jobs the existing DOC supports. After implementation of Phase 3 the DOC will support over 2000 FTE jobs across a broad spectrum of positions.

2041 pleased to see reference in draft policy SP3 that the Council will promote appropriate rural employment opportunities in sustainable locations. 1248 and 2415 support Ashford's approach to employment expansion in the rural area which promotes appropriate small scale expansion of existing rural employment sites.

Response *These comments of support are noted.*

POLICY SP4: DELIVERY OF RETAIL AND LEISURE NEEDS

Representations have been received from the following consultees:

1465 Maidstone BC	1991 Tenterden Town Council
1755 Ian Wolverson	2858 Indigo Planning Ltd

Summary of Representations – Main Issues

Issue - Retail Needs Assessment 2858 states that comparison retail need has been underestimated as there are the following issues with the Retail Needs Assessment:

- Quantitative assessment should not assume existing facilities trade at equilibrium at base year
- Population projections do not reflect the housing target in the SHLAA
- On-line expenditure should not be excluded completely, as physical store presence still required for some online purchases.
- 40% of turnover for extension to Ashford Designer Outlet Centre (DOC) will be derived from within the Borough, when the DOC study in the Borough concluded this was 20%

Response *No change proposed. See Appendix B for full response to representations on the Ashford Retail Needs and Leisure Assessment prepared by Carter Jonas for Ashford Borough Council.*

Issue - Retail Warehousing 2858 given the amount of housing proposed in and around Ashford, consider the need for bulky goods retailing. A new retail warehouse part will improve choice in competition, increase Ashford's market share and claw back expenditure currently leaking elsewhere.

Response *No change proposed. See Appendix B for full response to representations on the Ashford Retail Needs and Leisure Assessment prepared by Carter Jonas for Ashford Borough Council.*

Miscellaneous 1465 relates to housing delivery, traveller provision and Local Plan’s time horizon. 1755 relates to housing delivery 1991 also relates to SP5

Response See relevant policies for response.

POLICY SP5: ASHFORD TOWN CENTRE

Representations have been received from the following consultees:

80	Simon Gray	1750	Ian Wolverson
1165, 1168, 1407	Central Ashford Community Forum	1779	Kent Wildlife Trust
1705	Friends Life, AXA Real Estate and DMI Properties Ashford Ltd	1991	Tenterden Town Council (Philip Burgess)
1224	Paul W Bartlett	2554	Kent County Council

Summary of Representations – Main Issues

Issue – description of the town centre 80 objects to the statement that Ashford town centre is currently attractive and vibrant. 1991 suggests that the vision for Ashford town centre needs to apply also to Tenterden town centre.

Response *The supporting text to this policy states that Ashford has an attractive historic core and makes clear that a vibrant town centre is part of the vision of the Plan and not the baseline position. Ashford town centre is the key focus for shopping and services in the borough and the vision as set out in policy SP5 is considered appropriate to the role that Ashford town centre will be required to play in the borough over the Plan period. Its situation, particularly in terms of accessibility, is very different to that of Tenterden and the other rural settlements of the borough and as such is considered to warrant a policy in its own right. No change required.*

Issue - too much emphasis on apartments 1165, 1168 and 1407 object to the quantities of apartments planned for the town centre on grounds of limited likely demand, and shortages of seats on the HS railway at commuter times and consider that there is insufficient provision for families in the town centre.

Response *Private rented sector apartment schemes will bring a new product to the choice of homes on offer in the town, help broaden the market and are supported by national policy. Due to the nature of sites in the town centre, evidence indicates that many schemes coming forward remain only marginally viable and the comparatively high build costs needed to deliver a quality product are not reflected in returns from development. In an emerging market a degree of pragmatism is essential. Issue of rail overcrowding on high speed line to London is noted but outside the remit of the Local Plan to address. No change required.*

Issue – changes to the town centre boundary 1705 objects to the changes to the town centre boundary as defined in the TCAAP (2010) to exclude the land for Phase 3 of the DOC, currently used as HS1 Surface car park. 1750 is concerned that 3.130 does not make clear whether the DOC is included within the definition of the town centre and if it isn't then this paragraph is likely to be untrue.

Response *The town centre boundary has been altered since the TCAAP of February 2010 to reflect the desire for a more compact core to the town and to reflect the changing pressures on the retail market and current cautious market confidence in the town. No changes required aside from amending 3.130 to cross reference to Town Centre Plan on page 273 (Proposed Change MC6) and correcting the Plan to refer to SP5 not SP4.*

Issue – add reference to River Great Stour LWS 1779 requests the addition of reference to the River Great Stour LWS given its wildlife value and strategic green corridor importance in order to comply with the NPPF.

Response *The protection and enhancement of the Ashford Green Corridor, which incorporates the River Great Stour LWS, is addressed by Policy ENV2 of the Local Plan. No change required.*

Issue – tall buildings policy 1224 suggests that a tall buildings policy is required to deal with the increased need to deliver housing numbers, particularly in Ashford town centre

Response *The Council has a long established Ashford Design Panel to which larger developments or those on prominent sites are referred at a relatively early stage in the design process. It is considered that the appropriate scale of new developments coming forward within the town centre, and the borough as a whole is adequately addressed by this process and is also covered in Policy SP6. No change required.*

Support 2554 provides general support for the Plan's commitment to strengthen the role of the Ashford Town Centre.

Response *Support noted.*

POLICY SP6: PROMOTING HIGH QUALITY DESIGN

Representations have been received from the following consultees:

9 Kent Police CPDA Team	1769 Ian Wolverson
282 TG Designer Homes	1784 Mr and Mrs Jackson
817 Prima Paper Services Ltd	2177 Kingsnorth Parish Council
1166, 1409 Central Ashford Community Forum	2267 Persimmon Homes and Taylor Wimpey
1249 Kent Downs AONB Unit	2284, 2294 Peta Grant
1332 Sport England	2400 Chilham Parish Council
1401 CPRE Kent (Ashford District Committee)	2406, 2407, 2430, 2438 High Weald Joint Advisory Committee
1668 Jacqueline Male	2546 Bellway Homes
	2547 Kent County Council

Summary of Representations – Main Issues

Issue - Criteria a) Character, distinctiveness and sense of place 1166 requests wording specifying less intensive developments should be encouraged to enhance the appearance of the town centre. It is considered that high rise buildings are not necessary and appropriate for Ashford as a small town, and the designs are ‘cheap and unimaginative’ decreasing the visual appeal of the town. 1409 requests a commitment from the Council that proposals for town centre development seeking to use the style of south Ashford should not be considered acceptable as respect is needed for the townscape when new buildings are being proposed.

Response *The policy wording and pre-amble provides sufficient detail for these issues to be considered on a case-by-case basis, without being too prescriptive. No change proposed.*

Issue - Criteria b) Ease of movement 282 and 817 question whether this can become a reality due to the County Council’s requirements, with a potential conflict between this and County Council policy advice.

Response *Noted*

Issue - Criteria c) Legibility 1409 suggests closes in new housing development should be names in A-Z to make navigation easier.

Response *Not relevant*

Issue - Criteria f) Quality of public spaces and their future management 1409 states that play parks are essential for children, but so are locations for youth clubs and community space from Day 1.

Response *This is dealt with by other policies in the Plan, however it is not possible to always deliver these from ‘Day 1’.*

Issue - Criteria i) Efficient use of natural resources 282 and 817 question whether this can be required in the policy with the deletion of the Code for Sustainable Homes and the current reliance on building regulations. 1668 states that sustainability should be a priority in terms of energy efficiency and energy production, for example through use of solar tiles (instead of ‘ugly panels’) and rain water harvesting.

2177 considers all new houses should have solar panels to minimise proliferation on agricultural land. 2407 supports the protection given to Dark Skies an important feature of the High Weald AONB.

Response *This policy appropriately addresses the issue of natural resources as far as this can be done through design.*

Issue - Crime Prevention 9 recommends that a section be included in the Local Plan to ensure Crime Prevention through Environmental Design (CPTED) to ensure that Section 17 of the Crime and Disorder Act 1998 is complied with, as well as NPPF paras 58 and 69, NPPG (Design section Paras 10&11) and the Kent Design Initiative Design for Crime Prevention document dated April 2013.

Response See *proposed change MC8.*

Issue - Quality Monitoring Initiative 2284 supports this initiative as quality control of construction is of the utmost importance. 282 states that reference to the Council's Quality Monitoring Initiative should be removed from the policy as it is an initiative to be encouraged rather than a specific requirement.

Response *Noted. The policy does not make this an absolute requirement, but strongly encourages participation in the scheme.*

Issue - Landscape and Green Infrastructure 1249, 2430, 2438 and 2406 request that the design guidance which supports the delivery of the Kent Downs and High Weald AONBs Management Plans should be referred to in para 3.160 requesting specific amendments to para 3.160 and Policy SP6.

1249, 2177, 2406, 2430 and 1401 consider that the policy should include criteria in relation to landscape character, biodiversity and green infrastructure. Consideration of retention of important landscape features should be used as basis for landscape structure and setting of new development, as well as protection and enhancement of green infrastructure. Development should relate positively to topography, landscape and valued features, and be located to avoid loss of important views, as well as avoiding intrusion onto sensitive ridgelines and prominent open slopes.

1249 and 2430 consider reference should be made to the importance of retaining important landscape infrastructure and features within new development. 1401 states that the criterion and supporting text should encourage the use of 'making space for nature' principles during the design process.

Response *The AONB Management Plans are already referred to within the specific policy relating to Landscape and the AONB (Policy ENV3), there is therefore no need to repeat reference to it within this policy. No change required..*

These issues are already addressed appropriately through other policies in the Plan, specifically relating the Green Infrastructure (Policy ENV1) and Landscape Character (Policy ENV3). There is therefore no need to repeat these issues in this policy.

Issue - Historic Assets 1401 requests amendments to para 3.169 as follows: "All development should respond to the cultural and historic qualities of its location. Designated and undesignated historic assets (including listed buildings, conservation areas, ancient roads, green lands and byways and sites of archaeological interest) and historic landscapes should be protected, and enhanced or revealed where appropriate. Proposals that bring redundant or under-used buildings into an appropriate use will be encouraged."

And insertion of the following into policy SP6: 'Development proposals should demonstrate how they have responded positively to designated and undesignated landscape character and historic assets'.

Response *These issues are already addressed appropriately through specific policies in the Plan relating to heritage assets (ENV13 and ENV14), as well as in the NPPF. There is therefore no need to repeat these issues in this policy. No change proposed.*

Issue - Active Design 1332 recommend that the concept of 'Active Design' be incorporated into the policy. Active Design Guidance produced by Sport England and Public Health England, with 10 principles to 'inspire and inform the layout of cities, towns, villages, neighbourhoods, buildings, streets and open spaces, to promote sport and active lifestyles.'

Response See *proposed change MC8.*

Issue - Design and Access Statements 1784 states that DAS should be accurate and comprehensive according to the scale of development. Some DAS are accepted even if poor, vague, misleading and onerous.

Response *Noted – no change proposed.*

Issue - Public Consultation 1784 states that more emphasis should be placed on the importance of public consultation as part of application process and public consultation prior to submission of an application should be taken into account. 2294 agrees full consultation with local communities should take place before approval is given with reference to para 66 of NPPF.

Response *Noted. It is considered that this and other policies in the Plan deal with the issue of public consultation appropriately.*

Issue - Innovative design features 2294 considers that where appropriate it would be encouraging to see innovative design in larger developments rather than a pastiche as the easy option, in accordance with para 63 NPPF.

Response *This policy allows for such a response.*

Issue - Optimising site potential 2267 and 2546 comments that the NPPF requirement for developments to 'optimise the potential of the site to accommodate development' (NPPF, para 58, bullet 30) should be reflected in the policy criteria as a separate requirement to be consistent with national policy.

Response *This issue is specifically covered in the NPPF and therefore does not need to be repeated here.*

Issue - Housing density 2400 proposes that housing density standards need to be set to prevent overcrowding and enforce the aspiration of high quality design.

Response *Setting specific density requirements is not considered appropriate or necessary, as this is better dealt with through site specific design. High density does not automatically mean overcrowding, and it is possible to achieve high quality design through a variety of densities, which should take into account the specific characteristics of the site.*

Issue - Representations relating to other parts of the Plan 1769 regarding network of inter-connected routes relates to policies S3, S4, S5 and Chilmington Green. 2177 considers that and 'Enquiry by Design Workshop' should be held for Court Lodge

Response *See response to relevant policies.*

Support 282, 817, 2267 and 2547 provide general support to the policy approach to design. 1249 and 1668 support the requirement of new development to reflect local distinctiveness. 282, 817, 1409 agree with the approach to visitor parking. 1409 supports para 3.181.

Response Supports noted.

SITE POLICIES: INTRODUCTION

This section does not address omission site submissions. These are listed in Appendix A of this Report and responded to in the updated SHELAA 2016/17 and in the SA Addendum Reports.

Representations have been received from the following consultees:

1198 Rita Fassum	2259 Lewis
1250 Kent Downs AONB Unit	2306 Christine Craib
1389 Nash Court Estates	2309 Nicholas Hurst
1631 Helen Ansell	2335 Environment Agency
1858 Morghew Park Estate	2368 Natural England
2128 Mary Walton	2386 Gerald Moor
2245 Mr & Mrs Keen	2416 High Weald Joint Advisory Committee
2246 Daniel Bennett	2433 John and Joan Gamblin
2253 Paul Darnell	2607 Susan Speed
2257 Brenda Hicks	2683, 2684 Gladman Developments
2258 Spencer King	2863, 2864 Wheler Foundation

Summary of representations – Main Issues

Issue - Ashford Urban Area Site Allocations 2683 raises concerns with regard to timing and deliverability of sites, which impact upon the ability of the plan to meet its housing requirement and to demonstrate a 5 year land supply but state they cannot comment fully without further site specific information being provided by the Council. However do not currently consider the plan sound and robust plan in terms of deliverability of housing. It understands why ABC has sought to direct much of the housing growth to Ashford, however this is heavily reliant on complex brownfield sites, which is a flawed strategy that will lead to a shortfall in housing supply. Propose that a more balanced spatial development strategy that promotes development in other sustainable locations, such as Charing.

Response *This issue is addressed in the response to SP2.*

Issue - Village allocations 2684 does not object to the principle of the allocations, however consider that the plan fails to adequately allocate site in sustainable village locations, highlighting concerns that a number of settlements are left with just 8-15 houses over the length of the plan period, there is no up to date settlement hierarchy report, which assesses sustainability of individual settlements, that current evidence underpinning rural allocations is out of date and there is a lack of consideration of needs of the settlements. However it does

not object to the sites in Charing, and promotes two further sites for development to enhance and maintain the vitality of rural communities.

Response *This issue is addressed in the response to SP2.*

Wittersham A number of representations were made to this part of the Plan referring to the village of Wittersham and specifically in response to the representation made by Wittersham Parish Council (893) to Policy HOU4 this draft Plan.

2128, 2245, 2246, 2243, 2257, 2258, 2259, 2309, 2386, 2433, 2607 support the protection of the area of the AONB from anything but minor development. 2245, 2246, 2258, 2259, 2309, 2258, 2259, 2306, 2309 state that the parish council's comments have been sent without proper consultation with the village.

2246, 2258, 2259, 2309 there is potential for infill development in the village. 2309 Wittersham is not a relatively isolated village community. It is in the centre of the Isle of Oxney and on the B2082 which connects Tenterden and Rye. Children from surrounding villages attend the village school. It is a vibrant rural community which has a traffic and infrastructure problem with insufficient off-street parking. Large housing development would require road and infrastructure improvements which KCC cannot afford.

Response *See response to HOU4.*

Miscellaneous issues 1250, 2416 consider it crucial that Policy SP6 is included in the list of policies relevant to all site policies. 2368 points out that although many of the site allocations are on agricultural land, but only one allocation mentions the land classification. It would avoid confusion if all sites using agricultural land mention the land classification and whether they impact BMV land.

1198 objects to building on open spaces/agricultural land when as a country we have to import food and to increased congestion that will result from proposed sites (S2) emerging onto already congested roads, causing further congestion and delaying ambulances to the William Harvey Hospital. 1631 states that Victoria Road primary school needs a car park and wait until we have left the EU to see if additional housing is needed rather than building on green landscape.

2335 Flood Risk has been identified on a number of sites, but that providing Policy ENV6 is followed, this should not preclude development.

2306 could not make comments via the Local Plan website as it is complex and unwieldy and time-consuming.

1389 and 1858 are duplicates (of 1366,1877 and 1866)

Response *Paragraphs 2.2 and 4.2 of the Plan make clear that the Local Plan should be read and interpreted as a whole. Strategic Policies by their nature are overarching, applying to all other policies of the Plan so no need to add SP6 to list. Government policy requires local authorities to determine their own housing needs. However, this must be based upon an assessment of housing need through a Strategic Housing Market Assessment, to ensure that general market and affordable housing needs are fully met until 2030.*

Brexit doesn't alter the population forecasts, so at present the Local Plan must allocate based on the current position.

Minerals safeguarding

Subsequent to the submission of their representations, Kent County Council has confirmed that if a site is located within an existing urban area the provisions for safeguarding of minerals do not apply, and therefore their representations made on this matter can be ignored. Responses to representations made on minerals safeguarding grounds to sites outside of existing urban areas are addressed in the usual manner.

POLICY S1: COMMERCIAL QUARTER

Representations have been received from the following consultees:

137	Rod Gilbert	389	Paul Buggins
1411	Central Ashford Community Forum	1676	Jacqueline Male
2556	Kent County Council	763	Iris Clark (<i>comments relate to different site</i>)
1709	CPRE Kent (Ashford District)		

Summary of representations – Main Issues

Issue - Design and Landscaping 1709 advises that the opportunity should be used to create an attractive river frontage, with the riverside edge treated carefully to ensure biodiversity benefits. It is a sustainable site which has excellent access to the station. Site layout should ensure footpaths within the site are legible, promote these excellent links and connect to the footpath network beyond the site. Insert additional guidance on footpath/access legibility and riverside frontage design.

Response *The policy calls for the provision of 'high quality' public realm guided by a 'Design Framework'.*

Issue - Traffic and parking 1411 urges development of multi-storey car park.

Response *Policy SP1 supports the provision of multi storey car park and makes provision for contributions to be made by non-residential development towards the delivery of a multi-storey car park.*

Issue - deliverability 389 notes that this part of regenerating the town centre, the concept of a commercial quarter, is commendable but raises concerns that with reduction in Eurostar service at Ashford and UK exit from EU the need for offices will go.

Response Planning consent has been granted for development here and work is on site.

Support 137, 1676,1709 support this policy.

Response Support noted.

POLICY S2: LAND NE OF WILLESBOROUGH ROAD, KENNINGTON

Representations have been received from the following consultees:

ALP/1317, 1318, 1319	1967 (Janet Connaughton)
ALP/41, 42	A Furlong
ALP/1362	A Roake
ALP/963, 964, 965 ,966 ,967, 1197, 1200, 1202, 1204, 1205, 1207	Abigail Jane White
ALP/1585	Adam Drever
ALP/342, 343, 344, 692, 690, 695, 697	Aishling Baker
ALP/275, 276, 277	Alan Nicoll
ALP/737	Alan Boulter
ALP/941, 940, 942, 943, 944, 945	Alan Gray
ALP/15, 16, 17	Alan Hall
ALP/821	Alan Thom
ALP/150	Alan Wells
ALP/2038	Alexander Douse
ALP/110, 111, 112, 113, 114, 115	Alistair Baggs
ALP/1509	Amanda Falconer
ALP/836	Andrew Goodbody
ALP/449	Andrzej Wolcerz
ALP/742, 743, 744, 745, 746, 747, 748, 749, 750, 751, 752, 753, 754, 755, 756, 757, 758, 759	Andy Shephard
ALP/484	Angela Waite
ALP/1044, 1040, 1041, 1046, 1047, 1048, 1049, 1050, 1051, 1052, 1053, 1054, 1055, 1056, 1057, 1058, 1059	Aran Brooks
ALP/2036, 2037	B Pizzala
ALP/989, 990, 991, 993, 994, 995, 996, 999, 1000, 1001, 1002, 1004, 1006, 1007, 1008, 1010, 1011, 1012	Barrie Hart
ALP/1169, 1171, 1172, 1174	Barry Laphorn
ALP/1203	Barry Sallis
ALP/1642, 1643, 1644, 1645, 1646, 1647, 1648, 1650, 1651, 1653, 16541, 1655, 1656, 1657, 1659, 1661, 1662, 1663, 1665, 1666	Barry Woolgar
ALP/841, 844	Barton Zimenova

ALP/1211	Beinart
ALP/2042	Beryl Sinclair
ALP/51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68	Beth Clover
ALP/2736, 2743, 2746, 2757, 2759, 2771, 2778, 2781, 2792, 2799, 2806, 2813, 2818, 2823, 2835, 2842, 2849, 2856, 2737, 2744, 2745, 2758, 2765, 2772, 2779, 2780, 2793, 2800, 2807, 2814, 2817, 2822, 2836, 2843, 2850, 2857	Betty Bray
ALP/157	BHS South & East Kent Committee
ALP/925, 910	Boughton Aluph and Eastwell Parish Council
ALP/946	Brabourne Parish Council
ALP/478, 460, 463, 466, 467, 472, 474, 476, 477, 480, 481, 482, 483, 504, 1912, 1914	Brian Collins
ALP/525, 526, 527, 528, 529	Brian Lofts
ALP/21	Bridget Watts
ALP/804	Bryan Strange
ALP/2485, 2488	Canon Woods and Orchard Action Group
ALP/569, 571, 572, 573, 574, 575, 576, 577, 578, 579, 580, 581, 582, 583, 584, 585, 586, 587	carol clover
ALP/363, 364, 365, 366, 367, 368, 369, 370	Carol Fraser
ALP/1266, 1254, 1255, 1256, 1258, 1260, 1261, 1262, 1264, 1267, 1268, 1270, 1272	Carole White
ALP/345	Catherine Myers
ALP/1394	Cecil Horn
ALP/1414	Central Ashford Community Forum
ALP/410, 411, 412, 413, 414, 415, 416, 417, 419, 420, 421, 422, 423, 424, 425, 426, 427, 428	Charles Southon
ALP/147	Charles Traill
ALP/1547, 1548, 1550, 1551, 1553, 1554, 1555, 1556, 1558, 1560, 1565, 1569, 1573, 1576	Cheryl Sims
ALP/805	Christine Strange
ALP/1678, 1673, 1675, 1682, 1683, 1685, 1687, 1688, 1690, 1691, 1693, 1694, 1696, 1697, 1698, 1701, 1703, 1704, 1707, 1708	Christine Woolgar
ALP/22	Christopher Buchanan
ALP/829	Christopher Jewell
ALP/1201	Clare Sallis
ALP/119	Cobb
ALP/957, 958, 959	Collison Eric
ALP/169, 170	Coral White
ALP/1710	CPRE Kent (Ashford District Committee)
ALP/1315	CWOAG

ALP/109	D Brisley
ALP/1854, 1861, 1865	D Wickham
ALP/908	Danielle Duncan
ALP/84	David Bott
ALP/847	David Collins
ALP/121	David Watson
ALP/1398, 1399, 1722, 1726, 1727, 1729, 1731, 1734, 1736, 2474	derek standing
ALP/647, 648, 649, 650, 651, 652, 653, 654, 655, 656, 657, 658, 659, 660, 661, 662, 663, 664	Diane Setek
ALP/391, 392, 393, 394, 395, 396, 397, 398, 399, 400, 401, 402, 403, 404, 405, 406, 407, 408	Diane Southon
ALP/909	Dianne Duncan
ALP/1269, 1271, 1273	Donald Stedman
ALP/8	Donkersley
ALP/1953, 1954, 1956	Doreen Newson
ALP/225	Dr Garbacia
ALP/221	E. M. Webster
ALP/1067, 1069, 1071, 1074, 1080, 1082, 1084, 1085, 1086, 1087, 1088, 1093, 1096, 1101, 1104, 1106, 1109, 1112	Emily Brooks
ALP/264, 874, 875, 876, 877, 878, 879, 880, 881, 882, 883, 884, 885, 886, 887, 888, 889, 890, 891	Esther Walder
ALP/371	Fiona Britton
ALP/629, 630, 631, 632, 633, 634, 635, 636, 637, 638, 639, 640, 641, 642, 643, 644, 645, 646	Frank Setek
ALP/947, 949, 950, 951, 952, 953	Freda Gray
ALP/135	Gary Waters
ALP/254, 255, 256, 257, 258, 259, 260, 261, 262, 263, 336, 337, 338, 339, 340	Geophrey Holman
ALP/1215, 1216, 1217, 1227, 1232, 1235, 1238, 1239, 1241, 1244	Gerald White
ALP/1600	Gill Leighton
ALP/48	Gillian Pratt
ALP/2126	Gordon Ellul
ALP/2130, 2132, 2133, 2134, 2135, 2136, 2138, 2139, 2140, 2141, 2142, 2143, 2145, 2147, 2149, 2152, 2156	Graham Silcock
ALP/1301, 1299, 1274, 1276, 1277, 1279, 1281, 1283, 1286, 1288, 1289, 1292, 1294, 1295, 1298, 1300	H Smith
ALP/537, 543, 538, 539, 540, 541, 542, 544, 1575, 1577, 1578, 1580, 1581, 1583, 1586, 1587, 1589, 1591, 1593	Harriet Clements
ALP/1597	Hayley Drever
ALP/270	Heather Silk
ALP/226, 227, 228, 229, 230, 231, 232, 233, 234, 235, 236, 237, 238, 239, 240	Helen Holman
ALP/2687	Highways England
ALP/130	Howard C Air
ALP/800 ,802 ,803	Hugh Angus
ALP/547	Irene Finch
ALP/741, 760, 761, 762, 764, 765, 766, 767, 768, 769, 770, 771, 772, 773, 774, 775, 776, 794	Iris Clark
ALP/76	Ivy Blofield

ALP/809, 810, 811	J Powell
ALP/1930	Jacqueline Firman
ALP/69, 70, 71, 72, 73, 74, 75	James Neame
ALP/1123, 1124, 1125, 1126, 1127, 1129, 1130, 1131, 1133, 1134, 1135	James Ransley
ALP/350	Jane Hart
ALP/252	Janet Freeman
ALP/1525, 1526, 1527, 1528, 1529, 1530, 1531, 1533, 1534, 1535, 1536, 1538, 1539, 1541, 1542, 1543, 1544	Janet Hart
ALP/2064, 2065, 2067, 2068, 2070	Janet Rickner
ALP/1280, 1285, 1290	Janet Stedman
ALP/1212, 1308	Jeff Longman
ALP/83	Jeff Masters
ALP/830	Jill Jewell
ALP/148	Joanna Butterfield
ALP/1938, 1940	Joanne Elliott
ALP/129	John Bruce Donkersley
ALP/486, 487, 691, 693, 694, 696, 698, 699, 700, 701, 702, 703, 704, 705, 706, 707, 708, 709, 710, 711	John Elliott
ALP/992, 997, 1005	John Fassum
ALP/141, 142, 143, 144, 145, 146	John Hurrell
ALP/348	John Mitchell
ALP/848	JOHN SALKELD
ALP/485	John Waite
ALP/224	john wells
ALP/627	Jolana Byrtusova
ALP/223	Joyce Pooley
ALP/2100, 2101, 2102, 2103, 2107, 2110, 2113, 2114, 2115, 2116, 2117, 2118, 2120, 2121, 2123, 2124	Judith Silcock
ALP/1944, 1945, 1946, 2010, 2012, 2014, 2015, 2017, 2018, 2019, 2022, 2023, 2025, 2027, 2028, 2029, 2030, 2031	Julia Fraser
ALP/798	Juliette Holmes
ALP/278	Karthikeyan Mehnatamah
ALP/2733, 2739, 2750, 2753, 2764, 2767, 2774, 2785, 2788, 2795, 2802, 2809, 2815, 2828, 2831, 2838, 2845, 2852	Katherine Bray
ALP/907	Keith Duncan
ALP/812, 813, 814	Keith Powell
ALP/20, 23, 24, 26, 27, 29, 30, 31, 33	kelly hendrick
ALP2071, 2073, 2074	Ken Rickner
ALP/1449, 1442, 1443, 1444, 1445, 1448, 1453, 1454	Kenneth Dove
ALP/998, 1003, 1009, 1013, 1016, 1039, 1042	Kennington Community Forum
ALP/2557, 2559, 2561	Kent County Council (KCC)
ALP/1252	Kent Downs AONB Unit
ALP/1793	Kent Wildlife Trust
ALP/1596	Kerry Cheese
ALP/352, 353, 354	Kevin Turner
ALP/1309	Knight

ALP/1310, 1311	knight
ALP/1206, 1208, 1209	L Biermann
ALP/777, 778, 779, 780, 781, 782, 783, 784, 785, 786, 787, 788, 789, 790, 791, 792, 793	Lee Clark
ALP/970, 971, 972, 973, 974, 975, 976, 977, 978, 979, 980, 981, 982, 983, 984, 985, 986, 987	Lee Robinson
ALP/935, 928, 929, 930, 931, 933, 934, 936, 938, 939	Leonard Scopes
ALP/272, 273, 274	Linda Nicoll
ALP/1896, 1910, 1919, 1933	lisa moore
ALP/1532, 1540	Lorna Wood
ALP/116	Louise Brake
ALP/46	louise houston
ALP/1352, 1381	Margaret Woollven
ALP/1664, 1670	Maria Spencer
ALP/835	Marie Goodbody
ALP/712, 713, 714, 715, 716, 717, 718	MARK BAKER
ALP/1146, 1147, 1148, 1150, 1151, 1152, 1153, 1154, 1155, 1157, 1158, 1159, 1160, 1161, 1162, 1163, 1164	Mark Heustice
ALP/85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100, 101, 102	Mark McGlinchey
ALP/825	Mark Stanbridge
ALP/1936	Martin Hothersall
ALP/1964	Mary Longman
ALP/341	Matt Villion
ALP/1952, 1948, 1951, 1955, 1957, 1960, 1962, 1965, 1968, 1970, 1980, 1982, 1983, 1984, 1987, 1990, 1996, 2008	Matthew Fraser
ALP/915, 916, 917	Melanie Bowen
ALP/355, 356, 357, 358, 359, 360, 361, 362	Michael Fraser
ALP/279	Michael Morris Turner
ALP/608, 609, 610, 611, 612, 613, 614, 615, 616, 617, 618, 619, 620, 621, 622, 623, 624, 625, 626	Michael Setek
ALP/1875, 1881, 1882	Michael Wickham
ALP/2125	Michelle Secker
ALP/1089, 1090, 1091, 1092, 1094, 1095, 1097, 1098, 1099, 1100, 1102, 1103, 1105, 1107, 1108, 1110, 1111, 1113	Mirelle Smith
ALP/1320	Monica Hope
ALP/1818	Mr and Mrs Jackson
ALP/107, 1377, 1361, 1365, 1370, 1372, 1418	Mr Hopkins
ALP/271, 955, 956, 1323, 1324	Mr P Knight
ALP/1503	Mr Smith
ALP/843, 845, 846	Mr. Barton
ALP/1943, 1947, 1949	Mr. Peter Newson
ALP/2732, 2738, 2751, 2752, 2763, 2766, 2773, 2786, 2787, 2794, 2801, 2808, 2821, 2827, 2830, 2837, 2844, 2851	Mrs T E Bray
ALP/2369	Natural England
ALP/2672	Network Rail
ALP/171, 172, 174, 175, 176, 177, 178, 179, 180, 181, 182, 183, 184, 185, 187, 189, 192, 194	Nicholas Horn
ALP/204	Nicholas Horn

ALP/1893 ,1900	Nina Elliott
ALP/1428, 1424, 1427, 1431, 1433	Norma Smyth
ALP/133, 134, 159, 160, 161, 162, 163, 164, 188, 190, 191, 193, 195, 197, 198, 200, 201, 203	Norman Ibbotson
ALP/77, 78	Norman Reid
ALP/1018, 1020, 1021, 1022, 1023, 1024, 1025, 1027, 1028, 1029, 1031, 1032, 1034, 1035, 1037, 1038	Pam Webb
ALP/722, 723, 725, 726, 727, 729	parfitt
ALP/849	Pat SALKELD
ALP/222	Pat Wells
ALP/530, 531, 532, 533, 534	Patricia Lofts
ALP/806, 807	Patricia M.D. Vallance
ALP/551, 552, 553, 554, 555, 556, 557, 558, 559, 560, 561, 562, 563, 564, 565, 566, 567, 568	Paul Dockrell
ALP/2327, 2330, 2332, 2333, 2334, 2336, 2338, 2340, 2342, 2344, 2345, 2346, 2347	Paul Sweeney
ALP/124	Penny Carey
ALP/1265	Peter Davis
ALP/381, 386, 388, 390, 418, 429, 430, 433	Peter Kynston
ALP/136	Peter Vaughan
ALP/1400, 1460, 1462, 1466, 1468, 1469, 1470, 1472, 1475, 1477, 1478	Peter White
ALP/49, 50	peter wilson
ALP/799, 801	Phil Spencer
ALP/1616, 1604, 1605, 1607, 1608, 1609, 1610, 1611, 1613, 1614, 1617, 1619, 1620, 1621 ,1622	Phillip Neal
ALP/896, 897	Phyllis Stace
ALP/152	Robert Creasey
ALP/2040	Rachael Douse
ALP/294, 295, 296, 298, 300, 302, 304, 305, 307, 310, 311, 313, 315, 316, 317	Rebecca Webb
ALP/173	Richard Carey
ALP/288, 289, 290, 291, 292, 293, 297, 299, 301, 303, 306, 308, 309, 312, 314	Richard Daniels
ALP/1986, 1989, 1992, 1995, 1998, 2004, 2007, 2011, 2013, 2016, 2020, 2021, 2024, 2026	Richard Wapshott
ALP/588, 589, 590, 591, 592, 593, 594, 595, 596, 597, 598, 599, 600, 601, 602, 603, 604, 605	Robin Clover
ALP/1363, 1364	Rodney Ades
ALP/131, 132	Rodney Maynard
ALP/1382, 1384, 1387	Roger
ALP/79	Roger Edwards
ALP/898, 899, 900, 901, 902	Roger Rigg
ALP/280	Rosslyn Dawn Turner
ALP/1843	Samantha Firman
ALP/1598	Sandra Dunn
ALP/911, 912, 918, 919, 920, 921, 922, 923, 924, 926	Sandra Scopes
ALP/196, 199, 202, 205, 206, 207, 208, 209, 210, 211, 212, 213, 214, 215, 216, 217, 218, 219, 220	Sara Horn
ALP/13, 14	Sarah Hall
ALP/241, 242, 243, 244, 245, 246, 247, 248, 249, 250, 251, 665, 666, 667, 668, 669, 670, 671, 672, 673, 674, 675, 676, 677, 678, 679, 680, 681, 682	Setkova

ALP/833	Shauna Murphy
ALP/1312	Sheila Feeney
ALP/461, 456, 451, 452, 453, 454, 455, 457, 458, 459, 462, 464, 465, 468, 469, 471, 473, 475	Sheila Ibbotson
ALP/82	Simon Gray
ALP/7, 1242, 1243, 1545, 1557, 1559, 1562, 1563, 1564, 1566, 1567, 1568, 1570, 1571, 1572, 1574, 1579, 1582, 1584, 1588, 1590, 1592, 1594, 1595	Sims
ALP/719	Smith
ALP/1341	Somerlee Homes Ltd
ALP/2348	Southern Water
ALP/506, 505, 507, 508, 509, 510, 511, 512, 513, 514, 515, 516, 517, 518, 519, 520, 521, 522	Stanley Holman
ALP/1757	Stephen Blane
ALP/375, 376	Stephen Myers
ALP/155	Steve Turner
ALP/125, 127, 128, 828	susan carey
ALP/123	Susan Watson
ALP/2731, 2740, 2749, 2754, 2762, 2768, 2775, 2784, 2790, 2797, 2803, 2810, 2816, 2826, 2832, 2839, 2846, 2853	T E Bray
ALP/856, 857, 858, 859, 860, 861, 862, 863, 864, 865, 866, 867, 868, 869, 870, 871, 872, 873	Thomas Webb
ALP/1145, 1537	Timothy Atkins
ALP/149	Tony Butterfield
ALP/490, 491, 492, 493, 494, 495, 496, 497, 498, 499, 500, 501, 502, 503	Valerie Collins
ALP/1189, 1190, 1191	Valerie Collison
ALP/35, 36, 37, 38, 39, 40	Waldron
ALP/1060, 1061, 1062, 1063, 1064, 1065, 1066, 1068, 1070, 1072, 1073, 1075, 1076, 1077, 1078, 1079, 1081, 1083	Wendy Brooks
ALP/25, 28, 32	Wilkinson
ALP/2734, 2741, 2748, 2755, 2761, 2769, 2776, 2783, 2789, 2796, 2804, 2811, 2819, 2825, 2833, 2840, 2847, 2854, 2735, 2742, 2747, 2756, 2760, 2770, 2777, 2782, 2791, 2798, 2805, 2812, 2820, 2824, 2834, 2841, 2848, 2855	William Bray
ALP/2461	William Leslie Shaw
ALP/1624, 1625	wilma mellhuish
ALP/435, 436, 437, 438, 439, 440, 441	Winston Michael
ALP/2512, 2517, 2518	Wye with Hinxhill Parish Council

Objections to the development

Issue - Loss of Grade 1 Agricultural Land The following representations object to the site due to the loss of Grade 1 agricultural land.

ALP/15, 456, 21, 22, 23, 32, 40, 46, 50, 53, 55, 56, 57, 70, 71, 72, 78, 84, 87, 89, 90, 91, 107, 115, 119, 123, 127, 136, 142, 147, 148, 149, 160, 162, 163, 164, 174, 177, 179, 180,

202, 207, 208, 209, 210, 222, 223, 227, 229, 230, 242, 250, 251, 252, 255, 257, 258, 270, 278, 273, 276, 289, 291, 292, 295, 296, 298, 343, 354, 357, 370, 381, 386, 388, 935, 393, 395, 396, 397, 412, 414, 415, 416, 433, 435, 453, 455, 457, 463, 467, 472, 484, 485, 491, 492, 493, 494, 507, 509, 510, 511, 526, 531, 543, 539, 541, 542, 547, 553, 555, 556, 557, 572, 574, 575, 576 590, 592, 593, 594, 611, 613, 614, 615, 631, 633, 634, 635, 649, 651, 652, 653, 667, 669, 670, 671, 693, 696, 698, 699, 717, 727, 744, 746, 747, 748, 761, 764, 765, 779, 780, 781, 782, 800, 805, 807, 810, 812, 829, 830, 833, 841, 843, 858, 860, 861, 862, 876, 878, 879, 880, 898, 907, 908, 909, 912, 916, 920, 922, 931, 939, 943, 944, 950, 964, 965, 972, 974, 975, 976 990, 991, 992, 994, 995, 998, 1005, 1013, 1016, 1021, 1023, 1044, 1145, 1046, 1047, 1062, 1064, 1065, 1066, 1074, 1082, 1084, 1091, 1092, 1095, 1097, 1098, 1148, 1151, 1152, 1172, 1201, 1208, 1239, 1241, 1256, 1260, 1261, 1274, 1277, 1279, 1283, 1290, 1308, 1310, 1315, 1317, 1319, 1320, 1324, 1352, 1364, 1382, 1399, 1427, 1444, 1460, 1462, 1509, 1526, 1527, 1530, 1537, 1540, 1548, 1550, 1551, 1554, 1564, 1566, 1567, 1568, 1585, 1597, 1598, 1600, 1605, 1607, 1608, 1609, 1624, 1644, 1646, 1647, 1648, 1678, 1683, 1685, 1687, 1731, 1818, 1843, 1861, 1881, 1896, 1900, 1930, 1938, 1953, 1943, 1964, 1980, 1982, 1983, 1986, 1987, 1992, 1995, 1998, 2025, 2028, 2029, 2031, 2037, 2040, 2068, 2102, 2107, 2110, 2124, 2142, 2143, 2147, 2156, 2340, 2346, 2512, 2518, 2559, 2731, 2732, 2733, 2734, 2735, 2736, 2737, 2738, 2739, 2740, 2741, 2742, 2743, 2744, 2815, 2816, 2817, 2818, 2819, 2820, 2821, 2837, 2838, 2839, 2840, 2841, 2842, 2843.

Concerns are raised that there are no 'exceptional circumstances' and consideration has not been taken into the economic and other benefits offered by this most versatile predominantly Grade 1 land.

2369, 1710, 998, 1013 raise concern that the plan and evidence base does not justify and provide a clear rationale why the importance of development outweighs the weight that should be given to best and most versatile agricultural land. 2369 highlights the requirements of the NPPF to take account of the impact of the loss of soils, including its role in agriculture and food production. 1710 highlights that the vast majority of land in Ashford is Grade 3, the use of this Grade 1 land is therefore significant.

910 considers that this proposal will create a precedent to build on more Grade 1 agricultural land, such as in Boughton and Eastwell Parish.

278 loss of green site not acceptable.

841 concerned there is not much Grade 1 Land in Ashford and it should not be wasted for housing. Brexit may increase the costs of imports and therefore it is vital to supply food from own source.

843 development of Grade 1 land is wholly unsustainable and goes against national planning policy. It is the only Grade 1 land in Ashford.

Response Noted – *It is acknowledged that part of the site is Grade 1 agricultural land, however the NPPF does not include an exceptional circumstances test for the use of Grade 1 agricultural land. Para 112 of the NPPF states that 'where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality'. The use of agricultural land is one of many factors which need to be considered and balanced against*

each other in deciding which are the most appropriate sites to allocate for development. Full assessment of all of the factors has been carried out through the Sustainability Appraisal, and this site has been considered against the other reasonable alternatives. On balance whilst the development of this site will result in the use of Grade 1 agricultural land, it is considered that this site is an appropriate option taking into account the need to meet the Borough's housing requirement and the other alternatives available.

Issue – Highways and Transport The following representations object to the proposal due to the lack of appropriate road infrastructure and impact upon the highway network.

ALP/84, 119, 124, 252, 806, 147, 148, 149, 169, 811, 813, 814, 1126, 352, 1127, 1129, 713, 695, 712, 697, 692, 714, 1269, 1280, 836, 846, 886, 992, 1414, 844, 223, 135, 152, 350, 429, 719, 371, 82, 484, 1372, 278, 2461, 1312, 348, 270, 825, 2126, 1664, 847, 897, 77, 1933, 243, 485, 1171, 1936, 249, 1625, 132, 224, 946, 1197, 835, 829, 830, 345, 360, 367, 1311, 1309, 925, 976, 48, 1394, 439, 1399, 2333, 2342, 375, 1377, 512, 498, 515, 272, 275, 1093, 504, 516, 528, 533, 499, 1200, 483, 497, 517, 518, 474, 2822, 2823, 2824, 2825, 2826, 2827, 2828, 1970, 2023, 1650, 1688, 1443, 2036, 2073, 2114, 2140, 996, 910, 1529, 2038, 1865, 1875, 928, 2011, 1962, 2019, 1654, 1693, 899, 1232, 2138, 2116, 1912, 1449, 951, 957, 1189, 1289, 1362, 2064, 2759, 2760, 2761, 2762, 2763, 2764, 2765, 1469, 1001, 1203, 1534, 1266, 1428, 923, 934, 2013, 1960, 2018, 1655, 1694, 1323, 2117, 2136, 941, 1292, 1454, 2071, 2766, 2767, 2768, 2769, 2770, 2771, 2772, 918, 1227, 1470, 1002, 1535, 2015, 1955, 2808, 2809, 2810, 2811, 2812, 2813, 2814, 936, 2016, 1957, 2017, 1657, 1697, 1656, 1696, 2135, 2118, 952, 955, 1294, 1352, 2801, 2802, 2803, 2804, 2805, 2806, 2807, 1004, 1536, 1006, 1538, 911, 900, 1448, 1947, 1954, 1267, 1940, 155, 2687, 726, 803, 729, 722, 804, 26, 76, 221, 700, 1024, 211, 58, 133, 636, 654, 672, 766, 783, 977, 1048, 1068, 1085, 1153, 398, 417, 616, 458, 558, 577, 595, 144, 1570, 863, 881, 25, 92, 544, 73, 1553, 181, 300, 749, 233, 262, 61, 703, 1028, 191, 214, 145, 1595, 866, 884, 95, 639, 657, 675, 752, 769, 786, 979, 1051, 1052, 1053, 1073, 1088, 1102, 1157, 1578, 848, 716, 401, 421, 619, 344, 418, 1556, 183, 299, 305, 462, 561, 580, 598, 1613, 263, 234, 62, 704, 1029, 215, 1594, 867, 885, 96, 640, 658, 676, 753, 770, 787, 980, 1075, 1103, 1158, 1580, 402, 422, 620, 193, 1318, 1558, 184, 35, 301, 307, 464, 562, 581, 599, 1614, 336, 235, 236, 828, 14, 17, 63, 705, 216, 64, 75, 197, 642, 660, 678, 772, 789, 982, 1055, 1077, 1101, 1107, 1160, 404, 424, 622, 468, 564, 583, 601, 706, 1031, 146, 1590, 1592, 868, 97, 641, 659, 677, 771, 788, 794, 981, 1054, 1076, 1096, 1105, 1145, 1159, 1581, 754, 849, 403, 423, 621, 195, 74, 1560, 185, 98, 869, 887, 1583, 37, 303, 465, 563, 582, 600, 1616, 39, 310, 755, 129, 116, 737, 1042, 369, 1243, 1363, 362, 79, 109, 1265, 915, 1039, 247, 150, 368, 121, 1418, 1005, 1387, 1211, 361, 1734, 1201, 1532, 1540, 1585, 1597, 1598, 1757, 1818, 2125, 449, 1016, 222, 248, 259, 388, 472, 492, 943, 1281, 1381, 1609, 1843, 1930, 2518.

The following specific concerns are raised in relation to highways and transport:

- **Congestion/impacts on existing road network**

Concerns have been raised about the capacity of and impact upon the following roads and junctions:

Willesborough Road (A2070), Kennington Road (A2070), Trinity Road (A251), Canterbury Road (A28), The Street, Ulley Road, Little Burton Farm and Nettlefield

Junctions at Canterbury Road/Willesborough Road; Canterbury Road/Simone Weil Avenue

Concern has also been raised regarding access to the hospital for emergency vehicles

- **Transport Modelling/Evidence**

2687 (Highways England) raise concern about the impact of the proposed development on the SRN and request that additional transport evidence is required to understand the impact of the site on the SRN.

1039 proposals in Traffic Impact Assessment there is no evidence they can be adopted. There is significantly more queuing than the report suggests.

Response *KCC Highways and Transportation support the proposed allocations in the Plan from a highway capacity perspective, stating that ‘Transport modelling work has also been undertaken to understand and define the implications of proposed Local Plan allocations on the local highway network. Traffic surveys data has been collated and analysed at three key locations where the Local Plan envisages strategic growth will occur, namely Kingsnorth, Kennington and Eureka Park. The analysis that has been completed demonstrates that traffic movements generated from planned growth across the Ashford urban area will not give rise to a severe highway impact on any of the associated corridors’*

The policy also requires a full and thorough assessment of highways impact to be undertaken to inform future planning applications for the site, through which the need for a package of mitigation measures are to be identified and the delivery of which should be facilitated by the development.

The Council will work with Highways England and any site developer to provide evidence of the impact of development on the SRN of this site and its deliverability prior to the completion of Junction 10a of the M20.

- **Access to site**

129 states that road access does not comply with the law, with illegal creation of 2 emergency junctions in Canterbury Road in order to circumvent the legal requirement

360, 367 states there is inadequate access onto A28 Canterbury Road

345 raises concern that access from George Williams Way and the new access to the site will be potentially hazardous due to levels of traffic and poor visibility caused by the railway bridge.

439 raises concern that with only one entrance onto A2070 the estate will become gridlocked during peak hours and would lead to unsafe behaviour from impatient motorists.

1126 given the potential flood risk areas taking into account the revised guidance for climate change there is limited viable length of A2070 for access. Two junctions within the small remaining length would be vulnerable to an accident and cause the road to closure. Which means that a secondary access must be found on Canterbury Road for the development to have more than 50 houses.

1129 there are known doubts about deliverability of a secondary access, and without this the site would be limited to 50 homes.

692, 695, 697, 712, 713, 714, 830, 996, 997, 1129 raise concern about any access onto Canterbury Road, which is between 2 residential properties, with limited visibility. 695, 713 add that there is insufficient space for a footway and crossing Canterbury Road as a pedestrian is impossible and hazardous.

1005 A28 is a 40mph zone, exiting onto this would cause more accidents.

1127 a single principle access and emergency access is not sufficient for 700 homes. It is more likely than 2 large junctions, would be required, and two minor access points.

380 concerns about having only one access onto Willesborough Road.

371 inadequate access from Willesborough Road, as the road is already over capacity at peak times.

Response Kent County Council Highways has advised that appropriate and safe access can be provided to the site from Willesborough Road. The potential for the access from Canterbury Road is to be further investigated, however this is not essential as it is possible to achieve appropriate safe access to accommodate the proposed number of dwellings from Willesborough Road.

- **Junction 10a**

1243 considers there will be no direct or indirect relevance to traffic in this part of Kennington as a result of the construction of J10A, and it is misleading to imply the development is reliant upon it.

1532 raises concern as the commitment for J10a is ambiguous.

946 no development should proceed until M20 Junction 10a is complete

Response Noted – Additional traffic will use Junction 10 as a result of the development, at which there is insufficient capacity, taking into account existing commitments. The policy therefore requires J10a to be complete prior to the occupation of the site.

Other highways issues - 348 with no immediate solution to 'Operation Stack' Kennington Road will again be halted. 439 Julie Rose Stadium holds events and with Conningbrook Country Park when fully operational. 1574 Additional traffic caused by parents driving from Willesborough to the site, to access to the school.

Response- noted.

Issue - Impact on setting of Area of Outstanding Natural Beauty and Landscape Character ALP/49, 51, 436, 199, 264, 436, 440, 551, 569, 588, 896, 1016, 1040, 1252, 1352, 1445, 1503, 1710, 1727, 1729, 1854, 1882 object to the proposed allocation due to the impact of the proposal on the setting of the North Downs AONB.

Representation 1252 requested the insertion of additional criterion to address the impact:

j. the need to mitigate impact on the Kent Downs AONB and its setting, informed by a landscape and visual impact assessment, to include, structural and internal landscaping to be phased in advance of the development, restriction of building heights across the site to a maximum of two storeys, and restricted use of external lighting.

Response *It is acknowledged that the site will be visible from views out of the Kent Downs AONB. The urban area of Ashford already sits within the setting of the AONB, and whilst this proposal will result in the development on the edge becoming closer to the boundary of the AONB, the edge of the development remains over 1km from the boundary with the AONB, and development of the site would not have a negative impact upon the setting. The Kent Downs AONB Unit do not object to the site in principle, however request mitigation in order to minimise any potential impact of the development upon the AONB. It is agreed that a landscape and visual impact assessment be carried out to inform the detailed proposals for the site, including for structural and internal landscaping and building heights, however it would be unreasonable to make specific requirements for these until the assessment has been carried out. See proposed change MC9.*

It is not considered that there is a need to restrict the use of external lighting given the distance the site is from the boundary of the AONB. In addition draft policy ENV4 and the Council's Dark Skies SPD ensures external landscaping schemes are designed to minimised light pollution.

Issue - Loss of views and importance of site as countryside, AONB, Special Landscape Area and Wye Crown. The following representations raise concern about loss/importance of views, including of the countryside, and against the background of the AONB, Special Landscape Area, North Downs and Wye Crown, as a result of the development.

ALP/537, 13, 20, 28, 52, 59, 69, 83, 84, 85, 86, 93, 110, 119, 125, 134, 141, 159, 171, 182, 188, 196, 212, 226, 231, 241, 254, 260, 271, 279, 280, 288, 293, 294, 302, 341, 350, 506, 381, 388, 391, 392, 399, 410, 411, 419, 433, 436, 451, 452, 459, 466, 476, 484, 485, 486, 487, 490, 495, 505, 513, 525, 527, 530, 532, 538, 547, 551, 552, 559, 569, 571, 578, 588, 589, 596, 608, 609, 610, 617, 627, 629, 630, 637, 647, 648, 655, 665, 666, 673, 690, 691, 701, 715, 741, 742, 743, 750, 760, 767, 777, 778, 784, 801, 835, 856, 857, 864, 874, 875, 882, 919, 945, 947, 959, 963, 966, 970, 971, 972, 980, 987, 989, 999, 1018, 1020, 1025, 1049, 1060, 1061, 1067, 1069, 1070, 1071, 1086, 1089, 1090, 1099, 1146, 1147, 1154, 1169, 1191, 1211, 1238, 1244, 1252, 1254, 1255, 1262, 1273, 1276, 1281, 1285, 1315, 1352, 1361, 1399, 1400, 1424, 1466, 1509, 1525, 1531, 1537, 1545, 1547, 1554, 1559, 1562, 1571, 1575, 1585, 1596, 1597, 1604, 1610, 1642, 1643, 1651, 1670, 1673, 1675, 1690, 1710, 1727, 1729, 1818, 1893, 1914, 1930, 1968, 1989, 1990, 2022, 2027, 2042, 2070, 2100, 2101, 2113, 2141, 2149, 2152, 2336, 2333, 2338, 2512, 2517, 2518, 2745, 2746, 2747, 2748, 2749, 2750, 2751, 2844, 2845, 2846, 2847, 2848, 2849, 2850, 2851, 2852, 2853, 2854, 2855, 2856, 2857.

436 believes that the loss of this countryside view would be unnecessary, as there is plenty of land supply already outlined in the local plan, and there was in excess of 20000 homes offered by the response to call for sites

27 raises concern about loss of views for residents in Canon Woods Way, stating people actually moved to the area based on this consideration

835 views of countryside will be greatly affected.

836 concerns regarding loss of striking view across the Wye downs

1726, 2334 Objects to the idea the development in the countryside due to the visual and practical damage it will have on the landscape and residents nearby

350, 440 objects as the site would intrude into open countryside.

440 objects as the proposal would seriously damage the rural/urban edge

1361 disagrees that the land is part urban fringe. The site traditionally marks the boundary of built development and forms a barrier between town and countryside, providing important views of the North Downs.

107 road provides a natural barrier between town and country.

178, 208 states that para 4.15 is fallacious, the development would be extending completely into open countryside.

2512 - The Parish Council considers the scale and visual impact of development proposed at land north east of Willesborough Road, Kennington (para 4.12) to be incompatible with the delivery of the wider environmental objectives of the Local Plan.

Response *It is acknowledged that the proposed development will result in the loss of views of the site across open countryside, and this will result in a change in landscape character on this edge of Ashford. However the site itself does not have any national or local landscape designations which restrict the development of the site in principle. The impact upon landscape character is one of a number of factors which need to be considered and balanced against each other in deciding which are the most appropriate sites to allocate for development. Full assessment of all of the factors has been carried out through the Sustainability Appraisal, and overall this site has been considered suitable when considered against the other reasonable alternatives, taking into account all relevant factors.*

The loss of views from existing residential properties is not a material planning consideration.

Issue - Impact on biodiversity/wildlife The following representations object to the proposal due to the loss of the established trees and hedgerows and impact upon associated wildlife. This is evidenced by the wildlife found on the adjacent site at Conningbrook Lakes.

ALP/461, 29, 60, 84, 94, 1206, 111, 119, 124, 190, 204, 213, 225, 232, 261, 297, 304, 342, 350, 358, 365, 390, 400, 420, 437, 477, 496, 514, 560, 579, 597, 618, 638, 656, 674, 702, 718, 751, 768, 785, 802, 865, 883, 942, 956, 958, 967, 978, 1000, 1027, 1050, 1072, 1087, 1100, 1134, 1155, 1174, 1190, 1235, 1264, 1288, 1320, 1453, 1468, 1533, 1555, 1572, 1577, 1585, 1597, 1611, 1653, 1691, 1736, 1793, 1843, 1930, 1965, 2004, 2007, 2115, 2139, 2344, 2752, 2753, 2754, 2755, 2756, 2757, 2758.

124 states that at least 10 skylarks nest in the field each year

204, 213 lists a number of bird species which are regularly seen using the site

270 impact upon skylarks and other birds, the area joins the Conningbrook Lakes country park and should be retained as a farmland link.

250 and 437 raises concern regarding damage to River Stour and surrounding wetlands

437 raises concern as part of the site is prone to flooding and development will lead to problems for the river Stour, its water life and biodiversity. Increasing run off into the River Stour will have serious consequences for wildlife habitats downstream.

835, 836 wildlife will be greatly affected.

865, 883 states that endangered species such as Skylarks, and Cuckoos breed on the field and hedgerows. Destruction of habitat will cause further fall in numbers of Cuckoo which is already threatened with extinction in the UK.

Response *The policy for the site requires a habitat survey to be carried out to ensure appropriate ecological mitigation and enhancements are provided through the development of the site, with existing trees and hedgerows being maintained and enhanced.*

The proposed development will not result in increased run-off into the River Stour. The requirements of Policy ENV9 to provide sustainable drainage mean that the development will not result in any increase surface water run-off and should aim to reduce existing run-off rates, reducing the overall risk of flooding.

Issue - Conningbrook Country Park and Great Stour Local Wildlife Site 1793 objects to the proposal due to the potential additional recreational pressure on the Conningbrook Country Park and potential negative impact upon the ecological aims of the site, which also forms part of the Great Stour Local Wildlife Site (AS27). This requires investigation into the recreational capacity at Conningbrook Country Park and impact upon conservation aims and capacity as translocation sites, and potential for increased alternative recreational provision.

176, 206, 972 raise concern about the impact to Conningbrook Country Park in terms of its setting and enjoyment as a country park.

Response *Conningbrook Country Park is a strategic recreational, leisure and countryside conservation offer, which is provided for all residents of and visitors to the Borough. It is not considered that the proposals will harm to enjoyment or setting of the country park.*

Issue - Wastewater infrastructure The following representations object to the site due to inadequate capacity at the Wye Water Treatment Works, as the main water treatment works are 'Up-stream' of the site.

ALP/8, 31, 38, 66, 84, 100, 113, 119, 131, 478, 189, 200, 218, 238, 246, 309, 315, 338, 406, 426, 429, 438, 471, 484, 501, 520, 529, 534, 566, 585, 603, 624, 644, 662, 680, 709, 723, 757, 774, 791, 2348, 871, 889, 901, 921, 929, 953, 1008, 1035, 1057, 1058, 1079, 1106, 1110, 1299, 1162, 1204, 1215, 1270, 1271, 1352, 1381, 1433, 1478, 1542, 1582, 1589, 1619, 1662, 1703, 1919, 1946, 1948, 2010, 2024, 2780, 2781, 2782, 2783, 2784, 2785, 2786.

2348 requests that the following criteria is added to the policy to ensure that sewerage infrastructure is provided in parallel with development:

'Provide a connection to the nearest point of adequate capacity in the sewerage network, in collaboration with the service provider.'

Response Southern Water has confirmed that the Borough's Waste Water Treatment works have sufficient capacity to accommodate the development. However upgrades will be needed to the local sewerage infrastructure which can be provided by the development.

Amend policy to add 'Provide a connection to the nearest point of adequate capacity in the sewerage network, in collaboration with the service provider'

In the RJ add: *'Southern Water's assessment has revealed that additional sewerage infrastructure would be required to serve the proposed development. The development will therefore be required to make a connection to the nearest point of adequate capacity in the sewerage network. Early liaison should take place with the service provider in this regard.'*

Issue - Water Supply 270 questions where the water will come from, as Kent is one of the driest counties in the UK.

Response South East Water, who supplies water for Ashford Borough, has confirmed that the scale of housing development and population growth proposed in the Local Plan has been taken into account in their current Water Resources Management Plan, which sets out how sufficient water will be available.

Issue - Flood Risk The following representations object to the site as flood zones needs to be re-assessed due to climate change, and inevitably the newly designated flood zone will encroach into the site and reduce the habitable zone.

ALP/30, 65, 84, 99, 112, 119, 124, 187, 198, 217, 237, 244, 274, 277, 308, 313, 337, 405, 425, 429, 469, 481, 500, 519, 565, 584, 602, 623, 643, 661, 679, 708, 725, 756, 773, 790, 870, 888, 924, 933, 940, 983, 1007, 1034, 1056, 1078, 1104, 1108, 1126, 1133, 1161, 1174, 1202, 1216, 1268, 1298, 1431, 1442, 1472, 1537, 1541, 1569, 1584, 1587, 1617, 1661, 1701, 1818, 1910, 1951, 2012, 2021, 2065, 2074, 2347, 2773, 2774, 2775, 2776, 2777, 2778, 2779.

270 objects due to flood risk. 829, 830 states that the land adjacent to the railway often floods, this should be recognised in the report of the Flood Risk Assessment. 1126 raises concern about the increased flooding extents impact on providing suitable vehicular access to the site. 825 raises concern due to surface water flooding.

Response The Strategic Flood Risk Assessment has been updated to take account the updated climate change allowance guidance. This has not resulted in any significant reduction in developable areas for sites which have been identified for development in the Plan. The proposed capacity of this site has taken into account the need to avoid developing areas at risk of flooding. Nevertheless, a site specific flood risk assessment will be required for the site, to inform the specific location of development within the site.

The requirements of Policy ENV9 to provide sustainable drainage mean that the development will not result in any increase surface water run-off and should aim to reduce existing run-off rates, reducing the overall risk of flooding.

Issue - Public Rights of Way and Railway Crossings The following representations object to the site as PRoW grade crossings are in direct contradiction of Network Rail and the Officer and Rail and Road declared intention to abolish level crossings wherever possible, as they pose a risk significant risk to the public. To retain the PRoWs over a busy electrified line is nonsensical.

ALP/84,119,157,175, 306, 311, 366, 376, 429, 707, 1012, 1032, 1125, 1130, 1131,1207, 1217, 1295, 1475, 1539, 1565, 1586, 1588, 1659, 1698, 1952, 1949, 1956, 2014, 2020, 2120, 2134, 2561, 2672.

Representation 2672 (Network Rail) state that development of the site would need to seriously consider the impact of the proposal on the usage of the at-grade pedestrian crossings over the railway line. Network Rail has significant concerns in regards to the potential impact on the safety of crossings and request ABC to contact Network Rail to discuss the situation.

157 recommends that strategic routes should be upgraded to multi-functional PROW to accommodate all users. 2561 considers the delivery of the proposed bridge crossing must be a requirement on the proposed development, and the word 'investigate' should be removed from the policy. 1130 states that the proposed development would increase the risk at the railway crossings. 1130 weight should be given to the impermeability of the site to disabled persons, and the provision of a railway crossing bridge should be suitable for disabled access.

359, 366 objects due to the loss of footpaths through local countryside which are used by residents. 830 hopes that absolute restrictions will be put in place to protect and preserve the existing public footpaths.

1125 raises concern about proposals for a tree line to be planted along the boundary with the railway line as this would increase the risk to people crossing the railway at the existing crossings.

Response *Subsequent discussions with Network Rail have supported the principle of providing a footbridge across the railway line to replace the existing at grade pedestrian crossings. The existing at-grade crossings will need to be closed alongside the development, but requires close working with Network Rail to achieve (i.e. it cannot be actioned by the developers). Should it not be feasible to provide the footbridge, the existing PROWs will need to be diverted to provide an alternative route into the country park. See proposed change MC9..*

Issue - Education provision The following representations disagree that KCC requires additional school capacity and that building 2 FE school will satisfy the shortfall. KCC have said there is no shortfall. The school will only benefit the residents of the site and not address the alleged capacity problem.

ALP/33, 67, 68, 84, 101, 102, 114, 119, 128, 192, 194, 201, 203, 219, 220, 239, 240, 245, 312, 314, 316, 317, 1301, 339, 340, 353, 355, 407, 408, 427, 428, 430, 441, 473, 475, 480, 482, 502, 503, 521, 522, 567, 568, 586, 587, 604, 605, 625, 626, 645, 646, 663, 664, 681, 682, 710, 711, 758, 759, 775, 776, 792, 793, 845, 872, 873, 890, 891, 902, 926, 938, 984, 985, 1010, 1011, 1037, 1038, 1059, 1081, 1083, 1109, 1111, 1112, 1113, 1135, 1163, 1164, 1205, 1272, 1300, 1320, 1414, 1477, 1543, 1544, 1573, 1574, 1576, 1579, 1585, 1591, 1593, 1597, 1620, 1621, 1622, 1663, 1665, 1666, 1704, 1707, 1708, 1944, 1945, 1996, 2008, 2026, 2067, 2121, 2123, 2130, 2132, 2133, 2557, 2787, 2788, 2789, 2790, 2791, 2792, 2793, 2794, 2795, 2796, 2797, 2798, 2799, 2800.

2557 sets out the requirement for a provision of 2.05 ha site for a primary school and financial contributions towards its construction. Prior to preparation of the masterplan, development plan or development briefs relating to this allocation, the new primary school site is identified and secured in agreement with KCC.

135, 252 Schools cannot cope with such an increase in population. 364 states that there are inadequate primary and secondary schools in local area. 845 concerned that the housing scheme is being bolted on in order to meet the need for the school, and is a mechanism to justify the housing. Priority should be given to building such schools independent from any housing development.

Response *Kent County Council has advised that the provision of a Two Form Entry Primary School on this site is required in order to meet the future demand for primary school places as a result of this and other developments. The policy requires the land to be available for the school in the early phases of the development, and a financial contribution to be made by this site, and others, in order to fund the delivery of the school.*

Issue - Community infrastructure provision 2557 (KCC) state that contributions for the provision of County Council Services (e.g. Adult Social Care, Youth Services and Libraries) in the Kennington area will be required.

Response *The requirement for developer contributions towards the provision of infrastructure and community facilities is dealt with by generic policies (COM1, COM2 and IMP1) in the Plan. Where site specific projects have been identified in the Infrastructure Delivery Plan these have been identified in site specific policies. No change proposed.*

Issue - Green Infrastructure The following representations object to the site as the NPPF recognises green infrastructure and the importance of maintaining a network of multi-functional green space, which can deliver a wide range of environmental and quality of life benefits for local communities – and this is such a site.

ALP/24, 36, 54, 83, 84, 88, 119, 143, 161, 205, 228, 256, 290, 386, 394, 413, 440, 454, 460, 493, 508, 540, 554, 573, 591, 612, 632, 650, 668, 694, 745, 762, 809, 859, 877, 949, 973, 993, 1022, 1041, 1063, 1080, 1094, 1150, 1209, 1258, 1274, 1528, 1563, 1607, 1645, 1682, 1722, 1984, 2030, 2040, 2103, 2125, 2145, 2345, 2830, 2831, 2832, 2833, 2834, 2835, 2836.

Response *The policy includes a number of requirements in order to ensure that the development provides green infrastructure and multi-functional green space, including an*

extension to the Green Corridor, allotments, informal open space, SuDS, and ecological mitigation and enhancement. The development will also have to comply with generic policies in relation to green infrastructure and open space provision. No change proposed.

Issue – Lack of infrastructure 798, 821, 828, 917, 1201, 252 and 970 raise general concern that existing infrastructure cannot cope with the development, including schools.

1315, 356, 363, 135, 836, 917, 1399 and 1600 raise concern about lack of healthcare facilities, including doctors, dentists and hospital provision.

Response *It is accepted that any new development proposals will affect existing services. Therefore, service providers, including KCC Highways & Education, Water companies and the Environment Agency (drainage and flooding), the Ashford Clinical Commissioning Group and the East Kent NHS Hospital Trust are consulted at all stages of the plan making process to identify if they have existing capacity or if additional capacity is needed to accommodate additional development. If additional capacity is needed, this is then planned for through the Local Plan process and the Infrastructure Delivery Plan, which supports the Local Plan.*

It is the responsibility of these service providers and stakeholders to identify and ensure delivery of the infrastructure that is required. The Local Plan plays a supporting role in helping to deliver the infrastructure, by allocating sites or requiring developers to make financial contributions.

Where the providers have raised concerns with local infrastructure, these have been addressed within the specific site policy, or sites have been excluded from consideration if these could not be resolved. ABC will continue to work with these stakeholders in understanding the borough's infrastructure needs.

The Council has consulted with the CCG and Hospitals Trust through its work on the Infrastructure Delivery Plan. Unfortunately neither has been able to provide detailed proposals for new health facility requirements in the Borough as they are still in the process of development strategies for future healthcare in Ashford and the wider area.

The Hospitals Trust has indicated that there may be a need to expand the William Harvey in order to accommodate increased demand from housing development in Ashford, and also increased demand from outside of the Borough. The Trust are currently undergoing a Clinical Strategy, which will require public consultation later in 2017, until then it is difficult to predict what the specific infrastructure requirements will be. However the Trust is confident that any expansion requirements can be accommodated on the existing site. The existing policy provides sufficient flexibility to enable this to come forward.

The Plan and supporting Infrastructure Delivery Plan includes information that has been provided by these bodies at the current time. The Council will continue to liaise with these bodies to ensure their requirements can be addressed appropriately in the Local Plan and Infrastructure Delivery Plan where possible, and developments are able to contribute appropriately to the delivery of the infrastructure.

Issue - Minerals Safeguarding 1003 states that the site overlies important mineral deposits, which is safeguarded in the adopted Kent Minerals and Water Local Plan from

development that would sterilise that minerals. The draft Plan does not show that this site can be exempt and should be removed from the Plan.

1355 (KCC) advise that the Sandstone (Folkestone Formation) is present within the allocated site and is vulnerable to sterilisation. It is requested that a minerals assessment be carried out to determine the extent and nature of the mineral deposits to determine the viability and practicality of prior extraction.

Response *Ashford Town sits on a band of mineral deposits which run north-west to south-east through the Borough, meaning that the majority of land in and around Ashford Town, and at a number of other settlements, has safeguarded mineral deposits. Sites that are proposed for allocation in and around Ashford and at other settlements represent the most sustainable options to provide for the housing and employment needs for the Borough, as has been demonstrated through the Sustainability Appraisal. In order to meet the needs for housing and employment development it is the Council's view that it would not be possible to avoid allocations within these areas, and would create an unsustainable form of development if the mineral safeguarded areas were not considered for development as a matter of principle. Kent County Council has requested that minerals assessments be carried out in order to identify the need for prior extraction of the minerals within the safeguarded areas. The Minerals and Waste Local Plan 2013 – 2030 which forms part of the statutory development plan for the Borough, includes policies which set out these requirements, and are therefore material considerations when in determining planning applications. It is not considered necessary to replicate these policies within this Local Plan.*

Issue - Loss of designated green belt land/greenfield land 847, 833, 836 raise concern about the loss of greenbelt/greenfield land

Response *The site is not greenbelt land, there is no greenbelt land in the Ashford Borough. There are insufficient brownfield sites across Ashford to meet the level of new housing that needs to be delivered in the borough, the majority of growth will therefore have to be delivered on greenfield sites on the edge of the urban area and in the rural area.*

Issue - Self-build 986 objects to the self-build proposals presented by the landowner of the north-west corner of the site. 1286 provision of 5% self-build is of little consequence to overall development

Response *Provision of self-build on sites is required to meet national planning policy.*

Issue - Odour 8, 438, 350 raised concerns about the impact of odour from the WWTW, food factory and Guivadan.

2348 state that new development must be adequately separated from waste water treatment works to safeguard the amenity of future occupiers. Development should only be permitted if the distance to the works is sufficient to allow adequate odour dispersion. It is requested that an assessment be undertaken to demonstrate that there would not be a detrimental impact on amenity by reason of odour.

Response *With regard to the proximity to the WWTW and other odour generated sites, this is one of many factors which need to be considered and balanced against each other in deciding which are the most appropriate sites to allocate for development. Full assessment*

of all of the factors has been carried out through the Sustainability Appraisal, and this site has been considered against the other reasonable alternatives. On balance whilst this site may on occasion be affected by odour from the WWTW it is considered that this site is an appropriate option taking into account the need to meet the Borough's housing requirement and the other alternatives available.

Issue – Noise and air quality issues 170 concerns about impact of noise from the railway line. 846 will cause increased air pollution and noise, which is already at unacceptable levels between George William Avenue and Simon Weil Avenue, with local residents suffer noise from A28 and M20, as well as Willesborough Road, with Little Burton residents being most affected. 846 believes that the development will cause increased air pollution and noise, which is already at unacceptable levels between George William Avenue and Simon Weil Avenue, with local residents suffer noise from A28 and M20, as well as Willesborough Road, with Little Burton residents being most affected.

836 raises concern regarding noise from traffic along Willesborough Road, which is already unacceptable today.

1710 objects to criteria i) which states improvements will only be required if achievable, if they are not achievable this would have serious implications for air quality, including near the hospital.

Response *Criterion (i) of the policy recognises the need to minimise the potential impact of noise and vibration from the railway line and this will require the preparation of noise and vibration assessment. The Council considers that this a reasonable approach to the issue that will ensure that any potential issues are adequately addressed in the formulation of detailed proposals or the site.*

Issue - 270 states there are not enough local jobs for residents, this will just contribute to Ashford turning into a dormitory town.

Response *The growth of the town of Ashford over the last decades has been reflected in a growth in the economy of the borough and the delivery of a number of key infrastructural projects as well as an expansion of the town's retail and leisure offer. Policy SP3 provides the strategic approach to economic development in the Borough over the Plan period including the provision of 11,100 new jobs.*

Issue – Housing – affordability, density 270 questions how people will be able to afford the houses. 1124 these proposals represent a housing density of 18.44 dph, which is not an efficient use of available land and is significantly below the normal range of 30-50 dph for Ashford. Given there is no large scale provision for green corridor or wildlife habitat or sports facilities, the density is particularly anomalous. If a much higher number of homes is likely then there is an insufficient evidence base to support allocation of the site as the transport assessment is based on 700 homes. 252 thinks the area would be grossly overdeveloped.

Response *In accordance with policy HOU1 of the draft Plan a proportion of the houses on the site will be affordable. In terms of the overall approach to housing numbers, the proposed density of the site is considered to be reasonable and in line with other identified large sites in the Plan. The proposed quantity of development takes into account the provision of related on site infrastructure.*

Issue - Residential amenity 27, 836 raise concern about impact of development on residents in Canon Woods Way, and surrounding areas, resulting in loss of privacy and increased noise levels including during construction works.

825 raises concern about the impacts on standards of living from increase in traffic, vehicle fumes and emergency sirens. 835 impact from noise, traffic speed and vibration from heavy lorries along Willesborough/Kennington Road, which already impacts residents in Little Burton Farm.697 raises concern about the increased noise to residents from a potential vehicular access to Canterbury Road.

Response *Conditions are applied at a planning application stage to minimise disruption to nearby residents during construction. This is therefore not a matter that site policies are required to address.*

Issue - Site previously rejected The following representations object to the development of the site, as it has previously been rejected by the Planning Inspectorate and Council, and there has been no material change in circumstances that have taken place to change that decision.

ALP/941, 848, 537, 1266, 7, 13, 14, 16, 17, 25, 28, 35, 37, 49, 51, 58, 61, 62, 63, 73, 74, 77, 84, 85, 92, 95, 96, 97, 1449, 110, 119, 125, 133, 134, 141, 155, 172, 181, 183, 184, 185, 191, 193, 195, 199, 211, 214, 216, 226, 230, 233, 234, 235, 241, 243, 248, 249, 254, 259, 262, 263, 271, 272, 275, 279, 280, 288, 299, 300, 301, 303, 305, 307, 336, 341, 388, 391, 398, 401, 402, 403, 410, 417, 418, 421, 422, 423, 435, 436, 451, 458, 462, 464, 465, 466, 472, 474, 483, 484, 485, 486, 490, 492, 497, 498, 499, 504, 505, 512, 515, 516, 517, 525, 528, 530, 533, 544, 551, 558, 561, 562, 563, 569, 577, 580, 581, 582, 588, 595, 598, 599, 600, 608, 609, 616, 619, 620, 621, 627, 629, 636, 639, 640, 641, 647, 654, 657, 658, 659, 665, 672, 675, 676, 677, 691, 700, 703, 704, 705, 741, 742, 749, 752, 753, 754, 766, 769, 770, 771, 777, 783, 786, 787, 788, 794, 799, 803, 804, 805, 828, 849, 856, 863, 866, 867, 868, 874, 881, 884, 885, 886, 896, 899, 918, 919, 923, 930, 943, 945, 951, 952, 955, 957, 963, 970, 977, 979, 980, 981, 987, 989, 996, 1001, 1002, 1004, 1020, 1024, 1028, 1029, 1048, 1051, 1052, 1053, 1054, 1060, 1067, 1068, 1073, 1075, 1076, 1085, 1088, 1089, 1093, 1096, 1102, 1103, 1105, 1145, 1146, 1153, 1157, 1158, 1159, 1169, 1171, 1189, 1197, 1200, 1227, 1232, 1244, 1254, 1269, 1276, 1280, 1283, 1289, 1292, 1294, 1309, 1311, 1315, 1318, 1323, 1400, 1443, 1445, 1454, 1469, 1470, 1509, 1525, 1529, 1534, 1535, 1536, 1545, 1553, 1556, 1558, 1560, 1578, 1580, 1581, 1585, 1592, 1596, 1597, 1616, 1600, 1604, 1609, 1613, 1614, 1625, 1642, 1650, 1654, 1655, 1656, 1664, 1673, 1688, 1693, 1694, 1696, 1727, 1818, 1882, 1933, 1936, 1953, 1943, 1957, 1960, 1962, 1970, 1990, 2017, 2018, 2019, 2023, 2027, 2036, 2042, 2064, 2070, 2071, 2073, 2100, 2114, 2116, 2117, 2136, 2138, 2140, 2149, 2336, 2759, 2760, 2761, 2762, 2763, 2764, 2765, 2766, 2767, 2768, 2769, 2770, 2771, 2772, 2801, 2802, 2803, 2804, 2805, 2806, 2807, 2822, 2823, 2824, 2825, 2826, 2827, 2828, 2844, 2845, 2846, 2847, 2848, 2849, 2850

41 and 42 object as there is a need to be consistent and apply the same criteria as the following refused applications; refs 10/01731 and 06/00992

830 states that an earlier application further towards Canterbury was refused due to loss of agricultural land and access onto A28, surely this can be rejected for the same reasons.

Response *There has not been a planning application submitted on this site previously. The site was considered as part of the preparation of the Core Strategy and the Urban Sites and Infrastructure DPD and was not considered suitable, at that time, for inclusion. Clearly, circumstances change and in the wider context of the need to identify further sites for development to meet an increased housing requirement that covers the period to 2030 there was a need to re-assess possible sites for inclusion in the Plan.*

Issue - More suitable sites 435, 436, 37, states that with sites submitted containing circa 20,000 homes and land required for 4,400 homes, there is poorer quality land to address this need. 438 more suitable and less environmentally damaging sites available. 439, 440 development here is unnecessary and unfounded as there are other sites available. 124 suggests alternative site currently used by the Hockey and Football Club on Ball Lane. Access from Canterbury Road would reduce traffic on Ball Lane, from that currently.

440, 1370 local plan strategy focuses on a few large sites and not the many smaller sites that would have less damaging effect. A predilection for large sites should not be a reason to give small sites a cursory look and more should be done to embrace these small sites and research sites that have little impact.

2474 objects to the development on the grounds that there are available brownfield and contaminated sites that could be developed on, rather than readily available greenfield sites that developers find more attractive due to their profitability.

148, 149, 173 objects as there is no actual need as there are plenty of other housing estates already in progress and there are other sites already designated that should be used first. 270 already enough proposed development in Ashford.

1370 and 1384 consider the proposal would not create a sustainable community, just adding a further housing estate onto the edge of Ashford with no community core. It is too far to walk to town, the station or any shops. 1398 development in S2 has potential to just become another monotonous estate without a core that people can use to create a community

1726 adding S2 on the end of Kennington will not create a sense of community that can be derived from small/large villages – suggest creating small developments to encourage communities to develop around a core.

Response *There are insufficient brownfield sites across Ashford to meet the level of new housing that needs to be delivered in the borough, the majority of growth will therefore have to be delivered on greenfield sites on the edge of the urban area and in the rural area. Many of the previously developed sites in the town already have redevelopment proposals underway. However, the Local Plan encourages the re-use of previously developed sites where environmental constraints allow and sites are sustainably located.*

The introduction to the draft Plan highlights the results of the population projection as presented within the Strategic Housing Market Assessment (SHMA). Government policy requires local authorities to determine their own housing needs. However, this must be based upon an assessment of housing need through a SHMA, to ensure that general market and affordable housing needs are fully met until 2030. The borough wide strategic approach is to allocate most land in and around the urban areas. Rural areas must expand in a

sustainable way to enable us to meet needs of all population and secure the future sustainability of those settlements.

It is considered that this site, in combination with neighbouring sites and those already given planning permission will house a critical mass of population related to the urban area that is sustainable and will provide economic opportunities for the locality.

Issue - Sustainability Appraisal 1365 challenges the SA score for the site, in respect of distance to closest shop (Q 6.5), impact of odour from wastewater treatment works (Q 7.5), location is not urban fringe (Q13.1) Changing score from -1 to -5.

Response SA scoring matters are addressed in the SA Addendum Report.

Issue - Public Consultation 1016 highlights the great strength of concern felt by local residents following public consultation run by Kennington Community Forum (with ABC support) in 2014 and previous consideration of site.

1557 states that the consultation is non-compliant

1046, 1047, 1048, 1049, 1050, 1051, 1053, 1054, 1055, 1056, 1057, 1058, 1059, 1060, 1061, 1062, 1063, 1064, 1065, 1066, 1067, 1068, 1069, 1070, 1071, 1072, 1073, 1075, 1076, 1077, 1078, 1079, 1080, 1081, 1082, 1083, 1084, 1085, 1086, 1087, 1088, 1089, 1090, 1091, 1092, 1093, 1095, 1096, 1097, 1098, 1099, 1100, 1101, 1102, 1103, 1104, 1105, 1106, 1108, 1109, 1111, 1112, 1113, 1147, 1148, 1150, 1152, 1153, 1154, 1155, 1157, 1158, 1159, 1160, 1161, 1162, 1163, 1164, 1532 state that the document is not legally compliant as the required due process in public consultation has not been followed.

1532 raises concern about the communication process regarding this development, which has been poor, it has been difficult to obtain information, and messages coming out of the council have been confused.

Response *A general misunderstanding of the Localism Act is that the Government allows local communities to simply say 'no' to development; however the choice is more about where the development needed should best be located. The borough wide strategic approach is to allocate most land in and around the urban areas. Rural areas must expand in a sustainable way to enable us to meet needs of all population and secure the future sustainability of those settlements.*

A number of public consultation events were held around the borough during the local plan preparation from 2012 to 2016 and in particular around site submission and selection stages, where local opinions on the were sought and recorded. All consultation events were held in accordance with the adopted SCI with regards to Local Plan preparation. Full details can be found within the Pre-submission consultation statement.

Issue – Precedent 830 concerns that if this development takes places, this could lead to future 'ribbon' development between the railway line and up to the Wye Road, and even to Wye, desecrating even more Grade A land.

Response *New policy SP7 confirms the Council's commitment to the retention of the separate and distinctive identity of individual settlements particularly on the edges of the town of Ashford.*

Miscellaneous comments 830 the project may generate work during construction, and housing and Council Tax in the future to benefit the Council, however this does not outweigh the disadvantages in terms of loss of countryside, traffic and logistics access. 107, 1123 states that para 4.14 is false, as the Conningbrook development does not extend past the northern lake. It would be more appropriate for the boundary to run from Canon Wood Way to the north lake, reducing site by 50% and mean no secondary access point.

449 states that Kennington is a village and cannot cope with such an increase in housing.

1009 states that draft plans prepared and publicised by the owner of Orchard Farm, for development of 100 homes, assume this could be accessed from Canterbury Road, in conflict with the draft policy. Lack of vehicle access means it is not possible to develop this part of the site independently from the rest.

152 - ABC has not considered the impact of development on this sensitive area, which needs access to a busy hospital on the sites doorstep. 10a is mentioned but access to it is flawed and deliberately omitted.

830 - Raises concern about the application of developer contributions for the school and the footbridge, as there is a 'strong commercial' interaction between ABC Planning Department and a developer to enable this project to gain provisional approval.

843 - ABC should be harnessing the maximum produce this land can offer, with benefits to the local economy. Local farmer should be better supported financially with their produce promoted locally through local initiatives by ABC. The country should be self-sufficient and less reliant on imported, particularly after Brexit, when prices will inevitably increase as European funding is withdrawn.

2327 - Argues that the area is in urgent need of starter homes for young people. 2327 also feels that the approval of this development will result in landbanking by developers who wish to slowly release properties in order to increase their profits

2330 Argues that there is insufficient affordable housing in the Borough for young people and acknowledges that development is needed in Ashford and suggests the idea of Local Authorities creating non-profit building companies in order to develop the housing that is needed for the young people in the borough to get on the housing ladder.

Response *There is a policy requirement set out in policy HOU1 to provide a proportion of affordable housing.*

Support for proposals 1341 considers the allocation appropriately considered and consistent with National Policy. It is a positive response to providing sufficient housing to meet OAN. There is a supportive landowner and promotor on board being an effective allocation and ultimately deliverable. There are no overriding constraints to the development of the site.

Response *Support noted.*

POLICY S3: COURT LODGE

Representations have been received from the following consultees:

3	Kingsnorth Medical Practice	1724	CPRE Kent (Ashford District Committee)
5/6	Daren Nixon	1769	Ian Wolverson
117	Ward Member for Weald South (Cllr Aline Hicks)	1803	Kent Wildlife Trust
138	Personal (Rod Gilbert)	2062	Christine Pantrey
158	BHS South & East Kent Committee	2144	Shadoxhurst Parish Council
606/607	Helen Foad	2207	Barton Willmore on behalf of Hallam Land Management Ltd. (Carolyn Organ)
827/905 [duplicate of 827]	Gary Whatrup	2218	Kingsnorth Parish Council
1120	A Hayward	2349	Southern Water
1228/1230	Paul W Bartlett	2382	Susan Head
1240	Masterson	2390	G Harrison
1420	Ben Gilbert	2401	S Harrison
1631	Helen Ansell	2478	Hallam Land Management Limited
1686	Jacqueline Male	2689	Highways England
2563/2564 [duplicate of 2563]/2565	Kent County Council (Barbara Cooper)		

Summary of representations – Main Issues

Issue - Strategic approach and need 117, 1120 There is no need for allocation in light of Chilmington, and it would overwhelm local community. 1228 states that the allocated number of dwellings would result in too high a density “given that much of the area to the south of Court Lodge is prone to flooding and given that there needs to be a buffer between Knights Park and the houses in Pound Lane.”

1230, 2390, 2391 Number of dwellings needs reduction to ensure rural character maintained.1631 considers that there is no need to build if immigration cut, and suggests waiting to see what happens leaving the EU.

2062 Equates development with pressure on healthcare, roads, schools, light pollution, etc.

Response *The introduction to the draft Plan highlights the results of the population projection as presented within the Strategic Housing Market Assessment (SHMA). Government policy requires local authorities to determine their own housing needs. However, this must be based upon an assessment of housing need through a SHMA, to ensure that general market and affordable housing needs are fully met until 2030.*

The borough wide strategic approach is to allocate most land in and around the urban areas. Rural areas must expand in a sustainable way to enable us to meet needs of all population and secure the future sustainability of those settlements.

Brexit doesn't alter the population forecasts, so at present the Local Plan must allocate based on the current position.

Issue – Phasing 117 Majority of Chilmington development, and Discovery Park, should be delivered prior to any further development in the locality, as well as provision of Green Corridor. 2218 is supportive but propose phasing that delivers strategic link road upfront

Response *Noted. The Pound Lane Link Road should be delivered at an appropriate point to provide for traffic movements resulting from the development.*

Issue - Resident amenity 1230 an additional buffer needed to north to protect Knights Park, and for properties to west of Ashford Road. Southern part to be maintained free of development.

Response *Noted.*

Issue - Transport and traffic 5 The traffic increase as a result of the S3 (Court Lodge) allocation will be served by a rural road without pedestrian walkways which is currently used by pedestrians between Knights Park and Kingsnorth Primary School. 117 traffic should be directed north towards improved Park Farm roundabout

1420 Link Road is ill-conceived as it will cause Ashford Road between Steeds Lane and Church Hill to be used as a short cut for traffic, which is already dangerous and negatively impacts resident amenity. Traffic calming required on Ashford Road.1724 Criterion h should prioritise strategic link road in initial phases of development.

2062 Access road inappropriate and adds danger to road since the road is used as a race track, and cumulative development would enhance danger. 2144 Development will result in substantial negative impact on local roads and traffic through Shadoxhurst village, with a knock-on effect on the whole network.

2689 cites lack of evidence of impact on SRN and deliverability ahead of J10a. Proposes additional wording, *“No occupation of the residential element of the development shall take place until the proposed M20 Junction 10a is complete, in accordance with Policy TRA1.”*

Response : *The Council agrees that delivery of this site is dependent upon the delivery of J10a of the M20. Transport infrastructure improvements on this site are expected to come together with those on S4 and S5 to comprise a set of locally strategic improvements to the satisfaction of KCC as Highways Authority, and Highways England with responsibility for the Strategic Road Network. This will include the provision of a Pound Lane Link Road as the main distributor for the locality and relieving movements on Ashford Road.*

The Council will work together with the developers and KCC to explore options for the two crossroad junctions in the vicinity of the site (Ashford Road/Church Hill/Pound Lane; Ashford Road/Magpie Hall Road/Steeds Lane).

Given the proposed timescale for the implementation of Junction 10a, it is most unlikely that there would be any residential occupations on this site in advance of J10a completion. Given the relative lack of implementation of sites with committed capacity at Junction 10, it would be unreasonable to impose a specific policy restriction on occupations on this site.

The Council will work with Highways England and any site developer to provide evidence of the impact of development on the SRN of this site and its deliverability prior to the completion of Junction 10a of the M20.

Issue - Community and masterplanning 1120 has concerns that community facilities will be provided at the end of development. 1724 and 2218 state should provide community facilities on site early, thus providing also for Washford Farm. 2062 objects on grounds that development will destroy community spirit of Kingsnorth village. 2144 there should be safeguarding of existing residents during construction, and those around Stubbs cross shop and post office after construction. 2218 site is supported, but requirement for “Enquiry by Design” workshop ensuring residents have a say in design.

2563 The provision of 2.05 hectares of land for a 2 FE Primary School (to be transferred at nil cost to the County Council and in accordance with KCC’s General Transfer Requirements) will be required, along with financial contributions for education provision. Also, prior to master planning, DPDs or briefs, primary school site should be identified and agreement with KCC entered in to.2563 should be contributions required for delivery of services in community building.

Response *The requirement for developer contributions towards the provision of infrastructure and community facilities is dealt with by generic policies (COM1, COM2 and IMP1) in the Plan. Where site specific projects have been identified in the Infrastructure Delivery Plan these have been identified in site specific policies. No change proposed.*

Issue - Health infrastructure 3 Proposes provision of primary care health ‘hub’ on this site as one of three in the borough to serve ~30-50k patients. Concerned over lack of mention of health provision in the plan.

Response *The Council has consulted with the CCG and Hospitals Trust through its work on the Infrastructure Delivery Plan. Unfortunately neither has been able to provide detailed proposals for new health facility requirements in the Borough as they are still in the process of development strategies for future healthcare in Ashford and the wider area.*

The Hospitals Trust has indicated that there may be a need to expand the William Harvey in order to accommodate increased demand from housing development in Ashford, and also increased demand from outside of the Borough. The Trust are currently undergoing a Clinical Strategy, which will require public consultation later in 2017, until then it is difficult to predict what the specific infrastructure requirements will be. However the Trust is confident that any expansion requirements can be accommodated on the existing site. The existing policy provides sufficient flexibility to enable this to come forward.

The Plan and supporting Infrastructure Delivery Plan includes information that has been provided by these bodies at the current time. The Council will continue to liaise with these bodies to ensure their requirements can be addressed appropriately in the Local Plan and Infrastructure Delivery Plan where possible, and developments are able to contribute appropriately to the delivery of the infrastructure.

Issue - Water issues 6, 1240, 2382 The site is FZ2 and 3, and each year fields are flooded. Several ABC and PINS document note flood risk on site, and representation does not see that exceptions criteria in CS19 are overcome on site.

117 Lack of justification for removal of floodplain. 1240 proposal does not take account of climate change and extreme flood events. 1631 development will raise flood risk elsewhere. 1724 argues that open space should contribute to flood mitigation and be protected in perpetuity. 2062 resident requests her house on Ashford Road to be put into floodplain given groundwater flooding

827 Construction on this site and KSLR will reduce land area for natural absorption, while upstream flood defences are under increasing pressure from climate change. Climate Change, as well as development at Chilmington Green, need to be factored in to an updated flood risk model. Proposes a buffer zone to mitigate flood risk along line of Westhawk Dyke

2218 Reference to provision of SuDS is necessary

2349 Amended wording: *“b) Drainage – the layout and treatment of surface water drainage through the use of SuDS should be provided as an integral part of the landscape design and open space strategy along with acceptable maintenance arrangements and, west of Ashford Road, be compatible with drainage proposals serving Court Lodge Development. The development should provide a connection to the nearest point of adequate capacity in the sewerage network, in collaboration with the service provider and provide future access to the existing sewerage infrastructure for maintenance and upsizing purposes.”*

2351 - There is existing (sewerage) infrastructure on site, and an easement width of between 6 and 13 metres would be required. This should be taken into account in proposed development.

Response *Negotiations are ongoing with the Environment Agency on the potential for the existing floodplain to be remodelled. Permission for development will be dependent upon this. The recent Strategic Flood Risk Assessment to take account of new Climate Change predictions have revealed no increased risk.*

Developers and infrastructure providers should work together to identify and design existing structure into development and, if necessary, divert or improve existing on-site infrastructure.

Southern Water's assessment has revealed that additional sewerage infrastructure would be required to serve the proposed development. The development will therefore be required to make a connection to the nearest point of adequate capacity in the sewerage network. Early liaison should take place with the service provider in this regard – see proposed change MC10.

Issue - Natural environment 1120 proposals will result in removal of agricultural land and green open space. 1631, 2062 there is a lack of justification to build on attractive green spaces.

1803 reference needs to be made to the careful design of green infrastructure to protect and extend the existing Green and Blue corridor network; and to link with green infrastructure on other strategic allocations.

2144 Need for a buffer zone, as per its landscape character designation, around Shadoxhurst and avoid urbanisation of locality, including a buffer zone between development and existing properties on Magpie Hall Road. This should be accessible open space planted with native species in keeping with the existing landscape character, with Tally Ho Road as an important gateway.

Response *This land has been submitted to the Council by the landowner to judge its suitability for development. The land here is not designated Grade 1 or 2 (the best and most versatile), to be safeguarded as per the NPPF.*

The aspiration for this site is for biodiversity enhancements and increased all-round connectivity through and beyond the site. Green corridor connections within this site and between the wider Kingsnorth sites have been considered as potential sites for an extension of the Ashford Green Corridor, as per draft Policy ENV2 and in an updated Action Plan.

Issue – PRoW 158 opportunity to improve byway AW299a and Roman Road to multi-functionality for pedestrian, horses and cycles. 1769 states that major work is required to ensure a network of interconnected routes that tie the site to the surrounding area, and that Magpie Hall Road should remain a minor road.

Response *Noted – detail to be agreed through detailed design/masterplanning, although the Roman Road is already referenced within the existing policy.*

Issue - Heritage Assets 117, 1230, 2218 work should take account of identified and potential archaeological assets

Response *This is covered in draft Policy ENV15.*

Issue – Telecommunications 2144 there is currently insufficient broadband and telecommunication infrastructure

Response *The Council has been at the vanguard in this regard, and draft Policy EMP6 pioneers the outlay of fibre broadband across the borough.*

Support 138 strongly supports link road from Long Reach to Tesco roundabout, but this should be raised on pillars for drainage, wildlife and heritage conservation. This will relieve pressure on rural lanes.607 supports allocation subject to a landscape buffer around Stone

Cottage, Pound Lane, and would like to include some land within the allocation. 1686 is supportive of principle and maintenance of PRoW, though concerned that numbers are high for a rural area. 2218 is supportive in principle, and especially so for extension of Green Corridor and the integration of green necklace while 2478 believes that construction on site can be enabled by remodelling floodplain, and creating shallow basins and wetlands for flood storage, combined with habitat creation designed for multiple species.

2478 states that there will be limited visual impact e.g. there will be substantial screening to the south to limit views of development, questions why site boundary includes properties fronting Ashford Road and supports employment uses in local centre as a guide, but suggests amendment for flexibility for up to 1000sqm for flexible commercial uses (B1, A1-A5, D1, D2 excl. primary school)

2478 proposes insertion of requirement for specialist care housing in supporting text and contests requirement in S3 for the strategic link and J10a since Amec report does not, as per para 5.235, state the link road is “critical” for the full delivery of S3, but merely provides design guidance. This requirement is also missing for sites S4 and S5. Will provide proportionate contribution if evidence supports requirement.

2478 supports policy, but does not believe ‘up to 950’ requirement is justified since site including elderly persons accommodation could support 1000dw. Policy should not impose ceiling. 2565 supports retention of PRoW, and policy should specify that the Roman Road is to be protected as a non-vehicular route for pedestrians and cyclists only and that Roman Road should retain the character of the historic route. There should also be a requirement for the route to be enhanced forming green space and recreational Green Belt.

Response Supports noted. Inclusion of the properties fronting Ashford Road within the site boundary is to ensure these are given a buffer.

POLICY S4: LAND NORTH OF STEEDS LANE AND MAGPIE HALL ROAD

Representations have been received from the following consultees:

117 Ward Member for Weald South (Cllr Aline Hicks)	2146 Shadoxhurst Parish Council
139 Personal (Rod Gilbert)	2219 Kingsnorth Parish Council
322/324 Pentland Homes Ltd	2243 Jody Roberts
329/330/384 Malcolm Jarvis Homes Ltd	2244 Canterbury Diocesan Strategic Development Limited
382 Paul Buggins	2280 Emma Doww
387 Pentland Homes Ltd	2282 Tom Adams
550 Sue McGeever	2289 Peta Grant
824 Stephen Penny	2350 Southern Water
1121 A Hayward	2383 Susan Head

1170 Purse	2395 G Harrison
1228/1231 Paul W Bartlett	2403 S Harrison
1231 Paul W Bartlett	2434 Jade Roberts
1322 Elizabeth Buggins	2455/2456 [duplicate of 2455] Letitia Coney
1346 Purse	2457 Ruth Beeching
1631 Helen Ansell	2567/2568/2570 Kent County Council
1733 CPRE Kent (Ashford District Committee)	2691 Highways England
1769 Ian Wolverson	2726 Jennifer Taylor
1814 Kent Wildlife Trust	

Summary of representations – Main Issues

Issue – general 117, 2457 Surprised of need for substantial allocation in light of Chilmington. 329 and 322 – seeks more clarity in Paragraph 4.60. Proposes amendment: “It is recognised that, in allocating the land to the north of Steeds Lane and Magpie Hall Road, that this creates a longer term opportunity to consider development further to the south. The future extension of this allocation would almost certainly create a scale of settlement that would require a new local centre, complementary to the one proposed at Court Lodge, to allow a greater level of local living to be achieved. Therefore, the comprehensive masterplan to be developed for the site north of Steeds Lane and Magpie Hall Road should be developed in such a way that it acknowledges this future potential and, where appropriate, it facilitates it and does not prejudice further development to the south. The potential of the area to the south of Steeds Lane/Magpie Hall Road should be considered on its own merits in a future formal review of this plan.”

324 and 330 indicative extent of development in topic policy detailed maps is too specific, and greater flexibility is requested. 382 the little yellow arrow on the master plan showing direction of potential future development “must be removed”, as stated previously growth of the town into the countryside should stop now.

1121 seeks consideration of the economic impact of development on local post office at Stubbs Cross. 1631 No need to build if immigration cut, and suggests waiting to see what happens leaving the EU. 1733, 2244 object to principle as isolated development reliant on private car. Also concern that it does not provide employment opportunities and that the community facility is on the edge of development along Ashford Road (point h).

Response *The introduction to the draft Plan highlights the results of the population projection as presented within the Strategic Housing Market Assessment (SHMA). Government policy requires local authorities to determine their own housing needs. However, this must be based upon an assessment of housing need through a SHMA, to ensure that general market and affordable housing needs are fully met until 2030.*

The borough wide strategic approach is to allocate most land in and around the urban areas. Rural areas must expand in a sustainable way to enable us to meet needs of all population and secure the future sustainability of those settlements.

Brexit doesn't alter the population forecasts, so at present the Local Plan must allocate based on the current position.

It is considered that this site, in combination with neighbouring sites and those already given planning permission will house a critical mass of population related to the urban area that is sustainable and will provide economic opportunities for the locality. The potential for future extension is noted already in paragraph 4.60.

Phasing and strategic approach 117 Majority of Chilmington development, and Discovery Park, should be delivered prior to any further development in the locality, as well as provision of Green Corridor. 324 and 330 argue unrealistic to limit numbers to 320 considering that capacity will be determined following masterplanning (para 4.46). Seeks an upper limit of 400dw based on site density. 550 the level of development is excessive to 2030, and proposes phasing until 2070.

824 and 1121 the strategic approach in Kingsnorth incorrect, should focus on infill development rather than large scale allocations, as smaller infill development is more sustainable and does not require additional infrastructure. 1121 feels this is 'urban sprawl'. 1170 Development around Kingsnorth rejected by inspector at CS examination to maintain character of village. 1170, 1228 and 2455, 2280 significant cumulative effect on Parish and local community of recent development. Unlikely to be mitigated also by infrastructure improvements.

1228 strategy should be on providing affordable and starter homes in the town centre, complemented by larger allocations in Tenterden and the villages, based along the 'Finberry' strategy, given that delivery of larger extensions has been slow.

1231, 2395 and 2403 consider whole southern part of the site should be kept free from development (not simply lower density). 1322 Need for a hard envelope to contain development within a defined boundary for the town of Ashford. Contests need for future development south of site.

1170, 1231, 1733, 2219, 2395 and 2403 Proposes deletion of 4.60 as it proposes further future development as a basis for this allocation, and promotes 'urban creep'. 2219 Level of development too high on this small site, yet too low to offer adequate facilities for locals.

2243 and 2434 no need for urban extension at Kingsnorth since extant permissions "will easily satisfy the estimated housing needs to 2030." Seeks review of these before new permissions granted. Allocations contrary to NPPF for sustainable development. Cumulative development in this location will severely prejudice local amenity on all indicators, despite any results an EIA will reveal.

1170, 2243, 2434, 2457 Proposed development is too high a density compared with existing, and proposals should mirror style and density at S & SW development edge (bungalows in generous plots). Bungalows would enable maintenance of existing residential outlook.

2289, 2383, 2457 Development should be delayed until J10a delivered (2383 speculation that more developments than necessary allowed to ensure funding). 2282 vacant lots in town centre should be filled before allocation in villages.

2395 and 2403 Does not understand why infill development not allowed but large-scale development is allowed

Response *The Council agrees that there should be an increase in the proposed site capacity from 320 dwellings to 400. Amend paragraph 4.46. as follows: This site is proposed for residential development of up to ~~320~~ 400 units. See Proposed Change MC19. Amend policy S4 as follows:*

Land north of Steeds Lane and Magpie Hall Road is proposed for residential development, for up to ~~320~~ 400 dwellings.

See proposed Change MC22.

The Council is required to plan for current demographic increase through establishment of its Objectively Assessed Need and evidence from its Strategic Housing Market Assessment, projecting need to 2030. In addition, one of the recommendations of the Housing White Paper (Feb 2017) is that Local Authorities" should make efficient use of land and avoid building homes at low densities".

It is agreed, however, that delivery of this site is dependent upon the Development Consent Order being granted for J10a of the M20. It is also agreed that a Housing Mix policy is required to enable delivery of a variety of housing types and sizes, including affordable housing and opportunities for Self and Custom Build.

Future development beyond the site is already addressed within the policy's supporting text.

Resident amenity 2457 buffer zone required around all existing properties; not just listed. 1170 soundproofing should be proposed through heavy landscaping at Stumble Lane and Isaacs Wood to protect existing residents from urban noise pollution, and new residents from "rural country noises" (cockerels crowing). 2146 safeguarding existing residents during construction, and those around Stubbs cross shop and post office after construction

Response *Planning conditions will ensure suitable noise mitigation measures are in place during construction and, if deemed necessary, beyond this.*

Transport 117 traffic should be directed north towards improved Park Farm roundabout. 550 seeks protection of village from excessive traffic movements. Seeks traffic surveys. 1170, 1231, 2457 seeks no access from Bond Lane given its rurality and, given proposed Ashford Road access, upgrade to junction at Magpie Hall Road/Ashford Road crossroads required.

2219 Main concern of development is how much traffic it will produce congesting Ashford Road. 2243, 2434 Steeds Lane, Stumble Lane and Bond Lane are unsuitable for two-way traffic and increased movement of future residents/ construction traffic.

2282 upgrades to road and junction will not mitigate impacts of development. 2383, 2457, 2726 Will make road infrastructure increasingly dangerous, even with small development, while wider strategic rail networks will have to be upgraded for increased numbers. 2383,

2395, 2403, 2455 Stumble Lane and Church lane currently used as rat-runs from A2070, and Lorries use Violet Way as a lorry park.

384 and 387- Seeks amendments to the following:

Para 4.50 - reword third sentence to read ' Therefore development is proposed north of the water course that passes through this area, to be accessed from a new road which will include provisions for buses, pedestrians and cyclists, that would eventually....'

Para 4.57 - add a new sentence 'Similarly, the layout of roads within the site should take account of the potential opportunities for future bus services to create connections with Court Lodge and Chilmington to the west and the Town Centre and Station to the north.'

1170, 1228 and 1346 – This is an unsustainable location promoting use of private car. Public transport is unlikely given previous failures (Bridgefield), and this will lead to deterioration of air quality and congestion.

1733 will result in severe harm to local roads and strategic network, transport modelling required to understand impact on wider road network. 1769 states that major work is required to ensure a network of interconnected routes that tie the site to the surrounding area, and that Magpie Hall Road should remain a minor road. 2146 Development will result in substantial negative impact on local roads and traffic through Shadoxhurst village, with a knock-on effect on the whole network.

2457 feels that upgrade to footways and cycleways are required.

2691 – cites lack of evidence of impact on SRN and deliverability ahead of J10a. Proposes additional wording, “No occupation of the residential element of the development shall take place until the proposed M20 Junction 10a is complete, in accordance with Policy TRA1.”

Response *The Council agrees that delivery of this site is dependent upon the delivery of J10a of the M20. Transport infrastructure improvements on this site are expected to come together with those on S3 and S4 to comprise a set of locally strategic improvements to the satisfaction of KCC as Highways Authority, and Highways England with responsibility for the Strategic Road Network.*

The Council will work together with the developers and KCC to explore options for the two crossroad junctions in the vicinity of the site (Ashford Road/Church Hill/Pound Lane; Ashford Road/Magpie Hall Road/Steeds Lane).

Given the proposed timescale for the implementation of Junction 10a, it is most unlikely that there would be any residential occupations on this site in advance of J10a completion. Given the relative lack of implementation of sites with committed capacity at Junction 10, it would be unreasonable to impose a specific policy restriction on occupations on this site.

Wording alterations to paragraphs 4.50 and 4.57 are agreed – see proposed change MC11.

Heritage assets 117 work could impinge on Roman Remains such as those identified when Westhawk was being developed. 550, 1228, 2395 and 2403 an archaeological survey is required given the proximity of the Roman road.

550, 2280 Policy does not give sufficient protection to Cherry Tree Cottage and Rock Cottage, Taylor Farm House and other listed buildings and increased traffic vibrations will endanger them. 1231, 2280 seeks extended buffer zone (e.g. 100m as per U19) from listed properties, and archaeological assessment.

2243, 2434 proposes Kingsnorth village (area within Ashford Road, Church Hill, Bond Lane, Stumble Lane and Steeds Lane) should be designated as a Conservation Area.

Response *Attention to Listed Buildings and Areas Archaeological Potential, while covered in national legislation, are also covered in draft Policies ENV13 and ENV15. The Kingsnorth Conservation Area Appraisal and Management Plan has recently been adopted by the Council, and is supported through draft Policy ENV14.*

Flooding and water infrastructure 550, 1170, 2383, 2395 and 2403 - The site and wider area is prone to flooding, and new development will exacerbate flooding of existing cottages. Drainage on Ashford Road is minimal, and "Ashford Road is not maintained" (550 consulted KCC Highways on this). 2395 and 2403 note the risk to Steeds Lane properties is blocked culverts. 2395, 2403, 2726 Water pump at Steeds Lane is inadequate, unreliable, and would have to be double the capacity to serve a new development.

1170 request development connected to a new drainage system. 2350 states that there is existing main on site, which requires easement 6-13m. 1231 Needs a SuDS requirement as per site S3, as drainage issues at Mill Hill. 1631 development will raise flood risk elsewhere

2350 proposes amended wording: "b) Drainage – the layout and treatment of surface water drainage through the use of SuDS should be provided as an integral part of the landscape design and open space strategy along with acceptable maintenance arrangements and, west of Ashford Road, be compatible with drainage proposals serving Court Lodge Development. The development should provide a connection to the nearest point of adequate capacity in the sewerage network, in collaboration with the service provider and provide future access to the existing sewerage infrastructure for maintenance and upsizing purposes."

Response *Development does not necessarily increase flood risk locally or in the wider catchment. Indeed, as per the Council's Sustainable Drainage SPD, there are examples in which flood risk can diminish as a result of development. However, in this case, the site is wholly in Flood Zone 1 (lowest risk).*

Southern Water's assessment has revealed that additional sewerage infrastructure would be required to serve the proposed development. The development will therefore be required to make a connection to the nearest point of adequate capacity in the sewerage network. Early liaison should take place with the service provider in this regard – see proposed change MC11.

Health infrastructure 550, 2383, 2457 – there are insufficient GPs and healthcare professionals, and the Hospice and hospital will be unable to cope with the increased demand.

Response *The Council has consulted with the CCG and Hospitals Trust through its work on the Infrastructure Delivery Plan. Unfortunately neither has been able to provide detailed*

proposals for new health facility requirements in the Borough as they are still in the process of development strategies for future healthcare in Ashford and the wider area.

The Hospitals Trust has indicated that there may be a need to expand the William Harvey in order to accommodate increased demand from housing development in Ashford, and also increased demand from outside of the Borough. The Trust are currently undergoing a Clinical Strategy, which will require public consultation later in 2017, until then it is difficult to predict what the specific infrastructure requirements will be. However the Trust is confident that any expansion requirements can be accommodated on the existing site. The existing policy provides sufficient flexibility to enable this to come forward.

The Plan and supporting Infrastructure Delivery Plan includes information that has been provided by these bodies at the current time. The Council will continue to liaise with these bodies to ensure their requirements can be addressed appropriately in the Local Plan and Infrastructure Delivery Plan where possible, and developments are able to contribute appropriately to the delivery of the infrastructure.

Telecommunications infrastructure 2146, 2243, 2434, 2457 consider there is currently insufficient broadband and telecommunication infrastructure. 2395 and 2403 impossible to provide 'infinity' broadband in area, or to upgrade crumbling existing system

Response *The Council has been at the vanguard in this regard, and draft Policy EMP6 pioneers the outlay of fibre broadband across the borough.*

Natural environment and landscape character 550 environmental and ecological surveys are required, as preliminary surveys were "destroyed by the farmer". 1733 Indicative development footprint takes no account of landforms and boundaries, with the overall impact visual impact as substantial harmful. Need for inclusion of a 'greenbelt' south of Magpie Hall Road/Steeds Lane with a strategic gap to Stumble Lane. Need to mention ditches and ponds on site likely to host GCNs.

1170 and 1814 – Must make reference to protection, buffering and management of Isaacs Wood (Ancient Woodland), with a requirement for management activity to protect breeding bird species and ground floor/understorey from recreation pressure from development.

1170 – proposes a buffer zone to the east of Bond Lane to enable designation of Kingsnorth Village as a Dark Sky Zone, and ensure mature trees on verges are not removed.

1814 – proposed change in part d) "appropriate species and habitat survey needs to be carried out, details of which will inform ecological mitigation measures to be provided on the site and proposals for their future implementation, maintenance and monitoring."

2146, 2243, 2434 Need for a buffer zone, as per its landscape character designation, around Shadoxhurst and avoid urbanisation of locality, including a buffer zone between development and existing properties on Magpie Hall Road. This should be accessible open space planted with native species in keeping with the existing landscape character, with Tally Ho Road as an important gateway. 2280 proposed 100m buffer zone is insufficient "green space" while 2383 worries buffer zones will be built on in future. 139 supports an accessible green buffer zone linking Church Hill and Mill Hill.

1170 Greensand way should be rerouted into buffer zone to avoid urbanisation of path, while 2570 requests that AW319 should be upgraded to Public Bridleway to facilitate connectivity to the wider network, as an extension of the existing network.

Response *Attention to gateways and landscape approaches are already noted in the Local Plan's design policies.*

Agree that reference to appropriate species and habitat surveys can be added, as well as enhanced reference to relationship with ancient woodland – see change MC11. The requirement for safeguarding protected species and conducting proper ecological surveys is laid out in law, by way of the EU Habitats Directive, and in the UK through the Conservation (Natural Habitats, et al.) Regulations 1994 and the Conservation of Habitats and Species Regulations 2010. Ancient Woodland is to be given the highest level of protection in an amended national guidance, and therefore there is no need to duplicate national policy.

Kingsnorth Village in itself is not included within the proposed Dark Sky Zone, and does not currently meet the criteria for inclusion. However, attention to well-designed lighting is a borough wide concern.

The separate and distinctive identity of individual settlements forms part of the particular character of much of the borough, helps to define communities and is an important feature in maintaining the quality and attractiveness of the borough for residents and visitors alike.

As Ashford in particular has grown in recent years, some of the open space between the edge of the town and the closest surrounding villages has been eroded. In some locations, such as at Park Farm, specific features such as the buffer zone with Kingsnorth village have been implemented. But as pressure for additional growth to the south of Ashford continues (which is reflected in the proposed allocations in this Local Plan), the need for such protective features is likely to increase with more settlements potentially affected.

The Council is concerned that. This could occur in a variety of locations across the borough, for example by the large scale expansion of villages to encompass nearby hamlets; through progressive 'ribbon' or linear development along roads that joins up settlements, or through the expansion of Ashford itself.

A new policy SP7 Separation of Settlements has therefore been added to the Plan in order to prevent unplanned erosion of countryside between built up areas which would have a serious and significant adverse impact on the character and individual identity of villages through loss of their setting or through coalescence.

Electricity 2457, 2726 existing problems with electricity supply

Response *It will be up to the developers to provide a serviced site and serviced plots in conjunction with infrastructure providers.*

Land covenants 550 understand there may be a covenant on land around the water tower on condition it not be used for housing.

Response *Land ownership and legalities are a matter for the site promoters and developers.*

Community infrastructure 2383 priority should be given to upgrading existing local play facilities as part of development, and a secondary school should be considered as well as increasing capacity of existing primary school rather than providing a new primary school. 2567 supports, but requires financial contributions towards school buildings and services for community facility.

Response *Noted. Policies in the plan provide appropriate play provision when required. Provision for education facilities will be required at a level determined by KCC education.*

The requirement for developer contributions towards the provision of infrastructure and community facilities is dealt with by generic policies (COM1, COM2 and IMP1) in the Plan. Where site specific projects have been identified in the Infrastructure Delivery Plan these have been identified in site specific policies. No change proposed.

Minerals safeguarding 2568 – Limestone (Weald Clay formation) safeguarding. Requires a Minerals Assessment.

Response *Ashford Town sits on a band of mineral deposits which run north-west to south-east through the Borough, meaning that the majority of land in and around Ashford Town, and at a number of other settlements, has safeguarded mineral deposits. Sites that are proposed for allocation in and around Ashford and at other settlements represent the most sustainable options to provide for the housing and employment needs for the Borough, as has been demonstrated through the Sustainability Appraisal. In order to meet the needs for housing and employment development it is the Council’s view that it would not be possible to avoid allocations within these areas, and would create an unsustainable form of development if the mineral safeguarded areas were not considered for development as a matter of principle. Kent County Council has requested that minerals assessments be carried out in order to identify the need for prior extraction of the minerals within the safeguarded areas. The Minerals and Waste Local Plan 2013 – 2030 which forms part of the statutory development plan for the Borough, includes policies which set out these requirements, and are therefore material considerations when in determining planning applications. It is not considered necessary to replicate these policies within this Local Plan.*

POLICY S5: LAND SOUTH OF POUND LANE

Representations have been received from the following consultees:

117 Ward Member for Weald South (Cllr Aline Hicks)	1769 Ian Wolverson
140 Personal (Rod Gilbert)	2220 Kingsnorth Parish Council (Len Bunn)
323 Ian Bull Consultancy Ltd. (Ian Bull) for Pentland Homes Ltd	2290 Peta Grant

331 Ian Bull Consultancy Ltd. (Ian Bull) for Malcolm Jarvis Homes Ltd (Jarvis)	2351 Southern Water (Planning Policy)
906 Gary Whatrup	2392 G harrison
1229 Paul W Bartlett	2402 S Harrison
1631 Helen Ansell	2571/2573/2574 Kent County Council (KCC) (Barbara Cooper)
1741 CPRE Kent (Ashford District Committee) (Hilary Moorby)	2694 Highways England (Kevin Brown)

Summary of representations – Main Issues

Issue - General 117 surprised of need for substantial allocation in light of Chilmington. 1631 No need to build if immigration cut, and suggests waiting to see what happens leaving the EU. 1229 Density should be reduced to 15dph given relationship to Kingsnorth Village.

Response *The introduction to the draft Plan highlights the results of the population projection as presented within the Strategic Housing Market Assessment (SHMA). Government policy requires local authorities to determine their own housing needs. However, this must be based upon an assessment of housing need through a SHMA, to ensure that general market and affordable housing needs are fully met until 2030.*

The borough wide strategic approach is to allocate most land in and around the urban areas. Rural areas must expand in a sustainable way to enable us to meet needs of all population and secure the future sustainability of those settlements.

Brexit doesn't alter the population forecasts, so at present the Local Plan must allocate based on the current position.

Need for greater density / higher numbers 323 and 331– Seeks higher numbers on site, with 25dph leading to 150dw rather than 100dw, with higher densities on parts of site. Current Topic Policy detailed maps showing extent of development will be changed as a result of masterplanning. Requests following amendment, “*Land South of Pound Lane is proposed for residential development. The capacity of the site will be determined following a comprehensive Master plan exercise, but is expected to be in the region of 150 dwellings.*” Also required resultant changes to 4.48.

Response *Agreed – See proposed change MC12.*

Environmental concerns 906 – Allocation does not take account of location in flood zone 3 + climate change figures, with development inevitably leading to greater runoff (to Whitewater Dyke). Flood defences are under strain in this area, and will be compromised by development downriver. Current Kingsnorth Strategic Link Road Environmental Assessment document does not take into account new Environment Agency climate change prediction model, and factor in future Chilmington Green development. 1631 development will raise flood risk elsewhere and there is lack of justification to build on beautiful land.

Response *Development does not necessarily increase flood risk locally or in the wider catchment. Indeed, as per the Council's Sustainable Drainage SPD, there are examples in which flood risk can diminish as a result of development. However, in this case, the site is almost wholly in Flood Zone 1 (lowest risk), and the recent Strategic Flood Risk Assessment to take account of new Climate Change predictions have revealed no increased risk on this site. We continue to work with the Environment Agency in any case where appropriate.*

Visual impact and buffer zone 906 Original WS11 should be allocated to provide a buffer zone. 1229 seeks extension of buffer zone protecting houses on E side to Ashford Road. 2392 and 2402 seeks expanded green buffer, and reduced density.

Response *Noted. See New Policy SP7*

Traffic and infrastructure concerns 117 traffic should be directed north towards improved Park Farm roundabout while 1229 requests junction improvements at Church Hill/Ashford Road crossroads given access is from Ashford Road. 2220 also seeks traffic lights at Kingsnorth Crossroads. Traffic calming should be required on Pound Lane. 1769 states that major work is required to ensure a network of interconnected routes that tie the site to the surrounding area, and that Magpie Hall Road should remain a minor road. 2392 and 2402 Concern over traffic generated and impacts of this at Queens Head crossroads and outside the school, as well as lack of public transport.

140 supports outline layout providing green pedestrian routes through southern part of south, 2574 support for S5a and C, but requires consideration of Ashford Road crossing's safety, ensuring direct access (pedestrian/cycle) to village.

2290 seeks the delay of development until the construction of J10a of the M20. 2694 unconvinced site is deliverable pending J10a. Proposes addition of, "No occupation of the residential element of the development shall take place until the proposed M20 Junction 10a is complete, in accordance with Policy TRA1."

Response *The Council agrees that delivery of this site is dependent upon the delivery of J10a of the M20. Transport infrastructure improvements on this site are expected to come together with those on S3 and S4 to comprise a set of locally strategic improvements to the satisfaction of KCC as Highways Authority, and Highways England with responsibility for the Strategic Road Network.*

The Council will work together with the developers and KCC to explore options for the two crossroad junctions in the vicinity of the site (Ashford Road/Church Hill/Pound Lane; Ashford Road/Magpie Hall Road/Steeds Lane).

Given the proposed timescale for the implementation of Junction 10a, it is most unlikely that there would be any residential occupations on this site in advance of J10a completion. Given the relative lack of implementation of sites with committed capacity at Junction 10, it would be unreasonable to impose a specific policy restriction on occupations on this site.

The Council will work with Highways England and any site developer to provide evidence of the impact of development on the SRN of this site and its deliverability prior to the completion of Junction 10a of the M20.

Need for archaeological investigation 117 work could impinge on Roman Remains such as those identified when Westhawk was being developed. 1229, 2392 and 2402 seek requirement for archaeological assessment within policy.

Response *This site is wholly within an Area of Archaeological Potential (Iron Age and Roman activity), and so the provisions of draft policy ENV15 would apply.*

Other issues 117 Majority of Chilmington development, and Discovery Park, should be delivered prior to any further development in the locality, as well as provision of Green Corridor. 1741 Supportive of allocation, but should benefit existing community through “Enquiry by Design” process, and be phased over a longer period. 2351 There is existing (sewerage) infrastructure on site, and an easement width of between 6 and 13 metres would be required. This should be taken into account in proposed development.

2573 site is safeguarded sub-alluvial river terrace deposits and therefore vulnerable to sterilisation. A mineral assessment is required.

Response *Developers and infrastructure providers should work together to identify and design existing structure into development and, if necessary, divert or improve existing on-site infrastructure.*

The Council generally does as a matter of course organise a formal design process for larger sites.

Ashford Town sits on a band of mineral deposits which run north-west to south-east through the Borough, meaning that the majority of land in and around Ashford Town, and at a number of other settlements, has safeguarded mineral deposits. Sites that are proposed for allocation in and around Ashford and at other settlements represent the most sustainable options to provide for the housing and employment needs for the Borough, as has been demonstrated through the Sustainability Appraisal. In order to meet the needs for housing and employment development it is the Council’s view that it would not be possible to avoid allocations within these areas, and would create an unsustainable form of development if the mineral safeguarded areas were not considered for development as a matter of principle. Kent County Council has requested that minerals assessments be carried out in order to identify the need for prior extraction of the minerals within the safeguarded areas. The Minerals and Waste Local Plan 2013 – 2030 which forms part of the statutory development plan for the Borough, includes policies which set out these requirements, and are therefore material considerations when in determining planning applications. It is not considered necessary to replicate these policies within this Local Plan.

Issue - Developer Contributions 2571 Seeks financial contributions for primary school at Court Lodge, and for development of community centre.

Response *The requirement for developer contributions towards the provision of infrastructure and community facilities is dealt with by generic policies (COM1, COM2 and IMP1) in the Plan. Where site specific projects have been identified in the Infrastructure Delivery Plan these have been identified in site specific policies. No change proposed.*

POLICY S6: FORMER NEWTOWN WORKS

Representations have been received from the following consultees

2575 / 2576 KCC	2697 Highways England
2352 Southern Water	1482 Milligan Limited
1743 CPRE	1417 Central Ashford Community Forum
2170 Maddox and Associates	

Summary of Representations – Main Issues

Issue – financial contributions 2575 requires a proportionate financial contributions towards the construction costs of any new education provision required to mitigate the impact of the proposed development. Additional contributions for the provision of County Council Services (e.g. Adult Social Care, Youth Services and Libraries) will also be required.

Response: *The requirement for developer contributions towards the provision of infrastructure and community facilities is dealt with by generic policies (COM1, COM2 and IMP1) in the Plan. Where site specific projects have been identified in the Infrastructure Delivery Plan these have been identified in site specific policies. No change proposed.*

Issue – adequacy of sewerage infrastructure 2352 - (i) additional local sewerage infrastructure would be required to accommodate the proposed development (involving making a connection to the local sewerage network at the nearest point of adequate capacity) and (ii) there is existing sewerage infrastructure and pumping stations on site. It notes that the supporting text to policy S6 indicates that there is a need to provide additional sewerage infrastructure and protect the existing sewerage infrastructure on site. However, as planning law dictates that applications should be determined in accordance with planning policy and so a site specific criteria should be included in policy S6. Propose the following criteria is added to policy S6 after 'Development proposals for this site shall be in accordance with the agreed masterplan/development brief and':

- j) Provide a connection to the nearest point of adequate capacity in the sewerage network, in collaboration with the service provider.
- k) Provide an adequate gap between the wastewater pumping station and development to allow odour dispersal and help prevent an unacceptable impact from vibration. Provide future access to the existing sewerage infrastructure for maintenance and upsizing purposes.

Response: *The principle relating to the recognition of sewerage requirements in site specific planning policies was tested at the examination of the Ashford Urban Sites and Infrastructure*

DPD. The Inspector concluded in his report (paragraph 84): ‘The NPPF (para. 157) makes it clear that local plans should plan positively for the infrastructure required in the area. In the context provided by this new guidance I agree with SW that the requirement to upgrade the existing sewerage infrastructure where necessary should be included within policy wording’. Accordingly, a site specific criteria was included in policy U2 and its omission from the current Local Plan is considered to be a retrograde step. It is important to give early warning to prospective developers regarding the need to connect offsite, as it will add to the cost of development. If the requisite infrastructure is not delivered, the sewers would become overloaded, leading to pollution of the environment. This situation would be contrary to paragraph 109 of the NPPF, which requires the planning system to prevent both new and existing development from contributing to pollution.

Agree with the inclusion of point j) and k) in the policy S6. See Proposed Change MC13.

Issue – land use 2170 / 1482 - Paragraph 157 point 5 of the NPPF states that Local Plans should 'allocate sites to promote development and flexible use of land, bringing forward new land where necessary and provide detail on form, scale, access, and quantum of development where appropriate'.

The terms 'specialist' and 'small-scale' in draft policy S6 do not promote development and the flexible use of land at Newton Works. Concerned that building and occupation of future development is restricted to levels equivalent in traffic generation to the previous lawful uses on the site) in advance of the granting of a development consent order for the construction of the proposed M20 junction 10a and until additional capacity has been provided at the Orbital Park A2070 junction do not take into account the circumstances prevailing at a future point in time. Contend that to promote development at Newton Works the acceptability of the quantum of future development on highway capacity should be assessed at the time of its building and occupation.

The former Newtown Works represent a unique opportunity to develop a regional visitor destination. We contend this that this vision should be reflected in local plan policy. Recommend policy S6 be reworded.

Response *The site of policy S6 needs to be considered in the context of the adjoining policy S7 (Klondyke Works) which is the Council’s preferred location for a tourism/visitor centre such as the Ashford International Model Railway Centre.*

Issue – impact on the SRN 2697 - Policies S6 and S7 both state that “Only development that would generate no more traffic than would have been generated by the equivalent of the previous lawful uses of the site, shall be built and occupied in advance of the granting of a Development Consent order for the construction of the proposed M20 Junction 10a and until additional capacity has been provided at the Orbital Park A2070 junction.”

The impacts of these sites on the SRN should be set out in the transport evidence base. As currently written, these policies suggests that an unlimited amount of traffic, above and beyond previously permitted levels, would be acceptable once the proposed SRN improvements are completed. This approach is not considered justified, consistent with

national policy, or “sound” in line with the NPPF. We therefore recommend that the following policy wording additions and deletions should be applied:

Where traffic generation is expected to exceed that of previous lawful uses a Transport Statement/Transport Assessment should be provided in accordance with Policy TRA8.

Response: Amend the supporting text to the policy to refer to the cross reference to policy TRA8. See Change MC13.

General comments 1417 The houses around this area of Newtown have already been built very close to a narrow road, leaving no option for road widening as well as the problems with the Crowbridge Bridge. This development would greatly increase road use there. And anything developed there ought to be railway themed!

Response: Noted

Support 2576 supports the policy sub section (g) noting this area represents a significant opportunity to improve connectivity of the Walking and Cycle routes both locally and beyond towards Orbital Park as identified. 1743 supports the site allocation

Response: support noted.

POLICY S7: FORMER KLONDYKE WORKS

Representations have been received from the following consultees

2577/ 2579 / 2581 KCC	2698 Highways England
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Summary of Representations – Main Issues

Issue – developer contributions 2577 states that the County Council will require proportionate financial contributions towards the construction costs of any new education required to mitigate the impact of the proposed development. Additional contributions for the provision of County Council Services (e.g. Adult Social Care, Youth Services and Libraries) will also be required.

Response: The requirement for developer contributions towards the provision of infrastructure and community facilities is dealt with by generic policies (COM1, COM2 and IMP1) in the Plan. Where site specific projects have been identified in the Infrastructure Delivery Plan these have been identified in site specific policies. No change proposed.

Issue – PRoW 2581 states that the Southern Footway requires widening which could be achieved through re-alignment of the retaining wall in this location. The destination will lend

itself to sustainable access and it is imperative that this site delivers enhancements and good pedestrian and cycle connectivity to the mainline station.

Response: *This is a detailed design issue that has been incorporated into the scheme for the site and will be addressed through the development management process.*

Issue – impact on the SRN 2698 is concerned that Policies S6 and S7 both state that “Only development that would generate no more traffic than would have been generated by the equivalent of the previous lawful uses of the site, shall be built and occupied in advance of the granting of a Development Consent order for the construction of the proposed M20 Junction 10a and until additional capacity has been provided at the Orbital Park A2070 junction.” The impacts of these sites on the SRN should be set out in the transport evidence base.

As currently written, these Policies suggest that an unlimited amount of traffic, above and beyond previously permitted levels, would be acceptable once the proposed SRN improvements are completed. This approach is not considered justified, consistent with national policy, or “sound” in line with the NPPF. We therefore recommend that the following policy wording additions and deletions should be applied:

Where traffic generation is expected to exceed that of previous lawful uses a Transport Statement/Transport Assessment should be provided in accordance with Policy TRA8.

Response: *Amend the supporting text to the policy to include cross reference to policy TRA8. The Council will work with Highways England and any site developer to provide evidence of the impact of development on the SRN of this site and its deliverability prior to the completion of Junction 10a of the M20. See Proposed Change 14.*

POLICY S8: LOWER QUEEN’S ROAD

Representations have been received from the following consultees:

2582 / 2583 / 2585 KCC	1354 / 1327 Mr J Dance
1744 CPRE	1419 Central Ashford Community Forum

Summary of Representations – Main Issues

Issue – developer contributions 2582 states that the County Council will require proportionate financial contributions towards the construction costs of any new education provision required to mitigate the impact of the proposed development. Additional contributions for the provision of County Council Services (e.g. Adult Social Care, Youth Services and Libraries) will also be required.

Response *The requirement for developer contributions towards the provision of infrastructure and community facilities is dealt with by generic policies (COM1, COM2 and IMP1) in the Plan. Where site specific projects have been identified in the Infrastructure Delivery Plan these have been identified in site specific policies. No change proposed.*

Issue – ProW 2585 advises that Public Footpath AU32 runs adjacent to the Western boundary of this site and is an important and direct route to the Town Centre and Station Road. The current policy does not reflect the importance of this link or make any recommendations to enhance it. It supports Policy S8 (d) with the following requested amendments - reference should also be made to the Green Corridor to the West of the Site. Arguably, this is a more important link taking direct access to the town centre and forming part of the wider corridor from the Canterbury Road. Designs should include overlooking of the path to the West and create a wide and inviting pedestrian and cycle corridor.

Response *No change necessary. The policy and supporting text make reference to providing links to the existing pedestrian/cycle paths and improving accessibility into and through the green corridor. The land to the west of the site is not within the existing green corridor boundary.*

Issue – impact on biodiversity 1354 / 1327 argues that the policy is factually incorrect. There are no play facilities at the end of Heathfield Rd as stated. The proposed site has several mature (100 year +) lime trees of significant landscape value. The proposed site has nesting sites for several bird species including the area's only flock of *Aegithalos caudatus*, several types of warblers, finches, thrushes and woodpeckers. The proposed site is an essential adjunct to the Green Corridor providing undisturbed nest sites for species such as grass snakes and should be integrated into the aforementioned and not developed. Uninterrupted green spaces in urban areas are known to be of exceptional ecological value. This site provides a link from the riverbank/QMP to Northbrooke Lane and the cemetery and this is used by amphibians, reptiles and small mammals as a "highway". Being subject to a one in thirty year flood event this site is not suitable for development. The river bank adjacent to this site provides undisturbed nesting areas for coots and moorhens and water voles. The undeveloped riverbank is an essential resource for local residents, especially those with disabilities, seeking peace and tranquillity. Development of this greenfield site will have a measurable negative impact on the mental health and physical well being of local residents. The site should be withdrawn from the Plan.

Response: *This site has been identified for some time as an allocation. In the preparation of this Plan we have contacted the land owners and they have indicated their intention to vacate the site and therefore redevelopment remains likely during the Plan period.*

Acknowledge that the site could be of nature conservation value in its own right and agreed that this could be incorporated into the policy. Amendment to policy wording (see MC15) to add:

Ensure that there is an appropriate assessment of the nature conservation value of the site and that any development makes suitable arrangements for appropriate mitigation in accordance with ENV1.

Issue – highway safety 1354/1327 The junction of Lower Queens Road with Canterbury Rd has poor visibility for vehicles exiting Lower Queens Rd. Development of the site will not afford better access to the QMP as there is no bridge over the Stour at this point.1419 also objects on grounds that Lower Queens Road has terrible visibility onto Canterbury Road, and the road is not wide enough for delivery lorries. It would be better to have main access at Mace Lane whether or not greater than 40 units are created. No additional property should be built at the land fronting Queen’s Court because that would worsen it further.

Response: *Kent Highways have acknowledged that a development of 40 units could be accessed via the existing junction onto Canterbury Road. A development in excess of this level of development, including a redevelopment of the wider area will require the provision of a primary access onto Mace Lane and this is acknowledged in paragraph 4.102*

Issue – provision of family housing 1354 / 1327 There is no requirement for the properties in this space at Lower Queens Road to be flats - and if affordable housing, priority should be given to building sustainable communities with family housing at this town centre riverside location.

Response: *The Council is proposing, as an amendment to the Plan, the inclusion of a new policy HOU18 that will require a mix of dwelling types within new developments. The development of 40 units on this site will require the provision of affordable housing.*

Support 1744 supports this site.

Response: *support noted.*

POLICY S9 – KENNARD WAY, HENWOOD

Representations have been received from the following consultees:

2104/2137 Swan Property Ltd (DHA Planning)	2353 Southern Water
2321 Environment Agency	2588/2589/2591 Kent County Council

Summary of representations – Main Issues

Issue - House design and type 2137 objects to paragraph 4.109 of the supporting text which says development should be in keeping with surrounding residential areas and be terraced or semi-detached. They wish to add ‘detached’ as an option as they say there are detached properties in the area.

Response: *Agreed. Paragraph 4.109 amended to remove reference to specific house types.*

Issue - Groundwater Protection Zone 2321 (EA) The site is in a very sensitive setting from a groundwater protection point of view. Policy S9 should make reference to this, to ensure

appropriate site investigation and risk assessment is undertaken to prevent pollution of controlled waters. Where Sustainable Urban Drainage systems include infiltration, an assessment may be required to demonstrate that this will not cause pollution.

Response: Accepted. See proposed change MC16.

Issue - WWTW & Sewage infrastructure maintenance 2353 (SW) states that the development site is in close proximity to Ashford Wastewater Treatment Works and that there is existing sewerage infrastructure on site.

They propose that the following criteria is added to policy

h) Provide sufficient distance between Ashford wastewater treatment works and sensitive land uses, such as housing, to allow adequate odour dispersal and not result in an unacceptable impact on amenity by reason of odour.

i) Provide future access to the existing sewerage infrastructure for maintenance and upsizing purposes.

Response: Amend policy(See change MC16) to add 'Provide future access to the existing sewerage infrastructure for maintenance and upsizing purposes'

In the RJ add: 'There is existing sewerage infrastructure on the site that needs to be taken into account when designing the proposed development. An easement width of between 6 and 13 metres would be required depending upon the pipe size and depth. This easement should be clear of all proposed buildings and substantial tree planting.'

With regard to the proximity to the WWTW, this is one of many factors which need to be considered and balanced against each other in deciding which are the most appropriate sites to allocate for development. Full assessment of all of the factors has been carried out through the Sustainability Appraisal, and this site has been considered against the other reasonable alternatives. On balance whilst this site may on occasion be affected by odour from the WWTW it is considered that this site is an appropriate option taking into account the need to meet the Borough's housing requirement and the other alternatives available.

Issue - Cycle and Pedestrian routes 2591 supports the requirement for connections but would like such connections to specifically state between Henwood and Kennard Way.

Response: No change necessary – the policy and supporting text already make reference to providing links to the existing pedestrian/cycle routes and local services.

Support 2104 and 2137 supports the site allocation.

Response: Support noted.

POLICY S10 – GASWORKS LANE

Representations have been received from the following consultees:

1421 Central Ashford Community Forum	2323 Environment Agency
2354 Southern Water	2593, 2596 Kent County Council
2699 Highways England	

Summary of Representations – Main Issues

Issue: Housing Mix 1421 is concerned that the Town Centre allocations are flatted development and contain no mix of family homes which create vibrant mixed communities with homes for downsizing.

Response Allowance is made within the policy for townhouses (family homes). A masterplan is also required by the policy, where housing mix will be addressed in conjunction with new policy HOU18 ‘Providing a range and mix of dwelling types and sizes’. No change required.

Issue: Infrastructure 1421 is concerned that there is no planned additional school infrastructure in the Town Centre. 2593 from KCC states that it will require financial contributions to education provision and other county services.

Response: It is accepted that any new development proposals will affect existing services. Therefore, service providers, including KCC Highways & Education, Water companies and the Environment Agency (drainage and flooding), the Ashford Clinical Commissioning Group and the East Kent NHS Hospitals Trust are consulted at all stages of the plan making process to identify if they have existing capacity or if additional capacity is needed to accommodate additional development. If additional capacity is needed, this is then planned for through the Local Plan process and the Infrastructure Delivery Plan, which supports the Local Plan.

It is the responsibility of these service providers and stakeholders to identify and ensure delivery of the infrastructure that is required. The Local Plan plays a supporting role in helping to deliver the infrastructure, by allocating sites or requiring developers to make financial contributions.

The requirement for developer contributions towards the provision of infrastructure and community facilities is dealt with by generic policies (COM1, COM2 and IMP1) in the Plan. Where site specific projects have been identified in the Infrastructure Delivery Plan these have been identified in site specific policies. No change proposed.

Issue – waste water infrastructure 2354 requires wording to be added to policy relating to connections to the sewerage network.

Response: Add the following criteria to the policy: ‘Provide a connection to the nearest point of adequate capacity in the sewerage network, in collaboration with the service provider’

In the RJ add: ‘Southern Water’s assessment has revealed that additional sewerage infrastructure would be required to serve the proposed development. The development will therefore be required to make a connection to the nearest point of adequate capacity in the sewerage network. Early liaison should take place with the service provider in this regard.’

See Proposed Change MC17.

Issue – minerals safeguarding 2596 – KCC highlights that the site is within a mineral safeguarding area and that a minerals assessment should be prepared.

Response: Kent County Council has confirmed that if the site is located within an existing urban area, the provisions for safeguarding of minerals do not apply, and these comments can be ignored.

Issue – highway safety 2699 states that Policy S10 proposes the Gasworks Lane site (off Leacon Road) for residential development (up to 150 units). Policy S11 proposes the Leacon Road site for residential development (up to 100 units). The individual and cumulative impact of these closely located sites could adversely impact both the M20 and A2070 in terms of congestion and safety.

The impacts of the sites on the SRN should be set out in the transport evidence base. In the absence of a current transport evidence base there is uncertainty regarding the SRN impacts of these sites and whether or not the proposed development is deliverable in transport terms. In the absence of this information, for this Policy to be effective and "sound" in line with NPPF we recommend that the following policy wording additions be applied:

A Transport Assessment should be produced in accordance with Policy TRA8 and measures proposed to mitigate any impact of development on the wider transport network.

Response: Amend the supporting text to the policy to include cross reference to policy TRA8. The Council will work with Highways England and any site developer to provide evidence of the impact of development on the SRN of this site and its deliverability prior to the completion of Junction 10a of the M20. See Change MC17.

Support 2323 is supportive of the policy and consider it sound, with a minor amendment to replicate supporting text at 4.119 regarding assessment of land contamination arising from previous uses and how it can be resolved into the policy itself.

Response Agree, policy amended to include requirement as set out in paragraph 4.119 see proposed change MC17.

POLICY S11: LEACON ROAD

Representations have been received from the following consultees

2594 / 2597 KCC	2700 Highways England
2355 Southern Water	1422 Central Ashford Community Forum
1746 London and South Eastern Railway	1019 South Ashford Community Forum

Summary of Representations – Main Issues

Issue – developer contributions 2594 the County Council will require proportionate financial contributions towards the construction costs of any new education provision required to mitigate the impact of the proposed development. Additional contributions for the provision of County Council Services (e.g. Adult Social Care, Youth Services and Libraries) will also be required. 1422 objects to absence of planning for education facilities in the town centre.

Response *The requirement for developer contributions towards the provision of infrastructure and community facilities is dealt with by generic policies (COM1, COM2 and IMP1) in the Plan. Where site specific projects have been identified in the Infrastructure Delivery Plan these have been identified in site specific policies. No change proposed.*

Issue – adequacy of wastewater infrastructure 2355 requires in line with NPPF and NPPG and to ensure a sustainable development the following criteria is added to policy S11 after ‘Development proposals shall come forward in accordance with a detailed masterplan for the site that should be based on the following principles’:

j) Provide a connection to the nearest point of adequate capacity in the sewerage network, in collaboration with the service provider and provide future access to the existing sewerage infrastructure for maintenance and upsizing purposes.

Response *Agreed. See change MC18. Add the following criteria to the policy : ‘Provide a connection to the nearest point of adequate capacity in the sewerage network, in collaboration with the service provider’*

In the RJ add: ‘Southern Water’s assessment has revealed that additional sewerage infrastructure would be required to serve the proposed development. The development will therefore be required to make a connection to the nearest point of adequate capacity in the sewerage network. Early liaison should take place with the service provider in this regard.’

Issue – loss of railworks and potential future employment opportunities 1746 argues that the importance of retaining the former Bombardier rail works is undervalued within the context of ever increasing demand for rail services and increasing levels of overcrowding on Southeastern services which need to be resolved through the provision of additional rolling stock. Whilst the trains are leased the need for stabling facilities to maintain, service and clean additional rolling stock acts as a barrier to investment for rail franchises. The current Chart Leacon site already has a signalled rail connection to the mainline which is highly valuable in this context. This location could also provide additional employment opportunities for the local area which should not be lost. The GTR franchise will stable trains in the Ashford area from 2018 (approx 48 vehicles) in addition to Southeastern which is currently negotiating additional Mainline vehicles. Significant growth is being experienced on Highspeed services with high levels of overcrowding in the peaks, this will need to be addressed in the next Southeastern franchise, logically additional vehicles maintained by Hitachi at Ashford will be needed, to accommodate this other rolling stock will need to be displaced from stabling at the Hitachi depot.

1019 not sure that the site is appropriate for housing and notes the potential for the Chart Leacon Railway Works site becoming available. A small residential development on this site will be isolated from services and potentially suffer from the impact of adjacent commercial development leading to noise, traffic and parking problems. The whole of the site should be allocated for Commercial Use (B1-B8), development fronting Leacon Road and Beaver Lane providing an active frontage (creating a consistent approach with Site Policy S22 Chart Industrial Estate), and acknowledging the Green Corridor. Contributions from the site should be sought for enhancement of the Ford, an important heritage site for Ashford, and the land between the River, Leacon Road and Brookfield Road

Response Amend policy so that an appropriate area of land is safeguarded and protected for operational railway use. Feasibility Study has indicated that only a part of the site would be required to be safeguarded for operational railway use, This would leave sufficient space for other commercial development, and would not impact on the residential proposals for the site along the Leacon Road frontage.

Residential development on this site is an opportunity to revitalise the area, introducing a mix of uses along the Leacon Road corridor.

The current policy covers two separate parcels of land which are in different ownership. It is likely that the proposals for residential development will come forward separately from the commercial and operational railway use. For both these reasons it is proposed to separate the proposals for the site into two policies. See New Policy 11A.

Issue – Highways 2700 argues that the impacts of the sites on the SRN should be set out in the transport evidence base. In the absence of a current transport evidence base there is uncertainty regarding the SRN impacts of these sites and whether or not the proposed development is deliverable in transport terms. In the absence of this information, for this Policy to be effective and “sound” in line with NPPF we recommend that the following policy wording additions be applied:

“A Transport Assessment should be produced in accordance with Policy TRA8 and measures proposed to mitigate any impact of development on the wider transport network”.

Response : Amend the supporting text to include cross reference to policy TRA8. See Change MC18..

Issue – housing mix 1422 expresses concern that the focus for the town centre developments seems to be on flats which are not the best solution for vibrant mixed communities where families can thrive.

Response: *Nothing in the policy requires that flats are to be developed on this site but there is no reason why flatted development cannot be suitable on sites provided suitable design solutions can be achieved. New Policy HOU18 ‘providing a range and mix of dwelling types and sizes’ will apply.*

POLICY S12: FORMER K COLLEGE, JEMMETT ROAD

Representations have been received from the following consultees

2595 / 2626 KCC	1423 Central Ashford Community Forum
1329 Sport England	

Summary of Representations – Main Issues

Issue – developer contributions 1595 states that the County Council will require proportionate financial contributions towards the construction costs of any new education provision required to mitigate the impact of the proposed development. Additional contributions for the provision of County Council Services (e.g. Adult Social Care, Youth Services and Libraries) will also be required.

Response: *The requirement for developer contributions towards the provision of infrastructure and community facilities is dealt with by generic policies (COM1, COM2 and IMP1) in the Plan. Where site specific projects have been identified in the Infrastructure Delivery Plan these have been identified in site specific policies. No change proposed.*

Issue – loss of playing fields 1329 states that development that would either involve the loss of playing field or prejudice the use of the playing field would be strongly resisted by Sport England. No sites including playing fields should be allocated for development if this would include the loss of playing field or prejudice the use of the playing field.

Response: *There are no public playing fields on this site – open space is linked to the school here. Any residential development here will have to provide related open space.*

Issue – parking 1423 additional residential development on the Jemmett Road and Ashford South School sites will put pressure on existing parking provision. Jemmett Road provides essential parking for Victoria Park, and parking places are already hard to come by for residents. So whatever is built there, parking is essential. Roads access is currently poorly surfaced and complicated.

Response: *Any residential scheme will have to provide adequate parking in accordance with the adopted standards as set out in Policy TRA3(a).*

Support 2626 supports this policy. Public Footpath AU38 forms the basis of the strategic "Learning Link" which will remain a critical piece of the future Cycle network heading South from the town centre. This policy appears to protect and enhance this route including references to overlooking which are fully supported.

Response: *support is noted.*

POLICY S13: FORMER ASHFORD SOUTH SCHOOL, JEMMETT ROAD

Representations have been received from the following consultees

2356 Southern Water	1425 Central Ashford Community Forum
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Summary of Representations – Main Issues

Issue – wastewater infrastructure 2356 proposes in line with NPPF and NPPG and to ensure a sustainable development, that the following criteria is added to policy S13 after ‘Development proposals for the site shall’: j) Provide a connection to the nearest point of adequate capacity in the sewerage network, in collaboration with the service provider.

Response: See Change MC20. Add the following criteria to the policy :

‘Provide a connection to the nearest point of adequate capacity in the sewerage network, in collaboration with the service provider’.

In the RJ add: ‘Southern Water’s assessment has revealed that additional sewerage infrastructure would be required to serve the proposed development. The development will therefore be required to make a connection to the nearest point of adequate capacity in the sewerage network. Early liaison should take place with the service provider in this regard.’

Issue – parking 1425 additional residential development on the Jemmett Road and Ashford South School sites will put pressure on existing parking provision. Jemmett Road provides essential parking for Victoria Park, and parking places are already hard to come by for residents. So whatever is built there, parking is essential. Roads access is currently poorly surfaced and complicated.

Response: Any residential scheme will have to provide adequate parking in accordance with the adopted standards as set out in Policy TRA3(a).

POLICY S14: PARK FARM SOUTH EAST

Representations have been received from the following consultees

2598 / 2622 KCC	1426 Central Ashford Community Forum
2357 Southern Water	2396 G Harrison
1860 Kent Wildlife Trust	2404 S Harrison
1748 CPRE	1233 Paul Bartlett

1695 Jacqueline Male	1144 Bryan Curtis
2265 Persimmon Homes and Taylor Wimpey	815 Tony Heydon
2673 Network Rail	724 Ian Beevis
2701 Highways England	683 Denis King
	44 Gareth Evans

Summary of Representations – Main Issues

Issue - Minerals safeguarding 2598 states that Sub-alluvial River Terrace deposits are present within the allocated site and are vulnerable to sterilisation. As set out in the adopted Kent Minerals and Waste Local Plan 2013-2030, Policy CSM 5: Land-won Mineral Safeguarding and Policy DM 7: Safeguarding Mineral Resources detail how minerals of economic importance will be safeguarded from being unnecessarily sterilised by non-mineral development, as well as the circumstances when non-minerals development may be acceptable at a location within a Minerals Safeguarding Area. In light of this, KCC recommends that a minerals assessment should be prepared to determine the extent and nature of the mineral deposits to determine the viability and practicality of prior extraction.

Response : *Ashford Town sits on a band of mineral deposits which run north-west to south-east through the Borough, meaning that the majority of land in and around Ashford Town, and at a number of other settlements, has safeguarded mineral deposits. Sites that are proposed for allocation in and around Ashford and at other settlements represent the most sustainable options to provide for the housing and employment needs for the Borough, as has been demonstrated through the Sustainability Appraisal. In order to meet the needs for housing and employment development it is the Council's view that it would not be possible to avoid allocations within these areas, and would create an unsustainable form of development if the mineral safeguarded areas were not considered for development as a matter of principle. Kent County Council has requested that minerals assessments be carried out in order to identify the need for prior extraction of the minerals within the safeguarded areas. The Minerals and Waste Local Plan 2013 – 2030 which forms part of the statutory development plan for the Borough, includes policies which set out these requirements, and are therefore material considerations when in determining planning applications. It is not considered necessary to replicate these policies within this Local Plan.*

Issue – developer contributions 2622 states that proportionate financial contributions required towards KCC services including towards the construction costs of any new education provision required to mitigate the impact of the proposed development, as well as contributions towards the expansion of Finberry Primary School.

1233 The proportionate contribution to the provision of community facilities must be allocated to those in Bridgefield and should not be spent elsewhere. 1140 the infrastructure needs to be delivered around new developments. 815 argues that the proposal for additional

dwelling based on this land does not take into consideration various lack of infrastructure issues that the community based at Bridgefield already have to deal with.

Response : *The requirement for developer contributions towards the provision of infrastructure and community facilities is dealt with by generic policies (COM1, COM2 and IMP1) in the Plan. Where site specific projects have been identified in the Infrastructure Delivery Plan these have been identified in site specific policies. No change proposed.*

Issue – wastewater infrastructure 2357 proposes in line with NPPF and NPPG and to ensure a sustainable development, that the following criteria is added to policy S14 after ‘Development proposals for the site shall: j) Provide a connection to the nearest point of adequate capacity in the sewerage network, in collaboration with the service provider.

Response: *Agree. Add the following criteria to the policy (See proposed change MC21)*

‘Provide a connection to the nearest point of adequate capacity in the sewerage network, in collaboration with the service provider’

In the RJ add: ‘Southern Water’s assessment has revealed that additional sewerage infrastructure would be required to serve the proposed development. The development will therefore be required to make a connection to the nearest point of adequate capacity in the sewerage network. Early liaison should take place with the service provider in this regard.’

Issue – Highways and highway safety 2701 argues that the impacts of the sites on the SRN should be set out in the transport evidence base. In the absence of a current transport evidence base there is uncertainty regarding the SRN impacts of these sites and whether or not the proposed development is deliverable in transport terms. In the absence of this information, for this Policy to be effective and “sound” in line with NPPF we recommend that the following policy wording additions be applied: “A Transport Assessment should be produced in accordance with Policy TRA8 and measures proposed to mitigate any impact of development on the wider transport network”.

1140 If building takes place on the above site thought should be given to a new crossing over the A2070 together with a roundabout to provide access. This would take pressure of Finn Farm Road and Violet Way. Access to Cheesemans Green Lane should be denied. This is a country lane and too narrow to take additional traffic. 2396 / 2404 Lorries currently use Violet Way as a lorry park first thing in the morning and the junction from Finn Farm Road to Violet Way is blind and extremely dangerous. The traffic lights; three way junction at Finn Farm Road are a nonsense. 1233 The three-way traffic junction at Finn Farm Road must be upgraded to provide full access to the site. The conditions require “investigation” but this is not enough, and must be a prerequisite.

724/683 The impact of the extra traffic across the bridge at Finn Farm road has been vastly underestimated. Appreciate that there will eventually be the road through to Finberry but the majority of local resident's journeys will still be using the bridge. Suggest you revisit this site in 2023 when the true impact of traffic and sustainability are better understood once the current Bridgefield and Finberry sites are fully occupied and the road access to Finberry in place.

Response : Amend the supporting text to the policy to cross reference policy TRA8. See Changes MC21.

KCC Highways and Transportation support the proposed allocations in the Plan from a highway capacity perspective, stating that 'Transport modelling work has also been undertaken to understand and define the implications of proposed Local Plan allocations on the local highway network. Traffic surveys data has been collated and analysed at three key locations where the Local Plan envisages strategic growth will occur, namely Kingsnorth, Kennington and Eureka Park. The analysis that has been completed demonstrates that traffic movements generated from planned growth across the Ashford urban area will not give rise to a severe highway impact on any of the associated corridors'

The policy for this site requires that development proposals for this site investigate the potential to provide a primary vehicle access from the traffic controlled junction at Finn Farm Road to improve the overall junction arrangements.

The Council will work with Highways England and any site developer to provide evidence of the impact of development on the SRN of this site and its deliverability prior to the completion of Junction 10a of the M20.

Issue – access to public transport 2673 The council will need to liaise with Network Rail in relation to the possible public transport contributions to the rail station along the Ashford-Hastings railway line.1426 What provisions will be made to actually access the trains – if out of town there would have to be a very reliable frequent bus service or parking provision with easy access.

724/683 In the assessment document 4.148 it states that 'The existing developments in the area are well served by public transport via local bus services and there is a proposal for a rail station along the adjacent Ashford - Hastings railway line.' This statement is clearly untrue at this moment in time and don't see how either the proposed bus or rail connection can be considered until they are actually in place. The planning inspector turned down this site previously through lack of sustainability and nothing has changed. Were told when we bought our property 7 years ago that there would be a bus service and a rail halt and neither have transpired. Indeed with the possible future electrification of the Ashford - Hastings line it seems very unlikely that there will ever be a rail halt at Bridgefield.

44 believes this section is factually wrong. There is no public transport on Park Farm East and therefore there is no public transport available for the proposed S14 Park Farm South East. S14 is an unsustainable site wholly dependent on the car and should be deleted from the Local Plan.

Response *The reference in the policy to existing public transport relates to that which serves the existing Park Farm development to the west of the A2070. It is acknowledged that previous Inspectors have rejected this site allocation on sustainability grounds but clearly the overall context has changed and there is a requirement for additional housing land to meet the revised housing requirement and hence additional allocations have had to be made. There is a requirement in the policy to make links to the public transport network as well as the potential rail halt.*

Issue – green buffers 2265 A generous buffer is not required along the southern edge of the site – this is not a sensitive edge – existing boundary should be reinforced. 1233 there should be an extension of green corridor south and east of this extension to indicate that this is the final Park Farm extension. 1860 supports the proposal to extend the green corridor from the Park Farm East strategic allocation across to the east of this site. We would ask that the purpose of this as a functional green corridor is made more explicit in the policy S14.

Response *The policy currently requires a generous soft landscaped edge which was intended to reinforce the existing boundary to the south and provide screening to the wider area. Due to the proposed new site allocation to the south of S14, this criterion has been removed from the supporting text and policy criterion. See Proposed change MC21.*

The Green Corridor is proposed to be extended in the future to include the eastern edge of the site, and heading southward, following the South Willesborough Dykes. However, the future boundary for this future extension cannot be determined in advance of development proposals and cannot be defined at present, see map at proposed change MC83. With regards to the function of the Green Corridor, this is established by the Green Corridor Policy ENV2, and within the Green Corridor Action Plan update and will not be replicated within the policy text.

Issue – Flooding 44 states that existing trees, hedgerows and the drainage ditches which abut Cheesemans Green Lane (north boundary of S14) must be retained because these help prevent the Lane flooding in winter. S14 is a sloping site which slopes down to Cheesemans Green Lane which floods and becomes impassable several times every winter where it crosses the Ruckinge Dyke stream. The existing drainage ditches on S14 help prevent Cheesemans Green Lane flooding opposite Southdown Close. Also building houses on this sloping site will increase the run off onto Cheesemans Green Lane and cause it to flood during the heavy winter rains. Suggest addition of condition to require :‘Existing trees, hedgerows and the drainage ditches abutting Cheesemans Green Lane must be retained. Make certain that building houses on the site will not flood the Lane in winter’.

Response *The Strategic Flood Risk Assessment has been updated to take account the updated climate change allowance guidance. This has not resulted in any significant reduction in developable areas for sites which have been identified for development in the Plan. The proposed capacity of this site has taken into account the need to avoid developing areas at risk of flooding. Nevertheless, a site specific flood risk assessment will be required for the site, to inform the specific location of development within the site.*

The requirements of Policy ENV9 to provide sustainable drainage mean that the development will not result in any increase surface water run-off and should aim to reduce existing run-off rates, reducing the overall risk of flooding.

Support 1860 supports the proposal to extend the green corridor from the Park Farm East strategic allocation across to the east of this site. We would ask that the purpose of this as a functional green corridor is made more explicit in the policy S14. 1748 supports this policy, but feels it is essential that the policy gives further clarification on access.1695 supports this policy as basically sound; the flood risk assessment should be a priority along with access routes. The new routes should be in place prior to the development to ensure local roads are

not overwhelmed with additional traffic. Also ample parking provision is essential for both residents and non-residents alike to ensure the access roads are kept clear at all times.

2265 supports the allocation of the site but wishes to see the capacity of the site increased. The site can accommodate 375 dwellings (34 dph). The total site area is 21 hectares and not 11ha which should be corrected.

Response : *The net developable area outside of the Flood Zone is around 12ha. However, it is now proposed that the site can accommodate 325 dwellings across a slightly reduced development area of 11ha to allow for sufficient open space, road networks and landscaping – this an average density of around 30 dph, which is considered appropriate for a countryside edge location. See proposed change MC21.*

POLICY S15: FINBERRY NORTHWEST

Representations have been received from the following consultees

1175 Lesley Wickens	2358 Southern Water
1234 Paul W Bartlett	2399 G Harrison
1402 Brian and Mrs Kathy Roberts	2405 S Harrison
1702 Jacqueline Male	2600, 2624, 2627 Kent County Council
1752 CPRE Kent (Ashford District Committee)	2702 Highways England
2266 Persimmon Homes and Taylor Wimpey	2718 Church Commissioners for England
2318 Canterbury Diocesan Board of Finance LTD	2721 Crest Strategic Projects

Summary of Representations – Main Issues

Issue - Traffic/Highways 1175 Due to the high number of new developments that have been built east of Ashford (eg. Park Farm East, Bridgefield and Finberry), the road networks will struggle to deal with the increased volumes of traffic - too much pressure will be put on the A2070 and the proposed new J10a. 1175 argues that para 4.169 is an unsafe statement to make when combined with the aforementioned sites with regards to HE schemes ability to cope with the combined traffic numbers. 2702 also does not agree with para 4.169 of this policy. They acknowledge that this was agreed under the Core Strategy, but that in the absence of a transport evidence base, there is uncertainty regarding the SRN impacts of this site. They are dubious as to whether the site is deliverable in transport terms under the Local Plan but would be happy to work with ABC to confirm current capacity constraints. 1175 feels that para 4.129 should be replaced by a positive link to phasing the expansion of Finberry to the viability of the road network.

Response *The Council will work with Highways England and any site developer/s to provide evidence of the impact of development on the SRN of this site and its deliverability prior to the completion of Junction 10a of the M20.*

Issue – Parking 2399, 2405 believes that any new dwellings must have parking for the number of vehicles likely to be attributed to that dwelling. In addition, Kingsnorth is so close to the Waterbrook lorry park and is used by the lorries to park in their rest periods. Consideration must be given to physically preventing lorries being able to park (overnight) in residential areas.

Response *Minimum parking standards for all developments allocated in this Plan are set out in Policies TRA3 (a) and TRA 3 (b). Policy TRA3(b) states that the Council will pursue Controlled Parking Zones to manage on street parking where problems arise.*

Issue – Drainage/Flooding 1234 suggest that there should be a SUDs requirement on new development at Finberry. It is mentioned that ‘suitable ecological and flood alleviation measures to be delivered’ is not explicit enough and should require a SUDs.

2399 and 2405 believe that even though planning regulations and environmental studies have allowed for floodplains and drainage at Finberry, this has simply resulted in the water moving from the Finberry Area to Kingsnorth. Suggest that there has been an increase in flooding at Steeds Close and Steeds Lane in Kingsnorth since the Finberry dwellings were built.

Response *Policy ENV9 requires all developments in the Borough to include appropriate SuDS.*

Issue - Recreation facilities 1234 suggests that the off-site financial contribution towards the 3G sports pitch, MUGA at Finberry should be incremental to that provided by the existing Finberry development.

Response: *Proportionate contributions will be secured from development and these will go towards the envisaged hub for sport and recreation at Finberry, as referenced in Policy COM2 of the Local Plan. Funding for part of this provision is already secured through the existing S106 agreement, pursuant to the current Finberry development.*

Issue - Environmental considerations 1402 argues that the land to the east of Cheesemans Green Lane and land to the east of Highfield Lane could and should be protected as a strategic gap to prevent these areas from being subsumed by urban Ashford. The retention of this green corridor would ensure the continued use of this historic area for a variety of outdoor pursuits.

1752 feels a masterplan is required to ensure employment, residential, landscaping and parking use are appropriately blended to ensure a high quality development, sensitively meeting the countryside and delivering a high quality of life to residents. Amend policy to ensure masterplan is required.

2399/2405 believes it is essential that existing trees and hedges are retained as some have been in place for centuries and are concerned at potential decline in air quality.

Response *The separate and distinctive identity of individual settlements forms part of the particular character of much of the borough, helps to define communities and is an important feature in maintaining the quality and attractiveness of the borough for residents and visitors alike.*

As Ashford in particular has grown in recent years, some of the open space between the edge of the town and the closest surrounding villages has been eroded. In some locations, such as at Park Farm, specific features such as the buffer zone with Kingsnorth village have been implemented. But as pressure for additional growth to the south of Ashford continues (which is reflected in the proposed allocations in this Local Plan), the need for such protective features is likely to increase with more settlements potentially affected.

The Council is concerned that. This could occur in a variety of locations across the borough, for example by the large scale expansion of villages to encompass nearby hamlets; through progressive 'ribbon' or linear development along roads that joins up settlements, or through the expansion of Ashford itself.

A new policy SP7 Separation of Settlements has therefore been added to the Plan in order to prevent unplanned erosion of countryside between built up areas which would have a serious and significant adverse impact on the character and individual identity of villages through loss of their setting or through coalescence.

Air quality issues are covered by Policy ENV12 of this Plan. Policy S15 requires development proposals for this site to be implemented in accordance with an agreed masterplan. No change required.

Issue – Housing Numbers 2266 in principle is in full support of the proposed allocation. However, it feels that because there are multiple landowners, it must be a requirement of the policy that the masterplan is jointly agreed by all landowners and ABC to ensure site comes forward in a coordinated way as required by the NPPF, in order to make sure that the LPA can guarantee that the site is deliverable.

2266 also considers that the site should not be limited to 300 dwellings, as this is not in accordance with the NPPF and should be amended to refer to 'approximately' 300 dwellings as opposed to 'up to'. Policy and Para 4.161 should be amended accordingly to reflect both of these issues:

'Finberry north-west is allocated for approximately 300 residential dwellings and 8,500sqm of B1-8 employment floorspace. Development proposals for this site will be implemented in accordance with a masterplan that has been jointly agreed between all the landowners and the Borough Council that will set out how:'

2718 suggests that the housing allocation should be increased to up to 315 dwellings based on discussions with the council throughout 2014 and 2015. Also, if the 8500sqm employment space are removed then the site (according to Plan 6) could accommodate up to 435 dwellings.

Response *The current wording of the text already requires a Masterplan to be produced. As part of this process it will need to be clear that all parties are wanting to pursue development here, in a way envisaged under policy S15.*

It is agreed that the 'up to 300 dwellings' should be amended to be more flexible, as is the case with other similar site policies. Please see change MC22.

With regards the suitability of the site for employment uses, it is considered that this location benefits from excellent access onto the strategic road network and is very close to the motorway (the accessibility of which will be increased once Junction 10a is delivered). In addition, employment here would complement the employment offer at Orbital Park and that being proposed at Sevington. Evidence which supports the Local Plan also suggests that locations such as this complement the identified strategic employment locations and provide space for a more varied type of potential occupier.

Issue - Sewage 2358 propose addition to policy criteria to deal with connection to sewerage network: e) A connection to the nearest point of adequate capacity in the sewerage network is provided, in collaboration with the service provider.

Response *Agree. See change MC22. Add the following criteria to the policy :
'Provide a connection to the nearest point of adequate capacity in the sewerage network, in collaboration with the service provider'*

In the RJ add: 'Southern Water's assessment has revealed that additional sewerage infrastructure would be required to serve the proposed development. The development will therefore be required to make a connection to the nearest point of adequate capacity in the sewerage network. Early liaison should take place with the service provider in this regard.'

Issue - Infrastructure provision 2399 and 2405 consider that medical and educational establishments are already at full capacity without the extra housing.

2624 KCC will require proportionate financial contributions towards KCC services including towards the construction costs of any new education provision required to mitigate the impact of the proposed development, as well as a contribution towards the expansion of Finberry Primary School.

2318 It is recommended that the developer obligations are revisited to ensure social infrastructure provision for the whole of the emerging community. It will also be important to establish a rectory to deliver appropriate worship space and support for the new primary school.

2399 and 2405 state that allotments are still in demand and should be considered in new developments.

2721 the introduction of a 3G pitch would be a welcome facility in the village/community area of the existing development but as it is not supported by the Finberry scheme of S106, funding for it would have to be found from elsewhere.

Response *It is accepted that any new development proposals will affect existing services. Therefore, service providers, including KCC Highways & Education, Water companies and*

the Environment Agency (drainage and flooding), the Ashford Clinical Commissioning Group and the East Kent NHS Hospitals Trust are consulted at all stages of the plan making process to identify if they have existing capacity or if additional capacity is needed to accommodate additional development. If additional capacity is needed, this is then planned for through the Local Plan process and the Infrastructure Delivery Plan, which supports the Local Plan.

It is the responsibility of these service providers and stakeholders to identify and ensure delivery of the infrastructure that is required. The Local Plan plays a supporting role in helping to deliver the infrastructure, by allocating sites or requiring developers to make financial contributions.

The requirement for developer contributions towards the provision of infrastructure and community facilities is dealt with by generic policies (COM1, COM2 and IMP1) in the Plan. Where site specific projects have been identified in the Infrastructure Delivery Plan these have been identified in site specific policies. No change proposed.

Policy COM3 addresses the provision of additional allotments in the Borough over the Plan period.

Issue - Affordable housing 2399 and 2405 state that affordable housing is a government prescription, and therefore any proposals should be compliant with governmental recommendations.

Response *The Plan complies with national planning guidance.*

Issue - Housing for the elderly 2399 and 2405 most new developments are for family housing, and are not taking into account the need for bungalows and sheltered housing for the elderly.

Response *See proposed new policy HOU18 on housing mix.*

Issue - Roads/Road danger 2399/2405 all the country roads and lanes will be affected. New development will affect Bond lane; Steeds lane; Steeds Close; Ashford Road; Magpie Hall Road; Pound lane; Church Hill; Finn Farm Road; Violet Way to name but a few. There are crossroads and blind corners in the village which are becoming increasingly dangerous and accidents are becoming more prevalent as traffic increases from the newest focal housing developments.

Response *KCC Highways and Transportation support the proposed allocations in the Plan from a highway capacity perspective, stating that 'Transport modelling work has also been undertaken to understand and define the implications of proposed Local Plan allocations on the local highway network. Traffic surveys data has been collated and analysed at three key locations where the Local Plan envisages strategic growth will occur, namely Kingsnorth, Kennington and Eureka Park. The analysis that has been completed demonstrates that traffic movements generated from planned growth across the Ashford urban area will not give rise to a severe highway impact on any of the associated corridors'*

The policy also requires a full and thorough assessment of highways impact to be undertaken to inform future planning applications for the site, through which the need for a package of mitigation measures are to be identified and the delivery of which should be facilitated by the development.

Issue – Mineral safeguarding 2600 recommends that a minerals assessment should be prepared to determine the extent and nature of the mineral deposits to determine the viability and practicality of prior extraction.

Response : *Ashford Town sits on a band of mineral deposits which run north-west to south-east through the Borough, meaning that the majority of land in and around Ashford Town, and at a number of other settlements, has safeguarded mineral deposits. Sites that are proposed for allocation in and around Ashford and at other settlements represent the most sustainable options to provide for the housing and employment needs for the Borough, as has been demonstrated through the Sustainability Appraisal. In order to meet the needs for housing and employment development it is the Council's view that it would not be possible to avoid allocations within these areas, and would create an unsustainable form of development if the mineral safeguarded areas were not considered for development as a matter of principle. Kent County Council has requested that minerals assessments be carried out in order to identify the need for prior extraction of the minerals within the safeguarded areas. The Minerals and Waste Local Plan 2013 – 2030 which forms part of the statutory development plan for the Borough, includes policies which set out these requirements, and are therefore material considerations when in determining planning applications. It is not considered necessary to replicate these policies within this Local Plan.*

Issue - Site boundary 2718 the site boundary that has been drawn in the draft Local Plan included land that currently has reserved matters consent or applications related to the Finberry development. The land to the south included land which will be occupied by village centre uses such as the foodstore, retail units, public house, care home, school and community building and is subject to an outline planning permission – thus Policy S15 should not be applied to these uses.

Response *Part of the site allocation S15 does include some of the area that is already subject to planning permission. However, this is necessary given that some of this area will need to deliver development that is different to what has planning permission, on account of meeting the wider needs generated by an increase of residential development at Finberry North West. In part, this complexity justifies the need for a masterplan, as expressed in the policy.*

Issue - Employment land designation issues/live-work units 2718 argues that there is currently a lack of demand for employment land in the borough and questions the suitability of Finberry as a location for employment development. The provision of employment land at NW Finberry is considered to undermine the delivery of large scale employment sites at Waterbrook and should be removed from the Policy S15. 2721 questions the viability of the 8500sqm of B1-8 employment land and the 10 live/work units at Finberry and Finberry NW. CSP object to this part of the policy as not justified or effective.

2718 concerned with the inconsistent requirement to deliver live/work units at Finberry NW. This notion is reiterated by the council's previous poor delivery of live/work units at sites

such as Park Farm and Repton Park, as well as the difficulty in selling them when they are constructed. There is no national policy or guidance which promotes the delivery of live/work units and it is unclear on what evidence base such units are justified.

Response *With regard to live/work units specifically, these have been successfully delivered elsewhere in Ashford and such uses provide much needed variety of employment space, mainly catering for the smaller scale end of the market. Delivering 10 live work units in this location will complement what has already been agreed at Finberry through the existing S106 and subsequent negotiations. Such an approach also resonates with the NPPF in that it encourages flexible working practices such as the integration of residential and commercial uses within the same unit (para 21).*

Issue - Impact on PROWs 2627 believes that the allocated site will affect a number of PROW and concerns are raised that the proposed policy is not specific enough to direct designers to incorporate the objectives for non-motorised access to the site. Propose the following change to the policy 'Delivers a "Green Spine" a strategic corridor and cycle route through the site to provide a direct link between South Willersborough to the North West and the emerging development to the South West. The corridor should be complemented by a local childrens play area. Accommodates a Public Bridleway running East to West, connecting with the existing network'

Response *Agreed. See Proposed Change MC22. Detail to be agreed through detailed design and master planning.*

Miscellaneous 2399 and 2405 planning permissions to build an infill house in Steeds Lane have been refused on the grounds of being in the countryside – why then are the council able to consider 'vast developments' just yards away from the refused site(s)? why not build in the town? There are many derelict buildings in the town which could be utilised, reducing the overall number needing to be built in the countryside. 2399 and 2405 extra housing may promise extra facilities, but will require extra workers which will subsequently bring in extra traffic – it's a vicious circle.

Response *There are insufficient brownfield sites across Ashford to meet the level of new housing that needs to be delivered in the borough, the majority of growth will therefore have to be delivered on greenfield sites on the edge of the urban area and in the rural area.*

Many of the previously developed sites in the town already have redevelopment proposals underway. However, the Local Plan encourages the re-use of previously developed sites where environmental constraints allow and sites are sustainably located.

1234 suggests that money gained from contributions for the site should be pumped into the Ashford – Hastings railway line.

Response *Appropriate levels of S106 money will be secured from development and will be spent on appropriate projects that meet the legal requirements. These projects are listed in the infrastructure delivery plan.*

Support 1702 is in support of Policy S15 and believes that the green corridor will be maintained and enhanced by the Policy. The original employment planned may not have

been suitable, so housing, well planned with cycle routes and a community feel would be welcome. 2318 is in support of the policy as they believe that the area is in need of housing.

Response Support noted.

POLICY S16: WATERBROOK

Representations have been received from the following consultees

2601 / 2625 KCC	1699 Stephen Cecil
2717 Church Commissioners	2703 Highways England
2359 Southern Water	2722 Crest Strategic Projects
2254 GSE Waterbrook	1236 Paul Bartlett
2092 Geraldine Dyer	1176 Lesley Wickens
1756 CPRE Kent	

Summary of Representations – Main Issues

Issue – minerals safeguarding 2601 - as set out in the adopted Kent Minerals and Waste Local Plan 2013-2030, Policy CSM 5: Land-won Mineral Safeguarding and Policy DM 7: Safeguarding Mineral Resources detail how minerals of economic importance will be safeguarded from being unnecessarily sterilised by non-mineral development, as well as the circumstances when non-minerals development may be acceptable at a location within a Minerals Safeguarding Area. In light of this, KCC recommends that a minerals assessment should be prepared to determine the extent and nature of the mineral deposits to determine the viability and practicality of prior extraction.

Response : *Ashford Town sits on a band of mineral deposits which run north-west to south-east through the Borough, meaning that the majority of land in and around Ashford Town, and at a number of other settlements, has safeguarded mineral deposits. Sites that are proposed for allocation in and around Ashford and at other settlements represent the most sustainable options to provide for the housing and employment needs for the Borough, as has been demonstrated through the Sustainability Appraisal. In order to meet the needs for housing and employment development it is the Council's view that it would not be possible to avoid allocations within these areas, and would create an unsustainable form of development if the mineral safeguarded areas were not considered for development as a matter of principle. Kent County Council has requested that minerals assessments be carried out in order to identify the need for prior extraction of the minerals within the safeguarded areas. The Minerals and Waste Local Plan 2013 – 2030 which forms part of the statutory development plan for the Borough, includes policies which set out these*

requirements, and are therefore material considerations when in determining planning applications. It is not considered necessary to replicate these policies within this Local Plan.

Issue – developer contributions 2625 states that proportionate financial contributions required towards KCC services including towards the construction costs of any new education provision required to mitigate the impact of the proposed development, as well as contributions towards the expansion of Finberry Primary School.

Response : *The requirement for developer contributions towards the provision of infrastructure and community facilities is dealt with by generic policies (COM1, COM2 and IMP1) in the Plan. Where site specific projects have been identified in the Infrastructure Delivery Plan these have been identified in site specific policies. No change proposed.*

Issue – Odour, air quality, light and vibration issues 2359 in line with NPPF and to ensure a sustainable development, we propose that the following criteria is added to policy S16 after 'Detailed proposals for this site shall be developed in accordance with an approved masterplan that':

n) Ensure an adequate gap between the wastewater pumping station and development to allow odour dispersion and help prevent an unacceptable impact from vibration. Provide future access to the existing sewerage infrastructure for maintenance and upsizing purposes.

1236 the impact from diesel particulates / NOx / HC / CO should be assessed, particularly on nearby residential properties in Willesborough and on the William Harvey Hospital, given its already has a "amber" warning on CO2. The recent planning consent for use of the sidings in August / September 2016 identified that a vibration assessment was necessary for that use. It is a reasonable extension of this to require that any development at Waterbrook will require a vibration assessment because of the proximity of CTRL, the Ashford / Folkestone line and the sidings. This would be a very similar condition as is required for the Conningbrook and Kennington sites.

1176 An extra 300 lorries, now making 600 lorries at Waterbrook lorry park means that proper screening against light spill, movements limited to sensible hours and noise barriers for local residents both for Waterbrook Park and Sevington Park are required.

Response : *See Change MC23. Amend RJ to add 'Southern Water has advised that there is a pumping station on the boundary of the site that need to be taken into account so that the proposed design safeguards the amenity of future occupiers of the proposed development. The developer should liaise with Southern Water to ensure this can be taken into account when designing the layout of the proposed development.'*

With regard to the proximity to the WWTW, this is one of many factors which need to be considered and balanced against each other in deciding which are the most appropriate sites to allocate for development. Full assessment of all of the factors has been carried out through the Sustainability Appraisal and this site has been considered against the other reasonable alternatives. On balance whilst this site may on occasion be affected by odour

from the WWTW it is considered that this site is an appropriate option taking into account the need to meet the Borough's housing requirement and the other alternatives available.

The overall impact of all developments in terms of air quality will be monitored as part of the overall monitoring of the Local Plan.

Issue – land use 2254 supports the strategic approach but question the rationale to place 20ha of commercial floorspace at this location. Strongly support the in principle mixed use allocation of this site. Support employment commercial development on the site but question whether the amount of commercial land is appropriate and proportionate. Previously allocated in the Core Strategy for 15ha of commercial – does the 20 ha include the re-located truck stop – if so then there is no contention but if the truck stop is excluded from the 20 ha then policy is unsound. Re-location of the truck stop is supported but should be flexibility if there is a requirement to expand into the commercial section of the site. Support the residential allocation on the site but numbers may need to be revisited as part of the masterplanning exercise to ensure that this is the most appropriate figure. In addition, CSP also strongly supports the restriction on any residential or commercial development on this site until the proposed scheme for Junction 10a at the M20 is complete.

Junction 10A – the restrictions placed on the amount of development that can be accommodated here prior to junction 10A being completed are restrictive – shouldn't be held to ransom by third party development – any delays would jeopardise development. Suggest an amendment that inserts "Where otherwise justified" at the beginning of the wording

Response : *After a re-assessment of the development capacity of the site the Council considers that it is possible to increase the proposed residential allocation from the 300 indicated in the draft Plan to 350 dwellings. See proposed changes MC23.*

The Council can confirm that the proposal for the 20 hectares of employment does include the area of the re-located truck stop and para 4.176 should be amended to make reference to this. See proposed change MC23.

Issue – flood risk 1756 supports residential development to the west of the site. It is observed that the south westernmost part of the site lies within an area at risk of flooding and forms part of the draft Ashford Green Corridor. Detailed layout and design will need to respond to these. The proposed lorry park to the east of the site is also supported, subject to high quality landscaping and 'plug-in' facilities to minimise noise. Amend policy to ensure site layout responds to flood risk and the draft Ashford Green Corridor. The proposed lorry park should benefit from high quality landscaping and 'plug-in' facilities.

Response: *The policy requires a full flood risk assessment prepared in consultation with the Environment Agency. Equally, the policy requires that any development protects and enhances the East Stour river corridor that runs through the site and contributes to the improvement of the green corridor. No amendment necessary. The requirements of Policy ENV9 to provide sustainable drainage mean that the development will not result in any increase surface water run-off and should aim to reduce existing run-off rates, reducing the overall risk of flooding.*

Issue – Cheesemans Green Lane 1699 supports no access onto Cheesemans Green Lane. However, the policy should include wording that ensures the ongoing upkeep and maintenance of Cheesemans Green Lane, require effective signage and other preventative measures to ensure that lorry and other goods drivers do not use the Lane in error and maintenance of the hedgerow and borders to Cheesemans Lane. Currently water drains off the site onto Cheesemans Green Lane causing damage to the road edges resulting in subsidence and multiple potholes.

Response: *Policy specifies that there is no access onto Cheesemans Green Lane in order to minimise direct impact on this Lane. The issues raised here regarding Cheesemans Green Lane are acknowledged but are outside what can reasonably be included in a Plan policy. With regard to drainage, development here will be subject to Policy ENV9 of this Plan and the inclusion of SuDS for the disposal of surface water. No amendments required.*

Issue – impact on SRN 2703 This site is likely to adversely impact both the SRN in terms of congestion and safety. In the absence of a current transport evidence base there is uncertainty regarding the impacts of this site on the SRN and the proposed M20 Junction 10a. We would welcome the opportunity to work with ABC to assess the site SRN impacts of this site ahead of document submission.

Response: *The Council will work with Highways England and any site developer to provide evidence of the impact of development on the SRN of this site and its deliverability prior to the completion of Junction 10a of the M20. The allocation of this site is already for mixed use, therefore no change required.*

Issue – secondary link proposals 2722 It is noted that the supporting text (paragraph 4.182) references the secondary link to the Finberry development and proposes that this link should now become an 'all-movements' link to accommodate public transport services, a cycle and pedestrian route as well as car traffic. The current intention for this link road (as defined in the S.106 for Finberry) is that it should accommodate pedestrians, buses, cycles and emergency vehicles only.

Whilst CSP does not directly object to the opening up of this link, it would like to go on record to confirm that the neighbourhood play area is located adjacent to the link and the additional traffic in this location would need to be managed carefully from a health and safety perspective. In addition, any future costs of upgrades required to the bridge and link road would need to be recovered from alternative sources, as the existing Finberry scheme is only required to accommodate the modes of transport set out in the current legal documentation.

Response : *Noted*

Issue – impact on Finberry and Church Road, Sevington 1236 considers that noise, visual impact and artificial lighting impact on Finberry and Church Road, Sevington should be considered as well as the impact of these on Cheesemans Green Lane.

Response : *Agreed. Amend criterion e of the policy to read as follows:*

Provides suitable mitigation to deal with noise, visual impact and artificial lighting to restrict the impact of the new development on the new residential properties to be developed on the site and the existing properties along Cheeseman’s Green Lane. Finberry and Church Road, Sevington. See Change MC23.

Support 2717 support the allocation of Waterbrook (Policy S15) and proposes that the area of land show on Plan 5 is included within Policy S16 as land for a range of commercial development (including employment, retail and leisure use classes). The land should also provide a strong landscape edge to the Waterbrook site and approach to the A2070 roundabout. 1236 supports the exclusion of the rail sidings from the site development plans now that the sidings have permanent planning consent. 2092 Pleased to see that the truck stop may be enlarged, though this is a small measure.

Response: *It is agreed that the area identified should be included within the Waterbrook policy area see proposed change MC23.*

Amend paragraph 4.176 as follows

Elsewhere on the site, the principal uses should be commercial development (B1, B2 or B8) and residential development. Some “sui generis” uses, such as those found at Orbital Park (eg. car showrooms) will also be acceptable in principle here. The masterplan shall make provision for a minimum of 20 hectares of commercial development ~~(excluding the truck stop)~~. An additional area of land adjacent to the entrance to the site for similar commercial uses has been included within the site policy area and this could provide an additional 2 hectares of commercial development to enable the delivery of 22 hectares in total.

POLICY S17: LAND AT WILLESBOROUGH LEES

Representations have been received from the following consultees

2602 / 2628 KCC	2705 Highways England
1820 Kent Wildlife Trust	1391 Roger
1763 CPRE Kent	1374 Mr Hopkins
2544 Bellway Homes	

Summary of Representations – Main Issues

Issue – minerals safeguarding 2602 as set out in the adopted Kent Minerals and Waste Local Plan 2013-2030, Policy CSM 5: Land-won Mineral Safeguarding and Policy DM 7: Safeguarding Mineral Resources detail how minerals of economic importance will be safeguarded from being unnecessarily sterilised by non-mineral development, as well as the

circumstances when non-minerals development may be acceptable at a location within a Minerals Safeguarding Area. In light of this, KCC recommends that a minerals assessment should be prepared to determine the extent and nature of the mineral deposits to determine the viability and practicality of prior extraction.

Response : *Ashford Town sits on a band of mineral deposits which run north-west to south-east through the Borough, meaning that the majority of land in and around Ashford Town, and at a number of other settlements, has safeguarded mineral deposits. Sites that are proposed for allocation in and around Ashford and at other settlements represent the most sustainable options to provide for the housing and employment needs for the Borough, as has been demonstrated through the Sustainability Appraisal. In order to meet the needs for housing and employment development it is the Council's view that it would not be possible to avoid allocations within these areas, and would create an unsustainable form of development if the mineral safeguarded areas were not considered for development as a matter of principle. Kent County Council has requested that minerals assessments be carried out in order to identify the need for prior extraction of the minerals within the safeguarded areas. The Minerals and Waste Local Plan 2013 – 2030 which forms part of the statutory development plan for the Borough, includes policies which set out these requirements, and are therefore material considerations when in determining planning applications. It is not considered necessary to replicate these policies within this Local Plan.*

Issue – education facilities and developer contributions 2628 The provision of 2.05 hectares of land for a 2 FE Primary School (to be transferred at nil cost to the County Council and in accordance with KCC's General Transfer Requirements). The County Council will also request financial contributions towards the construction costs of any new education provision required to mitigate the impact of the proposed development including proportionate financial contributions towards the construction and other costs of a new primary school at Kennington. It is also requested that prior to the preparation of any masterplan, development plan documents or development briefs relating to this strategic site allocation, that a new primary school site is identified and secured in agreement with the County Council.

Response : *The requirement for developer contributions towards the provision of infrastructure and community facilities is dealt with by generic policies (COM1, COM2 and IMP1) in the Plan. Where site specific projects have been identified in the Infrastructure Delivery Plan these have been identified in site specific policies. No change proposed. With regard to primary school provision, it is understood that this is to be provided for on the Kennington Site (S2).*

Issue- landscape 1820 supports the policy reference to the extension of the tree cover from Breeches Wood across to the hospital. However, it specifies this is for screening whereas in fact it would provide an important green infrastructure connection between the Local Wildlife Site Willesborough Lees (AS44) and Breeches Wood. The functional role of this woodland extension needs to be specified and will demonstrate compliance with the NPPF para 114.

2544 objects to the requirement to provide a distinct gap and soft green buffer along part of the western boundary of the site to help to mitigate the impact of the development upon adjacent residential occupiers and the character and setting of the Conservation Area as this

has not been supported by a Conservation Area assessment or justification for why this mitigation measure is required. Paragraph 4.190 requires the development to provide links to the existing rural footpaths and cycleways. Links to such footpaths can be provided where they directly adjoin to the boundary of the site allocation but are unable to be secured where they are located on third party land. The wording of paragraph 4.190 should be amended to reflect this.

Response: *Agree that an extension of tree cover has an important role in providing an important green infrastructure connection between the Local Wildlife Site Willesborough Lees (AS44) and Breeches Wood. This is addressed in the policy sub section h. Mitigation is considered important and appropriate in order to prevent harmful impact on the living conditions of the residents of The Street and the setting and character of the Conservation Area.*

Issue - housing numbers and density 2544 supports this allocation for residential development. This Site represents a sustainable extension to the Ashford urban area and is currently designated for residential development by Policy U14 of the Ashford Borough Council Urban Sites and Infrastructure Development Plan Document (2012) (USIDPD). Also support the housing trajectory set out in Appendix 5 which confirms the deliverability of the Site within the early part of the plan period (2017/18) The only difference between Policy S17 and Policy U14 of the USIDPD is the total number of dwellings for which the Site is allocated. Policy U14 states 'The site to the south east of the William Harvey Hospital is proposed for residential development with an indicative capacity of 200 dwellings.' Whereas Policy S17 states 'The site to the south east of the William Harvey Hospital is proposed for residential development for up to 200 dwellings.' Request that the policy be reworded to say 'The site to the south east of the William Harvey Hospital is proposed for residential development for up to with an indicative capacity of 200 dwellings'.

In addition, paragraph 4.188 requires new development on the Site to be low (below an average of net 30dph) due to the prevailing character of the area mainly consisting of large detached properties. By contrast, paragraph 4.189 identifies that by detailed design, layout and landscape, a distinct neighbourhood could be created which would provide a sense of place. By restricting the overall net density of the Site it would detrimentally impact upon the ability to utilise design tools to create the distinct neighbourhood sought by paragraph 4.189. The overall quantum of development on the Site is restricted by the policy allocation and there should not be a need to seek to further control this by limiting the density of development. As such this reference should be removed.

Response: *The capacity of the whole site is based on the Urban Sites and Infrastructure DPD policy U14. There have been detailed negotiations regarding the development of a suitable scheme for this location and at this stage it is consider appropriate to retain the S17 draft policy as drafted.*

Issue – Highways and site access 2544 notes that the policy identifies that access to the Site is required to be from the A20. The text in the supporting paragraph 4.191 seeks to allow up to 100 dwellings to be accessed from a more simple priority junction. This allows for a development at Highmead House, which is in a separate ownership, to be brought forward

in advance of development on the wider Site in the control of Bellway Homes. The previous appeal decision for the Highmead Site (ref: APP/E2205/W/15/3067543) demonstrated that an adequate access to Highmead cannot be achieved from the A20 without prejudicing the wider delivery of the site but rather was reliant on the remainder of the policy allocation being brought forward. As such, the wording of paragraph 4.191 must be amended such that Highmead can still be developed as a separate scheme, but this must follow the delivery of the main site and be accessed from the principal access of the A20, to ensure the wider site remains deliverable.

2544 no objection to the delivery of the link road; however, point c) of the Policy allocation relates to highway improvement works required to facilitate the development of the Site. The policy firstly requires improvement works to the existing hospital emergency access. This land is outside of the control of Bellway Homes Ltd (Kent) and therefore is not achievable without entering onto third party land.

Secondly, it is required to close Hinxhill Lane to traffic to divert traffic through the site from the existing road network through Willesborough Lees. No evidence has been provided to detail why the highway impact necessitates a closure of Hinxhill Lane and other options may be available to mitigate any identified impact. The policy should therefore be reworded as follows: 'Facilitate make improvements to the existing emergency access to the Hospital, and Hinxhill Lane, to accommodate a new link road and junction, and close Hinxhill Lane to traffic south of the hospital access. Consideration shall be given to restricting a restricted access to Hinxhill Lane for emergency vehicles, pedestrians and cyclists only'.

2705 considers that as a result of the proposal including "*a phasing programme to be agreed with the Borough Council, local Highway Authority and Highways Agency that will include the construction and opening of the access road from the A20 to the hospital and the closure of Hinxhill Lane*" the impacts of the sites on the SRN should be set out in the transport evidence base. In the absence of a current transport evidence base there is uncertainty regarding the SRN impacts of these sites and whether or not the proposed development is deliverable in transport terms. In the absence of this information, for this Policy to be effective and "sound" in line with NPPF we recommend that the following policy wording additions be applied: "A Transport Assessment should be produced in accordance with Policy TRA8 and measures proposed to mitigate any impact of development on the wider transport network".

1391/1374 objects to the closing of Hinxhill Lane on grounds that will cause traffic issues for residents of Wye (and those going to the Wye Free School and Wye Primary School) in Wye, who use this lane to access the A20/M20, rather than have to use the level crossing. Whilst there may be a benefit to a small number of residents on Hinxhill Lane and The Street, this will simply transfer the problem to other residents in the area, such as Boughton Lees, as people try to access the M20 via there. Closure of this would significantly impact on the level crossing levels of traffic, which is already a congestion point.

Response: *The specific access arrangements for the whole site as drafted reflects the policy U14 in the Urban Sites and Infrastructure DPD and these set out the access arrangements from the A20.*

The creation of a secondary access to the Hospital is a critical part of this enabling development, and therefore the policy criteria for this to be provided as part of the scheme must remain. The requirement to close Hinxhill Lane followed extensive local consultation on the Ashford Urban Sites and Infrastructure DPD.

The closure of Hinxhill Lane is on the basis that the new access through this development site will become the direct route for traffic to leave and join the A20 – closing Hinxhill Lane will reduce the impact of through traffic on The Street and access to Wye and Brook will therefore be retained.

The Council will work with Highways England and any site developer to provide evidence of the impact of development on the SRN of this site and its deliverability prior to the completion of Junction 10a of the M20. No change required.

POLICY S18: WILLIAM HARVEY HOSPITAL

Representations have been received from the following consultees:

4 Kingsnorth Medical Practice	1429 Central Ashford Community Forum
1822 Kent Wildlife Trust	1603 Sandra Dunn
1177 Lesley Wickens	1772 CPRE Kent (Ashford District Committee)
1237 Paul W Bartlett	2706 Highways England
1297 Willesborough Parking Action Group	

Summary of Representations – Main Issues

Issue - Health Rep 4 states that additional input is provided from the CCG, GP Federation and other health providers including hospital and community trust. Plan needs to be mindful of direction of travel of health – to move all but most acute services out of hospital, leaving a small hospital and development of new purpose built facilities for primary care, community health and social care teams and most outpatient and day surgery facilities. The representation explains the expected approach in Ashford.

Response *The Council has consulted with the CCG and Hospitals Trust through its work on the Infrastructure Delivery Plan. Unfortunately neither has been able to provide detailed proposals for new health facility requirements in the Borough as they are still in the process of development strategies for future healthcare in Ashford and the wider area.*

The Hospitals Trust has indicated that there may be a need to expand the William Harvey in order to accommodate increased demand from housing development in Ashford, and also increased demand from outside of the Borough. The Trust are currently undergoing a

Clinical Strategy, which will require public consultation later in 2017, until then it is difficult to predict what the specific infrastructure requirements will be. However the Trust is confident that any expansion requirements can be accommodated on the existing site. The existing policy provides sufficient flexibility to enable this to come forward.

The Plan and supporting Infrastructure Delivery Plan includes information that has been provided by these bodies at the current time. The Council will continue to liaise with these bodies to ensure their requirements can be addressed appropriately in the Local Plan and Infrastructure Delivery Plan where possible, and developments are able to contribute appropriately to the delivery of the infrastructure.

Issue - Local Wildlife Sites 1822 states that reference needs to be made to the LWS of Willesborough Lees (AS44) to the north and east of the site, and development should assess impact and mitigate if necessary.

Response *Disagree – whilst the boundary of the LWS adjoins that of the hospital, expansion at the hospital is not expected to go beyond the current boundary of the site, and the Council does not consider that development will impact upon the LWS.*

Issue - Impact on road network 1177, 1237, 1297 and 2706 raise concern about the impact of proposals on the highway network. 1117 comments that access to the hospital is controlled by limitations to the current and future road network and requests that concerns are raised in the plan regarding the road network with reference to ambulances.

2706 and 1237 support the requirement for a Transport Assessment and Travel Plan, along with provision of measure to mitigate any impact of development on the transport network. Highways England (2706) requires sufficient clarity and certainty regarding management of transport impacts in order to confidently support any future applications relating to the hospital. 1237 considers there likely to be increased lorry movements on Kennington Road, due to J10a and new A2 junction. This must be included in the assessment of development on this site.

Response: *the requirement for a Travel Plan to support previous expansion of facilities at the Hospital remains in place. The need for a TA / Travel Plan is also covered in policy TRA8 and the impact of parking for staff and visitors is an acknowledged issue of concern in the area. The policy as drafted is considered to address these issues in respect of how future proposals may be considered.*

Issue - Parking 1237, 1249, 1603, 1772 and 1297 raise concerns about car parking capacity and impact upon surrounding residential roads. 1237 suggests a review of the impact should be carried out prior to Local Plan adoption, also promoting multi-storey car parking on the site. 1603 and 1772 states that charging must be at a reasonable rate. 1772 proposes that criteria d) be amended as adopted parking standards are not sufficient.

1297 states that the proposed CARE development should not be allowed to proceed because of increased traffic, a lack of parking and therefore impact on local residents.

Response *Any expansion at the hospital should be provided with parking to meet the expected future demand for staff and visitors, taking into account existing and future parking demand, and proposed travel plan measures. See proposed change MC24.*

Car parking charges are controlled by the Hospitals Trust and are not a matter for the Local Plan.

Issue - Air pollution 1237 considers that air pollution monitoring is required by the hospital and surrounding users to measure the impact and determine when a reduction strategy is required.

Response *Noted – Air pollution is dealt with by other policies in the Plan.*

Issue - Design 1237 considers that the height of the hospital should be allowed to be increased in order to grow.

Response *The appropriateness of such a proposal would depend upon the detailed design. The policy does not restrict this from happening, should it be required.*

Issue - Hospital Growth 1237 supports the growth of the hospital in order to meet the needs of a growing population

Response *Support noted*

POLICY S19: CONNINGBROOK RESIDENTIAL PHASE 2

Representations have been received from the following consultees

47 David Doughty	1776 CPRE Kent
108/1375 Mr Hopkins	1837 Kent Wildlife Trust
442/444/445/446 Winston Michael	1942 Brett Aggregates Ltd
738 Alan Boulter	2360 Southern Water
1014 Kennington Community Forum	2603/2629 KCC
1390 Roger	2674 Network Rail
1430 Central Ashford Community Forum	2707 Highways England
1612 Sandra Dunn	

Summary of representations – Main Issues

Issue - Impact on existing services 1375 Building additional houses on this site is simply a way of helping to provide for a junior school on the adjacent site of Kennington North East. It is not justifiable as sustainable development, as this site is not within reasonable walking distance of any facilities. 2629 KCC confirms that contributions will be required from this development to accommodate the additional educational need generated by the proposed development. 47 Additional development will impact on local doctor services, schools. 1430 Where are the accompanying secondary school places going to come from?

2360 Policy U22 of the urban sites DPD had a specific criteria referring to wastewater and sewerage, this should be re-instated in the policy wording for S19 so that it is in accordance with the previous Inspector and the NPPF. Another criteria should also be added which states: m) Provide sufficient distance between Ashford wastewater treatment works and sensitive land uses, such as housing, to allow adequate odour dispersal and not result in an unacceptable impact on amenity of future occupiers by reason of odour.

446 The open space this side of the A2070 is fundamental to dispersal of smells from the nearby sewerage treatment works and local factories, and is one of the reasons why it remains undeveloped. Building homes in the direct path of these smells has serious implications not only on resident health and well-being but also their right to reasonable enjoyment of their home and garden.

Response *It is accepted that any new development proposals will affect existing services. Therefore, service providers are consulted at all stages of the plan making process to identify if they have existing capacity or if additional capacity is needed to accommodate additional development. If additional capacity is needed this can then be planned for through the Local Plan process. Following existing consultation it can be identified that there is enough capacity to provide for doctors and secondary school places. However, a new primary school is needed and proposals set out its inclusion on the S2 Kennington site.*

However, it should be noted that allocation at this site is not the reason that a school is proposed on the Kennington (S2) site. The provision of a school is required by KCC in the local area, due to population projections and the cumulative impact of all of the proposed development sites in the area. ABC 'notes' the comment from KCC on the requirement for contributions towards the educational need generated by the proposed development.

See Proposed Change MC25. Amend Policy to add 'Provide a connection to the nearest point of adequate capacity in the sewerage network, in collaboration with the service provider'

In the RJ add: 'Southern Water's assessment has revealed that additional sewerage infrastructure would be required to serve the proposed development. The development will therefore be required to make a connection to the nearest point of adequate capacity in the sewerage network. Early liaison should take place with the service provider in this regard.'

With regard to the proximity to the WWTW, this is one of many factors which need to be considered and balanced against each other in deciding which are the most appropriate sites to allocate for development. Full assessment of all of the factors has been carried out through the Sustainability Appraisal and this site has been considered against the other reasonable alternatives. On balance whilst this site may on occasion be affected by odour from the WWTW it is considered that this site is an appropriate option taking into account the need to meet the Borough's housing requirement and the other alternatives available.

Issue - Additional traffic 1776, 1612, 738, 47 The infrastructure in the surrounding area cannot sustain this level of development. Concerns that the site would generate additional traffic, especially as it is adjacent to the S2 site and there is already development proposed on the Conningbrook site. KCC produced a traffic assessment and identified junction capacity problems in the study area and there is not enough infrastructure planning for this

site. There are frequent problems with the narrow bend heading towards Willesborough. 47 specifically outlines the issues that traffic will have on the Little Burton Farm estate.

445 The A2070 is already overwhelmed by traffic at peak times and the development of the Country Park and the 300 homes to enable it will bring considerably more traffic during peak hours and at weekends. Another 120 homes will be the tipping point for the A2070 and is not sustainable, and not only detrimental to resident quality of life but also pose safety issues for road users and pedestrians as there is no footpath on the road. The A2070 is susceptible to severe flooding and development could affect water run-off, increasing the affect caused by heavy rains on the A2070. 1776 The access from the A2070 road will be inadequate as it currently serves the Julie Rose Stadium, Conningbrook Country Park and will serve the 300 houses already approved.

2707 This site is likely to adversely impact both the Strategic Road Network in terms of congestion and safety. In the absence of a current transport evidence base there is uncertainty regarding the impacts of this site on the SRN and the proposed M20 Junction 10a.

Response *KCC Highways and Transportation support the proposed allocations in the Plan from a highway capacity perspective, stating that 'Transport modelling work has also been undertaken to understand and define the implications of proposed Local Plan allocations on the local highway network. Traffic surveys data has been collated and analysed at three key locations where the Local Plan envisages strategic growth will occur, namely Kingsnorth, Kennington and Eureka Park. The analysis that has been completed demonstrates that traffic movements generated from planned growth across the Ashford urban area will not give rise to a severe highway impact on any of the associated corridors'*

The policy also requires a full and thorough assessment of highways impact to be undertaken to inform future planning applications for the site, through which the need for a package of mitigation measures are to be identified and the delivery of which should be facilitated by the development.

The Council will work with Highways England and any site developer to provide evidence of the impact of development on the SRN of this site and its deliverability prior to the completion of Junction 10a of the M20.

The site is unlikely to come forward in the near future given the extant planning permission for 300 dwellings at Conningbrook Phase 1 which has yet to commence on the site and the draft policy contains a requirement for residential development not to be occupied in advance of the completion of Junction 10a and so there should be no impact on the SRN at this point although it is accepted that this needs to be documented.

Issue - Railway Crossing 2674 Any proposed development at the site would need to seriously consider the impact of the proposal on the usage of the at-grade pedestrian crossings over the railway line at this location. Network Rail has significant concerns in regards to the potential impact on the safety of the crossings.

Response *The Council's preferred solution would be to replace the existing crossing with a new pedestrian / cycleway bridge over the railway in order to provide safer access into the proposed Country Park from the site and wider area. Therefore, proposals for the development of the site must fully investigate the potential for it to deliver a new single bridge crossing over the railway line, in co-ordination with policy S2, with the intention of retaining the PRow's as far as possible. See proposed change MC25.*

Issue - The strategic park 1837 The policy wording seems ambiguous in S19. Para 4.221 implies that new allocation of 120 homes is separate from phase 1 of 300 homes. However, it is implied elsewhere (4.211 and 4.212) that phase 2 has been considered as part of original masterplanning process. Therefore it is unclear whether the impacts of this allocation of 120 dwellings has already been considered in the strategic allocation of Conningbrook and the assessment of recreational capacity.

442 The proposed Site Policy S19 for 120 homes is not enabling development and as such is in conflict with the intent and aims of the Core Strategy, Urban DPD, and the underlying principle to permit a limited amount of enabling development to deliver a strategic park. There was never a Phase 2 for Conningbrook. 1390 The original scheme provided housing on the basis that the trade off was the provision of a country park. The additional housing will not increase this provision, it is simply included to justify and help pay for the development of the adjacent site in Kennington.

1390, 1375 Any spare land at Conningbrook should be used to promote and enhance the country park facility, something that the area lacks, rather than create more housing, of which the borough has plenty. 1776, 1612, 1014, 444 Development of this site will remove the overflow parking. Relying on Givaudan and Premier food is not a sustainable long-term option. 1612 Another overflow car park to accommodate these vehicles will result in sterilising land to the detriment of the natural environment of the park. The Policy must give details of where cars will go on big event days and underpin the availability / viability of any proposed site for the overflow car park.

Response *The allocation is separate from the original 300 homes at Conningbrook. However, the S19 site does fall within the boundary of the Masterplanning Area, and therefore, has been considered from the earliest planning stages.*

The additional dwellings that are being proposed at S19 are not enabling development for the Country Park, but are in addition to, and on land within the Country Park area that has not been utilised previously. Due to the location of the site sandwiched between the A28, the proposed Phase 1 development and the Julie Rose stadium the site would not form an essential component of the Country Park.

Developing this land will not help justify or help pay for the adjoining site at Kennington, as this is a scheme that has come forward on its own merit through the Sustainability Appraisal exercise.

The policy includes a requirement, as part of this proposed development, in sub section j to provide and agree proposals for managing overflow parking from large events.

Issue - Biodiversity 108 Additional housing will destroy part of the woodland which would form part of the country park, the premise on which the original planning permission was given for the development of this site in the first place. If the country park is to be successful and is to form a barrier to development to the north of Ashford, then no additional housing should be created on the site and this part of the plan should be removed.

1837 Are mitigation measures such as translocation of species necessary as a result of Phase 2 or has this been accounted for within Conningbrook CP. Kent Wildlife Trust would seek clarification on this. This is especially important because at present there already appears to be a capacity issue at Conningbrook for reptile translocation, and this is before consideration of phase 2. If this has not been included, other sites suitable for relocation of species need to be identified at early stage and the need to do this should be included in policy S19. Failure to do this will not meet the legal requirements for mitigation for protected species. In paragraph 4.217 it is not clear what is meant by, "utilising a wider approach to biodiversity surveying" and this could be misinterpreted as "cutting corners".

1776 cat predation and additional recreational disturbance associated with dog walking will be more pronounced if additional homes are permitted in this area. The site may begin to suffer from urban edge pressures, and this is unnecessary and unhelpful to the purposes of the strategic park. 1776 Loss of tranquillity, associated with car movements and artificial light will be detrimental to the enjoyment of the area and the feeding, roosting and breeding activities of numerous species.

Response *The development of the Conningbrook country park is one of the Council's key projects that will deliver a regionally significant recreation and leisure facility and this is highlighted in para 5.437 of the Local Plan. The policy for this site makes it clear that there must be ecological mitigation and enhancement measures informed by a detailed habitat survey and the Council will ensure that partner organisations are included in this process. No change required.*

Issue – minerals safeguarding 2603 KCC confirms that Sandstone (Folkestone Formation) is present within the allocated site and are vulnerable to sterilisation

Response *Ashford Town sits on a band of mineral deposits which run north-west to south-east through the Borough, meaning that the majority of land in and around Ashford Town, and at a number of other settlements, has safeguarded mineral deposits. Sites that are proposed for allocation in and around Ashford and at other settlements represent the most sustainable options to provide for the housing and employment needs for the Borough, as has been demonstrated through the Sustainability Appraisal. In order to meet the needs for housing and employment development it is the Council's view that it would not be possible to avoid allocations within these areas, and would create an unsustainable form of development if the mineral safeguarded areas were not considered for development as a matter of principle. Kent County Council has requested that minerals assessments be carried out in order to identify the need for prior extraction of the minerals within the safeguarded areas. The Minerals and Waste Local Plan 2013 – 2030 which forms part of the statutory development plan for the Borough, includes policies which set out these requirements, and are therefore material considerations when in determining planning applications. It is not considered necessary to replicate these policies within this Local Plan.*

Issue – Miscellaneous comments

1942 request that the policy includes reference to the provision of a local convenience store.

1776 Squeezing in more houses here will be detrimental to the Conningbrook development of 300 houses, already approved, which is expected to be a prestige development.

Response Any new properties would be designed to complement the properties that are planned at Phase 1 and would also be of a 'prestige' design. It is envisaged that the same residential density would be achieved for site S19.

942 Whilst we support the principle of residential development at S19 Conningbrook, we object to this policy's capacity and land area as identified in the published documents. The suggested area shown on page 102 of the plan and headed 'Conningbrook Residential H2' is much smaller than the area identified in all masterplanning studies for the development of the site. Accordingly, the suggested site capacity of 120 dwellings fails to use the land efficiently and to maximise the potential of the site to deliver new homes. We request that the policy area is enlarged to use all available land and the capacity figure for this allocation is changed to 200 dwellings.

Response : The council has reassessed the potential capacity of this site given the representations received. Whilst a capacity of 200 units is considered to be too high for the size and location of the site, an increase in the capacity to 170 dwellings is proposed – see proposed change MC25.

POLICY S20: EUREKA PARK

Representations have been received from the following consultees

2604 / 2630 / 2631 KCC	2310 Sharon Middleton
2324 Environment Agency	1188 Sandyhurst Lane Residents Association
2361 Southern Water	1043 / 1015 Kennington Community Forum
1848 Kent Wildlife Trust	932 / 927 / 913 Boughton Aluph and Eastwell PC
1780 CPRE Kent	448 / 447 Winston Michael
1626 Margery Thomas	380 Graham Skinner
1715 Quadrant Estates	351 Jane Hart
1897 Westwell Parish Council	333 Geoff Hillier
2708 Highways England	265 England
1321 Christopher Partridge	

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Summary of Representations – Main Issues

Response *Ashford Town sits on a band of mineral deposits which run north-west to south-east through the Borough, meaning that the majority of land in and around Ashford Town, and at a number of other settlements, has safeguarded mineral deposits. Sites that are proposed for allocation in and around Ashford and at other settlements represent the most sustainable options to provide for the housing and employment needs for the Borough, as has been demonstrated through the Sustainability Appraisal. In order to meet the needs for housing and employment development it is the Council's view that it would not be possible to avoid allocations within these areas, and would create an unsustainable form of development if the mineral safeguarded areas were not considered for development as a matter of principle. Kent County Council has requested that minerals assessments be carried out in order to identify the need for prior extraction of the minerals within the safeguarded areas. The Minerals and Waste Local Plan 2013 – 2030 which forms part of the statutory development plan for the Borough, includes policies which set out these requirements, and are therefore material considerations when in determining planning applications. It is not considered necessary to replicate these policies within this Local Plan.*

Issue – developer contributions 2630 KCC confirms that contributions will be required from this development to accommodate the additional educational need generated by the proposed development. Contributions towards the provision of County Council Services including facilities for delivering early help and other services within the new community building at Court Lodge will also be required.

Response *The requirement for developer contributions towards the provision of infrastructure and community facilities is dealt with by generic policies (COM1, COM2 and IMP1) in the Plan. Where site specific projects have been identified in the Infrastructure Delivery Plan these have been identified in site specific policies. No change proposed.*

Issue – environmental impact 2324 - Overall we are pleased to note that matters of interest to us have been addressed and as such we consider the sound. We do however, have a few comments to make and suggested amendments for clarification purposes. This site is partially located within a Source Protection Zone 3 for a potable groundwater abstraction located to the north. Site Investigation and Risk Assessment may be required to ensure there is no unacceptable pollution to controlled waters from historic or proposed uses of the site.

1848 - Kent Wildlife Trust objects to the proposed allocation at Eureka Park for mixed commercial and residential use. We do not support the residential use of this site. This relates mainly to increasing recreational pressure upon The Warren Local Wildlife Site (AS25) and this is because the allocation now includes housing as well as employment purposes. We would like to see inclusion in this policy the need to prevent this; and where this is not possible to implement mitigation measures in The Warren for increased visitation

pressure and any financial support necessary for the future management of the site. In the event of allocation, any new residential allocation here should include adequate on-site alternative greenspace for the needs of new residents, and this should be included in the policy S20. Kent Wildlife Trust objects to this allocation until these additions have been provided.

We would also like to point out that in the event of this being allocated, it will in effect enclose the north west perimeter of the town. It is therefore very important that ABC carefully plans and retains the green corridors through this section of the town, which will help to maintain the linkage between the open land to the north west and the town centre.

This also increases the importance of the Golf Range, which has been identified for future growth, remaining as open space or there will be considerable, cumulative impacts of development in the north-west of the town. Taken in combination with the possible change of use of the Park and Ride allocation to employment (south of The Warren) this would in effect enclose The Warren entirely, isolating the Local Wildlife Site from any ecological network in the surrounding area. This proposal is not compliant with the NPPF para 113 and para 114 point 1."add to policy S20 avoidance and mitigation for recreational pressure in the warren reserve, including monitoring of impacts, financial support for ongoing visitor management."

Response *There is a requirement in the policy criteria f, to ensure that there is adequate ecological mitigation and enhancement measures informed by a habitat survey and the potential impact on the adjoining wildlife site is properly addressed through this process and this is deemed to be adequate to deal with this issue.*

Risk Assessment on the issue of groundwater protection is a matter for any planning application. No changes required.

The policy for the site requires that the proposed development be developed in accordance with an agreed masterplan and criterion a specifically refers to the incorporation of a linear park based around the existing lake . The retention of open green corridors within the site is a matter that is properly addressed as part any agreed masterplan.

Issue – need for a masterplan 1780 - Waterbodies to the centre of the site should be sensitively treated in terms of site layout, forming a key part of the landscape strategy. Further, the screen of proposed trees to the north west of the site should be retained and enhanced as part of an ecological network through the site. It is agreed that the site should be accessed from Trinity Road. The shops at Eureka Place can be accessed from Trinity Road too. There needs to be as defensible landscaped boundary to the golf course to ensure its future is not compromised by development proximity. A masterplan should be prepared for this site, using an Enquiry by Design process to ensure the existing community is actively involved in the planning and design. The masterplan should recognise its position in the setting of the AONB.

The policy should be amended to reflect landscaping concerns set out in the Comment, so that the policy responds appropriately to waterbodies, the tree screen to the north west of the site, and the golf course. The policy should refer to a masterplan (prepared using Enquiry by Design) which should recognise its position within the setting of the AONB.

1626 - Does not sufficiently protect the rural character of the area or minimise the impact on the North Downs AONB and on neighbouring residents or provide for adequate representation on the master planning group by local representatives. Set standards for all new properties of whatever purpose to minimise visual, landscape, light and environmental pollution.

Include representatives of local parish councils and relevant local amenity groups on the master planning group. Ensure a wide buffer is defined and implemented at the rear of affected houses on Sandyhurst Lane. Ensure increased parking, vehicle traffic, pedestrian and cycle traffic on Sandyhurst Lane is controlled to keep the lane safe as it had no pavements, is a rat run and the speed limit is regularly broken.

1897, 2310 and 1118 With regard to the site boundary consider that Policy S20 is unsound since it fails to define the scope, scale and nature of the proposed "generous landscaping buffer" (Para 4.230) between S20 and Sandyhurst Lane and show how the existing natural habitat on the S20 site, particularly in that locality, is protected in accordance with Policy ENV5. Propose Policy S20 (b) is amended to:

S20 (b) Any generous landscaped buffer to residential properties along Sandyhurst Lane shall, as a minimum, preserve the existing tree line and foliage behind Nos: 86 to 154 (inclusive) Sandyhurst Lane. (Policies ENV4 and ENV5)

In addition that any landscaping buffer between any S20 development and the nearest boundary to any existing premises in Sandyhurst Lane shall be not less in depth than the width of the existing "green maintenance strip" plus the widest point width of the tree line parallel to the strip behind Nos: 86 to 154 Sandyhurst Lane (Policies ENV3 and ENV5)

Response *The detailed proposals for the buffer zone are a matter for masterplanning – no amendment necessary.*

There is a requirement in the policy for a detailed masterplan to guide the detailed development of the site. A masterplan will be the appropriate way to deal with specific landscape concerns and the relationship with the AONB.

The preparation of a masterplan for the site will involve community engagement through appropriate workshops etc and this will involve representatives of the local community. There is a requirement in the policy criterion b to provide a generous landscaped buffer to residential properties along Sandyhurst Lane and criterion e specifies that access to the site shall be provided from Trinity Road only.

Issue – existing rural character 1897, 2310 and 1118 - Westwell is a rural parish located immediately adjacent to the north-west edge of urban Ashford. Since the creation of the Greater Ashford Development Framework (GADF) there has been an acknowledged green barrier between the parish boundary and the defined extent of the town's urban development. As a rural Parish Council we welcome the general principles set out in Policies in the draft Local Plan to protect the heritage and rural character of the borough and its residents. We also note the Plan acknowledges (Para 4.224) that the proposed new development at Eureka Park – Site S20, clearly redefines that urban boundary and will move

it to directly abut the rear of those properties in Sandhurst Lane that form the Westwell Parish boundary.

Welcome the "parkland" character proposed for the site and the conditions set out in Paras. (b), (f), & (k) of Policy S20, but are concerned that, when set against the precedence of Site Policies over Topic policies (Para 4.3), these conditions are too imprecise and are inadequate to ensure the rural character of the area is fully protected and preserved in compliance with Paras. 113 and 114 of the NPPF (2012) and the more detailed Environmental Policies as set out elsewhere in the Local Plan. We argue these inconsistencies make Policy S20 in the draft Local Plan unsound.

The PC considers that Policy S20 is unsound in that it fails to explicitly acknowledge the site's proximity to, and visibility from, the North Downs AONB and thereby fails to specify any special development conditions needed to protect and preserve the landscape and scenic beauty of its surroundings. (NPPF Para: 115) and ENV3). The Westwell Parish Council proposes Policy S20 (k) is amended to:

S20 (k) Laid out, orientated and landscaped so that the sites visual impact on the neighbouring North Downs AONB is minimised. (Policies ENV3 and ENV5)

Response

There is no need to repeat specific topic policy requirements in each site policy – and in this case policies ENV3 and ENV5 will apply as does national policy. Agree to amend para 4.230 to include a reference to the adjacent AONB boundary in the supporting text (see change MC26) but no policy amendment proposed.

That design and build standards for both employment and residential properties and site landscaping on S20 are required to mitigate the visual, landscape, environmental and light pollution impacts of the development on neighbouring residential properties (Policies ENV4 and ENV5)

Consider that Policy S20 is unsound since it fails to ensure the composition of the proposed S20 master planning group is representative of the affected neighbouring communities. We propose an additional clause to Policy S20

S20 (m) that any master planning group shall include representation from local parish and urban councils, environmental groups and representatives of affected Resident and Community groups. (Policies ENV3, ENV4 & ENV5)

Response *Participants in any community workshop to inform the preparation of a masterplan for the site will involve those from the local community and this is well established practice by the Borough Council - no amendment necessary.*

3) Accessibility -welcome the Plan's commitment to restrict vehicular access to S20 and any future development of the Golf Club to be only from Trinity Road. (S20 (e) & (g)) but is concerned that the resulting increase in vehicular traffic from the sites employment and residential use into Trinity Road may adversely create a knock-on increase in the use of

Sandyhurst Lane as a through route. Also supports the Plan's proposals to provide walking and cycling routes to and from Sandyhurst Lane, (S20 (d)).

However consider that Policy S20 is unsound in that it fails to propose steps to mitigate the resulting road safety risks arising from the proposed additional vehicular, pedestrian and cyclist traffic accessing Sandyhurst Lane, already a busy "rat run" secondary rural road. Proposes an additional clause to Policy S20: S20 (n) A proportionate financial contribution to traffic calming, road safety and parking management measures in Sandyhurst Lane to accommodate the increase in vehicular, pedestrian and cyclist use from S20. (Policy TRA5, TRA6 and TRA7)

Response *There is no clear evidence that levels of traffic on Sandyhurst Lane will increase as a result of development on this site as there is no vehicular access from the site onto Sandyhurst Lane. In any event, there is already development identified to take place on this site in accordance with the adopted Core Strategy and the Urban Sites and Infrastructure Policy.*

2708 - To date neither the Local Plan nor its transport evidence base has confirmed that existing M20 Junction 9 can accommodate the proposed development impacts. We would welcome the opportunity to work with ABC to assess the site SRN impacts of this site ahead of document submission.

In the absence of this information, for this Policy to be effective and "sound" in line with NPPF we recommend that the following policy wording additions be applied:

A Transport Assessment should be produced in accordance with Policy TRA8 and measures proposed to mitigate any impact of development on the wider transport network.

Response: *Amend the supporting text to refer to a cross reference to policy TRA8. See MC26. It is accepted that further discussions are needed with HE in respect of the impact on Junction 9 of the M20 and the nearby SRN but the site is, in large part, an existing allocation and the re-allocation to a mixed use site should have beneficial effects in respect of potential transport impacts. In any event, there is forecast to be a reduced level of development to be served by junction 9 at the end of the plan period from that previously assessed.*

1321 – Amend the reference to the golf club site to accurately reflect the Club's position. Suggest "The Club has considered moving to a new site within the Borough."

Response *Agree the proposed change MC26*

Amend para 4.237 to read "The Club has ~~indicated a desire to improve their facilities which may best be achieved by moving to a new location around the town~~" considered moving to a new site within the Borough

1015 - While supporting steps to develop employment opportunities on this site to the maximum consistent with existing planning considerations, this policy does not give any indication as to how development for residential purposes actually triggers development for employment. Mixed developments cited by the developer as potential models, such as Kings Hill, are very significantly larger, and it is unlikely that these would scale to this site.

Provide evidence showing how development for residential purposes actually triggers development for employment in the context of Eureka Business Park.

Response *There is no direct site specific correlation between the generation of jobs and the provision of housing on a related site. The point is that in overall terms the provision of housing and jobs are related and the SHMA elaborates on this particular point.*

932 - Boughton Aluph and Eastwell Parish Council is of the view that leaving aside the great realistic fear of the development causing traffic congestion, if the site was developed in a very much reduced form then it could provide affordable housing for which some evidence was shown in council's recent Neighbourhood Plan Survey.

Response *The development of the site for residential use will require the provision of affordable housing in accordance with policy HOU1.*

927 - With the only proposed access to this development (or any future golf course development) being on to Trinity Road my council fears much increased traffic congestion (which is already in evidence at peak times) especially when coupled with the fact that the existing Eureka Park business development is only 20% completed.

913 - Boughton and Eastwell Parish Council recognises that most of this development abuts our parish boundary with just a small section within, nevertheless it is most concerned about the inevitable great increase in traffic on Trinity Road any such development would create. A traffic survey in 2014 recorded 78,000 traffic movements a week on Trinity Road. Our recent Neighbourhood Plan Survey resulted in over 9,000 comments relating to traffic. The situation would be compounded by this development as it is clear any access to it or to any future development of the golf course is to be from Trinity Road only and this together with the fact that only 20% of the existing business park has been developed.

265 - This development will have a negative impact upon the A251 Trinity Road, which already has over 11,000 vehicles a day passing through. The original idea of a Science Park with low labour intensive operations was changed to include service industries, and this has triggered the increase in traffic. There are already long jams and gridlock at peak periods at traffic lights. The road is also used by many 38 tonne Artics as a short cut between the M20 and M2. Present usage of the Park sees 600 cars a day, even though it is only 20% built, and this could rise to 2000 cars. The land is marshy, and a haven for wildlife, and the building of 300 dwellings would be a loss of natural open space amenity for the residents of Kennington. Combined with future plans to build on Ashford Golf Course will create gridlock on roads not designed for this increase in traffic, requiring the A251 to be widened, the removal of grass verges, and the road made unsuitable for a residential area.

1043 - It is clear that the Kennington area already suffers from traffic congestion, with consequent loss of productivity, noise and exhaust pollution from queuing traffic. Local experience of peak-hour traffic in Trinity Road and in Canterbury Road south of Penlee Point is that there is significantly more queuing than this report has discovered. Although this report indicates that "something must be done", it is very difficult to see what in any practical sense could be implemented to avoid significant increase in congestion if large-scale

development is permitted. The mitigation factors listed in 6.1.11 are not supported by any evidence that they would be adopted.

No large-scale development should be allocated in this plan until a report identifying practical plans mitigating traffic congestion has been prepared and agreed.

Response *In terms of the traffic impact of the proposed development the Traffic Impact Assessment – Summary Report (2016) sets out the position. The site is already proposed for significant commercial development on the site and whilst traffic will still increase there is the possibility with the introduction of an element of residential development for there to be less peak time journeys and more linked trips.*

448 - The proposal is in conflict with NPPF for sustainable development and was never a part of the approved Eureka Business Park Master Plan that residents fought so hard to get. Development of the business park has stalled and over time permitted building classes added. To now permit housing as well could see the master plan for offices replaced by housing. Permitting this development will not encourage completion of offices in what is after all deemed by Ashford to be its flagship business park. Trinity Road during peak hours sees considerable traffic which at times is queued back to the M20 J9 and the traffic lights at Faversham Road. With the Business Park only 20% developed and already attracting around 600 cars, Trinity Road is already set to see a further considerable increase to peak hour traffic. The development will attract an additional 600 cars all spilling out onto Trinity Road at Nicholas Road which is a major congestion point. The local road infrastructure was not built to support this additional load of traffic nor was it considered by the traffic report for Eureka Business Park which completely underestimated vehicle movements as it was based upon a green travel plan forecasting bus use and walking, and a park and ride. All the businesses at Eureka re-located from other districts and most staff commute bringing at one time mayhem to local residential streets because of no on site parking facilities. This was eventually addressed but there is no capacity for further parking provision on site. Operation stack has brought attention to the A251 as a motorway to motorway link which the original traffic reports did not see. The traffic from the proposed development cannot be sustained by Trinity Road and with the further growth of the Business Park local residential streets will once again be overwhelmed by employees and visitors of the business park because of a lack of parking on site. The original master plan for the park should be adhered to and this addition for 300 houses be dropped.

Response *The Local Plan acknowledges that the site has played an important role as the principal “higher order” business park for the town and the development that has taken place there reflects this. The Local Plan has to identify additional sites for residential development and the opportunity exists in this location to introduce some high quality residential development to improve the overall development offer. There are substantial areas of land available for development and indeed, representors have indicated that to develop the employment site at the current rate of development would take substantial amounts of time complete. The Council considers that there is the opportunity to retain significant employment land here and to introduce residential development in a sympathetic way. Objectors have indicated that there could be substantially more residential development on the site but the Council considers that a modest increase to 375 dwellings can be accommodated on the site and significant area of employment land remains available.*

447 - The proposal is in conflict with NPPF paragraph 11. The area is teeming with wildlife and is an integral part of the wildlife corridor to the adjoining lakes. The re-location of the public footpath to accommodate Eureka Business Park recognised the area is water logged and acts as a feeder to the lakes from surface water drain off from Sandhurst Lane. It is a natural nature habitat enjoyed by many public footpath users and local residents. Building 300 homes together with an access road to Nicholas Road will severely damage the biodiversity and geodiversity of the area and will be harmful to the nearby fishing lakes.

380 - I feel that building 300 houses on this site is totally wrong. It was originally designated as a science park and the commercial buildings so far constructed and occupied fitted in well with the landscape. Building houses here will adversely affect the natural countryside, have possible implications on the local wildlife (of which there is much - it is a nesting site for skylarks among other things), I feel that there would probably an impact on the current water courses/lakes and also on the public footpaths which cross the land and are in almost constant use. 200-300 houses would increase the population in this area of Kennington to more than what the current amenities (schools/doctors/dentists) could cope with. Finally all traffic would probably need to access the site from Trinity Road which is already at capacity usage at peak times of the day.

351 - Housing inappropriate. We need to protect these precious and peaceful spots. The footpath is well used and the area is a wildlife haven, full of wildflowers and bird life. To think of it being reduced to an alleyway on a housing estate is horrendous. It is an asset to the town.

333 - The traffic on Trinity Road is already very heavy especially around rush hour. At times it stretches from the lights by the One Stop, all the way back to the Eureka Park roundabout. A completed business park could attract 2000 vehicles which would be far too many for this road to manage. The area around the fishing lake is an environmentally beautiful area with diverse wildlife. It also provides the many residents with green countryside to enjoy, walk dogs etc. Reconsider the traffic and environmental impact. Things have changed since this was first submitted.

Response *The detailed development of the whole site will be informed by a masterplan and in accordance with the policy this will include ecological mitigation and enhancement measures informed by a detailed habitat survey. The policy requires that there should be new pedestrian and cycle routes and that existing Public Rights of Way should be maintained and incorporated within the development.*

Issue – Commercial development 1715 feels that the amount of commercial employment space suggested for allocation is not appropriate or proportionate. Of the 66 hectares of employment space allocated over the plan period, Eureka Park is allocated for 20. In 2006 outline planning permission was granted for 115,000sqm of B1 floorspace for Science and Business Park use (04/00044/AS). This area is roughly akin to the 20ha site that the Council have indicated in their draft policy. Between 2005 and 2015, 15,396sqm of the 115,000sqm of consented employment space had been released. It demonstrates therefore that based on the delivery in the last 10 years, there is more than 70 years supply of commercial floorspace available. This suggests that the council are looking to reserve the land beyond the plan period, as based on the last 10 years take-up rate, this amount of land allocated is

simply not realistic in this location. 1715 mentions that in the NPPF, para 22 encourages the review of long term employment land allocations which have no reasonable prospect of being used for that purpose. 1715 argues that the full 20ha in this location is unnecessarily holding back land that as part of a balanced mixed use community, would be better suited for residential purposes.

Response *The Council considers that the proposed approach to the development of the S20 site is a reasonable and proportionate response to the overall issue of promoting a mixed use development. Previously the site did not encompass any residential development but the Local Plan is the opportunity to review this overall approach. The Plan indicates that Eureka is a key strategic employment site in the Borough as it is targeted at “higher-order” business uses that are set in a low density, high quality landscaped setting. This type of offer is critical if Ashford is to widen its economic base and provide a wider set of employment opportunities. It is essential that the extent of the proposed employment area is sufficient to maintain their key strategic nature of the site.*

Issue - Golf course site 1715 the supporting text in the policy includes provision for future links to the golf course to the south of the site. The golf course area (if relocated in the future) would be more suited to commercial development than residential development in order to deal with the likely noise and air quality issues arising from its location next to the M20. 1715 believes that to accommodate additional commercial land on Eureka is to the detriment of ideal residential land. 1715 mentions that based on the last 10 years’ experience, commercial land is not required for this plan period, or the next, and a potential additional site for the future, more suited to commercial than residential uses, has already been earmarked at the golf course and would be facilitated by Eureka Park.

Response *The Local Plan acknowledges in para 4.237 that there is longer term potential for the adjoining Ashford Golf Club to come forward for re-development but at present there are no definite proposals in place. The Plan therefore takes a reasonable approach to this possibility and in the absence of any further details it is difficult to see what other course of action the Plan could suggest. If there is quick progress on the potential redevelopment and re-location then it could be a matter for the review of the Local Plan.*

Issue – Residential allocation 1715 Support the principle of mixed use development of the site and the overall approach but question the requirement to have nearly one third of the overall 66 ha of new employment land in one location (SP3). Question whether the amount of commercial land suggested for allocation is appropriate and proportionate. Based on delivery in the last 10 years, there is more than 70 years supply of commercial floorspace available. Suggested that the policy wording be amended to say a minimum of 300 dwellings

Propose that the policy is too restrictive limiting the commercial development to B1 uses – should be widened to other employment uses outside B1 uses – B2 and B8 uses should be considered. Insert wording to say that any planning obligations will be superseded by CIL once it is adopted.

Consider the 300 units allocated at the site to be restrictive and it should be modified to include a higher yield of residential development. The Vision Document 2016 – which is appended to the rep – undertook a study to consider the employment and residential uses in the area. This study concluded that approximately 50,000sqm of employment space and 600

residential units would be a more appropriate mix (this is based on 32 years of employment land based on last 10 years take up). 1715 feels that compared to other allocations in the plan, the scale of residential development is disproportionate, particularly as other sites allocated for larger yields have significant constraints (such as those reliant on J10a). There are also concerns that 300 units will make it difficult to achieve a quality balanced community and a mix of dwellings that is sought and does justice to the quality of the location. Para 14 of the NPPF also requires a Council's Local Plan to be able to flexibly adapt to rapid change. In order to be effective the plan must ensure that certain sources of supply are identified to deliver the number of homes that are needed. The Land at Eureka Park is capable of accommodating approximately 600 dwellings, is deliverable and as currently drafted is considered to have an over allocation of employment space. Thus the reference of 'up to 300 dwellings' is objected to. 1715 therefore propose that the wording of 'up to 300 dwellings' is modified to state 'a minimum of 300 dwellings'.

Response *The Council is proposing an amendment to the Local Plan to increase the residential element on the site to 375 units and this will contribute towards the development of the balanced community outlined in the response. See Proposed Change MC26. It is clear that the site could accommodate considerable more residential development than the quantum specified but it is considered that this would deflect too far from an appropriately balanced mix of uses that is required in this location.*

Issue – Flexibility in employment uses 1715 Eureka continues to be promoted and considered as the prime business park in Ashford offering primarily B1 office accommodation. However, the take up of office space has been limited to 15,396sqm in the last 10 years. The wording of the policy is considered too restrictive and should allow for other employment uses to come forward, which may be well suited to the location and greatly contribute towards a balanced community. Complementary uses could also generate more interest in the B1 office market. Thus 1715 suggest that the following additional wording is added to the policy: "Other employment generating uses outside of the B1 use class may be considered appropriate for the site subject to their individual merits, and compliance with other policies in the plan".

Response *The policy as drafted makes no distinction between different types of employment use but there are specific requirements regarding design, layout and density which ensure an appropriate approach is taken. Paragraph 4.227 of the draft Plan does indicate that there is scope to broaden the range of potential employment that may be acceptable on the site – for example health care facilities or similar high quality services that complement the wider B1 office elements of the site.*

Issue – Planning obligations and CIL 1715 suggest that financial contributions sought for this scheme towards a number of facilities will be superseded by CIL. 1715 therefore propose that wording should be added to the policy to acknowledge that the planning obligations may be superseded by the CIL requirements once adopted; 'Any planning obligations will be superseded by the CIL once adopted for the Borough'.

Response *This is dealt with in policy IMP1. No change necessary.*

Support 2361 - This allocated site is crossed by a number of Public Rights of Way used regularly for recreational exercise. This policy recognises the importance of these routes and

the Service supports the inclusion of paragraphs 4.229 and 4.23 in respect of a "Parkland" feel. Support Policy S20 (d) with requested amendment. This policy should ensure that Public Rights of Way are maintained in a "Parkland" environment.

1175 support the principle of a mixed use allocation at Eureka Park as they consider it a relatively unconstrained site. They feel it is sustainably located, with no ecological designations present and no Listed Buildings or Conservation Areas nearby.

Response Noted

POLICY S21: ORBITAL PARK

Representations have been received from the following consultees

2605 KCC	2709 Highways England
1832 Broad Oak Motor Company	1178 Lesley Wickens

Summary of Representations – Main Issues

Issue – minerals safeguarding 2605 As set out in the adopted Kent Minerals and Waste Local Plan 2013-2030, Policy CSM 5: Land-won Mineral Safeguarding and Policy DM 7: Safeguarding Mineral Resources detail how minerals of economic importance will be safeguarded from being unnecessarily sterilised by non-mineral development, as well as the circumstances when non-minerals development may be acceptable at a location within a Minerals Safeguarding Area. In light of this, KCC recommends that a minerals assessment should be prepared to determine the extent and nature of the mineral deposits to determine the viability and practicality of prior extraction.

Response : *Kent County Council has confirmed that if the site is located within an existing urban area, the provisions for safeguarding of minerals do not apply, and these comments can be ignored.*

Issue – sui generis uses 1832 welcomes the acknowledgement in Paragraph 4.240 that other sui generis uses may be acceptable, such as 'motor dealerships' but we would suggest that the final sentence at Paragraph 4.240 and Policy S21 are revised to read: "Other, sui generis uses ~~may~~ will be acceptable where they...." We would submit that, given that capacity at both M20 Junction 10 and at the A2070/Orbital Park roundabout has increased over recent years, that there should be no constraints on bringing forward much needed employment sites at Orbital Park. We would, therefore, request that Paragraph 4.245 is deleted.

Response: The wording of paragraph 4.420 is deemed to be sufficient to enable the consideration of suitable sui generis uses at the Orbital Park.

In terms of paragraph 4.245, the wording does not preclude additional development taking place providing there has been a robust Transport Assessment undertaken that demonstrates that sufficient capacity is available. In the current circumstances, prior to M20 junction 10a completion this is considered to be the most appropriate approach.

Issue – Highway safety 2709 - In the absence of a current transport evidence base there is uncertainty regarding the SRN impacts of this site and whether or not the proposed development is deliverable in transport terms. We would welcome the opportunity to work with ABC to confirm the current capacity constraints and assess the site SRN impacts. In the absence of this information, for this Policy to be effective and “sound” in line with NPPF we recommend that the following policy wording additions be applied: A Transport Assessment should be produced in accordance with Policy TRA8 and measures proposed to mitigate any impact of development on the wider transport network.

1178 - No mention of both the customer and lorry traffic that is currently and will be generated by the development of this site. Please address the Barrey Road question in relation to HE's scheme.

Response: Orbital Park is a long standing employment allocation that has been factored into traffic assumptions at the A2070 junction in respect of proposed improvements to that junction. However, it is accepted that the supporting text could contain a suitable cross reference to policy TRA8. See Proposed Change MC27.

The question of access and egress from Barrey Road does not relate to this site.

POLICY S22: CHART INDUSTRIAL ESTATE

Representations have been received from the following consultees

2606 KCC

Summary of Representations – Main Issues

Issue – Minerals safeguarding 2606 As set out in the adopted Kent Minerals and Waste Local Plan 2013-2030, Policy CSM 5: Land-won Mineral Safeguarding and Policy DM 7: Safeguarding Mineral Resources detail how minerals of economic importance will be safeguarded from being unnecessarily sterilised by non-mineral development, as well as the circumstances when non-minerals development may be acceptable at a location within a Minerals Safeguarding Area.

Response : Kent County Council has subsequently confirmed that if the site is located within an existing urban area, the provisions for safeguarding of minerals do not apply.

POLICY S23: HENWOOD INDUSTRIAL ESTATE

Representations have been received from the following consultees

2322 Southern Water	2608 KCC
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Summary of Representations – Main Issues

Issue – groundwater protection 2322 This site is located within a Source Protection Zone 1 for a potable groundwater abstraction located to the east and southeast respectively. The sites are therefore in a very sensitive setting from a groundwater protection point of view. Policy should make reference to this, to ensure appropriate site investigation and risk assessment is undertaken to prevent pollution of controlled waters. Where Sustainable Urban Drainage systems include infiltration, an assessment may be required to demonstrate that this will not cause pollution.

Response: Accepted. See proposed change MC28.

Issue – minerals safeguarding 2608 As set out in the adopted Kent Minerals and Waste Local Plan 2013-2030, Policy CSM 5: Land-won Mineral Safeguarding and Policy DM 7: Safeguarding Mineral Resources detail how minerals of economic importance will be safeguarded from being unnecessarily sterilised by non-mineral development, as well as the circumstances when non-minerals development may be acceptable at a location within a Minerals Safeguarding Area. In light of this, KCC recommends that a minerals assessment should be prepared to determine the extent and nature of the mineral deposits to determine the viability and practicality of prior extraction.

Response : Kent County Council has confirmed that if the site is located within an existing urban area, the provisions for safeguarding of minerals do not apply.

POLICY S24: TENTERDEN SOUTHERN EXTENSION PHASE 2

Representations have been received from the following consultees

1872 Kent Wildlife Trust	2441 High Weald AONB unit
1877 Morghew Park Estate	2454 Wates Developments Ltd
1961 Tenterden Town Council	2609, 2632, 2633, Kent County Council
2362 Southern Water	2869 Philly Adams
2409 High Weald Joint Advisory Cmtee	

Summary of Representations – Main Issues

Issue - AONB, Green Corridors & Wildlife Sites 2409 and 2441 both request that they be part of the masterplanning process in relation to the proposed woodland / wetland belt along the southern boundary but also reference the historic routeways across the site and the impact of the site on the AONB setting. 2633 states that there is not adequate protection of Six Fields Path (Historic Routeway) or long distance views to the church. Public footpath AB31 should be retained as it forms part of the High weald landscape trail which showcases valuable features and landscapes of the AONB and must be protected and enhanced.

1872 would like reference added to the policy relating to the Green corridors which have been identified as part of the masterplanning process for phase 1.

1872 states that reference should be made in the policy and supporting text to avoid recreational pressure on the designated wildlife site AS05, through appropriate design and a buffer around the LWS.

Response: *The masterplanning stages of the development will be arranged by the local authority, developer/s and local stakeholders at the time the pre- application process commences. It is not appropriate for the policy to detail the list of required stakeholders for this purpose, as this is dealt with by the Council's Statement of Involvement (SCI).*

The long distance views of the church are specifically covered by the supporting text and policy wording.

Agree: Protection of historic routes and pathways will be specifically mentioned within the supporting text and policy wording. The AONB setting is referenced within the supporting text to the policy, but policy wording will be strengthened with regards to this point. See Proposed change MC29.

Issue - Infrastructure 2362 propose addition to policy criteria to deal with connection to sewerage network: *f) A connection to the nearest point of adequate capacity in the sewerage network is provided, in collaboration with the service provider.*

2632 request proportionate financial contributions towards KCC services, including 1FE extension to Tenterden Primary School.

Response *See proposed Change MC29. Amend Policy to add 'Provide a connection to the nearest point of adequate capacity in the sewerage network, in collaboration with the service provider'*

In the RJ add: 'Southern Water's assessment has revealed that additional sewerage infrastructure would be required to serve the proposed development. The development will therefore be required to make a connection to the nearest point of adequate capacity in the sewerage network. Early liaison should take place with the service provider in this regard.'

The requirement for developer contributions towards the provision of infrastructure and community facilities is dealt with by generic policies (COM1, COM2 and IMP1) in the Plan.

Where site specific projects have been identified in the Infrastructure Delivery Plan these have been identified in site specific policies. No change proposed.

Support 1877 supports development allocation as a logical extension to TENT1a and controlled expansion of Tenterden. Support Master planning requirement and housing numbers. 1877 welcomes change to policy relating to 'occupation' of phase b once phase a is complete and suggests earlier completions than those in HT.

1961 supports the allocation

Response Supports noted.

POLICY S25: PICKHILL BUSINESS VILLAGE

Representations have been received from the following consultees

1898 Hopes Grove Nursery	2410 High Weald Joint Advisory Committee
1963 Tenterden Town Council	2442 High Weald AONB Unit
2032 Pickhill Business Development Ltd (Barton Willmore)	2610 KCC
2370 Natural England	

Summary of representations - Main Issues

Issue – site boundary 2032 The owners of the site want the north of the site also allocated, which is the site they have taken a large amount of pre-application advice on. They also want us to reconsider the site boundary to more correspond with their ownership.

Response It seems that the boundary of the site has been interpreted incorrectly with regard to the site entrance opposite Pick Hill House. Therefore, the site boundary will be amended in the northern direction to reflect the correct property ownership boundary. However, it is not considered necessary to allocate the eastern site area as this area was granted planning permission on the 15th November 2016.

Change the site boundary. See Proposed Change MC30.

Issue – landscape impact 2370 The plan acknowledges that this site is within the High Weald Area of Outstanding Natural Beauty (AONB). It would therefore be appropriate that any proposal is accompanied by a Landscape and Visual Impact Assessment (LVIA) to properly assess any impacts to the special qualities of the AONB.

2410, 2442 increased rural employment is supported, but care will need to be taken to ensure that these are small businesses which do not generate heavy traffic or require tall bulky buildings. Whilst the restriction to two storeys is noted, a large warehouse could comply with this and still be very bulky in the landscape. It may be better to restrict the floorspace of individual units and the height (say to the height of the existing units). The materials and colour of facing materials will also be key.

Response *It is not considered appropriate to amend as the original buildings were farm buildings/warehouses that were converted. Retain the policy as “no more than 2 storey”.*

Due to the site being located in the AONB it is acknowledged that regard should be had to the impact on the AONB and its setting. See Proposed Change MC30..

Issue – increase rural employment opportunities 1898 There should be more rural employment and the site at Hopes Grove Nursery should be considered as an option as it is more accessible and located close to the town.

Response *The Hopes Grove Nursery site is not considered as sustainable as the Pickhill site as it does not have the same level of existing tenants and demand for new units that can be identified on the Pickhill Site.*

Issue – minerals safeguarding 2610 according to British Geological Survey safeguarding data, Sandstone (Wadhurst Clay Formation) are present within the allocated site and are vulnerable to sterilisation.

Response *The fact that the site is a mineral safeguarded area is irrelevant in this case as the majority of the site is already developed and you would never recover minerals from an extension area of the site.*

Support 1963 Policy for Pickhill supported. The extension of the existing site to incorporate the redundant garage to the south would also be supported if it resulted in significant improvements to the existing site.

Response *Support noted.*

POLICY S26: APPLIEDORE – THE STREET

Representations have been received from the following consultees

166 BHS South & East Kent Committee	1785 CPRE Kent (Ashford District Committee)
283 TG Designer Homes	2374 Natural England
1638 Appledore Parish Council	2611, 2634 & 2635 Kent County Council (KCC)

Summary of representations – main issues

Issue - ecology 283 requests clarity on the need for an EIA and which ecological areas are being requested to be linked and assessed. Suggest including land in site allocation for clarity.

Response Accepted. Policy amended to make site allocation boundary larger and include ecological area. See Proposed Change MC31.

Issue – PROW 166 requests that the PROW should be enhanced and upgraded for multi-use options. 2635 supports retention of PROW criteria but suggest addition of words 'to ensure safe access'.

Response It is not possible to require a site allocation of this size to upgrade a full length of PROW to enable horses and other users to pass through. Even if they did this within the site itself – it could not be applied to the PROW outside of the site boundary. Amend wording 'to ensure safe access.' See Proposed Change MC31.

Issue – minerals safeguarding 2311 – Request of minerals assessment as site is within sandstone formation

Response Sites that are proposed for allocation in and around Ashford and at other settlements represent the most sustainable options to provide for the housing and employment needs for the Borough, as has been demonstrated through the Sustainability Appraisal. In order to meet the needs for housing and employment development it is the Council's view that it would not be possible to avoid allocations within these areas, and would create an unsustainable form of development if the mineral safeguarded areas were not considered for development as a matter of principle. Kent County Council has requested that minerals assessments be carried out in order to identify the need for prior extraction of the minerals within the safeguarded areas. The Minerals and Waste Local Plan 2013 – 2030 which forms part of the statutory development plan for the Borough, includes policies which set out these requirements, and are therefore material considerations when in determining planning applications. It is not considered necessary to replicate these policies within this Local Plan.

Issue – developer contributions 2364 KCC requires financial contributions to education provision to mitigate this development.

Response The requirement for developer contributions towards the provision of infrastructure and community facilities is dealt with by generic policies (COM1, COM2 and IMP1) in the Plan. Where site specific projects have been identified in the Infrastructure Delivery Plan these have been identified in site specific policies. No change proposed.

Issue – corrections to wording 1785 requests wording change from 'protect' to 'preserve and enhance' in point A of policy referring to CA setting. 1638 and 1785 informs that the GP surgery is now a dwelling so all reference should be amended. 2374 Informs that the RAMSAR site is now adopted and not proposed and references should be amended. Also

that it is to the north east of the site and not the east as we have stated. Also requests that EIA references the impact on the SPA as the site is within the Impact Risk Zone (IRZ)

Response *These corrections agreed and noted.*

POLICY S27: BIDDENDEN – NORTH STREET

Representations have been received from the following consultees:

120 Philippa Harris	1786 CPRE Kent (Ashford District Committee)
122 Michael Kenton	1819 Millwood Designer Homes Ltd
154 Inigo Bing	2034 Biddenden Parish Council
156 Peter B Boyse	2043 Gillian Stephens
268 Jeannette Oatway	2044 David Walker
269 Mr Campbell-Lenaghan	2045 Jessica Bridgeman
720 Jackie Thomas	2047 Julie Tester
832 Ron Parker	2048 Christine Wheadon
954 Richard Wayre	2052 Biddenden Residents (Petition of 319 signatures)
1017 Judith Wright	2080 Susan Boon
1132 Melissa Hunter	2084 Betty Boon
1334 John Watkins	2091 Tom & Caroline Swain
1561 Scott Parks	2363 Southern Water (Planning Policy)
1618 Michael Benson	2452 Duncan Horlock
1730 Mason Brannan Design Partnership (Keith Brannan)	2636 & 2637 Kent County Council (KCC)

Summary of representations – main issues

Issue - Housing numbers 2034 (PC), 269, 122, 832, 954, 1132, 156, 2052 argue that allocation be reduced to 20/25 dwellings in accordance with local views. 2091, 2047, 2080 also request the reduction of the housing numbers for this site with no specific number. 1786 suggest that ABC should consider reducing the number to preserve landscape character.

2034 state that the Biddenden Community Plan agreed the need for additional houses but identified that the majority will come from ongoing infill, and potentially one or two small developments of up to 10 houses each. 20-25 houses by 2030 is in line with this plan; 45 is not. 120 supports this statement.

1561 states that additional housing need in Biddenden isn't justified as houses are already being built. 269 questions need for new houses. 954 argues that Ashford and Canterbury have already contributed significant effort to meet the need for housing and the villages should be protected from further development. 1334 believes vacant brownfield sites should be developed first.

1730 states that the policy fails to consider requirements of the Biddenden Parish plan 2013 which sets a requirement for 60 homes to 2023. Suggests that the allocation number should be higher but not on one site – numbers should be spread across smaller sites to prevent urban sprawl. 1819 supports the allocation but requests increase to 75 units to enable the provision of a full community building. The current proposal for 45 units is not economically viable to provide a full on site community building and associated parking. Nevertheless, 45 would be sufficient to provide a satellite surgery facility to the community, which is a key objective of the Community-led Plan. To support a full community facility building, then it is considered that site developer would need to provide 75 units or more to make it economically viable. It is considered that this is far better than having several smaller sites in the village, all of which can provide a limited number of dwellings, but little in the way of additional community benefits.

Response *Government policy requires local authorities to determine their own housing needs. However, this must be based upon an assessment of housing need through a Strategic Housing Market Assessment, to ensure that general market and affordable housing needs are fully met until 2030. A general misunderstanding of the Localism Act is that the Government allows local communities to simply say 'no' to development; however the choice is more about where the development needed should best be located.*

The strategic approach to housing allocations in this Draft Local Plan is to allocate most land in the urban area. Allocations are also needed in rural areas of the borough to enable the needs of all the population to be met and to secure the future sustainability of those settlements.

Local views are considered during the allocation selection process, and are weighed against the overall borough strategy.

Issue - Housing types, design and layout: 154 states that the policy does not require a mix of housing sizes and therefore will not cater for the needs of all people. 2048 and 2047 consider there is a need for low cost homes and homes for local families. 2045, 269, 2052 (petition) consider density of proposed development is too high.

832 believe that the community building should be provided at the rear of the site with the proposed housing to limit its impact on the listed properties in North Street. 2034 agree. 954 feels that the proposed layout with the housing at the rear of the site will allow for future infilling up to the road frontage and result in a much larger development.

1786 - This proposal should be design-led, preserving the landscape character and habitat features and this will inevitably determine the number of homes that are appropriate. 2034 agrees that any development should follow its Design Statement which is very specific about the design of self-contained estates.

Response *The need for a mix of housing types and sizes is acknowledged and new Policy HOU18 has been added to the Plan and will therefore apply.*

The proposed overall density of the site is less than 20dph, which is low and reflects the rural location and takes into account the local character. This is detailed in paragraph 4.288.

With regards to design and layout of the development, this is a matter for the detailed planning application stages, which will take into account site survey work, and will be available for public consultation at that time.

Issue - Negative Impact on character and historic core 120, 154 feels that a large development of 45 cannot be in keeping with the prevailing character and historic morphology of the village. 122 1561, 2048 and 154 feel that the rural character of the village will be lost with a large development. 720 is concerned with the loss of the rural views for Mansion House Close Residents and feels the policy is not in accordance with the Biddenden village design statement, which requires the retention of rural features such as hedges, access to rural views, protection of the green belt around the village and Conservation Area.

Response *The supporting text of the policy at 4.929 highlights the proximity of the site to the conservation area and listed buildings. However, these assets are located some way from the area of the site to be developed and do not adjoin the site boundaries. The requirement for soft landscape buffers and the developable area being located at the rear of the site will minimise the visibility of the buildings in the wider setting, and other Local Plan policy requirements regarding design and layout and conservation will also apply to the site.*

Issue - Traffic calming & Pedestrian Access: 154 Policy fails to take into consideration the traffic movement and changes to the carriageway and the impact that this will have on the character of the village. 720 believe that there is no way of making traffic calming measures on the A274. 832 reducing the number of homes would negate the requirement for traffic calming measures. 1132 The busy A274 road will be impacted by "traffic calming" measures and cause further congestion.

2034 requests clarification the type of traffic calming envisaged in North Street and on the development. This claim did surprise the parish council as the issue has been put forward before to the Highways Agency and has been dismissed as it is an A road. There has also been discussion regarding the junction of the A262 and A274 in the village. It is a cause for concern and safety of both pedestrians and vehicles and serious thought needs to be given to rectifying this. 2034 is concerned that at present the only pavement adjacent to the proposed site is on the opposite side of the road. Arrangements would need to be provided to create a safe passage across the road to the pavement and works to the narrow section should be addressed.

Response *Kent Highways are a statutory consultee and provided comments on this scheme relating to the access, traffic calming and pedestrian access. The policy is worded as per the*

advice received from the statutory body and therefore is accepted. The detailed requirements relating to the traffic calming and crossing will be dealt with as part of the planning application process, where the applicant will be required to liaise with KHS about how these requirements should be met.

Issue - Village Improvements Green Space/Play/PROW 120 suggests that the development should be providing more public green space. 269 suggests the policy should require enhancements to the PROW, recreation ground and play area. 832 suggests that a requirement be placed in the policy to upgrade the PROW footpath so that it is a suitable all weather footpath and negate the need for pedestrian crossing on North Street. 2637 agrees and requests policy inclusion to provide for improvements to the surfacing and drainage of Public Footpath AT10.

Response *Due to the close proximity of the site to the village recreation ground, the provision of a new area of open space is not considered necessary. The requirements set out in the Policy COM2 will also apply to all developments and this policy requires a contribution to the enhancement of the existing play, sport and open space facilities.*

Agree: It is identified in the supporting text that the PRoW may not be suitable in all circumstances, and it is agreed that contributions to the upgrading of this footpath should be sought from the development, See proposed change MC32. This does not negate the requirements for footpaths and crossing points on North Street.

Issue - Community Facility building 1017, 1132 & 2043 believe it likely that the building for the community will not be built at that site within the time frame and that there is a danger that 60 homes would be built instead. 2084 Community building should be in place before building homes. 2034 The Parish Council's view is that a new community building may well be of benefit to the village to replace the current facilities, but a Doctor's surgery alone is not viable given the number of parishioners in total and the 50% who already go to Doctor's elsewhere. We would be looking for a building that could serve a range of purposes and is used by as many different groups (including the school) as possible during the day and evening.

Response *The provision of a flexible use community building was included within the site policy due to the identification of the need within the Biddenden Community Plan. The proposed uses and detail of such a community facility building and timescales of the provision coming forward will be dealt with as part of a planning application process.*

Issue - Public consultation 2034 and 120 believes that ABC have not worked with the village in regards to the Parish Plan objectives. 122 and 720 state that this site has been rejected in the public consultation process and residents views have been ignored. 720 feel that the consultation process is not in accordance with the SCI with regards to informing residents. 1017, 1618, 2043, 2452 & 2052 (petition) Further community consultation is needed.

Response *A number of public consultation events were held around the borough during the local plan preparation and site submission/selection stages, where local opinions were sought and recorded. A number of these events were held in Biddenden, and in addition a bespoke event was held with the developers of the two shortlisted sites in the parish, as an addition to consultation elsewhere, which was arranged with the Parish Council. All*

consultation events were held in accordance with the adopted SCI with regards to Local Plan preparation. Full details can be found within the Pre-submission consultation statement.

Issue - Local Infrastructure 1334, 122, 268 and 720, 954, 1017, 1334, 1618, 2091, 2047, 2043, 2045, 2044, 2048, 2052, 2080, 2084. 2452, 2034 consider that local Infrastructure is not sufficient including some or all of the following concerns:

- New gas pipes are needed due to lack of gas pressure
- Sewage infrastructure not available
- School has no capacity (quote - as stated by a school governor). Children have to travel to other schools.
- Transport and road network capacity is a concern
- Lack of local policing
- No GP surgery
- Limited bus service
- No local jobs

1017, 2052 (petition), 1618, 2044 considers that this policy is not positively prepared and infrastructure and transport needs have not been assessed.

1017, 1132, 1618 There are no plans in place yet to ensure delivery of infrastructure within the time frame of the development (5 years) nor of the Local Plan (to 2030). 2034, 2052 (petition) request assurances of school places, infrastructure, road safety before plans for homes or multi use building are in place.

2636 The County Council will require financial contributions towards KCC services including towards the construction costs of any new education provision required to mitigate the impact of this development.

2363 Southern Water propose that the following criteria is added to policy S27 after 'Development proposals for this site shall':

- g) Provide a connection to the nearest point of adequate capacity in the sewerage network, in collaboration with the service provider
- h) Provide sufficient distance between Ashford wastewater treatment works and sensitive land uses, such as housing, to allow adequate odour dispersal and not result in an unacceptable impact on amenity by reason of odour

Response *It is accepted that any new development proposals will affect existing services. Therefore, service providers, including KCC Highways & Education, Water companies and the Environment Agency (drainage and flooding), the Ashford Clinical Commissioning Group and the East Kent NHS Hospitals Trust are consulted at all stages of the plan making process to identify if they have existing capacity or if additional capacity is needed to accommodate additional development. If additional capacity is needed, this is then planned for through the Local Plan process and the Infrastructure Delivery Plan, which supports the Local Plan.*

It is the responsibility of these service providers and stakeholders to identify and ensure delivery of the infrastructure that is required. The Local Plan plays a supporting role in

helping to deliver the infrastructure, by allocating sites or requiring developers to make financial contributions.

Where the providers have raised concerns with local infrastructure, these have been addressed within the specific site policy, or sites have been excluded from consideration if these could not be resolved. ABC will continue to work with these stakeholders in understanding the borough's infrastructure needs.

The requirement for developer contributions towards the provision of infrastructure and community facilities is dealt with by generic policies (COM1, COM2 and IMP1) in the Plan. Where site specific projects have been identified in the Infrastructure Delivery Plan these have been identified in site specific policies. No change proposed.

Agree: Policy and supporting text will be amended as suggested by Southern Water with regards to additional sewerage infrastructure. See Proposed change MC32.

With regard to the proximity to the WWTW, this is one of many factors which need to be considered and balanced against each other in deciding which are the most appropriate sites to allocate for development. Full assessment of all of the factors has been carried out through the Sustainability Appraisal and this site has been considered against the other reasonable alternatives. On balance whilst this site may on occasion be affected by odour from the WWTW it is considered that this site is an appropriate option taking into account the need to meet the Borough's housing requirement and the other alternatives available.

Issue - Ecology & Environment 122 states that their pond nearby to the site has Great Crested Newts and this is not considered by the policy. 1618 as this is a rural greenfield site there will be significant environmental impacts. A proper assessment of the impact of such a development has not been done. The proposed development will build over what is currently rural farming land. The plan indicates there will be loss of hedgerows and oak trees. Some of these trees may have Tree Preservation Orders on them. 1786 believes it would be appropriate to consider reducing the number of homes suitable for this site given the historic patchwork of small fields, with a similarly interesting mosaic of hedgerows linking ponds and small woodland features beyond the site.

Response Accepted, requirements for ecological survey work will be placed in policy and supporting text. See Proposed change MC32.

There are no TPO's within the site or on the boundary. Paragraph 4.292 and criterion e. of the policy requires the retention and enhancement of the tree and hedgerow boundaries. It is inevitable some may need to be removed for access or other requirements and this will be dealt with as part of the detailed layout and design at planning application stage.

Issue - General objections/concerns 1017, 1618 contests that only the housing delivery is considered and the SA assessment is inaccurate and flawed and not consistent with the NPPF and principle of sustainable development.

2034 understands that the area of land has a restrictive covenant on it restricting it to one dwelling. Please could this be looked into and clarified to the council.

2048 believes that country people and town people want different life styles and will not mix well.

Response Comments are noted. The Sustainability Appraisal criterion covers a wide range of issues, including the overall strategy for the delivery of housing across the borough, and site specific constraints with regards to suitability and deliverability.

On the issue of the covenant, this is a matter to be addressed by the landowner.

POLICY S28: NORTHDOWN SERVICE STATION, MAIDSTONE ROAD

Representations have been received from the following consultees:

850 Christine Drury	2612 Kent County Council
1257 Kent Downs AONB Unit	2638 Kent County Council
1787 CPRE Kent	2659 Charing CP
2291 Peta Grant	2730 Charing Parish Council
2325 Environment Agency	

Summary of representations – main issues

Issue - Landscape impact and AONB 850 2291, 1787 object to the inclusion of this site as it is outside the built area of Charing village and is isolated development which and could lead to ribbon development along the A20 and would be a radical change to the extent and character of Charing. The Policy should make specify reference to protecting and enhancing the setting of the AONB.

850, 1270, 2659 feel that development in the southern-most part of this site would not relate very well to the existing village settlement. If the site is to be allocated for development it is imperative that impact on the adjacent AONB is appropriately mitigated which should include the need for structural landscaping along the western boundary, a restriction on building heights to two storeys and a restriction on external lighting. It will interrupt the views from the AONB to the north and ultimately encourage further development right up to Hook Lane and materially affects the setting of the AONB.

1257 Suggest the following policy wording change “Land at Northdown Service Station is proposed for residential development for up to 20 dwellings. Development proposals for this site shall:

- Be designed and laid out in such a way as to protect the character and setting of the Kent Downs AONB and surrounding countryside. Particular attention needs to be given to the topography of the site and advice in the Charing Parish Design Statement, the impact of external lighting and building heights to be restricted to two storeys;
- Provide vehicle access onto the A20 Maidstone Road, as shown on the policies map;
- Retain the existing employment uses on the frontage where possible;
- Retain and enhance the hedge and tree boundaries around and within the site, particularly where there is adjoining countryside and provide additional structural planting along the western boundary”

Response *This site is not isolated in the countryside as it is an in use brownfield site and within walking distance of the village centre, it consists of an existing petrol filling station and small associated retail facility. Development of housing on this site would complement ‘The Swan’ hotel which adjoins the site to the east and would not impact on the village entrance when driving down the A20 from the Maidstone direction.*

This is a small development proposed in the setting of the AONB, due to its adjoining location to the A20 and its small size, it is unlikely to have a significant impact on the AONB. Criterion A of the policy sets out that it needs to “... be designed and set out in such a way as to protect the character and setting of the countryside” and the AONB is also set out in paragraph 4.298

Paragraphs 2.2 and 4.2 of the Plan make clear that the Local Plan should be read and interpreted as a whole. New Policy ENV3b provides specific policy requirements for developments within and immediately adjoining the AONBs in the borough.

Issue - Alternative sites 2659 Charing Parish Council objects to this allocation S28 believing that there are better potential sites than this that would offer an equal or greater number of dwellings. We will seek to identify these formally and to test opinion on them during the preparation of the neighbourhood plan over the next few months. 850, 1787 considers that the emerging neighbourhood plan is the appropriate process through which to identify sites for new homes in the village.

Response *The Neighbourhood Plan (NP) is a policy document that can help deliver homes in the neighbourhood area which it covers. It is acknowledged that this is a vehicle that can deliver housing development sites in Charing. However, at the time of the Reg 19 Plan going to print the Charing NP was in its infancy and the proposals for the area were advanced in the Reg 19 Local Plan. The relationship between proposals for housing development in both the NP and LP will need to be considered carefully as the LP advances. As it stands there is no National Policy that states that housing allocations cannot be in both the LP and NP.*

Issue - Land use 2659 - The services and employment provided by the filling station and car workshop are important so, in any event, the words "where possible" should be deleted from c).

Response *noted. No changes proposed.*

Issue -Traffic and parking 2659 the site is one kilometre from Charing High Street and further from the Station. While we accept that this is within walking distance for most people it is not "in close proximity" as para 4.296 implies and would certainly encourage some degree of additional car use. 2730 while the A20 has capacity to take additional traffic, many roads within Charing village, including Station Road and Pluckley road, are overcrowded. Topography, the absence of crossing places and the AONB make any significant development along the A252 impractical. We would like to see a policy stating that any development in Charing village, other than infill, should have direct access to the A20.

Response *It is not necessary to remove the reference to 'close proximity' as it is considered, and acknowledged, that this site is within walking distance for most people.*

Issue - Site access 2659 Para 4.296 on page 128 implicitly seems to assume that further additional development should happen since it states that access should be allowed from S28 onto land to the east. Further, while stating that it is to allow access to the rear garden of The Swan, it will in fact allow access into the small field/paddock to the west of the Swan, the Swan's rear garden lying beyond this.

Response *Remove the reference in the second sentence of paragraph 4.295 to the rear garden of the Swan Hotel as it cannot be confirmed if this is the rear garden or a paddock. See proposed change MC33.*

Issue – Minerals safeguarding 2612 Deposits are present within the allocated site and are vulnerable to sterilisation. KCC recommends that a minerals assessment should be prepared to determine the extent and nature of the mineral deposits to determine the viability and practicality of prior extraction.

Response *Ashford Town sits on a band of mineral deposits which run north-west to south-east through the Borough, meaning that the majority of land in and around Ashford Town, and at a number of other settlements, has safeguarded mineral deposits. Sites that are proposed for allocation in and around Ashford and at other settlements represent the most sustainable options to provide for the housing and employment needs for the Borough, as has been demonstrated through the Sustainability Appraisal. In order to meet the needs for housing and employment development it is the Council's view that it would not be possible to avoid allocations within these areas, and would create an unsustainable form of development if the mineral safeguarded areas were not considered for development as a matter of principle. Kent County Council has requested that minerals assessments be carried out in order to identify the need for prior extraction of the minerals within the safeguarded areas. The Minerals and Waste Local Plan 2013 – 2030 which forms part of the statutory development plan for the Borough, includes policies which set out these requirements, and are therefore material considerations when determining planning applications. It is not considered necessary to replicate these policies within this Local Plan.*

Issue – Land Contamination 2325 a petrol filling station is a potentially contaminative use. Any redevelopment must therefore consider this, and take appropriate measures to prevent any pollution to controlled waters.

Response Amend policy wording to state “Ensure that any land contamination issues are satisfactorily investigated and resolved or mitigated”. See Change MC33.

Issue - General corrections 2659 in para 4.295, "west" and "east" are the wrong way round.

Response Amend paragraph 4.295 to ensure that the east and west are the stated correctly in the policy. See proposed Change MC33.

Issue - Local infrastructure 2638 County Council will require financial contributions towards KCC services including towards the construction costs of any new education provision required to mitigate the impact of this development.

Response The requirement for developer contributions towards the provision of infrastructure and community facilities is dealt with by generic policies (COM1, COM2 and IMP1) in the Plan. Where site specific projects have been identified in the Infrastructure Delivery Plan these have been identified in site specific policies. No change proposed.

POLICY S29: LAND SOUTH OF ARTHUR BAKER PLAYING FIELD

Representations have been received from the following consultees

2613, 2639 KCC	2661 Charing Parish Council
2364 Southern Water	1378 Site owner via David Jarman
1789 CPRE Kent	

Summary of representations – main issues

Issue – proximity to wastewater treatment works 2364 This site is in close proximity to the Charing Wastewater Treatment Works. Unpleasant odours may arise from the treatment process that occur. New development must be adequately separated from WTW to safeguard the amenity of future occupiers. Therefore, development that is sensitive to odour, such as proposed housing, should only be permitted if the distance to the works is sufficient to allow adequate odorous dispersion. We would expect an assessment to be undertaken to demonstrate that there would not be a detrimental impact on amenity by reason of odour. Add an additional criteria to policy (suggested text supplied)

Response With regard to the proximity to the WWTW, this is one of many factors which need to be considered and balanced against each other in deciding which are the most appropriate sites to allocate for development. Full assessment of all of the factors has been carried out through the Sustainability Appraisal, and this site has been considered against the other reasonable alternatives. On balance whilst this site may on occasion be affected by

odour from the WWTW it is considered that this site is an appropriate option taking into account the need to meet the Borough's housing requirement and the other alternatives available.

Issue - Landscape and Alder Beds LWS 1789 The close relationship to the sensitive Alder Beds site, needs to be recognised in the policy. Additional site management funding may be required to ensure that recreational use remains sensitive and that livestock grazing continues to be appropriate. A sensitive lighting scheme will be need to ensure wildlife feeding, breeding or resting activities are not disturbed.

Response *Paragraphs 2.2 and 4.2 of the Plan make clear that the Local Plan should be read and interpreted as a whole. The supporting text to this policy (paragraph 4.299) makes clear that development of this site must comply with Policy ENV1 of this Plan. Policy ENV4 require full lighting schemes to be submitted for developments where any external lighting is required. No change required.*

Site boundary 2661 There is no reference to the fact that the area could shift towards the south-east as a result of the proposed extra care facility adjacent. 1378 suggest a more general policy wording to cover the combination ongoing discussions around extra care housing for the elderly, encompassing a larger site area, both to provide certainty through the Local Plan process, and to cover the possibility that an alternative scheme of this nature might come forward at a later time in the plan period.

Response *No changes are proposed to the boundary of this site Policy.*

Local infrastructure 2661 the footpath already exists, note the rest of the A20 does not have any cycle lanes, so question whether a lane for such a short stretch is appropriate

2661 The play equipment should be for the use of all Parish Children not a planning matter

Response *The provision of vehicular, cycle and pedestrian connectivity from the A20 through the site to the playing fields is considered appropriate given the well-used nature of this local facility. Use of the play equipment is not a land use planning matter.*

Minerals safeguarding 2613 according to British Geological Survey safeguarding data, Sub Alluvial River Terrace Deposits are present within the allocated site and are vulnerable to sterilisation.

Response *Ashford Town sits on a band of mineral deposits which run north-west to south-east through the Borough, meaning that the majority of land in and around Ashford Town, and at a number of other settlements, has safeguarded mineral deposits. Sites that are proposed for allocation in and around Ashford and at other settlements represent the most sustainable options to provide for the housing and employment needs for the Borough, as has been demonstrated through the Sustainability Appraisal. In order to meet the needs for housing and employment development it is the Council's view that it would not be possible to avoid allocations within these areas, and would create an unsustainable form of development if the mineral safeguarded areas were not considered for development as a matter of principle. Kent County Council has requested that minerals assessments be carried out in order to identify the need for prior extraction of the minerals within the safeguarded areas. The Minerals and Waste Local Plan 2013 – 2030 which forms part of the*

statutory development plan for the Borough, includes policies which set out these requirements, and are therefore material considerations when in determining planning applications. It is not considered necessary to replicate these policies within this Local Plan.

Developer contributions 2661 (f) is no longer required as the pavilion is built. A financial contribution to other facilities could be appropriate (e.g. scout hut) but probably best to deal with at planning application stage. 2639 The County Council will require financial contributions towards KCC services including towards the construction costs of any new education provision required to mitigate the impact of this development.

Response *The requirement for developer contributions towards the provision of infrastructure and community facilities is dealt with by generic policies (COM1, COM2 and IMP1) in the Plan. Where site specific projects have been identified in the Infrastructure Delivery Plan these have been identified in site specific policies. No change proposed.*

Support 1789 broadly supports the proposal.

Response *Noted*

POLICY S30: EGERTON – LAND ON NEW ROAD

Representations have been received from the following consultees

1457 Lee Evans Planning (David Stewart) for Caroline Jackson	1935 Lois Tilden
1728 Egerton Parish Council (Richard King)	2614 Kent County Council (KCC) (Barbara Cooper)
1791 CPRE Kent (Ashford District Committee) (Hilary Moorby)	2640 Kent County Council (KCC) (Barbara Cooper)

Summary of representations – Main issues

Issue – impact on village 1457 Egerton is an inherently unsustainable settlement for any development. 1791 supports allocation but considers that proximity to Conservation Area requires increased criteria for sensitive design, materials and layout.

Response *While Egerton is not a large settlement, it is by no means the smallest in the borough, and benefits from local services including a primary school, a public house, and a petrol filling station. The allocation made under this policy provides the opportunity for proportionate growth for a settlement of this size. Draft Policy ENV14 provides criteria for developments within designation Conservation Areas. This site is situated some 135m from the Egerton Conservation Area, separated from it by newer development. There is a case for sensitive design given the site’s ‘gateway’ character, and the policy already requires development to take into account the parish’s design statement. No change required.*

Issue – mineral safeguarding 2614 Site is within a mineral safeguarding area for Limestone (Hythe formation-Kentish Ragstone). Advises a mineral assessment to be prepared to determine nature of minerals, viability and practicality of extraction.

Response *Sites that are proposed for allocation in and around Ashford and at other settlements represent the most sustainable options to provide for the housing and employment needs for the Borough, as has been demonstrated through the Sustainability Appraisal. In order to meet the needs for housing and employment development it is the Council's view that it would not be possible to avoid allocations within these areas, and would create an unsustainable form of development if the mineral safeguarded areas were not considered for development as a matter of principle. Kent County Council has requested that minerals assessments be carried out in order to identify the need for prior extraction of the minerals within the safeguarded areas. The Minerals and Waste Local Plan 2013 – 2030 which forms part of the statutory development plan for the Borough, includes policies which set out these requirements, and are therefore material considerations when in determining planning applications. It is not considered necessary to replicate these policies within this Local Plan.*

Issue – PROW 1728 asks policy to be amended at d) to “Provide new pedestrian routes throughout the development and connections and improvements to existing routes facilitating pedestrian access to Harmers Way and local services”.

Response Agree. *See proposed change MC34.*

Issue – developer contributions 1728 and 1935 would like more flexibility for contributions to village facilities, affordable housing and older person accommodation. Within this, 1728 requests amendment of paragraph 4.311 to enable contributions “or village facilities/ amenities”. 2640 states that development will have to make financial contributions towards construction of education facilities.

Response *The requirement for developer contributions towards the provision of infrastructure and community facilities is dealt with by generic policies (COM1, COM2 and IMP1) in the Plan. Where site specific projects have been identified in the Infrastructure Delivery Plan these have been identified in site specific policies. No change proposed.*

Support 1728 and 1935 support the policy, considering it sustainable and well-related to the village. Support for the provision of affordable housing for local young people, and generally for smaller units.

Response *Support noted.*

POLICY S31: HAMSTREET – LAND NORTH OF ST MARY’S CLOSE

Representations have been received from the following consultees

12 Mike Fuller	1792 CPRE Kent (Ashford District Committee) (Hilary Moorby)
45 David White	1899 Kent Wildlife Trust (Vanessa Evans)
104 C Bradberry	2196/2207 Barton Willmore on behalf of Hallam Land Management Ltd. (Carolyn Organ)
151 Paul Settle	2365 Southern Water (Planning Policy)
1210 Sue Davison	2375 Natural England (Nigel Jennings)
1218 Peter Davison	2641/2642 Kent County Council (KCC) (Barbara Cooper)
1246 Ian Bull Consultancy Ltd. (Ian Bull) for Messrs Kirkland and Fuller	2671 Hamstreet Primary Academy (Spencer Goddard)
1314 Andrew Jones	2676 Network Rail (Elliot Stamp)
1652 Orlestone Parish Council (Susan Stiffell)	

Summary of representations – main issues

Issue – impact on village 45 and 1652 states that the village has grown 24% since 1990s, and that the vast majority of development in Hamstreet has been in last 55 years, and the village has accepted more development than other parishes in the borough. The result of this, as 1210, 1218, 1314 and 1652 state, is that further development will have a major social and physical impact on infrastructure, and will cause the settlement to lose its rural identity, instead becoming a commuter settlement.

1218 and 1652 speculate that the open market houses resulting from development on the site will not be for local people, and will “not provide affordable starter homes” for local young people.

Response *The Council is mindful of the impact of change and development on local communities. It is also aware of both the national and local shortage of housing, as highlighted most recently in the Housing White Paper (Feb 2017). Hamstreet as a settlement is one of the more sustainable in the borough, with a full range of local services, including commerce, public house, school and even a regular train service to Ashford and Hastings. Necessary development has, therefore, been focused here and in other equivalent settlements as per its size.*

There is a policy requirement for all sites to deliver affordable housing at a rate of 40 percent outside of Ashford town (Policy HOU1). Of this, the requirement is for a range of home ownership options. In addition to this, local needs housing is specifically allowed on ‘exception sites’ within the scope of the local plan (Policy HOU2).

Issue - Policy issues and supporting documents 1218 states that the allocation of the site is contrary to the Core Strategy 2008 and, in particular CS1 ‘Protection of Countryside’,

which promises that growth targets will not be met by development in rural parts of the borough. The representation states additionally that the site not allocated in Urban Sites & Infrastructure DPD.

1246 highlights that a LVIA and Traffic Impact Assessments have yet to be produced and, without these, the suitability of the site for allocation is unclear.

Response *The Local Plan to 2030 will replace the existing Core Strategy, and responds to the change in the government's planning context. There are insufficient brownfield sites across Ashford to meet the level of new housing that needs to be delivered in the borough, the majority of growth will therefore have to be delivered on greenfield sites on the edge of the urban area and in the rural area. Many of the previously developed sites in the town already have redevelopment proposals underway. However, the Local Plan encourages the re-use of previously developed sites where environmental constraints allow and sites are sustainably located.*

The introduction to the draft Plan highlights the results of the population projection as presented within the Strategic Housing Market Assessment (SHMA). Government policy requires local authorities to determine their own housing needs. However, this must be based upon an assessment of housing need through a SHMA, to ensure that general market and affordable housing needs are fully met until 2030.

The borough wide strategic approach is to allocate most land in and around the urban areas. Rural areas must expand in a sustainable way to enable us to meet needs of all population and secure the future sustainability of those settlements.

This policy provides the broad parameters to guide those wishing to develop this site, and establishes clear imperatives for landscaping (including lack of visual harm to the locality) and the improvement of traffic management along Ashford Road. Application documentation requirements including LVIA and Traffic Impact Assessments are clarified as of the planning application process.

Issue – loss of agricultural land 12, 1218 and 1652 highlight that this site serves as productive agricultural land, with a healthy grain crop.

Response. *The land here is not designated Grade 1 or 2 (the best and most versatile).*

Issue - Use by Hamstreet Academy 1210, 1218 and 1652 question why ABC, the School and land agents took part in “confidential discussions” without the Parish Council and without knowledge of the Governing Body, which was unaware of the allocation proposal. These claim that the borough council asked governors to write letters of support for this allocation, and therefore it is misleading. 1218 and 1652 state that there is no evidence of plans produced by Academy to support its proposed expansion, especially given that there are several new and existing schools in the area. The lack of a business plan places considerable financial risk on the Academy owner.

1246 contend that the site promoters are trying to “buy” an allocation, offering facilities to the school in excess of what is reasonable to address impact of development. It stated that facilities should only be delivered by CIL, and identified as infrastructure requirements Annex

2 of the Local Plan. 1246 opines that it is illogical to provide facilities to east of Ashford Road, given that this road is a major distributor.

Response *These issues are not planning matters.*

Issue - Wildlife and landscape issues 12 states that this site is located in the “green belt”, while comments 1210 and 1246 explained that the site acts a ‘green buffer zone’, and a green entrance to village, with any development negatively affecting the village’s character.

12 and 1210 comment that development on the site would impact negatively on a neighbouring woodland SSSI. Representation 1246 states that the site is actually 200m from a SSSI and any development will inevitably adversely impact habitats and protected species. Representation 12 added that development would have a negative impact on local wildlife and its ability to roam.

1246 states that development will inevitably negatively impact trees and hedgerows along site boundary and in adjacent ancient woodland. Representation 1899, however, requests that the policy wording is enhanced to emphasise the need for a generous on-site buffer that avoids development impacting on the adjacent Ancient Woodland. 2375 requests any development provides mitigation for the SSSI from increased recreation use.

2375 requested the development consider the impact of Light Pollution (as per draft Policy ENV4) in the design of development in this location in particular, given bats in Ancient woodland. However, 1652 commented that development on this site will result in the locality losing its intrinsic dark skies. 12, 1218 and 1652 commented that development will negatively impact long-ranging views (especially from Romney Marsh) up to the village, to the detriment of the skyline.

Response *The site is not a designated ‘green belt’, and there is no such designation within the borough. The land cannot act as a ‘green buffer zone’ since there is no development to the site’s north, east, south-east or north-west (i.e. there is nothing to buffer against).*

There will be a requirement as per draft Policy ENV4 to consider lighting in development, especially-so since this area of the borough benefits from intrinsically-dark skies and is in the process of application for an International Community Dark Sky allocation. However, this does not preclude development within the parish subject to the design meeting the provisions of the policy and SPD.

The interaction of the development on the adjacent ancient woodland and local wildlife reserve, and on the nearby SSSI, is highlighted within the policy and will be covered in more detail at planning application stage. Any development would have to engage with these designations, and avoid adverse impacts. There are already provisions within this policy for a generous landscaped buffer on the site. Criteria k) has been amended to require the submission of an LVIA as part of a planning application for this site. See Proposed Change MC35.

Impact - Visual impact on built character and amenity 1246 stresses that any development adjacent to St Mary’s Close would inevitably have a detrimental impact on built character of the large detached properties here, while 1652 states that the purchasers of

properties at St Mary's Close were assured this site is a green buffer zone and therefore not to be developed.

Response *This site is not subject to any particular 'buffer' designation and there is no particular reason for precluding development adjacent to existing modern properties.*

Issue - Infrastructure and road safety 12 states that cumulative development has a negative impact on local infrastructure, including school and doctors' surgery. 12, 1314, 1652 and 1792 state that any future development will cause increased congestion of the B2070, and increased traffic causing a danger for schoolchildren crossing this road. 1652 comments that major traffic calming and management will be needed on Ashford Road (B2070) at developer expense.

1210 and 1218 note that the road posed an inherent danger, with restricted visibility given the brow of the hill at site access, along with excessive vehicle movements engendered by development, would pose a risk to pedestrian safety (esp. children). Added to this 1246 and 1652 note that issues related to parking are also intractable, on the basis that on-street parking presents (as a result of the school and the station) a danger to pedestrians, and ABC has previously resisted accesses off Ashford Road because of this and, in any case, a "drop off" zone would be impractical since the school gates do not open before 0830 and 1500. Comment 104, however, supports the need for an off-road car park for school drop off and pick up.

45 contends that developer contributions for on-site sports facilities are not required, stating that the Parish Council in any eventuality will not have the resources to maintain them. While representation 1652 from the Parish Council offered use of its own sports facilities for the school, but if they are required on this site they must be made available prior to occupations and provided at developer expense.

1218 proposes that development is inappropriate in terms of permeability and accessibility, as the site is inaccessible by pedestrians to the village given the narrow pavement, and that it is too distant from village. Representations 2196 and 2676 focus on the pedestrian crossing over the railway line, highlighting that Network Rail must be key to this improvement since the allocation site's landowner cannot carry out improvement works on third party land. The wording of the policy therefore needs to be changed to reflect this.

Response *The proposal will provide additional facilities to the school, helping to promote its potential for expansion. It will be up to the school to manage and maintain the facilities on this site.*

It is recognised that Ashford Road can become congested at peak times. The policy as written provides for improvements in the current arrangements and road management, and has been agreed with KCC Highways. Any planning permission will have to be agreed by KCC Highways.

It is accepted and noted that there is currently no provision for the improvement of the narrow pedestrian route along Ashford Road between the site and the village centre. Amend policy to ensure the ability for safe pedestrian journeys. See Proposed Change MC35.

It is also accepted that improvements to the pedestrian crossing over railway line can only be undertaken in liaison with Network Rail. Noted that all parties will resolve ways to achieve this.

Issue - Flooding and drainage Representations 12, 104, 1218 and 1652 were concerned with the increased flood potential associated with development on the site, noting that it has existing drainage problems as a result of the relief and exacerbated by the existing hardstanding for farm vehicles. Any increased on-site hardstanding would overwhelm existing inadequate village culverts and flood The Street in Hamstreet, as foul water drainage systems are nearing capacity.

Comment 2365, from the statutory undertaker, requested the policy to introduce a requirement to “Provide a connection to the nearest point of adequate capacity in the sewerage network, in collaboration with the service provider.”

Response *Development does not necessarily increase flood risk locally or in the wider catchment. Indeed, as per the Council’s Sustainable Drainage SPD, there are examples in which flood risk can diminish as a result of development. In this case, the site is wholly in Flood Zone 1 (lowest risk).*

Amend Policy to add ‘Provide a connection to the nearest point of adequate capacity in the sewerage network, in collaboration with the service provider’

In the RJ add: ‘Southern Water’s assessment has revealed that additional sewerage infrastructure would be required to serve the proposed development. The development will therefore be required to make a connection to the nearest point of adequate capacity in the sewerage network. Early liaison should take place with the service provider in this regard.’

See Change MC35.

Spatial strategy for village and alternative sites 1210, 1218, 1246 and 1652 objected to allocation of the site as it is in open countryside outside the village confines, stating that this is delineated by the railway line and three TPOs by a ditch. 1246 in particular noted that a client was advised in 1994 that trees bordering his property constituted the village boundary, which was supported by an appeal in 1995.

Representation 1652 stated that the site is not within normal walking distance of village, therefore will rely on private car, while 1792 advised that the spatial strategy for Hamstreet needs to be re-examined as there are too many compromises at this site for its allocation.

Both 104 and 1314 suggested the Council seeks to allocated sites at the southern side of the village as an alternative to this allocation, with 104 proposing a field opposite Wyvale Garden Centre.

Response *While the village boundary may have been located at a particular point over two decades ago, the spatial context of the borough and of the planning system in general have changed significantly since then. In addition to this, the railway line cannot have historically acted as a boundary since there is existing development beyond it.*

The Council is satisfied that the village centre and all local services are located well within a 10 minute walk from the site, and amenities such as the train station are within a 5-minute walk, thus contributing highly to the site's sustainability, and that the site is one of the more sustainable of those submitted in the village.

Issue – contrary to local opinion 12, 45, 1314 and 1652 highlighted the strong rejection (“100%”) of site by local people at a previous exhibition. Representations 1210, 1218, 1246 and 1652 noted that past development proposals on this site had been resisted consistently by residents and the Parish Council; and the recent Parish Council-run referendum on the site resulted in a 5:1 decision against allocation.

Response *While the input and view of local people is important, there is a duty on the Council to find available and deliverable development sites to meet their objectively assessed housing needs.*

Issue – Deliverability 1210 stated that the funds offered by development will not be sufficient to pay for any school facilities as well as a traffic management plan, while comment 1652 states that it is not convinced funding for road improvements and schools will be found from a future developer. 2207 noted that CIL should be waived for this site on viability grounds given that the development will deliver facilities over and above what is generally expected on this site.

Response *The Council is satisfied with the viability evidence that the site is deliverable as per the policy requirements. The representation against CIL is noted.*

Support 151 supportive of the allocation, and of plans to manage traffic and in particular parking (drop off/pick up) relating to school on Ashford Road. 2196 supportive of the number of dwellings of a mix of sizes proposed on the site, which is in a sustainable location, and contributing positively to the local economy. It noted that the proposed scheme will provide on-site habitat creation and enhancement, as well as access to ancient woodland.

2641 and 2642 supportive of the principle of this allocation, provided that KCC receives contributions towards education facility provision, and any development ensures the existing PRoW is retained or rerouted to ensure safe access.

2671 explained the Academy's support of this site's allocation, which it says will not gain financially. Development would enable expansion of school without having to pay for significant long-term traffic management measures that would otherwise be necessary. This includes road crossing, traffic calming, parking restrictions; as well as provision of football pitch, changing and storage, car parking area and outdoor classroom. The Academy believes there is a shortage in school places for children from the local community; so expansion is required.

Response *Support noted.*

Issue - Omissions

Representation 2196 proposed, in addition to the 80 dwellings allocated on this site in the policy, an 80-bed residential care home on the site.

Response Noted – supporting text can be amended to allow for the possibility of a 60-bed residential care home on site subject to the provision of evidence that there is sufficient demand. See proposed change MC35.

POLICY S32: HAMSTREET – LAND AT PARKER FARM

Representations have been received from the following consultees

1316 Andrew Jones	1794 CPRE Kent (Ashford District Committee) (Hilary Moorby)
1497 Nicola O'Neill	2615/2643 Kent County Council (KCC) (Barbara Cooper)
1522 Kelly Toal	

Summary of representations - main issues

Issue – impact on local infrastructure 1316 considers development would exacerbate existing traffic problems at Orlestone View, removal of water tanks under open space would exacerbate flood risk. Should consider alternative point of access.

1497 Installation of legal passing points on access road is impossible as impacts surface drainage apparatus. Suitable pedestrian access is not possible. 1522 Access road will endanger children and dog walkers. Widening access road will impact flood tanks in banks, and increase in built area will further exacerbate flooding in risk-prone area.

Response *The very limited development on this site is unlikely to require significant upgrading of the access road and, given the narrowness, significant speeds are not expected.*

Issue - minerals safeguarding 2615 – site is safeguarded sub-alluvial river terrace deposits. A mineral assessment is required.

Response *Sites that are proposed for allocation in and around Ashford and at other settlements represent the most sustainable options to provide for the housing and employment needs for the Borough, as has been demonstrated through the Sustainability Appraisal. In order to meet the needs for housing and employment development it is the Council's view that it would not be possible to avoid allocations within these areas, and would create an unsustainable form of development if the mineral safeguarded areas were not considered for development as a matter of principle. Kent County Council has requested that minerals assessments be carried out in order to identify the need for prior extraction of the minerals within the safeguarded areas. The Minerals and Waste Local Plan 2013 – 2030 which forms part of the statutory development plan for the Borough, includes policies which*

set out these requirements, and are therefore material considerations when in determining planning applications. It is not considered necessary to replicate these policies within this Local Plan.

Support 1794 and 2643 support this allocation, although the latter requires financial contributions for the construction of education facilities to mitigate development.

Response Support noted. The requirement for developer contributions towards the provision of infrastructure and community facilities is dealt with by generic policies (COM1, COM2 and IMP1) in the Plan. Where site specific projects have been identified in the Infrastructure Delivery Plan these have been identified in site specific policies. No change proposed.

POLICY S33: HIGH HALDEN – LAND AT HOPE HOUSE

Representations have been received from the following consultees:

431 Paul Buggins	1830 Crabtree & Crabtree (High Halden)
937 Adrian Cox	2223 Hamlin Estates Ltd
1117 Elizabeth Buggins	2366 Southern Water
1307 Blanchard	2460 High Halden Parish Council
1797 CPRE Kent (Ashford District Committee)	2644 Kent County Council (KCC)

Summary of Representations – main issues

Issue - Outside Confines 937 and 1307 object to the site on the basis that it is located outside of the village confines and applications on the site have been refused for this reason. 937 explains that there are currently a number of infill plots being built out.

Response Government policy requires local authorities to determine their own housing needs. However, this must be based upon an assessment of housing need through a Strategic Housing Market Assessment, to ensure that general market and affordable housing needs are fully met until 2030. The strategic approach in this Draft Local Plan is to allocate most land in the urban areas and with rural areas seeing appropriately scaled allocations to enable the needs of all the borough’s population to be met in a sustainable way and to secure the future sustainability of those settlements.

There are insufficient brownfield sites across Ashford to meet the level of new housing that needs to be delivered in the borough, the majority of growth will therefore have to be delivered on greenfield sites on the edge of the urban area and in the rural area.

Issue – Heritage 937 and 1307 are objecting to the impact on the Listed Building of Hope House which adjoins the site and others nearby. They feel that development of this site will have an adverse impact on the character and setting of the listed buildings. 1307 believes

that the site was part of the Hope House Gardens when the house was listed, and therefore should be subject to Listed Building Consent.

Response *Setting of a listed building is very important and therefore the policy and supporting text makes detailed reference to the protection of this historic asset and its setting. The site is not part of Hope House and no gardens or land are mentioned in the listing detail. No change required.*

Issue - Impact on neighbours 937 development of this site would cause noise and disturbance through construction and occupation and adversely impact on neighbours 'quiet enjoyment'. 937 The topography of the site means that dwellings will overlook neighbouring properties and screening would not be able to prevent this and development would be 'overbearing' on the street scene and open nature that they currently have in large plots.

Response *These issues are appropriately addressed at the planning application stage.*

Issue – Ecology and extension of site area 1797 Ecological investigations of the site has though identified ponds on and near to the site that contain Great Crested Newts. Ecological evaluation and mitigation of their presence has identified that whilst the principle of the development of this site is not compromised by their presence, mitigation will need to be provided, particularly in relation to the location and method of construction of the access road into the site and in respect of the provision of a 50 metre ecological safeguarding area around the ponds with connectivity to surrounding areas.

The developable area of the proposed site allocation is restricted by the need to provide suitable mitigation and therefore the ability of the site to provide for the total of 25 dwellings identified may not be achieved. It is therefore proposed that in order to ensure the site can meet the level of provision expected that it is enlarged in size. The continued inclusion of this site allocation is therefore strongly supported but with the increase in size suggested in order that the overall development numbers are met.

Response *Site boundary amended and capacity revised accordingly to allocate this larger site for up to 35 units, whilst providing a larger area for ecological mitigation. See proposed change MC37.*

Issue - Safety of the road and traffic 1307 references the poor line of sight out of the site and on to the A28. They feel that this would be too dangerous with the increased traffic movements and that there have been several accidents in this location already. 937 states that the traffic will exceed the 40mph limit, even if it is extended. They do not believe traffic islands or calming will be effective in reducing speeds and will restrict agricultural vehicles which will have to use the curbs to pass. 2460 (PC) request that a requirement for a pedestrian crossing is in policy and extension of 30mph speed limit.

937 The pedestrian footpath proposed would not lead to an existing footpath and is not appropriate. No crossing is proposed, and would be dangerous. Children will not be able to cross to use the recreation facilities as the policy suggests.

Response *paragraph 4.335 and c. of the Policy already require the provision of traffic measures to slow traffic here to 30mph or below, to include extension of the 30mph limit to*

cover the site access and measures such as traffic islands or interactive signs, to be agreed with the highway authority as part of any planning application.

Issue – adequacy of local infrastructure 937 Local Infrastructure such as local schools and GPs are overstretched in this location. 2366 following criteria is added to policy S33 after ‘Development proposals for this site shall’: e) Provide a connection to the nearest point of adequate capacity in the sewerage network, in collaboration with the service provider and provide future access to the existing sewerage infrastructure for maintenance and upsizing purposes.

2644 - The County Council will require financial contributions towards KCC services including towards the construction costs of any new education provision required to mitigate the impact of this development.

Response *It is accepted that any new development proposals will affect existing services. Therefore, service providers, including KCC Highways & Education, Water companies and the Environment Agency (drainage and flooding), the Ashford Clinical Commissioning Group and the East Kent NHS Hospitals Trust are consulted at all stages of the plan making process to identify if they have existing capacity or if additional capacity is needed to accommodate additional development. If additional capacity is needed, this is then planned for through the Local Plan process and the Infrastructure Delivery Plan, which supports the Local Plan. It is the responsibility of these service providers and stakeholders to identify and ensure delivery of the infrastructure that is required. The Local Plan plays a supporting role in helping to deliver the infrastructure, by allocating sites or requiring developers to make financial contributions. Where the providers have raised concerns with local infrastructure, these have been addressed within the specific site policy, or sites have been excluded from consideration if these could not be resolved. ABC will continue to work with these stakeholders in understanding the borough’s infrastructure needs.*

The requirement for developer contributions towards the provision of infrastructure and community facilities is dealt with by generic policies (COM1, COM2 and IMP1) in the Plan. Where site specific projects have been identified in the Infrastructure Delivery Plan these have been identified in site specific policies. No change proposed.

See Change MC37. Amend Policy to add ‘Provide a connection to the nearest point of adequate capacity in the sewerage network, in collaboration with the service provider’

In the RJ add: ‘Southern Water’s assessment has revealed that additional sewerage infrastructure would be required to serve the proposed development. The development will therefore be required to make a connection to the nearest point of adequate capacity in the sewerage network. Early liaison should take place with the service provider in this regard.’

Issue - Constraints to delivery 2223 argues that the site suffers from a number of constraints cannot be considered deliverable or immediately developable. This includes an inability to accommodate two storey units across its entirety and a requirement to secure a change to the speed limit.

Response *The design and mix of housing together with any required alterations to the highway to serve the site will be integral to the determination of any planning application that comes forward for this site. No changes required.*

Support 1830, 2460 The PC accepts the site inclusion as appropriate for development. Criteria B of policy must be rigorously enforced. Welcome affordable housing element and traffic calming.

431 supports the site allocation in general but requests that the provision of housing should be for a Retirement Village and Community Centre which also accommodates a community hall to replace the existing memorial hall. 1117 agrees with this representation.

1797 does not object to this proposed allocation but proposes the following minor amendments:

- Part B should be amended to refer to ‘conserving and enhancing’ the setting and significance of the listed building.
- Insert a separate criterion related to surveillance of the pond, which is a distinct issue.
- At criteria a), relating to a wildlife corridor, delete: ‘where possible’. The emphasis should be more positive.
- Recognise in the supporting justification that 25 units is a maximum and that the final capacity of the site will be led by design

Response *Support noted. The mix of housing type is to be determined at the detailed planning application stages, and this may include options for retirement properties, but is not a requirement to be specified in the policy. There is now a requirement to provide a mix of property types in New Policy HOU18.*

At present it has not been evidenced that a community facility is required. The Parish Council and local residents will be able to make representations with regards to contributions to local facilities through the planning application stages.

The term ‘where possible’ is used in the policy as the detailed design and layout is not undertaken at this stage. The policy is therefore required to be flexible and not restrict the most suitable design and layout. No change proposed.

With regards to the ‘conserve and enhancing’ the setting of the listed building, this is agreed, however the site boundary and capacity has been revised. See proposed change MC37.

POLICY S34: HOTHFIELD LAND EAST OF COACH DRIVE

Representations received from the following consultees

1782 Crabtree & Crabtree Ltd	2046 Hothfield Parish Council
1790 Lord Hothfield	2127 Sheila Flynn
1798 CPRE KENT	2376 Natural England

1840 Lynne Graham-Matheson	2616; 2645 KCC
1921 Kent Wildlife Trust	

Summary of representations – main issues

Issue – minerals safeguarding 2616 according to British Geological Survey safeguarding data, Sandstone (Folkestone Formation) is present within the allocated site and are vulnerable to sterilisation.

Response *Sites that are proposed for allocation in and around Ashford and at other settlements represent the most sustainable options to provide for the housing and employment needs for the Borough, as has been demonstrated through the Sustainability Appraisal. In order to meet the needs for housing and employment development it is the Council's view that it would not be possible to avoid allocations within these areas, and would create an unsustainable form of development if the mineral safeguarded areas were not considered for development as a matter of principle. Kent County Council has requested that minerals assessments be carried out in order to identify the need for prior extraction of the minerals within the safeguarded areas. The Minerals and Waste Local Plan 2013 – 2030 which forms part of the statutory development plan for the Borough, includes policies which set out these requirements, and are therefore material considerations when in determining planning applications. It is not considered necessary to replicate these policies within this Local Plan.*

Issue – potential harm to the Hothfield SSSI & Biodiversity 2376 Given the threat to the SSSI (an SSSI already under threat) and the possibility that an alternative site may be found, we would question the inclusion of this site in the Local Plan as an allocated site, in the absence of further information e.g. survey work to determine the potential impacts. This would be in accordance with the avoid-mitigate-compensate hierarchy set out in paragraph 118 of the NPPF and Policy ENV1 of the draft Local Plan.

1921 suggests that bullet point f needs to be amended to reflect the purpose of the Biodiversity Opportunity Area. This is not a planning constraint; it is intended to direct any enhancement or mitigation so that it better reflect the typical habitats and species of the area. Also policy needs a reference to the sensitive site of Hothfield Common, which is already under considerable recreational pressure, in particular by dog walking activities. Any development proposal needs to give consideration to this and make it clear that assessment of impacts will be carried out and any necessary mitigation included so that there will be no negative impact upon the reserve.

Response. *Supporting text and policy already reference the importance of the SSSI and BOA but the Council agrees these areas can be further clarified with regards to mitigation requirements on the SSSI, particularly relating to increased recreation pressure. Council also agrees to proposed wording change of point f to clarify the BOA purpose and guidelines. See Proposed change MC38.*

Issue – impact on highway safety 2127 objects to the proposed site access stipulated to be from Station Road, close to Coach Drive, where it would lie close to the brow of a hill and

the inside of a bend. Coach Drive currently suffers poor visibility and the suggested new access will require extensive tree removal along the eastern side of Station Road. We feel that the type and location of the access should be a matter for the developer as part of their planning application.

Response *The policy as written has been agreed with KCC Highways who have not raised objection. Any planning permission will also have to be agreed by KCC Highways.*

Issue – impact on village character 1840 development should respond to village needs before requirement to meet borough’s housing needs in order to prevent urban sprawl and a loss of village character.

Response *Government policy requires local authorities to determine their own housing needs. However, this must be based upon an assessment of housing need through a Strategic Housing Market Assessment, to ensure that general market and affordable housing needs are fully met until 2030. The strategic approach in this Draft Local Plan is to allocate most land in the urban areas and with rural areas seeing appropriately scaled allocations to enable the needs of all the borough’s population to be met in a sustainable way and to secure the future sustainability of those settlements.*

There are insufficient brownfield sites across Ashford to meet the level of new housing that needs to be delivered in the borough, the majority of growth will therefore have to be delivered on greenfield sites on the edge of the urban area and in the rural area. Other policies within the plan are applied to mitigate impacts on rural settlements and the wider landscape where possible.

Issue - developer contributions 2645 The County Council will require financial contributions towards KCC services including towards the construction costs of any new education provision required to mitigate the impact of this development.

Response *The requirement for developer contributions towards the provision of infrastructure and community facilities is dealt with by generic policies (COM1, COM2 and IMP1) in the Plan. Where site specific projects have been identified in the Infrastructure Delivery Plan these have been identified in site specific policies. No change proposed.*

Support 1921 pleased to note that following earlier consultation, this allocation has been reduced to 40 dwellings.

Response *Support noted.*

POLICY S35: MERSHAM – LAND ADJACENT TO VILLAGE HALL

Representations have been received from the following consultees:

153 Edward Micklam	2617/2646 Kent County Council (KCC) (Barbara Cooper)
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Summary of representations – main issues

Issue – minerals safeguarding 2646 this site is safeguarded sub-alluvial river terrace deposits. A mineral assessment is required.

Response Sites that are proposed for allocation in and around Ashford and at other settlements represent the most sustainable options to provide for the housing and employment needs for the Borough, as has been demonstrated through the Sustainability Appraisal. In order to meet the needs for housing and employment development it is the Council's view that it would not be possible to avoid allocations within these areas, and would create an unsustainable form of development if the mineral safeguarded areas were not considered for development as a matter of principle. Kent County Council has requested that minerals assessments be carried out in order to identify the need for prior extraction of the minerals within the safeguarded areas. The Minerals and Waste Local Plan 2013 – 2030 which forms part of the statutory development plan for the Borough, includes policies which set out these requirements, and are therefore material considerations when in determining planning applications. It is not considered necessary to replicate these policies within this Local Plan.

Issue – need for a strategic buffer 153 seeks provision of a strategic buffer around Mersham to maintain its separate identity

Response The separate and distinctive identity of individual settlements forms part of the particular character of much of the borough, helps to define communities and is an important feature in maintaining the quality and attractiveness of the borough for residents and visitors alike.

As Ashford in particular has grown in recent years, some of the open space between the edge of the town and the closest surrounding villages has been eroded. In some locations, such as at Park Farm, specific features such as the buffer zone with Kingsnorth village have been implemented. But as pressure for additional growth to the south of Ashford continues (which is reflected in the proposed allocations in this Local Plan), the need for such protective features is likely to increase with more settlements potentially affected.

The Council is concerned that. This could occur in a variety of locations across the borough, for example by the large scale expansion of villages to encompass nearby hamlets; through progressive 'ribbon' or linear development along roads that joins up settlements, or through the expansion of Ashford itself.

A new policy SP7 Separation of Settlements has therefore been added to the Plan in order to prevent unplanned erosion of countryside between built up areas which would have a serious and significant adverse impact on the character and individual identity of villages through loss of their setting or through coalescence.

Issue – developer contributions 2646 requires financial contributions for the construction of education facilities to mitigate development.

Response *The requirement for developer contributions towards the provision of infrastructure and community facilities is dealt with by generic policies (COM1, COM2 and IMP1) in the Plan. Where site specific projects have been identified in the Infrastructure Delivery Plan these have been identified in site specific policies. No change proposed.*

Support 153, 1799 and 2643 support this allocation. 1799 requests a change in part c from ‘southern’ to ‘northern’ to correct policy.

Response *Support for this allocation is noted. It is agreed that part c should be corrected from ‘southern’ to ‘northern’. See Change MC39.*

POLICY S36: SHADOXHURST – REAR OF KINGS HEAD PH

Representations have been received from the following consultees:

106 Mary Lewdell	2241, 372 Peter Finnis
325 Pentland Homes Ltd	1939 Carol Ann Vant
372 (& 373) Peter Webb	2056 K Carroll
1118 A Hayward	2131 David Ledger
1802 Carol Procter	2151, 2154, 2155, 2167, 2169 Shadoxhurst Parish Council (David Ledger)
1800 CPRE Kent (Ashford District Committee)	2367 Southern Water
1870 Julian French	2647 Kent County Council (KCC)
1937 Karen Batterbee	2599, 2728 Jarvis Land LLP

Summary of representations – main issues

Issue - Impact on Character of village & Housing need 2056, 1870, 1802, 372, 1118 and 106 express concerns about housing growth changing countryside and damaging the rural character of the village and rural identity.

372, 2155 and 1802 feel the impact of nearby proposals will be great on this settlement including the 2,500 houses to be constructed at Chilmington Green. The Draft Local Plan proposes a further 950 houses at Court Lodge, a further 420 houses and Magpie Hall Road and Pound Lane. There are sufficient houses being built in the vicinity of the village without any more being built in the village itself, there is a risk of Shadoxhurst becoming part of Ashford.

Response Government policy requires local authorities to determine their own housing needs. However, this must be based upon an assessment of housing need through a Strategic Housing Market Assessment, to ensure that general market and affordable housing needs are fully met until 2030. The strategic approach in this Draft Local Plan is to allocate most land in the urban areas and with rural areas seeing appropriately scaled allocations to enable the needs of all the borough's population to be met in a sustainable way and to secure the future sustainability of those settlements.

There are insufficient brownfield sites across Ashford to meet the level of new housing that needs to be delivered in the borough, the majority of growth will therefore have to be delivered on greenfield sites on the edge of the urban area and in the rural area. Other policies within the plan are applied to mitigate impacts on rural settlements and the wider landscape where possible.

It is accepted that the close proximity of the village of Shadoxhurst to the urbanised edges of Kingsnorth, which is expanding, and Chilmington Green Urban extension causes concern for residents here about coalescence of the settlement into one urban area. A new policy SP7 is proposed to deal with this issue

Issue – Dark Skies 1802 and 372 argue that Dark Skies need to be protected.

Response Shadoxhurst is currently classified as a zone of transition between the “intrinsically dark skies” of Woodchurch and urban Ashford. Policy ENV4 Dark Skies, will ensure lighting is managed appropriately in this location.

Issue – Heritage, Green Space & Biodiversity 1937, 1870, 1802 and 372 consider that public green space should be used enhance the listed building and that the quantity of housing proposed would be detrimental to listed building.

1937, 372 and 1118 consider that this area should be retained as a community green space. There is evidence that over fifty years ago it was used as a village cricket pitch. Subsequently football has also been played there and many village events. Two well used public rights of way cross the field. The field is also used for dog walking and children playing.

1937, 372 and 1118 there would be a loss of biodiversity and this is the last green space on Woodchurch Road. 1800 suggests the site should be a local green space designation while 372 believes the site is expected to have archaeological value and should not be developed.

Response The policy is specifically worded to ensure that development protects the setting of the Listed Building, and the policy also states that an area of green open space on the frontage should be explored. This will assist in protecting the setting of the building.

The land is not designated as public open space and there has been no evidence presented that the field is used for regular community events in recent years. Historically, the field has been used for grazing. The development of the site will create an area of public open space that can be properly managed and used by the community for recreation, including for dog walking and play.

The PRoW are noted and the policy specifically requires the retention and enhancement of these routes which will provide more accessible linkages across this part of the village.

Issue - Village Facilities 372 is concerned that if a shop is provided on the site then this will cause traffic problems and would be in direct conflict with Stubbs Cross so not viable. 1802 states that new play equipment is not wanted due to anti-social behaviour and 1939 that new facilities proposed on site are not wanted by residents.

Response *It is not a requirement that the site provides a retail facility, but only that it assesses the opportunity of providing the provision. This would include a viability assessment.*

All new developments are required to contribute to local services and community facilities in the local area. In this case, it was highlighted during local consultation that the provision of a village green and public open community spaces was a local wish for this part of the settlement due to the distance from the existing recreational facilities in Hornash Lane. The exact details of this proposed open space and other contributions to local facilities will be dealt with at the planning application stages of development, using criteria set in the Public Green Spaces SPD, and in consultation with the Parish Council.

Issue - Infrastructure & Flooding 106 raises concern that there is a lack of water supply in the area to meet need. 1937, 372 and 1118 - Development will result in further pressure on the local roads and heavy traffic. Parking concerns on Woodchurch Road. 372 and 1118 Infrastructure (water, sewerage and telecommunications) is over capacity. No Shop, school or services. 1802 and 1870 point out that the village is only served by an irregular bus service.

372 Irrespective of the assurance about 100 year flooding, the north eastern part of the land has a pond and ditch, and this land does flood. Waterlogging has occurred as recently as 2016. The houses in Mace Terrace opposite the site have also been subject to recent flooding.

Response *It is accepted that any new development proposals will affect existing services. Therefore, service providers, including KCC Highways & Education, Water companies and the Environment Agency (drainage and flooding), the Ashford Clinical Commissioning Group and the East Kent NHS Hospitals Trust are consulted at all stages of the plan making process to identify if they have existing capacity or if additional capacity is needed to accommodate additional development. If additional capacity is needed, this is then planned for through the Local Plan process and the Infrastructure Delivery Plan, which supports the Local Plan.*

It is the responsibility of these service providers and stakeholders to identify and ensure delivery of the infrastructure that is required. The Local Plan plays a supporting role in helping to deliver the infrastructure, by allocating sites or requiring developers to make financial contributions.

Where the providers have raised concerns with local infrastructure, these have been addressed within the specific site policy, or sites have been excluded from consideration if these could not be resolved. ABC will continue to work with these stakeholders in understanding the borough's infrastructure needs.

The requirements of Policy ENV9 to provide sustainable drainage mean that the development will not result in any increase surface water run-off and should aim to reduce

existing run-off rates, reducing the overall risk of flooding. The site is not within the flood zone and the Environment Agency have raised no concerns.

Issue - Site Access 325 support the principle of the draft Policy S36 but have concerns regarding the detail. Amend as follows: "C – The vehicular access to the site, should be from the Woodchurch Road. The developers should explore the possibility of incorporating access to Maytree Place, to enable the existing access to serve only the public house car park."

Response *Agree need for flexibility. See Proposed change MC40*

Issue - Impact on neighbours

106 Concerns about impact on neighbours during construction phase. Developers should ensure on-site parking for construction workers.

Response *This is an issue that is addressed as part of the determination of any planning application for the site.*

Issues –inaccuracies, consultation and soundness queries. 372 & 2155 - this site is S35 in the electronic version of the Plan and S36 in the paper version. 2151 - The site in the Housing Trajectory reflects an aspiration of the site delivering 30 houses when the proposal refers to 25. On this point alone, if the Trajectory is deemed the correct item then there will be a shortfall of five in the final total.

1937, 1870 & 1802 site survey on 18/9/14 contains factual inaccuracies and incorrect assumptions which make scoring flawed. Different documents quote different size areas of the site. This proposal does not meet the social and environmental roles that underpin the question of sustainability. 372, 1118, 1939 the scoring on the 2014 Sites Assessment is not correct when compared with WS17 flawed in so much as it should have scored three points lower to give a total of zero and therefore not have been put forward in the first place.

1870, 1802 feel that there has been no consultation. 2155 - A survey of Shadoxhurst residents in 2016 62% of respondents said they wanted no more housing in Shadoxhurst. Of the 38% that accepted additional housing, most want small development. 2151 - Our response is one of disappointment in the inclusion of the site, given our consideration that the original assessment in 2014 was flawed, but note with relief that two further sites identified in the village were not included.

372 considers that the site needs to be reconsidered in the light of village needs and the current planning application for 24 houses on the site. There have been a number of reports and objections made, including a unanimous formal objection from the Parish Council.

Response *The site reference in both the Paper and electronic copies on file record the site policy as reference S36. We have been unable to locate this error.*

With regards to the Housing Trajectory figure, it is accepted that this was an administrative error. Please see proposed change MC84, which amends the Trajectory. Overall numbers are not affected due to the proposed changes.

With regards to the scoring within the Sustainability Appraisal (SA) and comparisons with site WS17 scoring, as the WS21 site scores more positively. The main reason for this is that

it is able to provide community benefits within the site. In addition, one particular aspect of the scoring was incorrect as 3.2 should have been -1 for adjoining listed building. Changes have been made in the SA addendum document.

Without these additional positive scores and the admin error, the site appraisal would have scored the same as WS17, and still been considered suitable for allocation as there are no major constraints to development. It must also be noted that the overall 'score' on the sustainability appraisal process is not the only determining factor for site allocation selection, and the more detailed conclusions provide an overall analysis of the suitability and sustainability of the site, which takes into account other site and local factors which may not be covered by the scoring process and the deliverability of the site. Therefore a higher 'score' in the SA assessment does not necessarily equate to the site being more suitable for allocation than an alternative site.

The site size is recorded as 1.2ha in both the SHELAA and the Sustainability Appraisal, which is an administrative error. The correct site area is 1.4ha which is reflected in the site policy supporting text 4.356. The error does not cause any subsequent issues with regards to site capacity or the Policy.

Comments received at Local Plan consultation events, have been taken into consideration where possible and are recorded in the pre-submission consultation statement, but must be weighted against the issues relating to borough wide housing needs outlined above in this report, and the results of the site assessment work undertaken. With regards to the planning application received on the site, the planning application process is distinctly separate from that of the Local Plan, and the comments made on the application will be considered as part of that process.

POLICY S37: SMARDEN – LAND ADJACENT TO VILLAGE HALL

Representations have been received from the following consultees:

374 Miles Bullock	2076 Alex Ferris
470 Hugh Ellison	2078 Jacque Shackleton
1219 Carl and Lorraine Bruce and Vines	2079 Stuart McLeish
1220 Smarden Parish Council	2081 Elizabeth McLeish
1658 Gillian Sadler	2099 Ashford Borough
1660 Michael Twort	2313 Mike Barkway
1805 CPRE Kent (Ashford District Committee)	2371 Southern Water
1852 Gillian Bromley	2437 Joel Arnstein
2066 Teresa Lucas	2618/2648 Kent County Council (KCC)
2069 S Rhodes	2685 Gladman Developments

Summary of representations – main issues

Issue - Housing type and affordability 1852 supports the site allocation and feels that it is vital that 2-3 bedroom properties are built here so that they are affordable to first time buyers. This would contribute to a greater mix of housing and population within the village. Amend to specify that new housing must be affordable and/or modest in size.

Response *Affordable housing requirements are set out in policy HOU1 and the affordable housing SPD. A new housing mix policy HOU18 will deal with the issue of different types and sizes of houses provided.*

Issue – Highways, Access and Infrastructure 374, 2066 and 470 feel that access would be dangerous, the traffic is already heavy at peak times and restricted by cars parked in the roads. Concerned about the effect of up to 25 new houses coming onto Smarden High Street would have on road safety. The majority of access to the village has single track lanes or pinch points. 470 states that the speed limits on the roads entering Smarden are inadequate. Should any development be allowed in Smarden then any S106 agreement should include speed restrictions along the entrances to Smarden village far beyond where they currently exist.

374 facilities and employment in the village are limited so with so many extra people there will be a significant increase in car journeys with no public transport of any relevance. The local school and surgeries are already full. There are already issues with drainage, water supply and sewage in this particular location which would only be added to.

2371 advises that additional local sewerage infrastructure would be required to accommodate the proposed development (involving making a connection to the local sewerage network at the nearest point of adequate capacity) and (ii) there is existing sewerage infrastructure and pumping stations on the site. Request that the following criteria is added to policy S37 after 'Development proposals for this site shall': h) Provide a connection to the nearest point of adequate capacity in the sewerage network, in collaboration with the service provider. Provide future access to the existing sewerage infrastructure for maintenance and upsizing purposes.

Response *It is accepted that any new development proposals will affect existing services. Therefore, service providers, including KCC Highways & Education, Water companies and the Environment Agency (drainage and flooding), the Ashford Clinical Commissioning Group and the East Kent NHS Hospitals Trust are consulted at all stages of the plan making process to identify if they have existing capacity or if additional capacity is needed to accommodate additional development. If additional capacity is needed, this is then planned for through the Local Plan process and the Infrastructure Delivery Plan, which supports the Local Plan.*

It is the responsibility of these service providers and stakeholders to identify and ensure delivery of the infrastructure that is required. The Local Plan plays a supporting role in helping to deliver the infrastructure, by allocating sites or requiring developers to make financial contributions.

Where the providers have raised concerns with local infrastructure, these have been addressed within the specific site policy, or sites have been excluded from consideration if these could not be resolved. ABC will continue to work with these stakeholders in understanding the borough's infrastructure needs.

With regard to highways in respect to an application for 50 dwellings on this site plus an adjoining site, KCC concluded that "the development is acceptable in terms of capacity of the local road network".

Amend Policy to add 'Provide a connection to the nearest point of adequate capacity in the sewerage network, in collaboration with the service provider'

In the RJ add: 'Southern Water's assessment has revealed that additional sewerage infrastructure would be required to serve the proposed development. The development will therefore be required to make a connection to the nearest point of adequate capacity in the sewerage network. Early liaison should take place with the service provider in this regard.'
See proposed change MC41.

Issue - Loss of agricultural land 374 argues that the land is of agricultural importance and remains of historical and ecological importance as part of the Low Weald.

Response *The use of agricultural land is one of many factors which need to be considered and balanced against each other in deciding which are the most appropriate sites to allocate for development. Full assessment of all of the factors has been carried out through the Sustainability Appraisal and this site has been considered against the other reasonable alternatives. The land is Grade 3, which is not considered to be the best and most versatile land.*

Issue - Impact on village character 374 The siting of these houses will be seen by all residents on this part of Pluckley Road, completely removing the picturesque natural features of this part of the village which includes listed buildings and the Charter Hall. A development of 25 houses here would impact materially on that current harmony. 470 and 374 suggest that if 25 houses are needed then development should be spread across a number of smaller sites. 1852 Support the development of up to 25 houses on land adjacent to the village hall up until 2030 as set out here. It is vital that any house meet the requirements of the Smarden Design Statement.

1852 the listed buildings must be protected from intrusive and inappropriate development and new housing must ensure that the village does not become a 'chocolate box'; village where only wealthy people can live. The balance is fragile but this plan can help to achieve it.

Response *Policy S37 requires that development on this site accord with the Smarden Parish Design Statement. The supporting policy text highlights the need for development to respect the character of the area and provide a frontage that fits the street scene. Other policies within this plan, especially ENV13, in addition to national legislation seek to conserve and enhance heritage assets (including listed buildings). No change required.*

Issue - Protection or designation of the Green space 2313, 1805 Welcome the inclusion in the draft plan of a protected area of green space. However this is formally defined in the

draft plan as "Informal Public Open Space", and we are unclear just how much protection this designation would give in the face of unwanted development proposals that would seek to override this designation. Could we further request that the identified green space on the site plan be also be designated as an "Asset of Community Value", which then gives "community interest groups the opportunity to bid if the owner wants to dispose of the land". It is important that proposals preserve the green edge to The Street and its hedgerow and ditch. The policy needs to refer to public open space to the south western part of the site. In view of this, we would like to request that the area shown on the site plan be formally designated as "Local Green Space" in the final Local Plan.

1852 - The Public Open Space is vital and welcome.

Response *The policy requires that any development on the site makes provision for informal Public Open Space. To designate local spaces as an asset of community value, there must be evidence that the space has historically been used as such a use and requires protection. No change required.*

Issue - Landscape impact 1805 Improve Policy so that the proposed development responds properly to ecological, heritage and landscape constraints. This Policy should be amended to require landscaping to screen the site when approaching from the north. 1857 Landscaping is essential to shield houses from noise and maintain this important community building.

Response *The policy as written requires that the development responds appropriately to the character of the surrounding countryside and that natural screening is provided. This is further supported by the plan's topic-based policies. No change required.*

Issue - Minerals 2618 Notes that according to British Geological Survey safeguarding data, river terrace deposits are present within the allocated site and are vulnerable to sterilisation. A minerals assessment should be prepared to determine the extent and nature of the mineral deposits to determine the viability and practicality of prior extraction.

Response *Sites that are proposed for allocation in and around Ashford and at other settlements represent the most sustainable options to provide for the housing and employment needs for the Borough, as has been demonstrated through the Sustainability Appraisal. In order to meet the needs for housing and employment development it is the Council's view that it would not be possible to avoid allocations within these areas, and would create an unsustainable form of development if the mineral safeguarded areas were not considered for development as a matter of principle. Kent County Council has requested that minerals assessments be carried out in order to identify the need for prior extraction of the minerals within the safeguarded areas. The Minerals and Waste Local Plan 2013 – 2030 which forms part of the statutory development plan for the Borough, includes policies which set out these requirements, and are therefore material considerations when in determining planning applications. It is not considered necessary to replicate these policies within this Local Plan.*

General comments 2648 The County Council will require financial contributions towards KCC services including towards the construction costs of any new education provision required to mitigate the impact of this development.

Response The requirement for developer contributions towards the provision of infrastructure and community facilities is dealt with by generic policies (COM1, COM2 and IMP1) in the Plan. Where site specific projects have been identified in the Infrastructure Delivery Plan these have been identified in site specific policies. No change proposed.

374 The signposting to make formal comments on the plan is not clear. A copy was not made available in the village and hence there has been no real understanding that this process was continuing to a conclusion.

Response Noted

374 There is a need for a Neighbourhood Plan along these lines which was a proposal that carried a good deal of support at a recent very well attended Parish Council meeting.

Response Noted

Support

1219 2078, 1220, 2066, 2069, 2076, 2079, 2081, 2099, 2313 and 2437 support the building of up to 25 houses in the village and the local green space adjacent to the Charter Hall and accept that the site adjacent to the Charter Hall was chosen as one of the most popular sites for development in the village following the consultation between Parishioners and Ashford Borough Council.

1805 feel that a smaller number of dwellings is gaining some support and would give more opportunity for a sensitive design-led scheme.

Response Support noted.

POLICY S38: SMEETH – LAND SOUTH OF CHURCH ROAD

Representations have been received from the following consultees:

488 John David Jamieson	2372 Southern Water (Planning Policy)
834 Jacqueline Fortescue	2499 Brabourne Parish Council (Sue Wood)
1196 W.J. Quick	2500 Smeeth Parish Council (Sue Wood)
1337 Messrs Barden and Mansfield	2619/2649 Kent County Council (KCC) (Barbara Cooper)
1807 CPRE Kent (Ashford District Committee) (Hilary Moorby)	

Summary of representations – main issues

Issue - Road infrastructure and settlement form 488 Site would promote ribbon development, and access off a narrow busy road opposite playing field. 834 Access point is too narrow for proposed development, and would exacerbate existing parking issues at primary school and increase danger at A20 junction. 1807 – 30 units would be too dense; 6 preferred to be in keeping.

2499 and 2500 - Propose minor amendment to wording to facilitate road widening: “d. A traffic management scheme will be put in place to mitigate the impact of the additional traffic movements arising, and where it is necessary to remove a hedgerow to facilitate such a scheme a similar, indigenous hedgerow will be planted.” Also proposes reduced speed limit on Hythe Road (A20) to resolve perceived danger.

Response *The site density and site area have been reviewed and the site is now considered suitable for a residential development with an indicative capacity of 35 dwellings, an overall density to 25dph. The Council considers that this density is suitable for a village location such as this and in keeping with the surrounding pattern of development in the wider village. See proposed change MC42.*

The Council disagrees that the access point is too narrow, since the dimensions of this have yet to be defined, and KCC Highways offer no objection to the allocation on any of the points raised. The potential opening on the road frontage is large, and appropriate visibility splays will be required in accordance with KCC Highways recommendations.

Issue - Local needs & Village protection 2499 and 2500 Site was previously put forward by PC for local needs housing but not preferred by the Borough Council. Concern over cumulative impact of development, and promotes a Smeeth and Brabourne Village Protection Policy. Seeks a requirement in policy for development to give priority to those with local connection.

Response *Over time settlements evolve and new developments coming forward need to be considered against the most up to date national and local policies. Previous site assessments, although an important consideration, cannot be weighted higher than the current policy position.*

There is no particular case for a specific Smeeth and Brabourne Village Protection Policy given that: a) development has overwhelmingly been focused on Ashford town and, b) there are no particular constraining designations for this part of the borough.

Local needs housing is not allocated and is by its very nature an ‘exception’ to normal planning restrictions. A specific policy is in place to deal with local needs housing which can be taken forward by Parish Councils with assistance from the ABC housing department.

Issue – landscape 1196 states there is significant wildlife on this site, that it is an area of outstanding natural beauty, and that the site suffers significantly from surface water flooding with an adjacent site flooding for 6 weeks this year.

Response *This part of the borough is not a designated Area of Outstanding Natural Beauty (AONB). The Council is content that the site lies outside the Environment Agency's Flood Zones 2 and 3 and is not under any particular risk from flooding or has particular surface water issues. Nevertheless, as for all sites surface water policies will apply have been proven to reduce runoff even on greenfield sites.*

Species surveys will be required on the site as part of any planning application, though Natural England has not raised any issue in relation to this site.

Issue – minerals safeguarding 2619 site is safeguarded Sandstone (Folkestone Formation) deposits. A mineral assessment is required.

Response *Sites that are proposed for allocation in and around Ashford and at other settlements represent the most sustainable options to provide for the housing and employment needs for the Borough, as has been demonstrated through the Sustainability Appraisal. In order to meet the needs for housing and employment development it is the Council's view that it would not be possible to avoid allocations within these areas, and would create an unsustainable form of development if the mineral safeguarded areas were not considered for development as a matter of principle. Kent County Council has requested that minerals assessments be carried out in order to identify the need for prior extraction of the minerals within the safeguarded areas. The Minerals and Waste Local Plan 2013 – 2030 which forms part of the statutory development plan for the Borough, includes policies which set out these requirements, and are therefore material considerations when in determining planning applications. It is not considered necessary to replicate these policies within this Local Plan.*

Issue – sewerage infrastructure 2372 requests the policy to introduce a requirement to "Provide a connection to the nearest point of adequate capacity in the sewerage network, in collaboration with the service provider."

Response *Amend Policy to add 'Provide a connection to the nearest point of adequate capacity in the sewerage network, in collaboration with the service provider'*
In the RJ add: 'Southern Water's assessment has revealed that additional sewerage infrastructure would be required to serve the proposed development. The development will therefore be required to make a connection to the nearest point of adequate capacity in the sewerage network. Early liaison should take place with the service provider in this regard.'
See Change MC42.

Support 1337 supports the allocation. 2649 supports the allocation but requires financial contributions for the construction of education facilities to mitigate development.

Response *Support noted. The requirement for developer contributions towards the provision of infrastructure and community facilities is dealt with by generic policies (COM1, COM2 and IMP1) in the Plan. Where site specific projects have been identified in the Infrastructure Delivery Plan these have been identified in site specific policies. No change proposed.*

POLICY S39: WODDCHURCH – LOWER ROAD

Representations have been received from the following consultees:

489	L Ransley	1765	Anna Haasjes
524	Sue Garnar and Mr Steve Baker	1775	Reg Mendes da Costa
732	Avril and Ray Farris	1783	Elisabeth Mobbs
796	Mary and David Bellingham	1809	CPRE Kent (Ashford District Committee)
894	Peter Marmara	1813	Julia Mathews
903	K Graves	1821	Charles & Lesley Boxer
904	Suzanne Graves	1824	Joyce Keeble
961	Pauline M Davey	1835	John Watson
968	Woodchurch Village Association	1839	Patricia Pope
1138	N/A (Martin Gurdon)	1891	Mr Headling
1195	D G Lewing	2119	Timothy Elliott
1359	Janet Stace	2248	Warren Stimson
1410	G Andrews	2281	Mr & Mrs Bertani
1461	Rosemary and Richard Harrison	2288	Peta Grant
1473	Larry Hatter	2435	Mr Thurley
1474	GJ Hatter	2440	Donald James Grant
1615	Helen Kendrick	2650	Kent County Council (KCC)
1639	Woodchurch Parish Council	103, 450	A Lukehurst
1717	N Baker	739, 795	Jon Chaplin
1739	D Hall		

Summary of representations – main issues

Please note that due to the agreement of the Council with the views of the PC and local residents that the 2 site allocations in Woodchurch of 8 units each are not large enough to provide the mix of housing and affordable housing required in the settlement, this site policy for Lower Road is to be deleted from the draft Local Plan 2030 and replaced by an alternative larger site in the settlement to resolve these local concerns. See proposed change MC43 and new site policy S62.

Therefore many of the additional objections on this site policy detailed below may not have been responded to fully.

Issue - Local Plan process and housing need 103 and 450 raise queries about the consultation process and procedures on the Local Plan. 2435 believes additional consultation is required.

1639 believes that the views of the community have not been considered when allocating this site and that the borough council has ignored repeated requests for a debate on tenure mixes and responding to concerns about this site and that it is not in accordance with the 2004 village plan, subsequent 2014 survey and their additional consultations. The PC also request response to a number of questions: What is the rationale of delivering more market homes on contentious sites given the increasing supply in neighbouring towns and villages?

What evidence do the BC have that more market homes will sustain the local economy when local business report they are busy and it is growing? Why the BC did not assess the cumulative impact of submissions?

1835 states that there have been numerous refusals of permission on this site, some at appeal and the reasons for refusal have not changed.

1195 and 1765 would like reassurance that the 16 homes will be all Woodchurch has to take up to 2030. 1473 and 1474 questions the need for additional housebuilding following the Brexit result, and believes that there are many unsold properties within the village already.

524 objects as they will have development sites either side of them. 524 and 1195 retired to Woodchurch due to its unspoilt and peaceful setting. 904 agrees. 732 are concerned that the noise of the development whilst being built will be "horrendous". 1410 believes development has no benefit to Woodchurch either in terms of local housing, amenities or employment and is totally inappropriate in this location.

Response *Government policy requires local authorities to determine their own housing needs. However, this must be based upon an assessment of housing need through a Strategic Housing Market Assessment, to ensure that general market and affordable housing needs are fully met until 2030. The strategic approach in this Draft Local Plan is to allocate most land in the urban areas and with rural areas seeing appropriately scaled allocations to enable the needs of all the borough's population to be met in a sustainable way and to secure the future sustainability of those settlements.*

There are insufficient brownfield sites across Ashford to meet the level of new housing that needs to be delivered in the borough, the majority of growth will therefore have to be delivered on greenfield sites on the edge of the urban area and in the rural area. Other policies within the plan are applied to mitigate impacts on rural settlements and the wider landscape where possible.

Over time settlements evolve and new developments coming forward need to be considered against the most up to date national and local policies. Previous planning applications and site assessments, although an important consideration, cannot be weighted higher than the current policy position.

Comments received at Local Plan consultation events, have been taken into consideration where possible and are recorded in the pre-submission consultation statement, but must be weighted against the issues relating to borough wide housing needs outlined above in this report. However, in this case, the strong public view that the 2 sites of 8 units are not large enough to provide the mix of housing required in the settlement have been considered and is supported, and therefore this site policy is to be replaced by an alternative site to resolve this local concern. See proposed change MC43 and New Site S62.

Issue - Conservation Area and 'Green Heart' of village 968 and 1639 strongly objects to any development which encroaches on to the green heart of the village. They state that this site is crucial to the character of the conservation area and character of the village and development should respect the open nature of this location and protects views. The site is open and valued countryside and the PC have requested that the BC agree criteria that meant development that failed to recognise and protect the valued landscape were removed

from consideration. 1891, 1195, 894, 739, 524, 1615, 1739, 1765 and 904 are also concerned with regards to the loss of 'green heart' of the village.

1138 and 1410 feel that it will be a shame to lose the last green gap in this conservation area location and will destroy the essence of the village. 1359 states that villages historically have green spaces improving wildlife and general wellbeing as against living in a road of houses. 732 believe that other sites in the village are more suitable and the green heart of the village, which is agricultural, should be protected. 1410 agrees and believes that development should be outside the confines of the village, similar to Bridge Close development.

1410 highlights that the site is in a designated conservation area which has already been compromised by the development of two very large inappropriate buildings to the north of this site. 1783 feels that there should be no development in the CA. 1821 also supports this view and states that the land has been protected for some time through CA and village design statement and that development of this site would be of different character to the recent development to the north and would affect views in and out of the CA and green heart. 2248 supports this view and believes that developing this area of the village seems again to take away the whole ambience. 2248 is also concerned about the recent change to the CA designation, which removed an area of the CA from designation.

Response *It is accepted that this site is within the Conservation Area and Green centre of the settlement, and both issues were specifically covered within the policy wording and supporting text. However, a small development here, particularly in the context of the recent developments to the north of the site, would not have been out of character for this location if designed and laid out in such a way as to protect the important vistas and views and conservation area setting, in accordance with the recently updated CA appraisal and management plan.*

Issue - Wildlife and Green Belt land 732 states that there is lots of wildlife in this location (provides a list) and it should be considered. 524 is concerned at the loss of Green Belt land and wishes for it to be protected.

Response *During planning application stages, ecology surveys will be undertaken and mitigation required if necessary. The site is not designated as Green Belt land (There is no Green Belt designation within Ashford Borough)*

Issue – developer contributions 2650 the County Council will require financial contributions towards KCC services including towards the construction costs of any new education provision required to mitigate the impact of this development.

Response *Noted*

Issue – adequacy of local services

103 is concerned that the local services are unable to take additional capacity, in particular southern water sewage works due to current problems when there is heavy rain. Other concerns include electricity, water, school and doctors surgery which are reiterated by 1195 and 1410. 1639 also raise concerns about the inadequacy for the sewerage infrastructure. 2119, 524 and 1195 also mentions that there is currently a problem in the

wider village and this particular site with drainage and sewage. 1783, 1739, 903 and 1138 supports this view and is concerned about the overstretched resources.

Issue – flooding 1835 suggests that there are severe problems with drainage on this site when it rains and this has flooded properties on the other side of the road. 1195 feels that the resulting solution will no doubt be to pipe this to the existing 'brook' at the rear of the properties in Lower Road ie. the eastern side, which will undoubtedly just move the problem somewhere else as the brook runs at almost capacity already. 968 states that sites such as this are historically left untouched for a reason. Residents are concerned that this field is a drainage basin for land higher up in the village and that the lower end floods in very wet conditions. There are concerns that nowhere in the text is there any reference to containment of surface water draining into the site. A requirement in the S39 policy for a drainage pond could also be used to resist an increase in the number of dwellings.

Issue - Emergency Access & Parking/Traffic 1824, 2440, 1783, 1138, 732, 904 and 961 do not believe the emergency access between Kirkwood Avenue and the site is required on the grounds that no other Closes have one, the new development is too small to need it, and it will impact Kirkwood residents and might lead to further infilling. 1138 suggests if it is provided it must be padlocked. 2440 would like clarity on the emergency access, why it is required and why it links to the green link path. Kirkwood Avenue is too narrow to support any extra traffic that would in any case be inappropriate in a residential street of this kind. 1835 states that there is a 'blocking strip' preventing the access from Kirkwood to the field so that access would be impossible.

968 parking in villages on minor roads is now a strategic planning issue. Two spaces per dwelling for large houses is woefully inadequate. There is simply no more room for on-street parking in Lower Road. The absence of any guidelines in S39 is not acceptable.

2281, 1615 does not feel the site is big enough for 4/5 bed houses and the parking that is needed. 1891, 739, 1765 - Off road parking must be provided as there are current parking problems in lower road. 894, 1739, 1891 agrees that traffic and parking is already a concern in Lower Rd. 1410 and 2281 considers there is already too much traffic on Lower Road it being used as a "rat run" for traffic from Tenterden to Ashford. This development will only increase the traffic on an already congested thoroughfare. 1639 also supports the view that access to this site would be poor and that the increased traffic movements are a risk to public safety. They also would like information about how the Highway infrastructure is to be maintained in light of the reduced funding. 1639 believes development of this site will lead to a loss of amenity due to traffic movements and public safety.

Response *It is accepted that any new development proposals will affect existing services. Therefore, service providers, including KCC Highways & Education, Water companies and the Environment Agency (drainage and flooding), the Ashford Clinical Commissioning Group and the East Kent NHS Hospitals Trust are consulted at all stages of the plan making process to identify if they have existing capacity or if additional capacity is needed to accommodate additional development. If additional capacity is needed, this is then planned for through the Local Plan process and the Infrastructure Delivery Plan, which supports the Local Plan.*

It is the responsibility of these service providers and stakeholders to identify and ensure delivery of the infrastructure that is required. The Local Plan plays a supporting role in helping to deliver the infrastructure, by allocating sites or requiring developers to make financial contributions.

Where the providers have raised concerns with local infrastructure, these have been addressed within the specific site policy, or sites have been excluded from consideration if these could not be resolved. ABC will continue to work with these stakeholders in understanding the borough's infrastructure needs. With regards flooding and highways access, no concerns have been raised by Environment Agency or KCC Highways in relation to this site policy.

Issue - Housing Mix/Design/layout 1639 , 1821, 1839, 2281, 1138, 739, 450, 796, 961, 1359, 1410, 1615, 1739, 1765, 1775, 1813, 1891 concerned that the site will be all large houses and no provision of starter homes. 1639 is concerned that the housing mix is not defined on this site, and that this development will end up as large 'commuter' homes with no benefits to the existing community. 894 believe the policy should stipulate the housing type to satisfy the need of the village. 1461 feels that the homes should be 2-3 bed to enable younger generation to buy and not leave the village with a population of only older generation. 2435 believes the policy is unsound due to lack of consideration of local needs housing.

968 reiterates this view and believes that not providing a mix is contrary to p 50 of NPPF which identifies that development should accommodate the needs of different groups in the community. 903 supports this view and also believes retirement homes should be considered instead.

524 and 1775 believe that the development should be in linear form along the Lower Road frontage and not into the field itself as proposed. 1138 thinks the policy requires clarification on whether this is frontage development proposed in the policy already. 1639 and 1783 also believe that the development is proposed to be in linear form, and therefore there is insufficient capacity for 8 units.

1839, 1891, 1615 object to a lack of a finite number of houses being defined in the policy and it should be explicit. 739 states that street lighting should be discouraged and 1195 believes specific design should be required in accordance with the Design statement with regards to materials.

Response *It is agreed that the 2 site allocations in Woodchurch of 8 units each are not large enough to provide the mix of housing and affordable housing required in the settlement, this site policy for Lower Road is to be deleted and replaced by an alternative larger site in the settlement to resolve these local concerns. A new policy which will seek a mix and range of dwellings on sites of 10 or more homes is also proposed and will apply to the replacement site.*

See proposed changes MC43, new Site Policy S62 and New Policy HOU18.

Green Link Route 795 the proposed green link goes across private land and cannot be provided by the landowner and therefore is ambiguous. 2444 seeks clarification of the "Green link" proposed which is described as giving pedestrian access but then mentions "an opportunity to provide an emergency access point through Kirkwood Avenue". Does this emergency access mean that the road will be extended from Kirkwood Avenue into the development? The map clearly shows only a footpath linking to the green. Either the plan and map are inadequate through vagueness, or they are misleading.

Response Comments noted. Policy deleted.

Support 489 is supportive of the reduced site size and dwelling number of the allocation and feels that these proposals should enhance the village rather than a negative effect. 2288 and 1813 support development of a few homes that are in keeping with the character. 961 would support if the development was small houses or bungalows. 1461 not opposed to the use of this area for future housing as the recent Planning Permission having been granted for the adjacent field has created a precedent for further building in the area. 1809 does not object to the policy.

Response Support noted.

POLICY S40: WOODCHURCH – FRONT ROAD

Representations have been received from the following consultees:

523	Sue Garnar and Mr Steve Baker	1714	N Baker
628	Jacqueline Gallagher	1745	D Hall
721	Susan Mansfield	1758	Anna Haasjes
740	Jon Chaplin	1773	Reg Mendes da Costa
797	Mary and David Bellingham	1781	Elisabeth Mobbs
895	Peter Marmara	1810	CPRE Kent
960	Pauline M Davey	1811	Mason Brannan Design Partnership
969	Woodchurch Village Association	1816	Julia Mathews
1137	N/A (Martin Gurdon)	1823	Joyce Keeble
1193	Don Smith	1829	Eric Davey
1213	C Vertue	1838	Patricia Pope
1358	Janet Stace	1845	Lindsey Deal
1416	G Andrews	1901	Mr Headling
1471	Larry Hatter	1950	Ann Tiplady
1476	GJ Hatter	2247	Warren Stimson
1623	Helen Kendrick	2436	Mr Thurley
1640	Woodchurch Parish Council	2651	Kent County Council (KCC)

Summary of representations – main issues

Issue - Local Plan consultation process & Conservation Area Review 1640 duplicates comments made in 1639 on Policy S39 relating to the Local Plan process and housing need

in Woodchurch. This has been responded to in Policy S39.1640 expresses concerns with the planning process, in particular that residents and PC do not appear to have as much opportunity to oppose development as developers have to put them forward. In particular, the PC have raised the concerns about the timing of the Conservation Area Review which resulted in the removal of this Front Road site from the CA boundary against the community's wishes. 960 states that all previous objections to earlier development proposals for this site should be taken into account. If these were relaxed or ignored then they would object to the development. 1950 states that ABC has not listened to residents views.

Response Noted. *Numerous consultation events have taken place with the PC and residents regarding the sites submitted and shortlisted, including this consultation. Views will be considered and changes to the Local Plan will be made following assessment of these representations, in an attempt to resolve concerns.*

With regards to the issue of the Conservation Area (CA) Review process overlapping with the Local Plan, a detailed reply to this concern/complaint has been supplied to the Parish Council previously. In summary, the CA review, was a separate area of work, which has commenced across all of the boroughs 43 CAs. Woodchurch CA was one of the first to be reviewed, mainly selected due to its importance and the large amount of site submissions received within and around it.

An independent consultant undertook the CA review, in accordance with HE guidance. At no time prior to the report being received, were the BC aware that the consultant was going to propose a boundary change to the CA which removed the WOOD1 (now S40) site. In any event, the site is still within the setting of the CA, and therefore remains covered by the Conservation Area Policies with regards to impact and design.

In addition to this, numerous revisions have been made to this policy, in order to deal with design and layout concerns raised through the previous applications and appeals, with a reduction in number and specific references to CA setting throughout supporting text and policy text, highlighting its importance.

Issue - Housing Need 1471 and 1476 raises the issue of Brexit and whether additional housing will be needed, and states that there are houses on the market and plenty unsold. 1714 states that the village is large enough and does not require further development. 1811 suggests investigating alternative brownfield sites for allocation.

Response *Government policy requires local authorities to determine their own housing needs. However, this must be based upon an assessment of housing need through a Strategic Housing Market Assessment, to ensure that general market and affordable housing needs are fully met until 2030. A general misunderstanding of the Localism Act is that the Government allows local communities to simply say 'no' to development; however the choice is more about where the development needed should best be located.*

The strategic approach of the Draft Local Plan is to allocate most land in the urban areas with rural areas expanding in a sustainable way to enable the needs of all the population to be met and to secure the future sustainability of the rural settlements. Brexit doesn't alter the population forecasts, so at present the Local Plan must allocate based on the current position.

Issue - Housing Mix and Numbers 1640 concerned that the site will be all large 'executive' houses and no provision of homes that meet local demand such as starter homes or homes for downsizing purposes. They believe that although the original allocation of 10, which was refused and lost appeals, has been reduced, there is no evidence that 8 units is the correct number for the site either, particularly if they are all 5 bed properties, and they have requested that the policy specifically states 'no more than 8, 2-storey houses with no rooms in loft space'.

969 state that residents are supportive of the reduced dwelling numbers of the allocation to 8, but suggest that this is still open to interpretation and that policy wording be amended to include the words 'maximum of 8'. 740, 1816 and 1623 1845, 1901 support this view and proposed change to wording.

1640 stated that the Appeals Inspector which dealt with the refusal of 10 units on this site quoted the NPPF para 50 stating that local authorities should, amongst other things, 'identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand'. They state that they requested the removal of the policy from the draft plan until mix and tenure imbalance had been addressed.

969 states that there has been a failure to define the mix of dwellings and that Woodchurch is desperately short of smaller dwellings which was highlighted to ABC in the Woodchurch Parish Council Survey of 2015. Even if restrictions are placed on the size of some dwellings, this will not hinder development on this site. 1845 states that the village will not survive without an influx of young people/families who will add societies and social life and help to create a vibrant, living community for the foreseeable future.

628, 721, 740, 797, 895, 1137, 1213, 1358, 1416, 1623, 1714, 1745, 1758, 1773, 1781, 1823, 1829, 1838, 1901, 1950, 2436 agree with the above views on the need for housing mix to be required to require smaller and affordable housing for younger people or downsizers to be built instead of just 'executive' style housing. 2436 believes the document to be unsound as there is no local need provision and a discussion with the local community needs to take place.

Response *It is agreed that there is a requirement to include a policy within the Local Plan on housing mix, which will provide a range of sizes and types of dwellings suitable for all members of the local community. See new Policy HOU18.*

Agree: The policy should be clear that a maximum of 8 dwellings is suitable for this site. The policy wording amended. See proposed change MC44.

With regard to Local Need provision and affordable housing requirements, these matters are covered elsewhere in the Local Plan. Affordable Housing will apply on all sites of 10 or more (which following the reduction in housing number does not now apply to this site), Local needs housing is dealt with through an exception site policy and is dealt with by the PC and Housing departments. It is not allocated within the Local Plan.

Issue - Housing Design/layout 1811 suggests that development should be restricted to single storey built at low density to maintain vistas of countryside and suggests this would be a maximum of 4 dwellings. 969 are concerned with the farmers access being retained which would slice the developable area of the site. If this is retained then the number should be reduced proportionately.

523 suggests that the design and layout should reflect the semi detached curved properties opposite the site, and should be designed with views through the new houses and set back from the road frontage to retain the feeling of openness and rural aspect. 1137 would like room sizes specified in the policy to prevent cramped houses.

Response *The revised site policy includes a large amount of detail regarding the layout and design for the site. This has taken into account the site area, the previous applications, and appeal decisions. There are requirements that the design must allow a degree of openness and a visual connection to the countryside, allowing long views through varying plot sizes and spaces between buildings (para 4.383).*

Policy HOU13 which specifies residential space standards applies to all residential development.

Issue - Impact on Rural Landscape, CA and Important Views 523 state that it is distressing that rural Woodchurch will disappear, 628 also has concerns relating to the impact on the openness and character of the village. 1193 is concerned with the loss of good agricultural land which is precious and finite and stresses the biodiversity importance and the increased presence of Little Owls.

721 states that the site is set higher than the road, and development would create a urban feel and restrict the open aspect of the village which is part of its character and part reason for the Inspectors refusal of the appeal application. 1213 states that houses will dominate the area due to the location on the bank above the road. 1745 supports this view.

969 feels there was not enough emphasis on the partial preservation of views when the site is developed. Existing wording needs to be replaced by a stronger form of words, such as 'whilst allowing specific views towards Shirley Moor and the Isle of Oxney'. 895 and 1137 agrees and states that the development leads to a loss of countryside views enjoyed by the village. 1137 would like to see specific guidance about elevations and gaps within the policy and removal of PD rights for extending into lofts. 1773 agrees and states that development heights should be as low as possible. 1781 also agrees that gaps in the development should be made to protect the views beyond. 1623 also raises the issue of protecting views of the countryside and 1845 suggests a change to the policy Sub Paragraph d to read "whilst allowing maximum views to the countryside".

1416 states that infilling the open spaces spoils the nature and essence of the village. 2247 agrees and states that the village does not need development that is detrimental to the ambiance and that this gap in building is part of the setting of the entrance to the 'Green'. Buildings above the current hedge will enclose the space and add additional light to the night sky. 1811 states that the inclusion of this site contradicts the adopted VDS and Design Guidance 10 which seeks to maintain important vistas within the CA and retain rural character created by pockets of open space. 1416 states that there is concern on the impact

of the CA. 1745 asks how development here would enhance or make a positive contribution to the setting of the CA.

Response: *Agree that more focus should be placed on key historic views through the site to the countryside beyond, see proposed change MC44.*

With regards to impact on the wider countryside and landscape and the impact of development on the setting, policy ENV3 Landscape character and Design applies to all development proposals coming forward in the borough over the Plan period. This covers many of the points raised here regarding the landform and topography, pattern of field boundaries and settlements, historic landscape features and other important local landscape character. There are no specific landscape designations in this village (such as AONB) which require additional protection.

Many of the issues raised such as conditions regarding lofts and elevations cannot be dealt with through Local Plan policy, and will be dealt with through detailed drawings and designs at the planning application stage.

With regards to the impact on the setting of the Conservation Area, the policy is clearly worded at para 4.382, 4.383, 4.384, 4.386 and in point b. of the policy itself and there is considerable mention of the CA setting and VDS. The historic environment is also covered separately in Policies ENV13 and ENV14 which deal with the protection and conservation of heritage assets and the setting of CAs.

Issue – Highways, Parking and Traffic 1640 states that Front Road is narrow and used as a 'rat run' and development along it would increase the risk of RTCs and create public safety problems. 969 expresses serious concerns about overflow parking on the dangerous bend and wish to see restrictions placed on the building of large 4/5 bedroom dwellings unless the developer can demonstrate realistic provision for visitor parking. Residents are aware of the minimum parking requirements, but feel these are inadequate for properties which might access Front Road on the bend. 740, 523, 895, 721, 1137, 1193, 1213, 1358, 1623, 1714, 1745, 1748, 1781, 1816, 1829, 1845, 1901, 2247 agree and reiterate these parking and traffic concerns on a 'blind bend' and the road is already difficult to navigate. Many suggest a large amount of off-street parking being essential to the new development.

628 also agrees with issues above and adds that there will be increased pollution from traffic and that the dip in the road towards the bottom of Front Road will create problems with already over capacity drainage here. 523 states that a pavement would need to be provided from the site. 1816 states that if a pavement is put on both sides of the road, it would create a further parking problem on both sides of the road. 1829 suggests traffic calming measures are required. 960 suggests 2 accesses are required at either end of the site.

740 states that the retained farmers access is unnecessary and could lead to more development beyond the site area. 895 and 1137, 1758 agree. 969 states that it has not been used for 10 years so is not needed.

Response *Kent Highways Services have been consulted on this proposed allocation with regards to traffic, safety, pavements and visibility splays. They have raised no concerns or*

recommendations for traffic calming. They have recommended one access point is required at the point identified.

Parking will be required for residential development in accordance with Policy TRA3a

The retention of an access to the agricultural field beyond the site area is a matter for the landowner, and it cannot be specified in policy for it to be removed. Retention of an access will also allow some views to be retained of the countryside beyond, a requirement of the policy.

Issue – Adequacy of infrastructure 740 raises issues on this site with the disposal of surface and foul water. In 1640 the Parish Council also raise concerns about the inadequacy of the current sewerage infrastructure. 969, 1137, 895 and 1358, 1416, 1623, 1745, 1758, 1781, 1816, 1845 1901, 2247 agree that there are concerns with capacity of current systems. 1193 questions if the primary school has capacity for increased population. 1416 raises concerns about the impact of development on all local amenities and infrastructure including shops 1745 states that the lack of street lighting here is a hazard.

Response *It is accepted that any new development proposals will affect existing services. Therefore, service providers, including KCC Highways & Education, Water companies and the Environment Agency (drainage and flooding), the Ashford Clinical Commissioning Group and the East Kent NHS Hospitals Trust are consulted at all stages of the plan making process to identify if they have existing capacity or if additional capacity is needed to accommodate additional development. If additional capacity is needed, this is then planned for through the Local Plan process and the Infrastructure Delivery Plan, which supports the Local Plan.*

It is the responsibility of these service providers and stakeholders to identify and ensure delivery of the infrastructure that is required. The Local Plan plays a supporting role in helping to deliver the infrastructure, by allocating sites or requiring developers to make financial contributions.

Where the providers have raised concerns with local infrastructure, these have been addressed within the specific site policy, or sites have been excluded from consideration if these could not be resolved. ABC will continue to work with these stakeholders in understanding the borough's infrastructure needs.

Support 2651 The County Council will require financial contributions towards KCC services including towards the construction costs of any new education provision required to mitigate the impact of this development.

1810 (CPRE) does not object to the policy. 1640 do agree that the PC had supported the original allocation of this site and therefore understand its inclusion in the Local Plan 2030. 1640, 969, 1823 supports reduction to 8 dwellings from 10.

Response *Support noted. The requirement for developer contributions towards the provision of infrastructure and community facilities is dealt with by generic policies (COM1, COM2 and IMP1) in the Plan. Where site specific projects have been identified in the Infrastructure Delivery Plan these have been identified in site specific policies. No change proposed.*

POLICY S41: CHILHAM – MULBERRY HILL, OLD WIVES LEES

Representations have been received from the following consultees:

347 Katherine O'Donovan	2051 Paul Mason
914 Alan Rogers	2053 Sharon Mason
1774 Doug Marriott	2054 Julia Kennett
1259 Kent Downs AONB Unit (Katie Miller)	2055 Marc Stickels
1385 Jane Marriott	2293 Peta Grant
1826 Lee Evans Planning (Jeanne Taylor) for Brian Davis, Ms Maureen Taylor & Mr Richard Andrews	2397 Chilham Parish Council (Geoff Dear)
1884 CPRE Kent (Ashford District Committee) (Hilary Moorby)	2652 Kent County Council (KCC) (Barbara Cooper)
2050 J Hale	

Summary of representations – main issues

Issue – landscape impact 1259 object to the allocation of this site as it would extend built ribbon of development and would be prominent in the AONB landscape, despite mitigation. Also, reference to “North Downs AONB” should be corrected to “Kent Downs AONB”. 347 raises concern about the site’s rural location in the AONB with access to the site via a busy country lane with little possibility of widening, and heavy pedestrian traffic in an area deficient in infrastructure (GP surgery, parking at station, buses).

Response *This site proposes only two dwellings, which in the Council’s view could be accommodated on the site and within the locality without undue pressure on local infrastructure or harmful impact on the AONB.*

Amend policy to correct the name of the AONB to the “Kent Downs AONB”. See Change MC45.

Issue – procedural concerns 1385, 1774 both point out that the site was filtered in Part 2 of the SA, and appeal (APP/E2205/W/15/3139821) dismissed on the site. 2397 comments along the same lines, although it is supportive of a policy in principle. 347 objects to the fact that this site was not included at the time of the Chilham allocations exhibitions.

1884 and 2293 propose that there should be a criteria-based general policy rather than specific allocations for exclusive homes. 1259 also argues that it is inappropriate to allocate sites based on NPPF paragraph 55.

Response *There is a need to provide opportunities for delivering housing which is of an 'exclusive' nature, at the top end of the housing market.*

Support 1826 – supports the policy but proposes three minor changes including removal of siting requirement (paragraph 4.398) as this would restrict architectural innovation; removal of reference to heritage assets (paragraph 4.399) as this duplicates national policy; and removal of reference to Old Wives Lees as the site is more related to Chilham Village.

914, 2050, 2051, 2053, 2054, 2055 provide unequivocal support.

2652 requires financial contributions for the construction of education facilities to mitigate development.

Response *Support noted. The Council is content that the siting provisions (paragraph 4.398) are justified given the potential for impact on the AONB, and reference to heritage assets in the supporting text relates to the particularly large and numerous designations in the vicinity.*

Amend wording to remove reference to Old Wives Lees, given the spatial context. See Change MC45.

Given the low numbers proposed on this site, contributions towards education provision would not be sought from this site as per the restrictions of the CIL Regulations 122 and 123. ABC and KCC will work together to ensure the most effective means of providing for education needs.

POLICY S42: ST MICHAELS – BEECHWOOD FARM

Representations have been received from the following consultees:

327 Ian Bull Consultancy Ltd. (Ian Bull) for Jarvis Land (SE) Ltd (Jarvis)	1966 Tenterden Town Council (Philip Burgess)
1634 Lee Evans Planning (David Stewart) for Caroline Jackson	2292 Peta Grant
1885 CPRE Kent (Ashford District Committee) (Hilary Moorby)	2653 Kent County Council (KCC) (Barbara Cooper)

Summary of representations – main issues

Issue – extension to site boundary 327 seeks extension of boundary to be able to deliver ample curtilages and truly innovative design. Also requests rewording of part a) given that this is not a rural area and so that p55 (NPPF) is not wholly reproduced, proposing the first bullet to read, “Be of high quality design and enhance the immediate setting of the site and defining characteristics of the area’.”

Response *It is envisaged that a low number of dwellings on this site will be designed to fit within the confines of this site as well as allowing for the retention of mature trees and hedges within what is classed as the edge of a rural settlement.*

Agree boundary extension to enable lower density design and layout – see proposed change MC46.

Issue – procedural concerns 1634, 1885 and 2292 contest that a criteria-based general policy is more appropriate for exclusive homes rather than specific allocations, since these are already covered in HOU5 and NPPF (para 55). 1634 furthermore comments that these allocations have not been through SA and are not supported by evidence that exclusive homes are not being provided already in the borough.

Response *The Council believes there is a need to provide opportunities for delivering housing which is of an ‘exclusive’ nature, at the top end of the housing market. The sites were subject to the SA process.*

Support Support received from 1966. 2653 requires financial contributions for the construction of education facilities to mitigate development.

Response *Support noted.*

Given the low numbers proposed on this site, contributions towards education provision would not be sought from this site as per the restrictions of the CIL Regulations 122 and 123. ABC and KCC will work together to ensure the most effective means of providing for education needs.

POLICY S43: BIDDENDEN – PRIORY WOOD

Representations have been received from the following consultees

2035 Biddenden Parish Council	2620 KCC
2239 Delanie Balsamo	

Summary of representations – main issues

Issue – size of the site 2035 There was concern over the possibility that given the size of the plot of land further pitches may be requested. Therefore the parish council would like the wording changed in a) to “The total capacity of the site *should* not exceed 3 traveller pitches”.

Response *The policy already states at criteria “a) The total capacity of the site does not exceed 3 traveller pitches”. Therefore, it is not considered necessary to add ‘should’ to the criterion.*

When a planning application comes forward for the site the Parish Council will be consulted in accordance with the guidelines in the Council’s Statement of Community Involvement.

Issue – principle of development 2239 does not believe that travellers should take over a wooded area in this village. We have already had a new housing estate built here in the last two years and continued expansion will upset the neighbourhood and cause problems within the village, not to mention the upheaval, noise and dust/dirt. Green Spaces in Kent should be conserved. I can only foresee problems for the village if this proposal goes ahead.

Response Travellers will not be taking over a wooded area, the traveller site is already located on the site and the policy is for the provision of 2 additional pitches. In addition, although the site contains a number of sporadic trees the ancient woodland is located to the south of the site.

Issue – minerals safeguarding 2620 according to British Geological Survey safeguarding data, Sandstone (Tunbridge Wells Sand Formation) is present within the allocated site and are vulnerable to sterilisation.

Response As the site is being proposed for gypsy and traveller uses, the structures on the site are likely to take the form of static homes, touring caravans and amenity blocks, all of which will not sterilise the underlying mineral deposits as with exception of the amenity blocks they are all moveable.

POLICY S44: WESTWELL – WATERY LANE

Representations have been received from the following consultees

332 His Honour Scarratt	1627 Margery Thomas
346 Sarah Scarratt	1630; 1671; 335 Farrington
349 Dean and Corrina Goodearl	1641 Michael Briest
734 Vivian Bailey	1738 Linda Perfect
892; 1632; 1633; 1635; 1636 Westwell Parish Council	1812 CPRE Kent
1263 Kent Downs AONB	1973 Celeste Muir
1313 Dean Warren	2148 Anne Thomas
1368 M Holder	2153 Roland Thomas
1386 Michael Briest	2384; 2385 Tarmac Ltd
1481; 1483; 1484; 1485; 1486; 1487; 1488; 1489; 1490 David Burke	2476 Ward Member Downs West Cllr Krause
1549 Claire Warren	2621 KCC
1606 Jacqueline Woodley	

Summary of representations – main issues

Issue - Harm to the AONB (including landscape issues) 892; 2384; 1812; 1627; 1738; 1973;1606; 1549; 1641; 346; 2153; 2148;1386; 1549; 1973; 1671; 335; 1483; 1484 all object to this allocation on the grounds that the proposed development would not conserve and enhance the Kent Downs AONB. The AONB should be offered the highest level of protection, as set out in NPPF. The site would be visible from the motorway, which was

deliberately designed to transverse the AONB at Grade. It is important that the Council prefers sites which are less harmful in their impact and this is a key element in delivering sustainable development.

1263 The AONB Unit is concerned that the allocation of Area B for an additional 4 pitches would fail to conserve and enhance the Kent Downs AONB. The identified land would result in an intrusion of development into the open countryside, beyond an established line of development to the west that would be unrelated to existing features on the site and would fail to respond positively to the existing character and quality of the landscape. Area B would be visible in views from the motorway, unlike Area A which is largely screened by existing vegetation. The formation of a new access to serve site B will require breaking through an existing bank and the loss of established trees, adjacent to the highway, opening up views into the site and degrading the rural character of the lane.

1263; 2153; 2148; 1368; 335; 1485; 1633 Noise mitigation measures with substantial bunding or acoustic fencing is undeliverable and if implemented would destroy the open character of the AONB. The settled community on the other side of the motorway have been trying for years to get noise reduction to the motorway without success this they were told was due to it being in the AONB and no funding being available.

2476; 1606; 892; 1633 The provision of acoustic protection is impractical and the required protection stated in the decision notice of the temporary planning application has still not been provided. The provision of acoustic protection is impractical at this low population level.

1738; 1606; 1641; 1313;734; 346; 332; 1633 The trees and vegetation surrounding the sites are deciduous and in the autumn and winter months the site is very visible on the landscape and because the land rises from Watery Lane the DW8 site will be visible in the summer from surrounding properties particularly Keepers. 734; 346; 332; 1633 states that rubbish from the existing site is clearly visible.

2476; 335; 892; 1368; 1633 ABC has made the assumption that the character of the AONB is not worth preserving because of the presence of the M20 and CTRL and that any landscaping surrounding the S44 development would represent enhancement - this is erroneous and unsound because it does not accord with the need to maintain the open farmland character of the landscape as set out in the AONB management plan and the Landscape Design Handbook. 1368 states the NPPF does not seek to categorise the AONB into zones of less or more sensitive quality and it is not appropriate for the Council to conclude that just because a site lies between the M20 and a rail line that it amounts to less important AONB. 1633 The openness of this site still has the retained character of the AONB. The landscape has not been changed by the motorway running through it (the residents of Westwell parish would be happier if it had done so to provide some noise screening by modifying the topography).

1313; 1812; 1633 The proposed development would not conserve and enhance the Kent Downs AONB. The site would be visible from the motorway, which was deliberately designed to transverse the AONB at Grade. It is important that the Council prefers sites which are less harmful in their impact and this a key element in delivering sustainable development. 1313 States the site lies at a higher elevation to the highway.

1484; 1485 The proposed development set out under draft policy S44 does not meet the requirements for maintaining visual amenity. Whilst the drawing shown depicts the proposed area of land to be developed, it does not provide any meaningful detail in terms of layout, scale, design and appearance and how the proposed development might be considered as appropriate to the character and density of its surrounding area, and comply with the requirements of the AONB designation.

892; 1263 The allocation of DW7 and DW8 conflicts with the CROW Act 2000 Section 82, NPPF 115, 123, 124 and 125, the AONB Management Plan and Landscape character assessment and guidance. 1313; 1483 This policy does not comply with the AONB management plan policies SD1 and SD3- At no time during the appraisals and assessments of these sites, does it mention that the stakeholders for the AONB have been invited to comment, or been consulted.

1368; 335; 1671 With the SA Scoring System, it is clear that AONB's have been afforded no greater weight than other rural areas. While the Council have added a footnote as set on the importance of the protection of AONB's the scoring system is applied inconsistently such that the plan cannot be considered to rest on a credible evidence base. More effort should be undertaken to find alternative sites outside of the AONB. 1368; 335 Council have not looked adequately for sites for gypsies and travellers that are not located in "sensitive areas". A failure to search adequately for such sites means that the Council have failed in their application of Paragraph 115 of the NPPF.

1633 The cumulative visual impact would be significant as this site would be on higher ground in the open landscape. There would therefore be cumulative impact from adding this site behind the existing DW7 site. 2384 Traveller accommodation does not rely on specific infrastructure in the same way as a tarmac railhead and therefore their location in the AONB is not justified.

1313; 2476; 1641; 1483 In the words of the Planning Inspectorate on the appeal of the planning application to grant current temporary planning on DW7 (Ref APP/E2205/A/13/2190874): "In my view, the proximity of the negative landscape elements I have described places greater emphasis on the need to protect remaining open areas and should not be a reason to justify further development in the AONB".

1313 In 2006, there was a planning application rejected for the storage of 50 caravans (06/00280/AS). The reasons for rejecting this was due to the location/preservation of the AONB, highways not suitable for the passage of caravans and safety issues.

1313; 346; 332 This development of these two sites, DW7 and DW8, would class as a major development as the proposed site in total is in excess of 4ha. Para 116 NPPF states that major development proposals should be demonstrated to be in the public interest before being allowed to proceed and that consideration of such applications should include an assessment, of amongst other things, the cost of, and scope for, developing elsewhere outside the AONB, or meeting the need for it in some other way.

1487 The NPPF does not support a development comprising a caravan park on land designated as an AONB. 1738 Further development of this land would conflict with AONB policy on dark skies.

Response *This site is located on the edge of the AONB, it is considered that the proposals for development for 5 traveller pitches would not negatively impact on the AONB in this location. The M20 and nearby railway lines have negatively altered the landscape in this location, and in addition to the tarmac works in the vicinity this area now has a more developed feel to it. The previous Inspector didn't agree with the statement that the AONB had changed, rather he upheld the status of the AONB. Now that the temporary permission is coming to end of its lifespan, it seems an appropriate time to reassess the quality of the AONB in this location and it is considered that development for a traveller site is suitable in this location.*

With regards to the site selection process, the Council undertook the same scoring exercises for all sites within the Sustainability Appraisal, of which the assessment criteria had been consulted upon with statutory consultees. The AONB is considered within this assessment.

To enable the Council to re-run a specific 'call for Gypsy & Traveller sites' process, and to ensure an up to date evidence base on the topic of Gypsy and Travellers accommodation, it is now the Council's intention to produce a specific DPD relating to the subject, which will support the Local Plan 2030. This has been outlined in the recently adopted Local Development Scheme – May 2017. The DPD will aim to update the evidence base and identify further sites for allocation. The initial consultation and evidence gathering stages will commence in late 2017, with proposed Adoption planned for early 2019.

Issue - Health and wellbeing of future residents (noise and pollution) 892; 1821;1630; 1627; 1738; 1606; 1641; 1313; 346; 332; 1386; 1671; 1812; 892; 1489 The Council has a responsibility to the health and wellbeing of its residents. The siting of residential uses in a location such this with disregard for potential noise and pollution related impacts cannot amount to sustainable development. The health and well-being of the current generation is important. You would not put housing development in this location. 1489 adds that the Council is in breach of the Human Rights Act 1998 (discriminatory against travellers)

2384; 2385; 2476; 1641; 1313 Opposite the site is the Hothfield Tarmac works, which is a safeguarded rail depot; policy CSM11 of the MWLP. The tarmac works can produce high noise levels and therefore criterion (a) should be extended to ensure that noise mitigation for the site allocation for the wider noise landscape should be provided, not just on the northern boundary with the M20, especially as caravans/statics may not have the same noise attenuation as other buildings. Tarmac considers that "great weight" should be placed on protection of the Hothfield Works and that intensification and release of additional land for gypsy accommodation at Watery Lane in accordance with Policy S44 is in conflict with national policy and emerging Minerals and Waste core development strategy.

2384 acknowledges that the existing residents have not complained about the noise levels. However, have concerns that noise levels may impact on future residents.

1481 This is an isolated site in the countryside with no support from Ashford Borough Council. To expand it would be contrary to Traveller pitch design guidance and support to manage multiple pitch occupation would not be available. The only supportive factor for this proposal is that there is already a temporary permission granted

Response *It is noted that the existing residents of the site have not complained about the noise. There are also sound proofing, acoustic products available which would mitigate any noise impact that might be available. It is specifically set out in the policy that acoustic barriers should be provided to protect from noise from the M20 motorway.*

With regard to pollution and the impacts of quality of life, it can be identified from aerial photography and mapping of the urban area there are hundreds of dwellings directly adjoining the motorway sidings in Ashford, and although, this is not ideal people do choose to live in these locations.

Issue - Transport (and parking) 1812; 1630; 1627; 1549; 1641; 346; 332; 1386; 1549; 335; 1812; 1488; 1489; 1633; 1313; 346; 332; 335; 1812 argue that the site is not sustainably located in terms of access to essential services and facilities. The winding rural road with no footway will discourage walking and cycling and it is clear that the residents of the site will need to rely on the private car to access schools and shops, the nearest of which are 4km and 4.5km away respectively. 1313 points out that the closest open public spaces are >2km from DW7 and DW8, being either Hothfield Common, or Westwell Village. These are largely reliant on a motor vehicle given the safety aspects of walking along the busy country lane/road.

2153; 2148; 1486; 1488; 1489; 1633; 1313; 1671; 335 This is an isolated site in the country side with no footpaths, fast moving traffic, and articulated lorries visiting local farms. 1486; 1488 Also states that children could be living on the site. 1489 states that S44 does not meet the requirements of paragraph 34 NPPF that “plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised.”

1486 The proposed site set out under draft policy S44 does not address how a safe access to and from the public highway will be achieved, it is not possible to provide a new access. The proposed site does not have an existing safe entrance, nor is access from the site onto a road that has any pedestrian facilities.

1633 The access proposed to Watery Lane is not available for DW8 as the part of the site shown adjacent to Watery Lane on the DW8 submission is either DW7 or Sunnybridge farm. It implies a new access onto Watery Lane down a steep bank : this would be opposed by Highways The implication that this was an extension of the existing temporary single pitch is both wrong and misleading . It is in fact a separate agricultural area behind DW7, proposing an access to Watery lane through Sunnybridge farm which is unavailable.

892 Proper management of the existing access cannot be achieved until ownership of the small triangle of land between the motorway and site DW7 has been ascertained. It is in several ownerships and the site is used for fly-tipping and illegal vehicle storage.

1486 Whilst it can be reasonably assumed that each pitch will have parking for more than one vehicle and (possibly) stabling for horses, the proposal does not set out any detail on number of parking spaces or extent of stabling to be provided, internal driveway design and turning areas to be provided, whether driveway to the extended site will be wide enough for vehicles to pass, etc.

1633 The railway mentioned in the SA is the Maidstone line not the CTRL, which is the boundary of the AONB.

Response *Despite the site being on the outskirts of the village, it is only a short distance from the edge of the urban area of Ashford.*

It is acknowledged that the site access is incorrect and is on land owned by Sunnybridge Farm. Site access has been amended, see proposed change MC47.

The ownership of the triangle of land between the allocation and the M20 could be investigated further as this could provide a more inclusive policy, but this would not essentially change the policy.

Noted - Sustainability Appraisal site assessment will be amended. Replace 'CTRL' with 'Maidstone Line'.

Issue - Flooding (and water) 346; 332; 1627 note that the site is liable to flooding. 1313 Flooding on Watery Lane is a constant problem during the winter months and during periods of heavy rainfall. Additionally, the development of these sites would require hard standing, creating an increased risk of further flooding on to the lane and also to DW7 following the topography of the land if DW8 was to be developed. 1633 Further to the SA the site has no water supply nor sewerage services.

Response *The site is not located in either Flood Zone 2 or 3. Therefore, it is considered that no changes need to be made.*

Issue - Sustainability Appraisal 1632; 892 site policy S44 has not been subject to SA, only the inputting site submissions DW7 and DW8.

892 The council should commit to being leading edge on sustainability appraisal and community partnership on G&T accommodation policies working positively and visibly with parishes as it does on other housing policies. The present temporary personal permission on DW7 runs to August 2018. That review should coincide with further information being available on alternatives and a community liaison approach.

1481 Representation sets out proposed alternative questions that should be asked in the SA. 1633 The site description is that it cannot be seen from Watery Lane. This is incorrect: it can be. 1633; 1635 There are flaws in the SA approach, meaning the site would not have been allocated had they been assessed correctly. DW8 is not available.

1368 it is not understood how the Council refer to this site as being close to the edge of Ashford. Even as the crow flies the site is over 2KM from the outer edge of the Town. 1633; 1313 The site is incorrectly described as 1.4 km from the urban edge of Ashford . It is actually 2.9 km from the urban edge of Ashford (if that is taken to be Sandyhurst Lane) and 4.5 Km to the nearest facilities (waitrose) .

1633; 335. The nearest primary schools are either at Charing, or Repton Park: both over 4km away. There are not 3 schools within 3km as stated in the SA. It may be that the survey assumed Hothfield school was available : it is no longer a primary school.

1633: The IMD refers to Hothfield which is the neighbouring parish over 1km away. The DW7 site is in Westwell parish which is not in a Lower Super output area and is strongly cohesive and supportive

1633 Sustainable travel: route 17 listed under 8.2 runs through Westwell village but is a mountain bike leisure route along the pilgrims way in either direction and not an alternative for everyday travel.

1738; 1313; 1368 There are discrepancies as to the results of some of the SA's compared with others. 1.7/002A was rejected due to the topography of the land and the effect on the nearby properties; site WC20 which currently has two pitches but further development would have a detrimental impact; 1738 The fact that Cob Tree Meadows site Ref 11/01048 is not in AONB but 200 metres away was rejected for its close proximity. This Rep questions the distances applied in the Sustainability Appraisal, stating that facilities are further from the site than are stated.

1313 The Sustainability Appraisals carried out in Dec 2015, showed that other sites had a higher SA score than DW7 and DW8, but the cumulative effect would make them unsuitable for development. e.g WC7 Tyrol Farm, GCS1 Nickolls Quarry and WS2 South of Iron Works. The proposal does not state that DW7 and DW8 would be strictly limited to 5 pitches combined, only a 'suggestion'.

Response *All areas are located in a Super Output Area and the site is located in a SOA that scores relatively highly on the SA. National cycle routes are not intended to account for everyday travel but are contained within all SA site assessments.*

No change needed. SA scoring matters, and any changes which may affect those (such as school closure) are addressed in the SA Addendum Report)

Issue - Alternative Sites 892 The Council should amend the strategy to commit to a further search for sites, as proposed in para 1.16 of the G&T Sustainability Appraisal of May 2016, but not implemented.

1632; 1633 Para 4.3.9 of the SA This paragraph relates to engagement with local people and states that ABC place great emphasis on working with local communities particularly in villages and this has contributed to the choice of allocations and shortlisted sites. With respect of the allocation of DW7 and DW8 the views of the Parish, with their local knowledge, should be heeded. There was no discussion of these sites.

Response *The Council's preferred approach is to prepare a separate DPD that deals with Gypsies and Travellers. This is the correct vehicle to search for additional sites and the Council is committed to that approach. As part of the preparation of that DPD there will be renewed engagement with local organisations, including Parish Councils.*

Issue - The existing Temporary Pitch (and previous planning applications) 1633 The site as submitted suggests that it is an integral extension of the DW7 site. That is not correct. DW7 and DW8 are separate adjacent sites in separate, unrelated ownership. The occupants and agent of DW7 had no knowledge that DW8 was being submitted. 892 Unifying the two sites is undeliverable since this would not be acceptable to the owner of site DW7.

1313 Temporary planning permission for DW7 was partly granted as the current family did not want to live on a larger site due to anti-social behaviour. The submission form that was accepted by the Council for DW8 stated suitable for 5 – 10 gypsy pitches. S44 appears to envisage a privately run combined site of DW7 and DW8. These are not owned by the same landowners, so how could this be a possibility.

1606 There is already anti-social behaviour on the site and this will only increase if the site is made larger. 892 the small triangle of land between the motorway and site DW7 is in several ownerships and the site is used for flytipping and illegal vehicle storage. 734 we have the problem of their trotters racing round our country lanes, which are narrow and cause obstruction, we are a farming community, and there are tractors, combine harvesters etc, so do not need extra traffic.

2476; 1638 The Council has previously refused a planning application on these sites and such decisions including appeal decision should be upheld. We also consider that the Council's consideration of the site is inconsistent with the Council's own decision relating to the site under reference 14/01508/AS

2476 The policy states that the personal permission be removed off this site. Given consideration that the Borough Council does not own or 'control' this site, how is this Policy Condition to be enforced? If the current applicant owns the land then what law gives the Borough the right to enforce occupation by all and sundry on others property? 2476 in almost 4 years of usage the current applicant could not maintain the Conditions set by the Planning Inspectorate for their own occupancy.

Response *It appears that the current occupants of Site A have supported the proposed allocation (see below).*

Issue - Travellers, sites and Management 892 In the light of the comment that the majority of the traveller community in Ashford have a settled lifestyle, the plan could also be made sound if ABC undertook to establish an up to date register of Travellers who travel vs those who don't : this could recalibrate demand for sites

1313 The government state that larger sites should be avoided due to cumulative anti-social behaviour and this is mirrored by the fact the Council owned site at Chilmington Green has vacancies for this reason. The Council have not stated that they have plans to reduce or improve the conditions here, nor are they allowing further development of other available plots in this Chilmington Green area.

2476 due to the importance and sensitivity of the placement of Gypsy & Traveller Sites and given the historically better governance by Kent County Council such sites should be found and managed by that Authority. ABC does not have the expertise to manage such sites. The Borough Co wants to open the 'gates' to anyone to camp on land owned by others – I do not consider that this idea is credible.

Response *To enable the Council to re-run a specific 'call for Gypsy & Traveller sites' process, and to ensure an up to date evidence base on the topic of Gypsy and Travellers accommodation, it is now the Council's intention to produce a specific DPD relating to the subject, which will support the Local Plan 2030. This has been outlined in the recently adopted Local Development Scheme – May 2017. The DPD will aim to update the evidence*

base and identify further sites for allocation. The initial consultation and evidence gathering stages will commence in late 2017, with proposed Adoption planned for early 2019.

Issue - Agricultural Land 1487; 2153; 2148 The site is agricultural land. 1487 Agricultural land in the Westwell area has restrictive covenants that preclude the occupation of caravans other than for short periods by farm workers when they are temporarily employed in agricultural and forestry activities. 1313 DW8 is located on Grade 2 agricultural land which is also a mineral site. Both sites are of Archaeological interest and are close to the Conservation Area of Beechbrook Farm.

Response *Noted – It is acknowledged that Site A is Grade 3 and Site B is Grade 2 agricultural land, however the NPPF does not include an exceptional circumstances test for the use of higher Grade agricultural land. Para 112 of the NPPF states that ‘where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality’. The use of agricultural land is one of many factors which need to be considered and balanced against each other in deciding which are the most appropriate sites to allocate for development. Full assessment of all of the factors has been carried out through the Sustainability Appraisal and this site has been considered against the other reasonable alternatives. On balance whilst the development of this site will result in the use of Grade 2 agricultural land, it is considered that this site is an appropriate option taking into account the other alternatives available.*

The whole area around Westwell and Tutt Hill is in an area of potential archaeological importance, which is not a constraint to development with regards to allocation. Conditions may be placed on any subsequent planning applications to deal with this matter. There are no nearby Conservation Areas or other heritage assets.

Covenants are not a planning matter.

Miscellaneous 892; 1738; 1630; 1606; 1263 The policy as written is against what is stated in the windfall Traveller policy HOU16. 892 additionally states that DW7 and DW8 do not conform to policies ENV3 and ENV4.

2621KCC Local Minerals- Sandstone (Folkestone Formation) is present within the allocated site and is vulnerable to sterilisation

Response *It is noted that the site is located in a mineral safeguarding area. However, because the site is being proposed for gypsy and traveller uses, the structures on the site are likely to take the form of static homes, touring caravans and amenity blocks, all of which will not sterilise the underlying mineral deposits as with exception of the amenity blocks they are all moveable.*

Support 349 This representation is in support of policy S44 insofar as it relates to area 'A' on the plan set out above in paragraph 4.409. This land is already in use as a pitch for a gypsy family, and meets the family's accommodation needs and travelling way of life. It has little impact upon its surroundings. Specifically, it is noted that at paragraph 4.42 it is stated that it would be acceptable to keep areas 'A' and 'B' independent in their own right. This is

the approach that the respondents would strongly prefer, and they have no wish to be incorporated into area 'B'.

Response: Support noted.

POLICY HOU1: AFFORDABLE HOUSING

Representations have been received from the following consultees:

284 TG Designer Homes	2093 Geraldine Dyer
535 Courtley Planning Consultants	2157 Shadoxhurst Parish Council
818 Prima Paper Services Ltd	2180 Kingsnorth Parish Council
837 Lewis	2268 Permission Homes and Taylor Wimpey
1224 Paul W Bartlett	2285 Peta Grant
1275 Kent Downs AONB Unit	2429 High Weald AONB Joint Advisory Committee
1357 Hobbs Parker Property LLP	2483 Hallam Land Management Ltd
1403, 1404 CRPE Kent (Ashford District Committee)	2548 Bellway Homes Ltd (Kent)
1674 Ashford Access	2686 Gladman Developments
1857 Gillian Bromley	2225 Hamlin Estates Ltd
1869 Homes Builders Federation Ltd	2723 Crest Strategic Projects
1967 Tenterden Town Council	2580 Jarvis Land LLP
1994 Rentplus UK Limited	2083 Mr P and Mrs L Cameron and Barnes
2060 Paul Browne Homes	

Summary of representations – main issues

Issue - Level of affordable housing 1224 object to the policy, stating that the town centre should be required to provide on-site affordable housing as part of effective town centre master planning, and there will be a scarcity premium associated with town centre development, which should create enough value to result in sufficient profit to enable developers to provide affordable housing. Empirical evidence supports the fact that housing develop remains a highly profitable activity.

2157 considers that the level should be increased to 40% in order to ensure that development on the edge of Ashford provide sufficient affordable housing to meet the needs of the villages just outside Ashford (including Shadoxhurst) as these are limited in the amount of affordable housing they can provide, and there is not enough to satisfy the demand.

837, 1674, 2285 support the level of affordable housing provision in the 'Rest of Borough' area.

2225, 535, 284, 818, 2060, 2083 raise concern regarding the overall level of affordable housing required in the 'Rest of Borough' area and the impact upon development viability

535 raises concern that requiring 40% affordable housing in the rural areas will prohibit brownfield sites from coming forward, and the target for 1000 windfalls over the plan period, will not be met. The viability assessment does not include an assessment of such sites. Setting a more realistic target of 30% would encourage brownfield opportunities to come forward.

535 also considers that the level of affordable housing required in the 'Rest of Borough' has not been informed by a rural housing strategy or a rural affordable target, stating the Council should not be relying on rural windfall sites to meet any viability shortfalls for affordable housing in other areas of the Borough.

2060, 2083 states that the approach is too onerous and not justified.

284, 2060 and 818 recommend the requirement in the 'rest of Borough' be reduced to 30%

1869 objects to the level of affordable housing, stating that the viability work provides evidence of marginal viability on key strategic sites. It proposes that the Council should consider the efficacy of other policy requirements internal space standards, external space standards, the application of Part M4 (3) and policy EMP6, if it wishes to prioritise affordable housing.

1674 states that consideration should be given to equal standards of affordable and buy to rent as any private development.

Response *The Housing White Paper February 2017 indicates a change in national policy regarding affordable housing provision. It is has therefore been necessary to review the policy approach in relation to the overall levels of affordable housing required and the mix of tenure proposed. See new Policy HOU18.*

The revised policy has been informed by viability testing and it is considered that the required levels of affordable housing, when taking into account all other policy requirements in the Plan, will in the majority of cases be viable. The policy allows for flexibility where there are site specific circumstances which mean that is not the case.

Issue - Policy threshold 284, 2060, 2083 and 818 consider the policy threshold to be too low, which would impact upon the viability of schemes and affect delivery. It also conflicts with legal advice as set out in the Court of Appeal Order dated 13th May 2016. It is requested the threshold be increased to 15 dwellings.

Rep 2060 states that the threshold is not justified.

Reps 1357, 1869, 2580 state that the threshold of 10 dwellings is contrary to NPPG which states that contributions should not be sought from developments of 10 units or less, requesting the threshold be changed to 11 dwellings or more, or where combined gross floorspace is more than 1,000 square metres.

1275, 1403 and 2429 request a lower threshold for affordable housing on sites in the AONBs, of 5 dwellings. There is a crisis in rural areas compared to urban areas where only 12% of stock is classified as 'social' and earnings in the countryside are well below those in urban areas. Therefore in the rural areas and particularly in AONBs there remains a need for social provision of affordable homes. Without an adequate supply of AH within AONBs there

is the risk that this will undermine the ability of those on the lowest incomes to live and work within the AONB and settlements will become predominantly for commuters and second home owners. NPPG at para 031 Reference ID 23b-031-20160519, allows LPAs to choose to apply lower thresholds in designated areas.

Response *The Housing White Paper February 2017 indicates that the government is proposing to change national policy so that a minimum of 10% affordable home ownership products be provided on sites of 10 units or more (or 0.5+ hectares). It is therefore justified to utilise this threshold.*

The viability evidence demonstrates that affordable housing can be achieved at the threshold proposed.

It is not considered that reducing the threshold within AONB's in the Borough is justified or would necessarily deliver additional affordable housing in the AONB's.

Issue - Flexibility 2268, 2548, 2723, 2483 and 2868 consider that the policy needs to allow for greater flexibility in provision if viability evidence supports it.

2723 considers the policy is not effective, because there is an inconsistency in the wording of the policy. Strong support is provided for the penultimate para of HOU1 and the first para should be amended to ensure it is consistent and flexible.

2483 raises concern regarding the affordable housing requirement, as the viability work illustrates there is little scope for increase costs without drawing into question the extent to which 30% can be achieved without the scheme becoming unviable. The flexibility provided by the deferred contributions approach prioritises affordable housing and enables deferment of infrastructure contributions. There may be instances where the more appropriate response would be to reduce the proportion of affordable housing to ensure the necessary infrastructure is provided. This is especially relevant on large sites where infrastructure is considered critical. The policy therefore needs to allow greater flexibility in instances where the affordable housing requirement cannot be met.

Response *See proposed change MC48*

Issue -Tenure Split 837 consider the provision of 10% affordable rent in the rural areas is too low. The evidence from local needs surveys show the majority in need cannot afford shared ownership or starter homes.

Response *The Viability assessment work carried out for the council has indicated that up to 15% affordable rent could be provided by rural housing developments but only in the context of a reduced overall affordable housing requirement of 30%. On balance, it is considered that the policy target should remain at 40% in the rural areas as this will generate a greater overall quantum of affordable housing – as a consequence, the viability evidence indicates the affordable rent requirement should remain at 10%.*

Issue - Starter homes 1403 proposes that the policy wording should be sufficiently flexible to allow the Council to respond to the Starter Homes regulations as they emerge.

2093 supports the high importance given to starter homes

Response Agree – see proposed change MC48.

Issue - Exclusive homes 1403, 2180 objects to the reference to exclusive homes, which should be removed from the policy.

Response Agree – none of the allocations for exclusive homes are greater than 0.5ha, reference can therefore be removed from the policy. See proposed change MC48

Issue - Available in perpetuity 1403 states that the policy should make clear that affordable homes built on rural exception sites should remain affordable in perpetuity, otherwise the number of affordable homes will reduce over time.

2180 considers that housing designated for local residents in, for example, Kingsnorth should remain available in perpetuity and not be allowed to become full market values

Response This policy does not specifically relate to rural exception sites, it would therefore not be appropriate here, however, the issue of retaining affordable housing in the ownership of Registered Providers will be governed by the Government's intention to extend the Right to Buy to such properties.

Issue - Discounted rented homes 1994 states that the Council should plan for the inclusion of affordable rent to buy, in the form of Rentplus. This tenure of housing can meet the needs for affordable housing which are not currently met by both affordable and market housing, and also serve to improve development viability and deliverability. There is ready availability of private funding for Rentplus, which offers significant scope for early delivery on sites across the Borough. This affordable model would help to maximise the affordable housing provision across the plan period.

Response See proposed change MC48.

Issue - Priority for local residents 2285 strongly advocates priority for local residents in the provision of affordable and starter homes.

Response The affordable rented provision is only available to those on the Council's Housing Waiting list, which is subject to local connection criteria.

Support 1967 and 2093 fully support the policy. 2268, 2686 and 2548 have no objection in principle subject to minor changes in relation to flexibility (see above).

Response Support noted

Other issues

Housing mix 1404 proposes the insertion of a new policy (Mixed and balanced communities) to ensure that new development include a mix of housing, types, tenures and sizes, in order to ensure there is a range of accommodation types (such as lifetime homes, extra care), and for downsizing. This is supported by the SHMA.

2157 considers it important that new builds provide a variety of dwelling types and sizes, and not just large four bedroom homes which bring the highest return. There is a local need (Shadoxhurst) for housing for young people. The mix should also include bungalows to provide for downsizing.

Response Agree – a new policy on housing mix is included in the Local Plan HOU18.

POLICY HOU2: LOCAL NEEDS/SPECIALIST HOUSING

Representations have been received from the following consultees:

105 English Rural Housing Association	2181 Kingsnorth Parish Council
853 Westwell Parish Council	2268 Peta Grant
1408 CRRE Kent (Ashford District Committee)	2308 Christine Craib
1500 Newenden Parish Council	2496 The Mersham Estate
2129 Mary Walton	2662 Charing Parish Council
2158 Shadoxhurst Parish Council	

Summary of representations – main issues

Issue - Cross-subsidy 105 raises concerns regarding the use of Starter homes as cross subsidy on exception sites. Starter homes are described by the Government as affordable housing and therefore it is not appropriate or viable that they be included as a mechanism of generating cross subsidy for affordable rented homes.

105 comments that it may be viable in some villages, but not in others, to introduce custom build as the cross subsidy element.

1500 consider given the current financial climate it may be impossible for Housing Associations and other providers to create local needs housing without subsidies.

2662 considers that open market housing will often be needed to deliver local needs housing given reduction in government subsidies. Do not agree that this should be restricted to starter homes and self-builds.

105 consider open market housing needs to be accepted as a cross subsidy, subject to robust viability evidence if other forms of cross subsidy are not viable.

105 and 2662 suggest that bungalows for people to downsize could provide the cross subsidy, as well as meet housing needs of the local community.

Response – Policy HOU2 does enable general market housing to be used to enable the provision of local needs housing but it is reasonable and appropriate for other forms of ‘affordable housing’ or self-build to be considered first in any viability assessment. If this is not the case, there is a danger of added residential ‘hope’ value being attached to potential local needs sites making them harder to deliver per se. No change to policy proposed.

Issue - AONB and other criteria

853 raises concern as the policy fails to mention the AONB, and recommends the following be added to the policy to ensure it is in line with NPPF and CROW Act 2000.

'Where a proposal is located within or in the setting of an AONB, it will also need to demonstrate that it is justifiable within the context of their national level of protection and conserves and enhances their natural beauty'

1408 raises concern that it is inappropriate to discuss landscape impact, and amenity of neighbours in isolation, as this infers other policies in the plan are less relevant. It recommends the criteria be amended to the following:

'(a) The local need for affordable housing, or requirement for specialist housing, is clearly evidenced;

(b) The scheme has the support of the relevant Parish Councils,

(c) The development is well designed, appropriate in location, scale and character and would not result in an adverse impact on the character of the area or the surrounding landscape; the proposed development is appropriate to the size / scale and character of the village, and is acceptable in terms of other detailed considerations, such as impact on residential amenity, landscape, historic assets, and biodiversity interests, highway safety, and access.

(d) There would be no significant impact on the amenities of any neighbouring residential occupiers'

Response - *There is no specific need to reference the AONBs or their setting in this policy as this is considered specifically in other policies in the Plan. With respect to rep 1408, it is accepted that reference could be made to the need to ensure that the development is appropriate to the size, scale and character of a settlement to ensure it is appropriate in sustainability terms. Therefore, a proposed change to criterion (c) of the policy is justified – see proposed change MC49*

Issue- In perpetuity 1408 states that reference should be made to new homes being delivered on exception sites will be kept in perpetuity as affordable housing for local people. This restriction would not apply to starter homes used as an enabling element.

Rep 2158 comments on the conflict between housing provided for local needs in perpetuity with the occupiers 'right to buy' and seeks guidance on how this works in practice

Response - *The issue of retaining affordable housing in the ownership of Registered Providers will be governed by the Government's intention to extend the Right to Buy to such properties. Planning policies will not be able to override national legislation.*

Issue- Downsizing 2181 supports proposals for specialist housing especially smaller housing allowing for down-sizing.

Response – *the support is noted and it is agreed that enabling downsizing opportunities for local people is likely to be a growing issue in the future.*

Support 1500, 2129, 2181, 2286, 2308, 2496 support the policy. 1408 broadly supports the policy subject to detailed comments (see above)

Response *Support noted.*

Other issues 2129 supports draft Local Plan as it affects Wittersham. Open market housing is not wanted in Wittersham.

2158 considers 'normal' housing sites planned should be made available for local needs housing.

2496 comments that local communities may wish to bring forward residential development in conjunction with a community facility as a form of enabling development. Such schemes could deliver a proportion of local needs housing. Such composite proposals would present a true form of community-led development that is supported by the Localism Act 2011 and Chapter 8 of the NPPF.

Response - *Comments noted. Local Needs housing is facilitated by being brought forward on sites that would not normally be permitted for general demand housing.*

Please note the representations made against HOU3, HOU4 and HOU5 raise many overlapping issues. Therefore the summaries of the representations, as well as their responses, have been combined.

POLICY HOU3: RESIDENTIAL DEVELOPMENT IN ASHFORD URBAN AREA

Representations have been received from the following consultees:

1412 CPRE Kent (Ashford District Committee) (Hilary Moorby)	2108 Ashford Borough Council (Geraldine Dyer)
1747 Friends Life, AXA Real Estate and DMI Properties Ashford Ltd	2526 Wye with Hinxhill Parish Council (V McLean)
1833 Mr and Mrs Jackson	2587 Jarvis Land LLP
1847 Chris Foley and Family	2688 Gladman Developments (Mat Evans)
1873/1902 Home Builders Federation Ltd (James Stevens)	

POLICY HOU4: RESIDENTIAL DEVELOPMENT IN THE RURAL SETTLEMENTS

Representations have been received from the following consultees:

285 TG Designer Homes (Anthony Ralph)	2063 Paul Browne Homes (M Browne)
383, 546 Courtley Planning Consultants Ltd (Howard Courtley)	2075 Thomas Bates and Son Ltd (Josh Bates)
819 Prima Paper Services Ltd (Grant Mahoney)	2085 Mr P and Ms L Cameron and Barnes
831 Stephen Penny	2105 Ashford Borough Council (Geraldine Dyer)
838 Lewis	2159 Shadoxhurst Parish Council
854 Westwell Parish Council (Sue Wood)	2182 Kingsnorth Parish Council (Len Bunn)
893 Wittersham Parish Council (Yvonne Osborne)	2198 Barton Willmore on behalf of Hallam Land Management Ltd
1278 Kent Downs AONB Unit (Katie Miller)	2226 Hamlin Estates Ltd
1338 Peter Brett Associates (Tim Allen)	2307 Christine craib
1355 Hobbs Parker Property LLP	2427 High Weald Joint Advisory Committee
1415 CPRE Kent (Ashford District Comittee) (Hilary Moorby)	2417/ 2428 High Weald Joint Advisory Committee (Clare Tester)
1501 Newenden Parish Council (Ake Nilson)	2491 The Mersham Estate (Michael-John Knatchball)
1747 Friends Life, AXA Real Estate and DMI Properties Ashford Ltd (Friends Life, A...	2525/2526/2527/2528/2529 Wye with Hinxhill Parish Council (V McLean)
1749 Friends Life, AXA Real Estate and DMI Properties Ashford Ltd	2587 Jarvis Land LLP (unknown)
1833 Mr and Mrs Jackson	2663 Charing Parish Council (Jill Layland)
1847 Chris Foley and Family	2688 Gladman Developments (Mat Evans)
1873/1902 Home Builders Federation Ltd (James Stevens)	2865 Wheler Foundation (Wheler Foundation)
1969 Tenterden Town Council (Philip Burgess)	2108 Ashford Borough Council (Geraldine Dyer)

POLICY HOU5: RESIDENTIAL WINDFALL DEVELOPMENT IN THE COUNTRYSIDE

Representations have been received from the following consultees:

286 TG Designer Homes	2106 Ashford Borough Council
321 Henshaw	2108 Ashford Borough Council (Geraldine Dyer)
328 Jarvis New Homes	2287 Peta Grant
684 Paul Buggins	2443 High Weald AONB Unit
820 Prima Paper Services Ltd	2494 The Mersham Estate
855 Westwell Parish Council	2690 Gladman Developments
1282 Kent Downs AONB Unit	2866 Wheler Foundation
1325 Elizabeth Buggins	1446 CPRE Kent (Ashford District Comittee)
1340 Peter Brett Associates	2389 Hobbs Parker Planning Consultants

1353	Hobbs Parker Property LLP	2411, 2427 High Weald Joint Advisory Committee
1850	Chris Foley and Family	383 Courtley Planning Consultants (Howard Courtley)
1903	Home Builders Federation Ltd	

Summary of representations – main issues

Issue: Lack of clarity within Policy HOU3: 1833 considers that there is not enough clarity within policy HOU3 with respect to private residential gardens and conservation areas. They consider that Policy HOU4 gives a clearer steer in this regard, as it deals with the rural area. However the same approach should be adopted for Ashford.

Response: *Policy HOU10 specifically covers development in residential garden areas and so there is no need to replicate that here.*

Issue: The overall policy approach is too restrictive

Policy HOU3: 1847 suggests that policy HOU3 is too restrictive in only allowing for windfall development within the confines of Ashford as there will be numerous opportunities adjoining the town which should also be viewed as acceptable in principle. 2587 makes a similar point with respect of promoting their land off Church Hill, Kingsnorth. 1847 feels that adopting this approach would help the 5 year land supply position and meet the windfall assumptions towards the Plan’s overall housing target as set out. 2587 suggests this approach is need to support the wider objective of promoting sustainable growth in general.

1873, 1902 considers that the approach will lead to too many refusals and therefore undermine the likelihood of enough windfalls coming forward overall to meet the wider plan targets.

1873 also considers that the policy relies on ambiguous terms such as ‘significant impact’, ‘development should not harm’ and ‘not result in harm’. These are all very subjective statements.

2526 makes a similar comment in respect of what is meant by significant and local when it comes to heritage assets. The policy approach should simply state ‘harm to nearby heritage assets’, for clarity.

2688 states that the policy should not refer to minor development as this is not consistent with the NPPF. It should simply refer to sustainable development. Scale and impact on settlement would be considered under this term.

Response: *It is accepted that there may be suitable sustainable development opportunities that lie beyond the existing built up confines of the settlement and some adjustment to the policy should be made to bring it more into line with the policies set out in the NPPF. Similarly, there is no need for a specific reference to minor development as schemes can be judged on their own sustainability credentials- see proposed change MC50.*

Significance in respect of assessment of harm to heritage assets is referred to in the NPPF. This should be the appropriate test of impact.

Policy HOU4: 285, 383, 546, 819, 2063, 2085 considers that the list of settlements in policy HOU4 is too restrictive and in effect creates a blanket restriction of development coming forward at the edges of other settlements, some of which in isolation or in combination with others, provide for a range of local services. In addition, they consider that the policy is worded in a negative way, whereas new housing can have numerous positive impacts and benefit the local community. 383 suggests the wording of the policy effectively removes all potential sites, including brownfield sites outside “an existing settlement”, whilst 2226 emphasises that it should not be a requirement for development to be located within existing settlements, as that is inconsistent with the NPPF.

546 also states that policy HOU4 sets out that housing should not displace active employment, leisure or community facilities which in their opinion is contrary to what Para 51 of the NPPF says. 1355 makes a similar point but suggests that viability/marketing evidence should be used to determine if such uses are no longer viable, thus triggering the sites release to residential. In addition, 546 sets out that the wording of policy HOU4 with regards to the AONB needs to be changed as it currently implies that development needs to demonstrate that it is justifiable, but in a number of cases (such as infilling plots within the AONB) they would be acceptable in principle in any event. 383 wants clarity over how the word ‘active’ is defined. Without clear definition, it is believed that it could restrict redevelopment of brownfield sites. For instance, does it include part of the site, an implemented consent or sites which are restricted by environment conditions?

2688 states that the policy should not refer to minor development as this is not consistent with the NPPF. It should simply refer to sustainable development. Scale and impact on settlement would be considered under this term. Rep 383 reiterate that the word ‘minor’ should be removed and the phrase ‘existing settlement’ should be replaced with ‘sustainable rural areas’. 2865 makes a similar comment. They suggest the term minor is not needed and is already incorporated within the context of acceptable integration of the existing settlement. They refer to the village of Charing in this context. 2159 emphasise that the word ‘minor’ is not defined.

Response: *The list of settlements covered by this policy is substantial and significantly broader than the equivalent policy TRS1 in the Tenterden & Rural Sites DPD. It is considered to include all towns and villages of any scale in the borough save for Kingsnorth and Sevington which are proposed to be added to the list.*

The potential loss of employment or other uses is covered by other policies in the Local Plan and so need not be repeated here.

Changes to the policy in respect of development in the AONBs are proposed to address the concerns raised – see proposed changes MC50 and MC51.

Policy HOU5: 286, 321, 328, 383, 546, 820, 1850, 2063, 2427, 2690, 2866 do not believe you can pre-judge what isolated means as it will depend on the merits of the case and the context of the scheme when it comes forward. There is no justification to

limit it to up to 3 dwellings. A scheme above 3 dwellings could very well be sustainable in the context of the NPPF and housing delivery. 2690 contend that this policy in itself is unsound in that it is not in compliance with para 49 of the NPPF, as it does not make a judgement on the sustainability of an individual site, but rather imposes a blanket restriction.

383 objects to paragraph c as they feel it is doubtful that an isolated residential windfall policy can be expected to be 'within easy walking distance of a shop or facility'. Rep 2287 reiterates this, as they suggest that a degree of flexibility should be applied to new developments in the countryside and be enforced where it makes sense, although they acknowledge that Para 55 of the NPPF states that there should be no 'new isolated homes in the countryside'.

546, 820 suggest that in some cases an isolated brownfield site could well be far removed from a settlement, but would have merit coming forward if it removed an inappropriate industrial use or removes an un-neighbourly commercial use, for example in the AONB. This would contribute to meeting housing need – a significant and relevant planning consideration. Copfield Farm in Rolvenden is cited as an example by rep 546. 2443, 2411 agree with the Kent Downs AONB that the policy is too relaxed towards development in the countryside, but feel that the High Weald AONB is characterised by dispersed development. Thus there may be a case for the small scale development within the AONB when it is associated with an existing farmstead and supports the continuation of a productive agricultural unit.

1903 and 2866 set out that Policy HOU5 is ineffective because it basically places so many conditions on development that means it will not come forward.

2389 acknowledges that HOU5 intends to release suitable sites for housing but unnecessarily restricts eligible sites through the inclusion of criterion b. In its current format this excludes all buildings with any low key use.

Response : *It is accepted that an alternative approach to establishing whether a development is sustainable is needed and this is reflected in the proposed changes to the policy. The redevelopment of isolated brownfield sites may have some benefits but there is a general presumption against isolated residential development in the NPPF and so this should not be included within the policy but may be considered on an exceptional case by case basis. The criteria in the policy are necessary to ensure that development is acceptable in all aspects – development not meeting these criteria should not be regarded as sustainable.*

Issue: HOU3, 4 and 5 as a collective 2690 feel that the combination of policies HOU3, HOU4 and HOU5 severely restrict development. They emphasise that it is clear from the wording in the supportive text in para 5.56, that the approach is one of control and restriction rather than sound planning for sustainable sites. 2690 also remarks that when considering these three policies as a whole, unless the site is allocated, an infill development, or under 3 units it is not acceptable and must be refused. 2690 notes that this is not in accordance with the NPPF and cannot be considered sound. They argue that they cannot understand how the council can apply

such policies, when the NPPF ethos is to approve sustainable development without delay.

2108 emphasises that a reliance on windfall sites for housing and gypsy pitches will place the rural parts of the Borough under threat. The lack of a 5 year housing land supply will result in the temptation to allow development which may gradually destroy the rural areas.

Response: *Some of the criticisms set out here are justified and a revised approach to windfall developments is now proposed – see proposed changes MC50 and MC51. The proposed revisions will make the policies more compliant with the NPPF and provide a sound basis on which to objectively consider the relative sustainability of windfall proposals that come forward whether within or outside settlements. It is inevitable that windfall proposals will come forward in significant numbers over the Plan period and it is essential that the policy base is robust to properly assess their suitability. This will also be the case should the council not be able to demonstrate a 5 year housing land supply at any stage during the Plan period. The reliance on windfall housing is relatively small in terms of meeting the overall housing target in the Plan whilst the approach to gypsy and traveller accommodation is now to be considered in a separate DPD.*

Issue- The overall policy approach is too liberal

2105 and 2106 believe that policies HOU3, HOU4 and HOU5 are too supportive of development and will lead to the rural area being destroyed.

1282, 2427 suggests that policy HOU5 is too generous in its definition of what could be considered non-isolated development, whilst 1446 consider the definition to be poor. A scheme of 3 units which is removed from a settlement is not sustainable as a point of principle, even if it is a brownfield site. The current policy approach will lead to a proliferation of development in what is the countryside – something which should be avoided. 1446 claims that the policy will not give adequate attention to ensuring development is sustainable and will not provide sufficient protection to the countryside. They believe that permitted development rights already give sufficient flexibility where conversion of agricultural buildings is concerned.

1446 request that the first half of the policy is deleted or substantially amended, in order to ensure that there are clear parameters that deliver sustainable development.

Response: *The proposed revisions to these policies are designed to bring them more into line with the guidance in the NPPF in respect of sustainable development. This should provide better policy guidance to restrict unacceptable, unsustainable developments in the rural areas and protect the integrity and character of the rural areas in general. A policy approach that is overly restrictive on new development in rural areas will not be regarded as consistent with national policy and undermines the council's strategy for meeting its housing needs in a sustainable way.*

Issue- Reliance on windfall development: Reps 546, 684 states that the Council is too heavily relying on windfall development to meet its overall housing target, particularly as the current policy approach is negatively written and doesn't allow for residential garden

development to come forward, for example. Therefore, relying on 1,000 homes to come forward as windfall by 2030 is not sound.

Response: *The definition of isolated development is given in para 55 of the NPPF. Development elsewhere can be sustainable development depending on several critical factors including the scale of development and its accessibility to / impact on local services. The policy approach is proposed to be amended to reflect the need for development to be sustainable and in accordance with the principles set out in the NPPF. This can enable suitably scaled and designed schemes to come forward as windfall proposals which will allow rural settlements to evolve in an organic fashion. Windfall developments have been coming forward at a much greater average than 100 per year over recent years and so relying on 1000 units over the remainder of the Plan period is relatively conservative and entirely reasonable.*

Issue - Kingsnorth / Stubbs Cross / Sevington: Rep 831 sets out that Kingsnorth village should be included in the list of settlements under Policy HOU4. It is a sustainable settlement in its own right and contains – and is close to – a number of services and facilities, including a GP surgery, a supermarket, a primary school, a public house and a village hall.

2182 suggests Stubbs Cross should also be included in the list of settlements covered by HOU4.

1749 suggests Sevington should be included in the list of settlements covered by HOU4.

Response: *It is agreed that Kingsnorth and Sevington should be added to the list of settlements referred to in the policy but not Stubbs Cross. See Proposed Change MC50.*

Issue - Wittersham The Borough Council have received a number of comments from Wittersham Parish Council which set out the following:

Wittersham lies entirely within the AONB and the Local Plan avoids making any allocations within the village. This will lead to a relatively isolated village community which goes against the principles of rural development.

The Borough Council have also received a number of comments from respondents who are questioning what Wittersham Parish Council has stated. It should be noted that the PC comments were posted on their website during the consultation period. They were not publically viewable via the Borough Council's consultation portal until after the consultation period closed. These reps made the following points:

2307 suggests that the Parish Council has no mandate for setting out its views as they have on the draft Local Plan. There was no opportunity to for local people to express their views. There was no publicity, no public meetings. They also question why the Parish Council didn't make comments on HOU2 as there is clearly a desire for the villagers to have more accommodation for the elderly in the village.

2086 - The plan is not consistent with National Policy as it fails to adequately provide housing provision within Wittersham. Allocate housing provision within Wittersham village in

order to support the future sustainability of the village and to retain important local services and community facilities.

Response : *An allocation is now proposed in Wittersham new Policy S61. The matters referenced in 2307 relate to internal parish council issues.*

AONB related comments: 854, 855, 1282, 2427 sets out that the policy wording in HOU4 and HOU5 (which sets out 'adjoining' an AONB) does not reflect the provisions set out in the Countryside Rights of Way Act 2000, or the NPPF in respect of the AONBs. They suggest alternative wording.

1278, 2417 and 2428 set out that development needs to be in conformity with AONB management plans and its associated design guidance. This should be a requirement in the policy approach. In addition rep 1278 sets out that the policy wording is not consistent with the relevant Act or the NPPF with respect of the undermining of the intrinsic or scenic beauty of the AONB.

1415 also makes this point in that the policy – as drafted – refers to 'not significantly undermine' rather than 'conservation and enhancement' when refereeing to an AONB's intrinsic or scenic beauty.

Response : *These points are accepted and a change to the policy wording is proposed see proposed changes MC50 and MC51.*

Landscape protection: 1338 considers that the unique environment of the villages and their surroundings is worth of specific protection and therefore the Local Plan should have an additional policy on landscape protection around settlements. A draft policy has been suggested. In addition, where the AONB is present, more specific criteria should be applied to the policy approach. Aldington village is cited as a particular settlement in need of a village protection policy. Rep 1340 also makes this point.

Response : *A location specific landscape protection policy for the Saxon Shore part of the borough cannot be justified. The Plan contains several generic policies that seek to protect the character of the landscape and landscape features as well as other local features of importance to the rural character of the area. It is considered that this provides a good level of protection for locations in Saxon Shore and other rural parts of the borough.*

Issue: Infilling 2159 contend that infilling as a policy is not justified and may impact on village green spaces and green corridors. Using the word 'infill' in policy encourages developers to pick off rural sites that sit within village envelopes and might otherwise have green space value. 2159 propose that the words 'and infilling' should be removed from the policy HOU4. 2690 consider the policies related to infilling (HOU3 and HOU4) to only refer to the urban area of Ashford and the list of settlements in the rural area, and not the Borough as a whole.

Response: *The proposed revisions to policy HOU4 better reflect the importance of public or private land that contributes positively to the local character of the area and the need for any proposals (for infilling or otherwise) to avoid significant harm to these areas. The removal of the reference to infilling from the policy would create more uncertainty in policy terms as to how these proposals should be addressed.*

Issue: Different criteria for different settlements 2198 state that policy HOU4 should possess different criteria for different settlements with more flexibility in sustainable locations in order to comply with the NPPF. 2198 highlights that within the rural settlements there are different roles, with some acting as service centres, others as secondary centres and others not considered due to lack of services and facilities. They feel that HOU4 does not differentiate between those that are more constrained by designations such as AONBs.

Response: *Whilst the point raised is not unreasonable, on balance it is preferred to rely on the application of the criteria associated with the proposed revised version of HOU4 as that will provide flexibility in the application of the policy on a site by site and settlement by settlement basis. The suggestion in 2198 may be overly prescriptive and too detailed for a policy of this type.*

Issue: Brownfield/Unoccupied land use for residential purposes 1412 believe that HOU3 should proactively encourage residential development in urban areas where land or buildings are no longer required for non-residential development. It is suggested the policy refers to the use of vacant or derelict land for residential purposes as long as it doesn't harm public or private spaces that contribute to the local area (ie residential gardens). 1412 also want the policy to encourage mixed use development in town centres, residential use of upper floors in commercial premises and the infilling of residential areas, provided the environment and residential amenity is improved. They also suggest the policy should refer to the change of use or redevelopment of existing buildings where they do not contribute to vitality of the area by providing employment, retail or community facilities (EMP2, EMP7, EMP11, COM1 are relevant).

Response: *Policy SP1 establishes the suitable use of brownfield opportunities as a strategic objective of the Local Plan. This places the suitability of the site as a key prerequisite rather than simply the brownfield or vacant status of a site – for example, buildings on industrial estates may be vacant but would not be suitable for use for residential purposes. It should be noted that the extension of permitted development rights also covers the ability for some vacant buildings to be converted to residential use without the need for planning permission. The promotion of mixed use development in the town centre is already covered by policy SP5 of the Plan.*

Policy HOU5 criteria / approach

1282, 2427: Policy HOU5 should define criteria/guidance to justify an exception for essential workers to live in the countryside. They suggest that an independent report is needed, supported by viability evidence in relation to the enterprise and that no other dwellings – or buildings suitable to of being converted - are nearby which could fulfil this purpose.

There is not support for either local needs of specialist housing in the countryside in the NPPF. They should be limited to within or adjoining settlements. Therefore this part of Policy HOU5 should be removed (criterion f – the second part of this policy). Policy HOU5 criterion (c) should include a requirement for the building to be a permanent and substantial construction and that it is capable of conversion without major reconstruction or extension.

1325: The definition of what a brownfield site needs to be included and the term 'in situ for a number of years' is too vague and therefore open to abuse. 1903: No justification to require

the development to be of exceptional design quality or innovative design. This is not consistent with the NPPF.

1353: The policy should also support proposals for the replacement of isolated rural buildings where their form and appearance is such that they currently detract from the character of the immediate countryside. New development could significantly enhance its appearance.

1446: The extent of the relationship between a site and the settlement edge needs to be defined, as the brownfield status of a site does not itself amount to a sustainable, or appropriate location. There should also be a definition of how long an agricultural building should stand unused for before conversion, and a settlement hierarchy in place to identify settlements which have a minimum level of services.

Facilities and services that are indeterminate should not be considered in sustainability, whilst walking distances (typically 800m) should not always determine whether or not a site is isolated, as it is dependent on a number of other factors such as lighting. Criteria (i) refers to nationally protected sites but a number of other constraints such as protected species, heritage assets and landscape character impacts are not included – what is the justification?

The second half of the policy is mostly a repetition of the NPPF. Part (f) is a notable exception and 1446 request it is deleted from the policy. Local needs should not be permitted in isolated rural location as the NPPF exceptions relate to isolated homes and not 'schemes'. Part (a) needs further explanation as it would lead to a harmful proliferation of dwellings in the countryside. It is reiterated that it should be a requirement to live near the place of work, and there should be a requirement that there are no suitable alternative dwellings nearby. Part (c) should refer to the building being permanent and being capable of conversion without any major reconstruction. It should also specify how long the building should have been redundant, as well as the length of time it should have been in situ. Part (d) is supported, as it is believed by 1446 that the permitting of dwellings in the countryside that are of exceptional quality or innovative design will benefit the setting and be sensitive to the local area. They will also sufficiently provide exclusive homes. Thus 1446 object against the allocation of sites for exclusive homes as they are unnecessary, particularly when other windfall sites will generate crucial inspiration and high quality, innovative designs.

The final paragraph of the policy should refer to 'conservation and enhancement' of AONB rather than the current reference to 'not significantly undermine' their intrinsic or scenic beauty. This is to ensure compliance with the CROW Act 2000 and national policy.

Response *The process for establishing an exception for an agricultural workers' dwelling is well established and need not be included in detail in the policy. It is agreed that local needs housing should not be in isolated locations and this is proposed to be deleted from the policy. Similarly, the policy and supporting text can be tightened and made more specific in respect of brownfield sites and the conversion of buildings in policy HOU5 to guard against a misuse of the policy. The requirement for exceptional or innovative design is one of the specific exceptions for allowing isolated residential development in para. 55 of the NPPF. The potential enhancement in appearance resulting for the replacement of isolated farm buildings may be a material consideration in favour of a scheme but this goes beyond NPPF policy that solely refers to the re-use of redundant or disused buildings being a potential*

exception to the general approach of avoiding isolated new residential development and so no change to policy HOU5 is justified.

Supporting statements: Reps 838, 1415, 1501, 1747, 1969, 2075, 2491, 2494, 2525, 2527, 2528, 2529 and 2663 all made supporting statements which are noted.

Response - Support noted.

POLICY HOU6: SELF-BUILD / CUSTOM BUILD DEVELOPMENT

Representations have been received from the following consultees:

549 Courtley Planning Consultants Ltd (Howard Courtley)	2867 Carter Jonas (Kieron Gregson) for Wheler Foundation (Wheler Foundation)
735 Orchard Farm Kennington Limited (Adam Roake)	2184 Kingsnorth Parish Council (Len Bunn)
1351 Hobbs Parker Property Consultants LLP (Steve Davies)	2204 Barton Willmore on behalf of Hallam Land Management Ltd. (Carolyn Organ)
1447 CPRE Kent (Ashford District Committee) (Hilary Moorby)	2459 Judith Ashton Associates (Judith Ashton) for Wates Developments Limited
1868 Gillian Bromley	2484 LRM Planning Limited (Owen Jones) for Hallam Land Management Limited (Ruth McKeown)
1906 Home Builders Federation Ltd (James Stevens)	2692 Gladman Developments (Mat Evans)
1971 Tenterden Town Council (Philip Burgess)	

Summary of representations – main issues

549, 2459, 2692, 2867 state that the 5% figure is not justified, ineffective and not viability tested, resulting in delays to securing s106 agreements since developers will be unable to value the land, and will be an impediment to house sales.

549 comments that part b is a 'back door' to affordable housing provision. Evidence required from Right to Build Register.

1351 explains that self-build is better on sites of 4-10dw so as not to delay larger sites

735, 2204, 2692 consider phrasing of Part B confusing and incomplete regarding the 'affordable' dimension. There is a need to ensure there is provision within HOU1 for the transfer required in Part B; there is also a need to avoid a fully-occupied development with vacant plots through providing criteria at end of defined period to allow reversion to market housing. 735 proposes, "b. Where plots have been marketed and not sold for at least a 12 month period the unsold plot(s) may continue to be offered on the open market as custom build or be built out as general needs housing. And, where plots originally offered as affordable housing have been marketed and not sold for at least a 12 month period the unsold plot(s) may continue to be offered on the open market or it may be built out and offered to the Council or a Housing Association."

735, 1906 state that part C is not supported by national guidance, and is too subjective, also repeats general design guidance within plan

2484 states that policy refers to 'urban sites' but viability report includes Ashford hinterland within this. Policy wording needs to be tightened. However, there is no evidence to support likely turnout of this policy.

Response *Concerns raised in the representations are acknowledged, however, in order to ensure that the need for self and custom build can be met it is considered necessary to require all developments of a certain size to provide a proportion of self and custom build plots. The need for self and custom build is evidenced by those registered on the self and custom build register. The Council has maintained that register since April 2016 in accordance with the relevant regulations. The register is maintained in annual base periods, with a year end of 31 October. The Council is required by the regulations to grant enough planning permissions to meet the need for each base period, within three years of the end of that base period. At the end of the first base period (31 October 2016) there were 16 individuals on the register. A further 45 individuals have joined the register during the current base year. This demonstrates a relatively high need for self and custom build, and if the registrations were to continue to be made at the rate of this year, this would equate to 10% of annual housing need. However, it is likely that there has been a surge in applications dealing with backlog need. The Council is also considering requiring a fee and local connections test for the register in order to establish a more realistic estimate of need. At present there are minimal criteria to being on the register.*

It is therefore considered that 5% is a reasonable proportion to require on sites across the Borough. The requirement for 5% has been included within the assumptions for the viability testing supporting the Local Plan.

With regard to criteria b) this is only required if the plots had originally been offered in lieu of affordable housing, and the purpose was not to increase affordable housing provision, where the policy requirements had been met. However, following further review of this requirement, it is unlikely that self-build would be required to be provided in lieu of affordable housing, given the wider range of products which the government now propose to include within the definition of affordable housing, such as starter homes and discounted market homes. It is not therefore necessary for it to be included within the policy.

In order to address some of the concerns raised it is proposed to amend criteria b) so that where plots have been marketed for a 12 month period (to the satisfaction of the Council), and not sold, they can return to the developer to be used for normal open market housing.

Criteria a and c can remain as they incorporate national guidance into the policy.

It is agreed that the use of 'urban' and 'rural' areas should be clarified within the policy text.

Minor amendments are proposed to be made to the policy, see proposed change MC52.

Support 1447, 1868, 1971 and 2184 support this policy, noting that evidence is to come from Self Build and Custom Build registers

Response Support noted.

POLICY HOU7: REPLACEMENT DWELLINGS IN THE COUNTRYSIDE

Representations have been received from the following consultees:

1450 CPRE Kent (Ashford District Committee) (Hilary Moorby)	2183/2185 Kingsnorth Parish Council (Len Bunn)
1874 Gillian Bromley	

Summary of representations – main issues

1450 offers general support, but advises the LPA to use conditions rather than planning obligations to remove permitted development rights on permitted countryside dwellings.

1874 states that replacement dwellings should be in the same Council Tax band as the original dwelling unless there are overarching reasons why they should not.

Response *The council notes that the removal of PD rights could be done at planning application stage if necessary. The policy as written provides the potential for sympathetic replacement dwellings subject to landscape and visual impact considerations.*

Support 2183 and 2185 support subject to proposal meeting criteria.

Response Support noted.

POLICY HOU8 and HOU9: RESIDENTIAL EXTENSIONS AND STANDALONE ANNEXES

Representations have been received from the following consultees:

685 Paul Buggins	1972 Tenterden Town Council (Philip Burgess)
1222 Smarden Parish Council (Sarah Ellison)	2186/2187 Kingsnorth Parish Council (Len Bunn)
1452 CPRE Kent (Ashford District Committee) (Hilary Moorby)	2482 Strutt & Parker (Emma Challenger) for The Mersham Estate (Michael-John Knatchball)
1878 Gillian Bromley	

Summary of representations – main issues

685 extensions and annexes should always be considered permanent rather than temporary. However, if the council seeks this, it should be embedded in the main policy body rather than supporting text. This holds for the whole document.

1222 and 1878 express concern that greater controls are needed to avoid hyper-extension of homes diminishing choice of local mix, especially affordable dwellings. Seeks Council Tax bracket to be used to define limits to extension.

1452 Support for policy, pending insertion of following at 5.82, “The Council will impose a condition or require a planning obligation to ensure the Annex remains ancillary to the main house.”

Response *The General Permitted Development Order (GPDO) deems a variety of development ‘permitted’ and therefore not subject to planning controls. In other cases, it is the responsibility of the Council to act ‘reasonably’ in considering individual applications. ABC seeks to enable delivery of a variety of housing types through development of a housing mix policy to accompany other housing policies.*

Any conditions would be attached to a planning permission following application, if appropriate to make the development acceptable in planning terms. Amend paragraph 5.82 See Change MC53

Support 1792, 2186, 2482 and 2187 support both policies. 2482 supports policy HOU9.

Response *Support noted.*

POLICY HOU10: DEVELOPMENT OF RESIDENTIAL GARDENS

Representations have been received from the following consultees:

1284 Kent Downs AONB Unit (Katie Miller)	1974 Tenterden Town Council
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1455 CPRE Kent (Ashford District Committee) (Hilary Moorby)	2188 Kingsnorth Parish Council
1725 Jacqueline Male	2426 High Weald Joint Advisory Committee
1909 Mr and Mrs Jackson	

Summary of representations – main issues

Issue: Protection of Gardens 1284, 1455 and 2426 are concerned that this policy does not protect gardens in the open countryside. They propose adding a reference in the policy text that this policy only applies to recognised settlements and that garden development in the countryside is unacceptable and isolated.

2188 objects to the policy as they think gardens should not be regarded as brownfield in the rural areas where substantial gardens contribute to the visual amenity of a neighbourhood.

1725 is objecting to the policy and comments that gardens should be greenfield and protected because building on them can look haphazard and don't match etc.

Response *The supporting text to policy HOU10 refers to the guidance in the NPPF that local authorities should set out policies to resist inappropriate development of residential gardens. There is no blanket restriction on such development and the criteria set out in policy HOU10 provides a reasonable set of indicators to judge proposals. With respect to gardens in the countryside, proposed residential development would also need to meet the criteria in policy HOU5 on windfall sites and so there this no need to repeat those criteria in this policy.*

Issue: Backland development 1909 is particularly concerned with backland garden development and that this policy does not particularly mention this subject or the different problems that are faced by backland such as new vehicle access etc. They propose the following: the title of '*sustainable control of residential garden areas*' and an additional para:

"This policy must be read with parking, pedestrian, residential space standards, design , landscaping, conservation and environmental policies. Infilling and backland development and complete or partial redevelopment may be acceptable subject to meeting these policy requirements"

Response *Whilst it is accepted that 'backland' development may not necessarily encompass redevelopment of residential gardens, this will be case in the large majority of cases. Where this is not the case, the same criteria as in policy HOU10 and HOU5 would be applicable and the need to meet other policy requirements would apply. No change is proposed.*

Support 1974 supports the policy.

Response *Support noted.*

POLICY HOU11: HOUSES IN MULTIPLE OCCUPATION

Representations have been received from the following consultees:

1735 Jacqueline Male	1751 Jacqueline Male
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Summary of representations – main issues

Support 1735 and 1751 offer support, with preference for small self-contained units as opposed to rooms with shared facilities. There can, however, be communal laundry room and garden. Any bathroom facilities to be lockable.

Response Support noted.

POLICY HOU12: RESIDENTIAL SPACE STANDARDS (INTERNAL)

Representations have been received from the following consultees:

1908 Home Builders Federation Ltd (James Stevens)	2269 Barton Willmore (Lucy Wilford) for Persimmon Homes and Taylor Wimpey (Persimmon Homes and Taylor Wimpey)
1997 Tetlow King Planning (Elaine Elstone) for Rentplus UK Limited (R Connelly)	2486 LRM Planning Limited (Owen Jones) for Hallam Land Management Limited (Ruth McKeown)
2221 Steve Mellor for Chilmington Green Consortium (Company)	2551 Barton Willmore (Kate Holland) for Bellway Homes Ltd (Kent)

Summary of representations – main issues

1908, 1997, 2486 need to demonstrate evidence of Need (current delivery), Viability (land supply, build costs and affordability) and Timing (could require transitional period).

1908 states that the policy is against current “direction of travel of Government policy”, especially in relation to Starter Homes.

1908 argues that space standards are not justified given that lowest quartile earnings are lower than the Kent and national averages.

1997, 2221, 2269, 2486, 2551 state there is no justification or evidence of need, which is required by the NPPG and WMS (25/03/15)

Response *Viability has been tested through the draft Local Plan; ABC's existing SPD proves the market can deliver internal spaces above the nationally described space standards (NDSS) already, without a transition period. The policy has been viability tested, and more rigorous requirements have been delivered over the past decade through the Council's SPD.*

The Council disagrees that use of the NDSS is against the government's "direction of travel", since the optional requirements are available local authority tools. The council is to produce a background evidence paper outlining the borough's need for the optional NDSS.

POLICY HOU13: HOMES SUITABLE FOR FAMILY OCCUPATION

Representations have been received from the following consultees:

1350 Hobbs Parker Property Consultants LLP (Steve Davies)	2270 Barton Willmore (Lucy Wilford) for Persimmon Homes and Taylor Wimpey (Persimmon Homes and Taylor Wimpey)
1911 Home Builders Federation Ltd (James Stevens)	2555 Barton Willmore (Kate Holland) for Bellway Homes Ltd (Kent)
2224 Steve Mellor for Chilmington Green Consortium (Company)	

Summary of representations – main issues

Issue - Lack of evidence 1350, 2270, 2555 states that there is no evidence to justify this approach, and that it should be up to the market/housebuilders to define internal configurations, with policy flexibility.

2224 states that there is no evidence to justify this approach, and evidence is required by WMS 25/03/15. There is no way around this as WMS cannot be challenged.

Issue - Does not conform to national guidance 1911 argues that this policy is not allowed by WMS 25/03/15 given that no other local policies are allowed "relating to the construction, internal layout and performance of new dwellings".

2224 Requirement for separate rooms to accommodate cooking, eating and living does not conform with national guidance for internal layout standards.

Response Agreed. Policy deleted. See proposed change MC55.

POLICY HOU14: ACCESSIBILITY STANDARDS

Representations have been received from the following consultees:

1349 Hobbs Parker Property Consultants LLP (Steve Davies)	1997 Tetlow King Planning (Elaine Elstone) for Rentplus UK Limited (R Connelly)
1393 Ian Bull Consultancy Ltd. (Ian Bull) for Pentland Homes Ltd	2227 Steve Mellor for Chilmington Green Consortium (Company)
1913 Home Builders Federation Ltd (James Stevens)	2558 Barton Willmore (Kate Holland) for Bellway Homes Ltd (Kent)

Summary of representations – main issues

1349, 1393, 1913, 1997, 2227 highlights that there is no evidence that an assessment of need, viability or impact on delivery as per NPPG requirement, has been undertaken, even for the Part M4(2) requirement. Assessment should also include audit of flexibility of existing housing stock across tenures.

1393 Proposed amendment: (a) be amended to limit the requirement to comply with building regulations part M4 (2) to 15% of dwellings on developments of 15 or more dwellings. Optional standard at present completely unjustified.

1913, 2558 propose a limit to Part M4(3) standard homes in Part B at 7.5% as per Viability Study and to establish clarity for expectations on developers. Any change by the council would impact on delivery and housing numbers.

1349 states that the policy should allow for possible exemption where nature of site cannot deliver.

Response *The council firmly believes that it is reasonable and appropriate for new homes to be built to standards that mean they are suitable for all members of the community. With an ageing population, there is a strong justification to future-proof new housing stock where possible to allow for flexible occupation without the need for costly adaptations. It is considered that this helps to fulfil the NPPF requirement to plan for housing based on current and future demographic trends, including the needs of older people and those with disabilities. The viability work undertaken to support the Plan has tested this policy as part of the whole Plan viability assessment. However, it is considered reasonable to cap the requirement to deliver part M4 (3) standard homes to 7.5% - see proposed change MC56.*

Support 1913 supportive of Viability assumptions as per paragraph 2.23, and notes high cost of Part M4(3) and therefore need for zero CIL rate for flats in and around Ashford.

Response Support noted.

POLICY HOU15: PRIVATE EXTERNAL OPEN SPACE

Representations have been received from the following consultees:

1740	Jacqueline Male	1916	Home Builders Federation Ltd (James Stevens)
2189	Kingsnorth Parish Council (Len Bunn)	2300	Peta Grant
2228	Chilmington Green Consortium (Company)		

Summary of representations - main issues

Issue - Garden size 2189 and 1740 feel that a 10m deep garden is not sufficient provision for family housing. 2228 and 1916 feel that a 10m garden is unachievable for all but the largest dwellings.

Response No change required. 10m has been accepted in previous development plan examinations and has a strong track record of delivery in this Borough.

Issue - Policy wording 2228 and 1916 feel that the policy should be clearer and that for flats, either a balcony or a patio can be provided.

Response the policy wording is clear that a balcony, roof garden or ground level patio can be provided. No change required.

Issue- Policy justification 2228 and 1916 suggest that insufficient policy justification has been provided and that external space policies are contrary to "construction, internal layout and performance of new dwellings" (Written Ministerial statement, 25 March 2015).

Response this policy is compliant with government policy.

Support 1740 Agrees that balcony space should correspond to bed spaces. 2300 supports the policy in general.

Response support noted.

POLICY HOU16: TRAVELLER ACCOMODATION

Representations have been received from the following consultees:

686/687/688 Paul Buggins	1632/1635/1636 Westwell Parish Council
1114 Elizabeth Buggins	1712 Richard King
1122 Carol Weare	1880 Gillian Bromley
1221 Smarden Parish Council	1917 Lois Tilden
1367/1368 M Holder	2191 Kingsnorth Parish Council
1456 CPRE Kent	2295/2296/2297 Peta Grant
1465 Maidstone Borough Council	2462 High Halden Parish Council

Summary of representations – main issues

Issue - Objectively Assessed Need Policy 1465 The Plan intends to meet the identified pitch needs in full and this is supported although, unlike for other types of needs, this intention is expressed in supporting text (paragraph 5.117 onwards) rather than in a policy. The additional pitches will be delivered by means of specific site allocations and by granting consents on suitable windfall sites within the borough.

Issue - Approach to using a windfall policy 1632, 1635 and 1636 consider the approach to relying on windfalls is against the approach originally set out in the G&T issues and options paper from 2010. 1636 provides extensive analysis of that report and considers that it should be included in the plan. 1632 states that the policy goes against para 6.26 of the DPD SA 'one of the advantages of having the DPD in place and sites allocated, will be that it should be possible to avoid sites being permitted in rural areas where planning policies would not normally permit development'.

2296; 1221; 686 Reliance on windfalls and lack of allocations, leaves the Council open to criticism for not having a 5yr land supply. This could lead to sporadic and unplanned development.

1635 the SA does not assess the option of using a windfall approach against objectives

1635 concerned that an effect of the windfall approach is that many temporary sites are granted which can ultimately become permanent.

1632 Reassessment of alternatives which have already come forward for assessment, or through contact with people who own suitable land in the SHELAA as stated in the Sustainability Appraisal para 1.16 should be undertaken. The current strategy for provision is unsound;

1635 Ashford BC has not found enough sites for Gypsies and Travellers and allocating sites would be a preferred approach. ABC has not taken the approach set out in para 1.16 of the

SA [contacting owners of sites in the SHELAA], which leaves 16 sites to be found through the 'windfall policy' by 2030.

Response *To enable the Council to re-run a 'call for Gypsy & Traveller sites' process, and to ensure an up to date evidence base on the topic of Gypsy and Travellers accommodation, it is now the Council's intention to produce a specific DPD relating to the subject, which will support the Local Plan 2030. This has been outlined in the recently adopted Local Development Scheme – May 2017. The DPD will aim to update the evidence base and identify further sites for allocation. The initial consultation and evidence gathering stages will commence in late 2017, with proposed Adoption planned for early 2019.*

This policy will not allow temporary sites to be automatically granted full permission. Sites will have to go through the existing process of applying for full planning permission.

Issue - Sites in the AONB The SA of site S44 scores the policy as neutral in respect of AONB. However the wording of the policy and other overarching policies which relate to development in the countryside do not reflect requirements of the CROW Act 2000, the NPPF 113,115 and 116 and the provisions of the adopted AONB Management Plans which provide for the conservation and enhancement of the AONB. We suggest that amended wording would bring the policy into conformity with national policy and provide more robust criteria against to test new sites. "The form and extent of the accommodation does not affect the essential qualities of a SSSI, Ancient Woodland international, or national or local nature reserve or wildlife site or the key characteristics of a Landscape Character Area. Where a proposal is located within or in the setting of an AONB, it will also need to demonstrate that it is justifiable within the context of their national level of protection and conserves and enhances their natural beauty." The term 'in the setting of an AONB' conforms with national policy in Planning Practice Guidance (Natural Environment paragraph reference ID 8-003-20140306) and the AONB Management Plans. It has a wider application than 'adjoining' and is accepted terminology.

2191; 1367; 1221 Consideration should be given to identifying brownfield sites for such provision as this works effectively elsewhere, e.g. Thamesmead and sites should be sort in areas that are not sensitive, i.e. in the AONB. In view of the relatively low level of need required, the Council could and should look again outside sensitive areas to find perhaps 4 or 5 sites suitable for gypsy and traveller provision. In accordance with the policies of the NPPF and Guidance as set out below we reiterate that this should not be within the AONB. Sites should be sought on the edge of the urban area.

1368 Policy should be amended to ensure that the AONB is appropriately protected and given the highest landscape protection in accordance with the NPPF.

1367; 1635 should be amended to ensure that the AONB is appropriately protected and given the highest landscape protection in accordance with the NPPF. Specifically HOU16g should be reworded to include: 'The form and extent of the accommodation does not affect the essential qualities of a SSSI, Ancient Woodland international, or national or local nature reserve or wildlife site or the key characteristics of a Landscape Character Area. Where a proposal is located within or in the setting of an AONB, it will also need to demonstrate that it is justifiable within the context of their national level of protection and conserves and enhances their natural beauty.'

2295 protection of the landscape should be paramount

Response *The Council concurs that protection of the landscape is paramount and that AONBs and their setting should be protected. To this end, the policy already includes reference to AONB's in criterion g.*

Further landscape protection detail will be included in paragraph 5.121 of the windfall policy. See proposed change MC57.

Issue - The policy criteria 1917 and 1712 the criteria should include the same considerations as in EMP3 because it seems many sites combine residential and commercial/industrial type activities.

1632 and 1635 a statement on HOU16 should indicate that applications for Gypsies and Travellers sites need also to comply with HOU2, HOU4, and HOU5 and ENV3.

2462, 1114, 687 All support the approach of the 5 pitch threshold. However, this should be vigorously enforced to ensure that sites don't creep to accommodate pitches. Limiting sites to 5 pitches is good as far as it goes but does not cover the situation where sites adjoin each other or are close to each other. E.g. Plurenden Road, High Halden. Point b needs to be expanded to prevent multiple pitches being agreed under the umbrella of different sites and to cover density in an area.

1122 and 687 No new sites must be allowed for 5 (or less) pitches where sites adjoin existing gypsy sites or are situated in close proximity to existing sites. Likewise no existing sites must be allowed to divide to allow further pitches. The number of existing pitches in the vicinity of a new application site should also be taken into account.

2462, 1114, 1122 the impact of new Traveller accommodation on existing communities needs to be of paramount importance/ and how well proposals can be integrated is an important consideration in the determination of applications for Traveller provision'. The Parish Council recommends that para 5.125 is included in the Policy, and not merely appended as a comment. 1122 the policy should be worded to include the effect on the local community. It must state clearly that Traveller sites cannot dominate the local settled population or affect on the rights of the settled population to enjoy their own environment.

1221, 2295 there should be a criterion to ensure the applicant proves their gypsy status

1456 Broadly supports this policy except (Section (g) of the policy omits reference to heritage assets/ designations

687 Section g should include ...general visual amenity of the countryside ... Section I should include something preventing the creation of ghetto/gated and segregated communities.

Response *Paragraphs 2.2 and 4.2 of the Plan make clear that the Local Plan should be read and interpreted as a whole.*

With regard to existing adjoining sites, applications will be looked at on an individual basis in accordance with national and local policies.

Heritage assets and designations are already protected under policy ENV13, 14 and 15.

Issue - Sustainability Appraisal and background documents 1632; 1635 The SA process is flawed objects to the low score that environmental issues and designations are given in comparison to personal need and sustainability issues (proximity to schools and bus services, etc.), and to their misapplication by Ashford BC. Based on this experience there is concern for the future of similar windfall sites coming forward in the AONB (and other designations) and how they will be assessed .

688 The Ashford Gypsy and Traveller update paper contains some anomalies. The deductions made from table 2 are incorrect/flawed/statistically insignificant and more people do not meet the criteria of Gypsy and Traveller status. There is also a document mentioned in the paper that is not available.

Response *The scoring system for all sites is set out in Appendix 1 of the Sustainability Appraisal. This scoring system and the matrix was screened by the statutory consultees and was a standardised process for all housing and traveller sites to ensure fairness.*

The Gypsies and Travellers update paper was produced using the same methodology as that which was examined as part of the Swale Local Plan. It is inevitable there may be other Gypsies and Travellers that do not meet the definition, however with the current available data it was considered that if the travelling status of a particular family was unclear they should be given the benefit of the doubt that they do travel as this would be the fairest approach.

Miscellaneous

1880 the Council must do more to help traveller and local communities to build more positive relationships

686 Central Government policy should be made clearer on what constitutes and pitch and the definition of 'traveller'.

Response *Noted*

686 There is a reference to lack of available sites; this should be changed to lack of available appropriate sites. The sites in High Halden are not on appropriate sites

Response *No sites in High Halden have been allocated in the plan. No change to wording necessary.*

1880, 687 and 1221 this policy must be backed up by enforcement and ongoing monitoring. 1122 gives more detailed suggestions as to how this monitoring should be undertaken- to ensure that once permission has been granted for residential use by gypsies, those pitches are not rented for use by persons who do not meet that definition.

687 The longstanding empty pitches at Chilmington traveller site should be addressed before any further sites are permitted.

The Council has a strong track record in pursuing enforcement where breaches of planning control have occurred.

Ongoing discussions with the housing department about the Chilmington Site, including transfer of the site management to alternative provision to ensure conditions are ongoing.

Support 1456, 2462, 1114, 687 support the policy.

Response Support noted

POLICY HOU17: SAFEGUARDING EXISTING TRAVELLER SITES

2193 Kingsnorth Parish Council	2297 Peta Grant
687 Paul Buggins	

Summary of representations – main issues

2297 raises concerns that para 5.119 states that the policy is to retain all existing traveller sites to ensure the continual supply. We hope that this does not mean that temporary permissions, illegal sites will become permanent. Paragraph should be reworded to ensure it is only for permanent sites. Amend the first sentence of the policy to say “existing permanent authorised gypsy and traveller sites.....”

Response Agree. See Change MC58.

687 This appears to be a positive approach to maintain an adequate supply of traveller pitches. However, it lacks detail on the practical application in terms of monitoring, freeing up pitches for real traveller use and how the continuing qualification of occupants under the definition of Gypsies and Travellers. It is important to show how this can work including the use of enforcement powers.

Response To ensure an up to date evidence base on the matter of Gypsy and Travellers accommodation, it is the Council's intention to produce a specific DPD relating to the subject, which will support the Local Plan 2030. This has been outlined in the recently adopted Local Development Scheme (May 2017). The DPD will aim to update the evidence base and identify further sites for allocation. The initial consultation and evidence gathering stages will commence in late 2017, with proposed Adoption planned for early 2019.

Support 2193 supports the approach of this policy.

Response Support noted.

POLICY EMP1: NEW EMPLOYMENT USES

Representations have been received from the following consultees

1975 Tenterden Town Council	1343 Peter Brett Associates
2194 Kingsnorth PC	1287 Kent Downs AONB Unit
1458 CPRE Kent	2425 High Weald AONB JAC

Summary of Representations – Main Issues

Issue – impact on local road network 1458 agrees with para 5.135 and the importance of ensuring that the rural road network is suitable for the scale and type of vehicle movements associated with new employment proposals. It will also be important that any mitigation measures required by new development do not radically alter the character of the rural road network. Suggests rewording to this end.

1343 The Parish Councils at Aldington, Bonnington, Brabourne and Smeeth wish to see new sub-section to emphasis landscape protection, particularly in respect of the type and quantity of traffic generation, making reference to a suggested new landscape protection policy.

Response *This issue is already covered in the Environment and Transport policies of this plan. Rural lanes with a landscape, nature conservation or historic importance are protected by Policy ENV5 of this Plan while regard to Landscape Character and Design, including the pattern and distribution of settlements and roads is required by Policy ENV3 as amended. Policy TRA7 states that proposals in rural areas which would result in the generation of traffic types and movements beyond the reasonable capacity and road safety of rural lanes will not be permitted. No changes required.*

Issue – impact on AONB 1287 and 2425 consider that as currently worded, this proposal does not offer adequate protection to AONBs from inappropriate development. Para 113 of the NPPF specifies that local authorities should set criteria based policies against which proposals for any development on or affecting landscape areas will be judged and that distinctions should be made between the hierarchy of designated sites so that protection is commensurate with their status. It is therefore requested that additional wording be included in the policy that ensures that the AONBs are afforded appropriate protection.

Response *Agree. This is addressed in new Policy ENV3b (Proposed Change MC72).*

Support 1975 and 2194 support the policy

Response *support noted.*

POLICY EMP2: LOSS OR REDEVELOPMENT OF EMPLOYMENT SITES AND PREMISES

Representations have been received from the following consultees

2388 Hobbs Parker	1918 Home Builders Federation
1993 Tenterden Town Council	1496 Newenden PC

Summary of Representations – main issues

Issue – marketing requirements 2388 argues that the policy and text supporting text at 5.147 relating to marketing evidence goes beyond what is reasonable and practical and is at odds with NPPF policy which emphasises the need for policies to be flexible and allow rapid response to changes in economic circumstances.

Response *The proposed policy approach is a proportionate response to dealing with the loss or redevelopment of employment sites and premises. It reflects the approach that has been successfully implemented through the previously adopted Local Plans.*

Correct policy text to refer to sites within the HOU4 settlements, and not HOU3 as drafted.

Issue – clarity concerns 1918 raises concerns that the policy places many conditions on the re-development of employment sites for housing. It requires applicants to satisfy various criteria. Some of these criteria are vague. For example, for urban sites, part B requires the applicant to demonstrate that a unit has been unlet or for sale “for a substantial period of time”. It is unclear what the Council might deem to be ‘substantial’. It also requires applicants to demonstrate that ‘genuine and sustained attempts’ have been made to let or sell the site ‘on reasonable terms’. This vague and open to wide interpretation.

In terms of the rural area, applicants must both replace the developed employment site with a comparable sized building, and demonstrate that the unit in question has been unlet or for sale “for a substantial period”. It is unclear what the Council might deem to be ‘substantial’. It also requires applicants to demonstrate that ‘genuine and sustained attempts’ have been made to let or sell the site ‘on reasonable terms’. Paragraph 22 of the NPPF states that planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for employment. To make the policy sound, it is necessary for the Council to define in its Plan how long a site needs to be empty for before an application for its redevelopment as housing can be made.

The policy lacks the clarity required of local plan policies to enable planning applications to be made and determined with a high degree of predictability and efficiency (NPPF, paragraph 17).

The Plan maybe ought to clarify that the policy does not restrict an owner’s ability to exercise his/her permitted development rights.

Response *The Council does not think it necessary to reflect the fact that permitted development rights will obviously apply. In terms of the length of time that a site has to be marketed for the policy has worked successfully previously and gives the necessary*

safeguards to ensure that employment buildings retained as such where there is market demand. The policy does not preclude the loss of employment buildings but ensures that there is a flexible approach that can be adapted to individual circumstances.

Brownfield Register 1918 We also consider that the policy conflicts with emerging national policy where the government may require local authorities to maintain a brownfield register whereby sites included in that register will be subject to the proposed permission-in-principle.

Response *At present in the absence of the completed brownfield register there it is prudent to retain the current approach. Clearly, when the specific details of the new register have emerged then there may a need to amend the approach accordingly.*

Miscellaneous 1993 should this Policy refer specifically to use class B employment, and should there be an equivalent for use class A?

2388 There is scope for misinterpretation in the second part of the policy relating to land outside the Ashford urban area. The policy wording currently refers to the whole of the rural area in the heading, the wider rural area is not subject to this policy, this could be misinterpreted with the current wording. 2388, 1496 There is a minor drafting error in the policy reference HOU3 rather than HOU4.

Response *This Policy covers employment sites. No land use categories clarification required. Replace the heading “In the rural area” with “ Within Tenterden and HOU4 listed villages” and amend the text as follows: “Within Tenterden and HOU4 listed villages:*

Proposals for the loss or redevelopment of existing employment sites or premises within Tenterden or the villages listed in Policy HOU4 will not be permitted, unless....” See Change MC59.

Support 1496 welcomes the emphasis placed on the importance of rural employment and business activity.

Response *support noted.*

POLICY EMP3: EXTENSIONS TO EMPLOYMENT PREMISES IN THE RURAL AREA

Representations have been received from the following consultees

1976 Tenterden Town Council	1344 Peter Brett Associates
1459 CPRE Kent	

Summary of Representations – Main Issues

Issue – impact on local road network 1459 requests rewording to ensure that any mitigation measures required by new development do not radically alter the character of the rural road network. 1344 The Parish Councils at Aldington, Bonnington, Brabourne and Smeeth wish to see new sub-section to emphasis landscape protection, particularly in respect of the type and quantity of traffic generation, making reference to a suggested new landscape protection policy.

Response *This issue is already covered in the Environment and Transport policies of this plan. Rural lanes with a landscape, nature conservation or historic importance are protected by Policy ENV5 of this Plan while regard to Landscape Character and Design, including the pattern and distribution of settlements and roads is required by Policy ENV3 as amended. Policy TRA7 states that proposals in rural areas which would result in the generation of traffic types and movements beyond the reasonable capacity and road safety of rural lanes will not be permitted. No changes required.*

Support 1976 supports policy.

Response *support noted.*

POLICY EMP4: CONVERSIONS OF RURAL BUILDINGS TO NON-RESIDENTIAL

Representations have been received from the following consultees

2490 Mersham Estate	1291 Kent Downs AONB Unit
1464 CPRE Kent	2424 High Weald AONB JAC

Summary of Representations – main issues

Issue – new build employment premises 2490 supports the re-use of rural buildings for employment, tourism, leisure or community-related uses. However it considers the policy in its current form to conflict with policy EMP1 which supports new build employment development on greenfield sites 'within or adjoining the built up confines of Ashford, Tenterden and the rural settlements' Propose that a new criteria is included to provide support for new buildings on sites where re-use is partly proposed (in accordance with EMP1).

Response EMP4 provides specific policy guidance for the conversion of existing buildings to non-residential uses in rural areas. It is not considered necessary to repeat the wording of EMP1 which address the provision of new employment premises.

Issue – impact on the road network 1464 requests rewording to ensure that any mitigation measures required by new development do not radically alter the character of the rural road network and that sensitive provision can be made for parking and access. In addition guidance no guidance relevant to listed buildings or where development would affect the setting of a listed building should be included.

Response This issue is already covered in the Environment and Transport policies of this plan. Rural lanes with a landscape, nature conservation or historic importance are protected by Policy ENV5 of this Plan while regard to Landscape Character and Design, including the pattern and distribution of settlements and roads is required by Policy ENV3 as amended. Policy TRA7 states that proposals in rural areas which would result in the generation of traffic types and movements beyond the reasonable capacity and road safety of rural lanes will not be permitted. Policy ENV13 addresses. No changes required.

Issue – impact on AONB 1291 and 2424 consider that as currently worded, this proposal does not offer adequate protection to AONBs from inappropriate development. Para 113 of the NPPF specifies that local authorities should set criteria based policies against which proposals for any development on or affecting landscape areas will be judged and that distinctions should be made between the hierarchy of designated sites so that protection is commensurate with their status. It is therefore requested that additional wording be included in the policy that ensures that the AONBs are afforded appropriate protection.

Response Agree. This is addressed in new Policy ENV3b (proposed Change MC72).

POLICY EMP 5: NEW EMPLOYMENT PREMISES IN THE COUNTRYSIDE

Representations have been received from the following consultees

2176 Village Alliance	1467 CPRE Kent
2489 The Mersham Estate	1345 Peter Brett Associates
1498 Newenden Parish Council	

Summary of Representations – main issues

Consistency with other policies 2489 considers that Policy EMP5 and its preceding text is not consistent with national policy and other policies in the Local Plan. The policy infers that in principle new employment premises cannot be located in the countryside, whereas policy EMP1 allows for new buildings in the countryside, albeit adjacent to rural settlements (inter alia). It also does not make an exception where buildings are proposed to be re-used (in accordance with Policy EMP4). Policy EMP5 requires additional criteria to clarify under what circumstances new buildings will be permitted in the countryside, so that it accords with policies EMP1 and EMP4.

***Response** Paragraphs 2.2 and 4.2 of the Plan make clear that the Local Plan should be read and interpreted as a whole. The reasoned justification to Policy EMP1 (5.132) makes clear that new employment development is acceptable in sustainable locations, within or adjoining towns and rural settlements and not in the countryside, and this is embodied in Policy EMP1. Policy EMP4 reflects the support in the NPPF for the conversion of rural buildings to support the growth and expansion of business and enterprise in rural areas. Policy EMP5 covers proposals which do not involve conversion of rural buildings but that concern a functional need to be located in the countryside. It is not considered that any changes are required to provide any overlap or cross reference between these policies.*

Small businesses 1498 is concerned that the policy may be unnecessarily restrictive in respect of small-scale, artisan or professional services businesses which may not fulfil the requirement in EMP5 (a) that it be essential they be located in the countryside, but would otherwise comply with the requirements. As Internet communications improve, it becomes more and more feasible for such businesses to be located close to where the owner/employee lives. This of course has a beneficial impact on the social life of the village, as well as reducing transport-related emissions. Although EMP10 and EMP11 are positive in this respect, they only apply to retail and tourism, and we would be keen to see other types of small businesses being encouraged to establish themselves locally.

***Response** This policy is not considered restrictive on the development of small businesses, which are supported by other policies in the Plan and in many circumstances by recent changes to permitted development rights. It does not preclude the development of small businesses within or adjoining existing towns and villages in the Borough or in converted rural buildings. No changes required.*

Issue – impact on local road network 1467 stresses the importance of ensuring that that the rural road network is suitable for the scale and type of vehicle movements associated with new employment proposals. It will also be important that any mitigation measures required by new development do not radically alter the character of the rural road network. Suggests rewording to this end.

1345 The Parish Councils at Aldington, Bonnington, Brabourne and Smeeth wish to see new sub-section to emphasis landscape protection, particularly in respect of the type and quantity of traffic generation, making reference to a suggested new landscape protection policy.

Response This issue is already covered in the Environment and Transport policies of this plan. Rural lanes with a landscape, nature conservation or historic importance are protected by Policy ENV5 of this Plan while regard to Landscape Character and Design, including the pattern and distribution of settlements and roads is required by Policy ENV3 as amended. Policy TRA7 states that proposals in rural areas which would result in the generation of traffic types and movements beyond the reasonable capacity and road safety of rural lanes will not be permitted. No changes required.

Support 2176 strongly supports this policy.

Response Support noted.

POLICY EMP6 – PROMOTION OF FIBRE TO THE PREMISES (FTTP)

334	Gigaclear plc	1777	Local Government Association
1179	Lesley Wickens	1920	Home Builders Federation
1977	Tenterden Town Council	2165	Shadoxhurst Parish Council (David Ledger)
2195	Kingsnorth Parish Council (Len Bunn)	2465	Matthew Hancock
2473	Virgin Media (Dan Butler)	2543	Kent County Council (KCC) (Barbara Cooper)
2665	Charing Parish Council (Jill Layland)		

Summary of Representations – main issues

Issue – Broadening to include existing dwellings 2165, 2665, 1179 villages currently often have a limited and costly service. Does this cover existing dwellings and businesses within the surrounding villages where no provision seems to be in place now or for the future.

Response Policy EMP6 only applies to new dwellings and businesses. There is however an opportunity that when expanding the fibre network into rural areas there may be greater opportunities for existing dwellings and businesses to have access to either fibre or improved broadband speeds.

Issue - Existing infrastructure Many of the village BT exchanges are at or over capacity and fibre optic connections to existing users are sporadic. For many users, Broadband access is minimal or non-existent. Whilst the Plan claims that exchanges are "fibre enabled", there is little progress to connect users.

Response Policy EMP6 only applies to new dwellings and businesses. Where a new development site is identified the fibre provider would need to provide the appropriate new fibre infrastructure to enable the deployment of FTTP on the identified development site.

Issue – Procedural matters 2165 is concerned that the draft Plan & EMP6 states "promotion of FTTP to all new developments wherever practical" which is seemingly a get-out clause. There is no apparent provision for S106 or other CIL contribution to the fixed &

mobile capabilities, notably broadband and landline capabilities, for either new or existing users.

1920 This is in effect a Grampian Condition imposed on applications. 2543 considers that the inclusion of Policy EMP6 meets the requirement of supporting high quality communications infrastructure as set out in paragraphs 42 and 43 of the NPPF and the tests of soundness set out at paragraph 182.

1920 considers that the cost burden of this policy on developers is excessive, the caveats in the policy requiring applicants for proposals of ten units and under to demonstrate what is 'practical' does not accord with the NPPF. We consider that the policy should be deleted from the plan.

Response *Deployment of an FTTP solution for new developments should be considered in the same way that all issues of viability are considered on a site by site basis. The cost burden to developers will vary from site to site and in many cases there will be no cost burden to the developer as sites will be commercially viable for a fibre provider or will fall within a commitment to deploy. The house price increase and the greater appeal of dwellings and business premises with FTTP should also be taken into consideration. The policy provides a flexible approach to deployment where an FTTP solution cannot be provided.*

Issue – Broader telecoms issues 2165 argues that telecommunications (mobile) networks are poor within Ashford, yet it is an issue that the plan ignores.

Response *The NPPF provides guidance to Local Planning Authorities on siting telecommunication masts where network providers have identified a demand. The Local Authority works with telecommunication providers as part of the Local Plan process and local infrastructure planning.*

Miscellaneous 334 FTTP future-proofs new property developments.

Response *The Housing White Paper February 2017 sets out the governments support for full fibre connectivity for the UK. Providing FTTP to new developments prevents the need for multi-billion pound fibre retrofit programmes, subsidised by the public purse. FTTP deployment is the pinnacle of broadband infrastructure deployment.*

Support 1777, 2473, 2465, 1977, 2195 support this policy.

Response *support noted.*

POLICY EMP7: PRIMARY AND SECONDARY FRONTAGES IN ASHFORD TOWN CENTRE

Representations have been received from the following consultees:

1432 Central Ashford Community Forum	1684 Ashford Access
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No comments are made specifically regarding the policy. The following comments are made more generally in relation to Ashford Town Centre : 1432 comments that Ashford Town Centre would benefit from larger retail units to attract bigger retailers and that Ashford Town Centre would benefit from heritage restoration of above street-level buildings in the High Street and Bank Street. 1684 comments that empty shop windows should be 'dressed' by their landlords and we should get young people involved through the new college.

Response *Comments noted – no change proposed.*

POLICY EMP8: PRIMARY FRONTAGES IN TENTERDEN TOWN CENTRE

Representation has been received from the following consultees:

1999 Tenterden Town Council

Rep 1999 comments that we should strive for retail use within the primary shopping frontage rather than all town centre uses.

Response *Noted – however such a policy would not be effective as there are permitted development rights which allow retail units to change to other uses without the need for planning permission.*

POLICY EMP 9: SEQUENTIAL ASSESSMENT AND IMPACT TEST

Representations have been received from the following consultees:

1434 Central Ashford Community Forum	2301 Castle City Estates
1718 Friends Life, AXA Real Estate and DMI Properties Ashford Ltd	

Summary of Representations – main issues

Accessibility criteria 2031 believes that criteria b) of the policy is unnecessary as this is not imposed by the NPPF. The accessibility of sites is addressed elsewhere in the Plan and does not need to be re-stated within the policy.

Response Agree. *Criteria b) deleted. See Change MC60.*

Definition of town centre development 2301 Town Centre development is assumed to mean 'main town centre use' in the NPPF; if this is the case the NPPF phrasing should be used.

Response Agree. *See Proposed Change MC109.*

Application of sequential test for non-retail town centre development 2301 raises concern that need for sequential test applies to all town centre development outside of the primary shopping area. The NPPF confirms that the application of the sequential test is different for retail uses and other main town centre uses. This should be clarified in the policy.

Response Agree. *See proposed change MC60.*

Support and general comments 1718 supports the policy, including specifically the requirements for sequential and impact assessments to be carried out for development outside of the town centres, the set of criteria proposed to support assessment of retail development outside of town centres and guidance on early engagement with the Council to agree that scope of the assessment.

1434 comments that Ashford should be trying to attract an Ikea click and collect store

Response Support noted. *Not relevant to Local Plan, planning cannot control the individual occupation by a particular retailer.*

POLICY EMP10: LOCAL AND VILLAGE CENTRES

Representations have been received from the following consultees:

1479 CPRE Kent (Ashford District Committee)	2197 Kingsnorth Parish Council
2666 Charing Parish Council	

Summary of representations - main issues

Issue - Loss of shops and services 1479 is concerned that the policy is not satisfactory in relation to the emphasis placed on the value of protecting village services, and the supporting text fails to give sufficient advice on its implementation. Proposes that marketing should be extended to 12 months. 2666 also questions whether 6 months is sufficient. 1479

Promoting the retention of local shops and public houses should be covered in the policy (NPPF para 28)

2666 considers that the Plan should set out more clearly the Council support for diversification of local shops, services and public houses and summarise in more detail the necessity of local shops, pubs and other services for shopping top-up needs, ensuring the independence of those who cannot travel further afield, and maintaining active and sustainable communities.

Response *Wording amended to promote the retention of local shops and public houses (see Proposed Change MC61). It is considered that the importance of local centres in providing for local shopping needs is already covered sufficiently in para 5.204 and in the policy reasoned justification. There is no justification to extend marketing requirement to 12 months.*

Miscellaneous 1479 states that the community right to bid should be mentioned, that the use classes to which the policy applies should be identified and that Part b) should be amended *'the unit is no longer viable for that purpose, or an alternative local service / community use, and that it has remained unlet etc'*

Response *New paragraph added to reasoned justification on community right to bid and use classes added for clarity. Community uses and local services are covered by Policy COM1 of this Plan. See Change MC61*

1479 does not agree with criteria in relation to being able to provide a similar type of use, sometimes this is not sufficient, for example loss of a village pub when there is a 'bistro' style pub nearby.

Response *Noted, no change made. It is not possible to deal with all eventualities, and the alternative provision would need to be considered at the time of the application, taking into account representations from the local community.*

Support 2666 and 2197 support the policy.

Response *Support noted.*

POLICY EMP11: TOURISM

Representations have been received from the following consultees:

1180 Lesley Wickens	1883 Gillian Bromley
1293 Kent Downs AONB Unit	2391 Chilham Parish Council
1436 Central Ashford Community Forum	2423 High Weald AONB JAC

1723 Freidns Life, AXA real Estate and DMI Properties Ashford Ltd	
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Summary of representations – main issues

Protection for AONBs 1293 and 2423 consider that the policy fails to provide adequate protection to the AONBs and proposes additional wording to the policy.

Response *This is addressed in Proposed Change MC72 new Policy ENV3b*

Chilham 2391 considers that the policy fails to recognise the unique character of Chilham. Chilham PC should be consulted to agree a strategic plan to exploit this potential and a revised policy created based upon these findings, including reference to cultural and historic links and the Tudor Trail.

Response *The Ashford Heritage Strategy, which forms part of the evidence base for the Plan and which is being consulted on in parallel with the Local Plan, addresses cultural and heritage opportunities, including tourism potential, across the borough. Reasoned justification amended to include cultural heritage assets.*

Tenterden 2001 considers that the 2nd para of the policy should be extended to say 'Tenterden or to throughout Borough'.

Response *Partly agree, Policy amended to include Tenterden. See Change MC62.*

Support and general comments 1723 supports the policy, noting that the Ashford DOC to is a major tourist facility that attracts millions of visitors every year, and the planned Phase 2 expansion of the centre will compliment other planned investments that will drive tourism to the south of Ashford town. 1880 and 1883 consider that villages and countryside to be a tourist attraction, which should be protected through sensitive and controlled development. 1436 considers the policy is weak, only protecting what we have and not encouraging more tourist development.

Response *Support and comments noted. The policy encourages sustainable growth of tourism through the provision of a wide variety of new facilities.*

SECTION C TRANSPORT: INTRODUCTION

Representations have been received from the following consultees:

168 Aaron Bowes	1764 Peter Finnis
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287 Southeastern (Nina Peak)	2377 Natural England (Nigel Jennings)
1491 CPRE Kent (Ashford District Committee) (Hilary Moorby)	2387 Network Rail (Elliot Stamp)
1680 Ashford Access (Michael Claughton)	2533 Kent County Council (Barbara Cooper)

Summary of Representations – main issues

Issue - Phasing of transport infrastructure 168 considers that current plan does not address ever-increasing stress on roads, especially the A2070. These should be improved before large housing developments. 1680 states that development of road infrastructure, both rural and urban, should go hand-in-hand with development.

1764 ABC should develop a hierarchy/priority system with respect to development of Ashford's road network, and a transparent vision of road infrastructure required prior to development.

Response *Impact on the road network has been taken into account in plan-preparation. ABC works with KCC and HE to plan sustainably for road infrastructure improvements required to enable and mitigate development.*

Issue - Air quality 1491 states that annual mean nitrogen dioxide has been exceeded close to J10 of the M20 (Canterbury Road and Lees Road). An updated transport strategy should be a clear priority and mechanism in resolving this. 2377 considers that air quality should be highlighted within the plan given proposals for growth will increase traffic flows and therefore nitrogen emission. In particular, concern over relationship of A20 and M20 to Hatch Park SSSI, noted for lichens especially sensitive to air quality changes. Air quality modelling and a traffic assessment to include increased flows should be undertaken in relation to sensitive designated sites.

Response *Air quality is covered in draft Policy ENV12. Monitoring and mitigation with regards to the M20 and the Hatch Park SSSI will be dealt with through the J10a National Infrastructure Planning PINS application.*

Issue - Rail Infrastructure 28 and 2387 object to the lack of acknowledgement in relation to the importance of the railway within the Borough the omission of rail initiatives from Transport section - there is a need to address the importance of rail in supporting local growth. 1680 states that with Ashford's growth, as a business centre, train access to Europe, despite Brexit, will become even more essential.

Response *Accepted. Paragraph added to address rail infrastructure. See Proposed Change MC63.*

Issue - Sustainable and Integrated transport 287 Access to all six [sic] railway stations in the borough should be addressed in the plan. In particular the transport interchange at Ashford International Station needs to be designed to provide for the changing needs of the

borough, ensuring that an effective and sustainable transport interchange is developed to deliver seamless door to door journeys via bus and rail travel and support cycle and walking facilities at the station.

1491 The transport chapter of the plan must be amended and re-emphasised to demonstrate a desire to encourage and improve sustainable transport modes, as per government guidance. The Local Plan should also bring forward the modal shift proposed in the Ashford Transport Strategy, but also be reason to update the Ashford Transport Strategy.

Response *Access to the seven railway stations within the borough is part of Southeastern's development plan, and this will be supported by the Council as walking and cycling routes to and from Charing, Wye, Chilham, Hamstreet and Appledore stations are encouraged. The Council is also supportive of Network Rail's aspiration to improve the forecourt at Ashford International Station, creating improved pedestrian routes to the town centre and adjacent to the River Stour, an extended/repositioned taxi rank, and increased cycle parking on the International site of the station. While the principle of modal shift is no longer at the forefront of national government policy, the Council is continuing to work with partners to ensure modal integration.*

Issue – Modelling 1491 ask that Transport Modelling Assessments (e.g. VISUM) should be presented as evidence to underpin the Local Plan. This is required both to resolve transport and air quality issues.

1764 states that for the overall Local Plan to be viable, the associated Infrastructure, and its integration, must be defined to a level sufficient to permit complete understanding. Need for a Transport and Roads Infrastructure Delivery Plan, to support both the construction phase and for existing/future residents. This would include: Analysis of impact of all works associated with the Local Plan, covering Construction / Building related vehicle movements, diversion of normal vehicular traffic caused by the foregoing, and the short-, medium- and long-term Road Infrastructure needs. Development of a "Construction Traffic Management Plan" which looks globally across the Borough, and by individual area / village, at needs to limitations & controls, particular of large vehicle movements (in & out of the area), parking of construction related vehicles, etc.

Response *KCC Highways and Transportation support the proposed allocations in the Plan from a highway capacity perspective, stating that 'Transport modelling work has also been undertaken to understand and define the implications of proposed Local Plan allocations on the local highway network. Traffic surveys data has been collated and analysed at three key locations where the Local Plan envisages strategic growth will occur, namely Kingsnorth, Kennington and Eureka Park. The analysis that has been completed demonstrates that traffic movements generated from planned growth across the Ashford urban area will not give rise to a severe highway impact on any of the associated corridors'.*

Issue - Requirement for additional studies 1764 proposes a series of transport assessments (especially related to HGV movements) related to the Chilmington Green development including but not limited to the following: A28 Ashford to Tenterden, whole route; Magpie Hall Lane & Stubbs Cross junctions (designated as a Chilmington access route); Criol Lane (designated as a Chilmington access route); Bethersden Road; Tally Ho

Road – Woodchurch Road through Shadoxhurst; Ashford Road & Ham Street Road from Kingsnorth to Hamstreet.

Response *The Chilmington Green Area Action Plan was published in July 2013. This application was agreed at Planning Committee in October 2014, and outline planning permission granted in January 2017. The infrastructural requirements and modelling related to this development have been thoroughly explored and agreed previously between relevant parties.*

Support 2533 highlights that the transport modelling work completed by Highways England for the M20 J10A scheme has taken account of proposed site allocations as reflected in the draft Local Plan. The correlation between the Local Plan and the transport modelling work prepared to inform the M20 J10A DCO submission has ensured the transportation implications of growth across the plan period have been thoroughly examined at the strategic level to the satisfaction of the Local Highway Authority. The analysis that has been completed demonstrates that traffic movements generated from planned growth across the Ashford urban area will not give rise to a severe highway impact on any of the associated corridors. Therefore, KCC is supportive of the proposed allocations from a highway capacity perspective.

Response *Support noted.*

POLICY TRA1: STRATEGIC TRANSPORT PROJECTS

Representations have been received from the following consultees:

5 Daren Nixon	2271 Barton Willmore (Lucy Wilford) for Persimmon Homes and Taylor Wimpey
1149 Central Ashford Community Forum (Emily Neighbour)	2304 Geoff Meaden
1181 Lesley Wickens	2315 David Buckley
1491 CPRE Kent (Ashford District Committee) (Hilary Moorby)	2654 Kent County Council (Barbara Cooper)
1846 carol procter	2693 Gladman Developments (Mat Evans)
1932 Kent Wildlife Trust (Vanessa Evans)	2710 Highways England (Kevin Brown)
2199 Kingsnorth Parish Council (Len Bunn)	2719 Deloitte (wright) for Church Commissioners for England

Summary of representations – main issues

Issue - impact on local communities and nature 5 is concerned that the traffic increase as a result of the S3 (Court Lodge) allocation will be served by a rural road without

pedestrian walkways which is currently used by pedestrians between Knights Park and Kingsnorth Primary School.

1181 is concerned that ABC will not vote to control growth within limitations of the road network, and that developer contributions to Jct10a should be as a result of a sensible policy of expansion rather than commercial considerations interfering with free-flowing traffic.

1932 asks for reference of Roadside Nature Reserve AS07, and the need to protect it, assess any impacts and mitigate for them in junction development.

Response *The Pound Lane Link Road is proposed in the plan as a strategic road link to service sites S3, S4 and S5, thereby relieving pressuring on surrounding roads. Impact on the road network has been taken into account. Developer contributions will be used as required.*

This Plan will not be used to determine the J10a application which is a PINS application as it forms a National Infrastructure Planning project.

Issue - Other traffic transport infrastructure improvements required 2199 requires provision of the Pound Lane Link Road from Chilmington Green via Long Length to the Southern Orbital Road is of the utmost importance, especially since KPC considers the A28 improvements will impact Kingsnorth Village.

Response *Noted - this is already required as part of site policies S3, S4 and S5.*

Issue - Other non-traffic transport infrastructure improvements required 1149 offers general support, but concern that pedestrian crossing over Station Approach has not been delivered, and High Speed Train Services are increasingly crowded. 1149 recognises that ABC has no control over rail services but believes that it should do more to influence those that do, while it should refuse flatted development close to station without increased rolling stock. 1491 states that the Council has not identified any strategic walking or cycling network improvements, nor bus/rail improvement measures

Response *ABC continues to work with Network Rail, the landowner at Station Road, and with Southeastern trains, and a redesign of the forecourt of Ashford International Station is on the service providers' agenda. While public routes are within the remit of the County Council, ABC is separately identifying an expansion of the Green Corridor, and is to undertake a review of its Cycling Strategy. Bus and rail improvement measures are included, where relevant, in site policies. However, it is noted that these could be explored within this chapter.*

Issue – Funding 2271 objects as policy does not make provision for repayment of forward funding of J10 M20 interim improvements, completed in Sept 2007, forward funded by Taylor Wimpey and Persimmon Homes to facilitate the release of land in the south of Ashford.

Response *Saved SPG6 'Providing the Transport Needs arising from South Ashford Study' payments will still be expected from relevant development via s278 payments to the highway authority.*

Inadequate modelling 1181 Contends the J10a scheme takes no account of true likely traffic, and therefore requests an independent review now and annually into this. 184 also raises concerns about lack of Traffic Impact Assessments for construction traffic and for the developments themselves. Without these, the plan will not be effective, and will result in local disruption over the plan period.

2304 Road/highway development relating to Ashford town is inefficient, and not underpinned by (suitable) modelling. There would be no need for J10a if suitable modelling (i.e. VISUM) had been used in the town's recent development, and there is nowhere else in the country with a requirement for two junctions so proximate. The J10a scheme should be scrapped, and resources deployed in pursuit of sustainable transport.

2304 Need for VISUM modelling on which to base expansion of town, and subsequent policy wording amendment, requiring the Council to commission consultants to undertake an agreed range of neutral traffic modelling (either VISSIM or VISUM as appropriate) covering all of the Ashford urban area.

Response *Traffic modelling has been undertaken for the planning application for J10a, currently under consideration by the Planning Inspectorate and publicly viewable online. Impact on the road network has been taken into account for plan-making purposes. Further assessment will be necessary at planning application stage.*

Highways England has a SATURN model for the strategic network under its responsibility. KCC as highways authority has VISUM models for strategic link roads. Impact on the road network has been taken into account for plan-making purposes.

KCC Highways and Transportation support the proposed allocations in the Plan from a highway capacity perspective, stating that 'Transport modelling work has also been undertaken to understand and define the implications of proposed Local Plan allocations on the local highway network. Traffic surveys data has been collated and analysed at three key locations where the Local Plan envisages strategic growth will occur, namely Kingsnorth, Kennington and Eureka Park. The analysis that has been completed demonstrates that traffic movements generated from planned growth across the Ashford urban area will not give rise to a severe highway impact on any of the associated corridors'

Ring road junction improvements 2654 offers support, but seeks amendment to 5.241 to bring the paragraph up to date with recent progress and planning consents.

Response *Agreed. See Proposed Change MC63.*

Support 2710 Highways England is fully supportive of the Junction 10a scheme and is committed to its delivery. The scheme is included in the Road Investment Strategy and a Development Consent Order application is due to be submitted soon. However, wishes to engage with ABC to seek clarity over level of contributions to support J10 of the M20.

Response *Support noted. ABC and HE are continuing engagement and cooperation over J10a.*

2693 Supports delivery of infrastructure, but ABC should be realistic on scheme deliverability and development costs as a result, and especially in relation to 5YHLS statement.

2719 Support, but seeks clarification on how staged release of sites will be managed following the DCO for J10a within paragraphs 5.226-5.227. At present, there is a lack of clarity in these two paragraphs as to when spare capacity at J10 will be released (to those developments most likely to complete) following the DCO announcement. There should be clarity that those developments already given outline permission but constrained by condition pending completion of J10a should be given priority to use J10 capacity once the J10a announcement is made.

2719 Support, but proposes sites at Cheeseman’s Green are more deliverable in the short-term than strategic sites in Kingsnorth, and that policy should protect “appropriate highway links to the strategic network”. Despite the lack of progression of the highway from J10a across the CTRL as per the 2008 Core Strategy, urges protection of high standard connections to the A2070 west of the Hastings Railway Line.

Response Noted, but no change required.

POLICY TRA2: STRATEGIC PUBLIC PARKING FACILITIES

Representations have been received from the following consultees:

81 Simon Gray	1905 David Buckley
1251 Ian Bull Consultancy Ltd. (Ian Bull) for Pentland Homes Ltd	2229 Chilmington Green Consortium (Steve Mellor)
1335 Sally Gathern	2299 Peta Grant
1437 Central Ashford Community Forum (Emily Neighbour)	2302 Indigo Planning Ltd (Sean McGrath) for Castle City Estates
1762 Jacqueline Male	2536 Kent County Council (Barbara Cooper)
1801 Jon Heuch	

Summary of representations – main issues

Issue – likelihood of delivery 1251 states there is no realistic prospect of implementation of any P&R schemes as the evidence in the Ashford Parking Review does not support it, there is plenty of unoccupied parking in the town centre, and Ashford has neither the congestion, bus priority or constrained parking in the town centre to justify P&R.

1437 Paragraph 5.252, P&R regular service should be guaranteed to ensure certainty for the commuter, or else the facility will not be used by this group and therefore cannot form part of an integrated transport link. 2229 believes that justification for P&R is undermined by paragraph 5.253, which makes it clear that the market will not deliver it, and that the town centre office market is currently fragile.

2229 argues that there is no clear basis on which statements in paragraphs 5.252 or 5.254 can be effective, deliverable or justified. [P&R as a component of long term parking strategy]

2536 P&R was based on the provision of SMARTLINK as an integrated approach to modal shift. The relevance of P&R to the local plan is deemed surplus to requirements.

2536 Other aspects of this policy, incorporating the recommendations of the Ashford Parking Strategy, along with the promotion of a Variable Messaging System and provision of a Multi-Storey Car Park, are supported and will meet the demand without P&R.

Response *Agreed – see proposed change MC64*

Issue – The Warren 1251, 1905, 230 the Warren P&R should be deleted from this policy given that there is no evidence that delivery would not be necessary, realistic or viable, and parking provision could be delivered in the town centre. The site would be more suited to retail development. In the infrastructure plan, delivery of the P&R is considered low priority. 1335 seeks an explanation of the impact of The Warren P&R scheme on the recreational wooded area used by residents.

Response *Amend to delete references to the Warren in the Policy and reasoned justification. See Change MC64.*

Issue – shortage of commuter parking 1801 Commuter parking in the town centre will be reduced by the Commercial Quarter development, and there is a shortage of affordable commuter parking in the town centre

Response *The Council is satisfied that this policy addresses parking need adequately.*

Support 81 Free public parking in the town centre should be given greater priority. 1762 and 2299 supports provision of P&R. 2299 seeks addition within it for improved parking provision in Tenterden.

Response *Parking provision in Ashford and Tenterden, along with consideration of Park & Ride facilities is detailed in the Local Plan's supporting document, Ashford Parking Review (PBA, 2014).*

POLICY TRA3a and TRA3b: PARKING STANDARDS FOR RESIDENTIAL AND NON-RESIDENTIAL DEVELOPMENT

Representations have been received from the following consultees:

1491 CPRE Kent (Ashford District Committee) (Hilary Moorby)	2298 Peta Grant
1915/1925 Mr and Mrs Jackson	2562 Barton Willmore (Kate Holland) for Bellway Homes Ltd (Kent)
2200 Kingsnorth Parish Council (Len Bunn)	2667 Charing Parish Council (Jill Layland)
2230 Chilmington Green Consortium (Steve Mellor)	2695 Gladman Developments (Mat Evans)
2272 Barton Willmore (Lucy Wilford) for Persimmon Homes and Taylor Wimpey	

Summary of representations – main issues

Omissions 1491 objects to the failure to include standards for cycle storage (residential) or cycle parking (non-residential). 2667 seeks reference to standards for visitor parking.

Response Policy TRA6 amended to include cycle storage/parking standards. See Change MC65. Visitor parking is addressed in the supporting text, and remains as per the existing Residential Parking SPD.

Design issues 1915 objects to 5.258 and statement that Residential Parking SPD has been a success. 2200 feels that parking courts should not be part of any parking design as these are seldom used. Parking should be positioned as close to the dwelling as possible. Parking should be restricted at key road junctions (identified Church Hill and Ashford Road crossroads, Charing)

Response 5.258 states that the SPD has proved useful, robust and clear. It also provides tested parking design guidance. No change required.

Miscellaneous 1925 Special attention should be given to small businesses, often with trade vehicles, operating from home, with allowance made for these and contributions payable for parking elsewhere. 2200 Minimum standards for 4-bed houses are too low if a garage does not count as a parking space. 1925 Extra attention should be given to 5/6-bed homes.

2230 General approach is welcomed, but policy is unjustified and lacks sufficient clarity that: 1) Chilmington is considered to have 'central areas'; 2) These are C3 residential parking standards; 3) Chilmington is considered to be suburban location; 4) 4 bedroom housing requires 3 parking spaces.

2272 and 2562 Supports principle of standards, but should not be up to the Council to determine application on particular sites (increase or decrease) [should be up to the developer]. Introductory wording should be amended as follows: “In exceptional cases, the Council may require will consider proposals which to depart from the standards in policies TRA3(a) or TRA3(b) if any of the following apply”.

2695 Unnecessary to impose such stringent parking requirements, especially for 3-4 bed (larger) dwellings, and that if this is continued Council must consider knock-on impact of deliverable density on site capacity.

Response Disagree - The proposed parking standards are minimum standards, based upon evidence of need and delivery.

Support 2298 Supports policy, but seeks particular attention to developments and parking provision in general in Tenterden.

Response Support noted.

POLICY TRA4: BUS PROVISION

Representations have been received from the following consultees:

1491 CPRE Kent (Ashford District Committee) (Hilary Moorby)	2273 Barton Willmore (Lucy Wilford) for Persimmon Homes and Taylor Wimpey
2090 Cllr Geraldine Dyer	2566 Barton Willmore (Kate Holland) for Bellway Homes Ltd (Kent)
2201 Kingsnorth Parish Council (Len Bunn)	2668 Charing Parish Council (Jill Layland)

Summary of representations - main issues

Miscellaneous 1491 Need for the identification of bus network proposals. 2668 feels that this policy should commit the Council to working with the rail operator to ensure HS1 connections with other trains, relieve overcrowding on lines, reducing the need to travel to AIS to catch high-speed trains, and partial manning of rural stations.

2273, 2566 Principle of sustainable transport supported, but does not perceive this policy to be justified or consistent with the CIL regs as being necessary, directly related and fair and reasonable in scale and kind to the development.

Response The Council works with Network Rail and Southeastern to promote and plan for a range of railway improvements, including station upgrading, service improvement and has recently attracted significant funding for signal upgrading to allow Eurostar services to continue.

The Council is obliged in any eventuality to work with the County Council and bus providers to meet additional demand as a result of new developments. There is no need for this to be repeated in the Local Plan.

Support 2090 is supportive of enhancement of bus network to serve developments as they occur. 2201 is supportive of this policy and the creation of an efficient bus network to reduce reliance on the private car.

Response Support noted.

POLICY TRA5: PLANNING FOR PEDESTRIANS

Representations have been received from the following consultees:

1759 Jacqueline Male	2202 Kingsnorth Parish Council (Len Bunn)
2088 Cllr Geraldine Dyer	2539 Kent County Council (Barbara Cooper)

Summary of representations – main issues

2202 Feels the policy is unsound, and states that it is essential that safe and practical routes for pedestrians and cyclists are provided.

Response This is required within the existing policy.

Support 1759 and 2088 support the policy, and that routes should be well-planned and well-linked together to encourage walking as leisure and as linking. 2539 is supportive of the policy, and seeks mention of connection with KCC’s Countryside Access Improvement Plan to secure wider connection and funding potential.

Response Support noted.

POLICY TRA6: PROVISION FOR CYCLING

Representations have been received from the following consultees:

10/11 Kennington Community Forum (Christopher Morley)	2005 Tenterden Town Council (Philip Burgess)
1491/1492 CPRE Kent (Ashford District Committee) (Hilary Moorby)	2089 Cllr Geraldine Dyer
1502 Newenden Parish Council (Åke Nilson)	2203 Kingsnorth Parish Council (Len Bunn)

1760 Jacqueline Male

2538/2655 Kent County Council
(Barbara Cooper)

Summary of representations – main issues

Inclusion of specific proposed routes 11 Policy should refer to ambition to improve routing of cycleway linking Conningbrook through Little Burton as per original plan when the country park was developed. 2005 is supportive of principle of the policy, but seeks specific mention of a number of routes.

1491 considers there is a need for indication of strategic cycle network improvements. 1492 is supportive of policy in principle, but seeks identification of content of a specific Cycle Strategy and the land required to be safeguarded for specific routes, as well as perceived challenges to delivery.

Response *Identification and scope of cycle network improvements will be identified in the forthcoming review of the Ashford Cycling Strategy, and the Infrastructure Plan. This will also outline land-take and perceived challenges to delivery, as requested, and will provide further details of strategic links within and around the urban area.*

Support 10 supports, but seeks specific mention of NCR17 the “Pilgrims Way Cycle Trail”, which can provide a strategic link to Eureka Park. This is in addition to mention of NCR18, which is already mentioned. 1502 1760, 2089, 2203 support this policy. 2538 and 2655 fully supportive of policy, but seeks reference to KCC’s Active Travel Strategy which underwent consultation in the summer. It outlines an aspiration for ABC and KCC to work together to identify and prioritise routes and maintenance, as well as funding requirements.

Response

Support is noted. 5.274 amended to refer to KCC’s Active Travel Strategy. 5.275 amended to include reference to the other National Cycle Route (17) in the borough . See proposed change MC67.

POLICY TRA7: IMPACT ON THE LOCAL ROAD NETWORK

Representations have been received from the following consultees:

1761 Jacqueline Male	2305 Geoff Meaden
2094 Cllr Geraldine Dyer	2572 Bellway Homes Ltd (Kent)
2160 Shadoxhurst Parish Council (David Ledger)	2669 Charing Parish Council
2205 Kingsnorth Parish Council (Len Bunn)	2711 Highways England
2274 Persimmon Homes and Taylor Wimpey	2829 Willesborough Parking Action Group (John Bailey)

Summary of representations – main issues

Issue – suggested amendments to policy wording 2160 proposes amendment to policy to add “to enforce proper vehicle routing for all major construction sites across the Borough.” This would avoid an anticipated significant increase in vehicle movements through Shadoxhurst village, as a result of proximate proposed development (inc. S3-5 and Chilmington).

2274, 2572 This policy sets significantly lower tests than paragraph 32 of the NPPF, and would be a significant constraint on development (esp. at Willesborough). In addition the terms ‘adequate capacity’ and ‘significant highway movements’ are inadequately defined.

Response *The Council disagrees and considers that the policy, as written, suffices.*

Issue - Road planning in Ashford is inadequate 2305 Road and highway development in Ashford has been inefficient, and need for J10a, close to J10, is evidence of this. Proposes scrapping of J10a. 2829 also considers that recent planning has been inadequate and that development over the years at Willesborough Lees and Kennington has exacerbated pressure on local roads, and that this will deteriorate in light of J10a of the M20. 2829 Any further expansion of the hospital especially a specialist A&E unit or more private health facilities will gridlock the area regularly, which in the case of ambulance traffic could be fatal.

Response *The Council disagrees, and the delivery of J10a will unlock development potential of sites in South Ashford.*

Issue - Other comments 2829 Proposes S2 at Large Burton would be more suited for a railway station with a substantial parking offer (circa 2000 spaces), and would improve the quality of life for residents.

2305 Need for VISUM modelling on which to base expansion of town, and suggests policy wording amendment to this effect.

Response *KCC as highways authority has VISUM models for its strategic link roads in the borough, while Highways England has a SATURN model for the strategic network under its responsibility.*

Further railway halts to the north of Ashford International Station are not on the agenda of service providers.

Support 1761 and 2094 Supportive of policy. 2205 Support, but proposes prohibition of HGVs as well as construction traffic from rural roads. 2669 particularly supportive of second paragraph. 2711 offers support for the policy, but urges ABC to engage with HE over impacts of development on SRN, given the DfT circular 02/2013 which states “capacity enhancements and infrastructure required to deliver strategic growth should be identified at the Local Plan stage”.

Response *Support noted. The Council engages regularly with KCC Highways and Highways England on the impacts of development on the road network. The Council already*

requires applicants with planning permissions to submit a Construction Management Plan for approval to demonstrate measures to minimise local impact during development.

POLICY TRA8: TRAVEL PLANS, ASSESSMENT AND STATEMENTS

Representations have been received from the following consultees:

1493 CPRE Kent (Ashford District Committee) (Hilary Moorby)

Summary of representations – main issues

1493 Supports the policy generally, but proposes the requirement of a travel plan opposed to/in addition to a transport assessment and that a travel plan should require timetabling monitoring schedule, methods and reporting requirements and the appointment of and funding for a Travel Plan Coordinator.

Response A Travel Plan arises from the findings of a transport statement or assessment and sets out a plan of measures and initiatives, for a site or organisation, which encourages more sustainable travel. They commonly contain a range of measures including new infrastructure, changes to working practices etc. Policy to be amended to clarify . See Change MC68.

POLICY TRA9: THE APPROACH TO HEAVY GOODS VEHICLES

Representations have been received from the following consultees:

826/1331/1333/1336 Westwell Parish Council (Jolyon Drury)	1629 MARGERY THOMAS
1182 Lesley Wickens	1689 Alan Vaughan
1194 Sandyhurst Lane Residents' Association (David Porter)	2161 Shadoxhurst Parish Council (David Ledger)
1225 Paul W Bartlett	2312 sharon middleton
1494 CPRE Kent (Ashford District Committee) (Hilary Moorby)	

Summary of representations – main issues

Issue - Landscape setting 1225 is pleased that this policy pays attention to HGV movement at particular times. Proposes a buffer zone between Blind Lane and Highfield Lane to protect Mersham from “development creep” and spatial segregation from lorry parking.

Response See new Policy SP7.

Issue - Outdated standards used 826, 1331, 1336 the standards offered in para 5.283, referring to KCC SPG4, are out of date and, in calculating buffer, delivery and overlay parking for B8 uses does not account for increased tempo of supply chain. 1336 advises that the recommended parking bay for articulated goods vehicles of 16m x 3.5m has been superseded by a requirement for 18.5m length to accommodate 15.65m trailers and draw-bar combinations. A bay width of 3.5m requires considerable draw forward to clear adjacent vehicles when turning out- it is recommended to refer to the FTA planning guide “Designing for Deliveries” 2016.

1336 Outlines alternative truck parking and Goods vehicle traffic generation standards from a consortium of transport consultants and TRICS.

Response Agreed. Amend to update standards. See proposed change MC69.

Issue - Impact on residential amenity 826 states that the policy gives insufficient attention to overnight and buffer truck parking provision given acknowledgement of strategic location as per 5.281.1182 states specific HGV consideration is needed on all commercial development site allocations, to include limiting lighting, noise and limiting hours of operation, so as not to impact residential amenity.

2161 Policy does not go far enough to restricting HGV use of rural roads, and should include need for restrictive signage and road narrowing. Asks for greater ABC pressure on KCC to secure road repairs particularly those caused by HGV movements.

1331 explains that a greater relationship needed between this policy and B8 use class permissions needs to be established and proposes greater strategic attention is paid in para 5.281, to note that major distribution centres are being constructed towards Dunkirk and Belgium to supplement restricted opportunities locally, thus potentially increasing HGV movements, and this paragraph requires greater consideration of overnight and buffer truck stops.

Response The council agrees that the borough is situated in a geographically strategic location, and is aware of and engaged with the Department for Transport and Highways England’s plans for improved provision related to the strategic road network, and continues to work with the Kent County Council in improving road infrastructure.

Some of the issues outlined, including lighting, are dealt with elsewhere in the plan (ENV4), while issues such as noise and residential amenity are covered by national planning policy.

Issue - Likelihood of policy implementation or success 1182, 1225 are supportive of all aspects of the policy, but doubt these requirements will be translated into conditions related to planning permissions, as at AXA Sevington development. 1194, 1629, 1689, 2312 support doubling the size of Waterbrook overnight lorry park (para 5.282), but judges policy unsound as it does not allow for enforcement against nuisance parking elsewhere in the borough, especially A20 near Potters Corner. Similar support from 1333, but proposes a greater expansion of Waterbrook to provide 900 spaces, and encouragement of SDC to double provision at Stop 24.

1331 At a UK level the lack of provision of secure parking with drivers' rest facilities on key trunk routes located to match drivers' hour isochrones, room for trailer interchange and chilled trailer chill-down away from domestic communities is a pressing public policy problem that must be resolved.

Response *Planning conditions are applied to make a development acceptable, and national guidance requires that they should be imposed only when they are necessary, relevant to planning and to the development to be permitted, enforceable, precise, and reasonable in all other respects (See NPPF paragraph 206).*

Local enforcement measures are outlined online at <http://www.ashford.gov.uk/heavy-goods-vehicles> , while more strategic solutions are dealt with by the Department for Transport.

Issue - Administration of planning applications 1336 Proposes a criteria-based approach for assessing appropriateness of applicants' DAS in predicting vehicle traffic generation. Proposes use of planning condition, "No additional floor space, increase in storage density , turnover or working hours shall be created inside the building(s) without consultation to ensure that the employee car/ goods vehicle parking continues to meet the need and the highways access remains sufficient in the interests of road safety" might be considered.

Response *The council appreciates the criteria-based approach to design and access statement assessment. Application materials submitted as part of a planning application will need to provide sufficient detail as required by KCC or Highways England as consultees on traffic generation issues.*

Planning conditions are applied to make a development acceptable, and national guidance requires that they should be imposed only when they are necessary, relevant to planning and to the development to be permitted, enforceable, precise, and reasonable in all other respects (See NPPF paragraph 206).

Support 1494 offers support.

Response *Support noted.*

POLICY ENV1: BIODIVERSITY

Representations have been received from the following consultees:

1296 Kent Downs AONB Unit	2326 Environment Agency
1499/1506 CPRE Kent (Ashford District Committee)	2378 Natural England
2162 Shadoxhurst Parish Council	2393 Chilham Parish Council
2208 Kingsnorth Parish Council	2418 High Weald Joint Advisory Committee
2275 Persimmon Homes and Taylor Wimpey	2521/2523/2524 Wye with Hinxhill Parish Council
2303 Geoff Meaden	2578 Bellway Homes Ltd (Kent)

Summary of Representations – Main Issues

Issue - SAC's / SPAs and Habitat Regulation Assessment 1499, 1506 and 2378 recommends a re-word of policy and supporting text to include a mention of the SPA at Dungeness, Romney Marsh and Rye Bay in addition to its Ramsar site and other rewording to policy text relating to appropriate assessment and HRA.

1499 suggests additional policy coverage for protected species specifically to cover protection, mitigation and enhancement and set out survey and legal requirements and habitat regulation tests and requests a summary explanation of the HRA process that applies to the SAC/SPAs.

1506 Would like specific requirement for HRA screening in policy. Also suggests including a reference to projects being assessed 'alone or in combination with other plans' to take cumulative effects into account. At paragraph 5.296, the local plan should summarise the Habitats Regulation Assessment process and the sites that it may apply to. This might include Stodmarsh SAC, SPA, Ramsar as well as Wye and Crundale SAC, and Dungeness, Romney Marsh and Rye Bay SPA, Ramsar Site.

Response *The recently extended Dungeness, Romney Marsh and Rye Bay Special Protection Area does not fall within the Borough boundary. A small area, in the vicinity of Stone in Oxney, adjoins the railway line boundary of the borough for a number of metres. Paragraph 5.296 is amended to clarify this position. Reference is added to paragraph 5.296 and to Policy ENV1 to the HRA process. It is not considered necessary to suggest the European Sites that could be assessed in this regard. See proposed Change MC70.*

Protected species are already protected under legislation and Policy ENV1 as drafted already requires that development should avoid significant harm to protected species. It is not considered necessary to create a separate policy.

Issue - BOAs and BAPs 1499 and 2162 request a more detailed explanation of the BOAs and greater prominence of the topic in the plan and the policy. 2326 supports reference to BAP habitats but notes these are also referred to as Priority Habitats.

Response BOAs are referenced in both the Policy and the reasoned justification text and are mapped in Chapter Seven of the Plan. Policy ENV1 requires that the management, restoration and creation of habitats in line with the opportunities identified for the BOAs and targets set out in the Kent Biodiversity Strategy will be supported. No amendments necessary aside from addition of Priority Habitats for clarity.

Issue – The strategic green infrastructure network 1296 suggests that the defined Green Infrastructure Network in para 5.300 should also include reference to the Kent Downs AONB. 1499 suggests other natural features and spaces, including parks and open spaces, rivers and ancient woodland as well as designated habitats should be added to this definition.

Response Paragraph 5.300 as currently drafted refers to nationally designated sites. These include both the AONBs in the borough. The wording is amended to make this clearer and to add reference to other natural spaces such as woodlands and open spaces to clarify. See Change MC70.

Issue - Local Wildlife Sites 2162 requests the list of LWS to have greater prominence in the Plan and be better protected through this policy. Also requests that the policy should encourage landowners to identify new LWS or enhance them.

Response LWS are referred to in paragraph 5.298, and are listed in full in Appendix 4 of the Plan in the environment section of the plan. Policy ENV1 requires development to avoid significant harm to LWS. The Kent Nature Partnership oversees the selection of LWSs in this county, using robust, scientifically-determined criteria and local knowledge and understanding of this area's natural environment. The Partnership is made up of a variety of stakeholders including local authorities, public bodies, nature conservation NGOs and groups representing landowners and farmers.

Amend paragraph 5.298 to refer readers of the Plan to the list of Local Wildlife Sites in the Appendix 4. See Change MC70.

Issue - Creation of new woodlands/meadows/boundary planting 2162 requests that detail be added here regarding the creation of new areas for wildlife and planting around proposed site boundaries early on in the process before commencement of developments to protect the views and rural edges.

Response The policy ENV1 does encourage new and enhanced biodiversity (wildlife areas) as part of new developments coming forward, and appropriate mitigation measures if harm caused. Green Corridor extension and some wildlife areas are allocated specifically in site policies where they are deemed appropriate. No change necessary.

Issue - Ancient Woodland 1499 suggests specific policy coverage for protection of Ancient Woodland

Response Ancient woodland is mentioned in paragraph 2 of this policy and is also specifically protected by Policy ENV5. No change necessary.

Issue - Mitigation measures 2275 and 2578 object to the requirement that any necessary mitigation measures be established prior commencement of development. Request a change to 'in line with a timetable to be agreed with the Local Planning Authority'.

Response It is a standard condition of planning consents that any ecological mitigation measures be identified, submitted and agreed in writing by this planning authority prior to the commencement of development. Amend policy to clarify that mitigation measures should be delivered in line with a timetable to be agreed with the Local Planning Authority see Proposed Change MC70.

Issue- Monitoring and baseline data 2393 states that the policy lacks teeth and does not contain a method to quantify effects on biodiversity. 2303 agrees and suggests that there is no quantitative data or baseline evidence to be able to verify the future actions. It proposes that we must assess current extent of biodiversity in order to be able to monitor effects of local plan in accordance with NPPF paragraph 165.

Response Monitoring indicators for the LP include several indicators that can be monitored annually to record biodiversity effects.

Support - 2208, 2521, 2523, 2524 support the policy. 2578, 2378, 2326, 2275, 2303 also support the policy subject to a number of minor changes.

Response Support noted.

POLICY ENV2: GREEN CORRIDOR

Representations have been received from the following consultees:

378/379/1508 Kennington Community Forum	2209 Kingsnorth Parish Council
730 Graham Skinner	2215 Padraig Herlihy
731 Graeme Peterson	2234 Great Chart with Singleton Parish Council
948 Elizabeth Welch	2261 Persimmon Homes (Barton Willmore)
1030 South Ashford Community Forum	2276 Persimmon Homes and Taylor Wimpey (Barton Willmore)
1507 CPRE Kent (Ashford District Committee)	2328 Environment Agency
1141 James Ransley	2379 Natural England
2162 Shadoxhurst PC	2479 Hallam Land Management Ltd
1806 Jaqueline Male	2584 Bellway Homes Ltd (Kent) (Barton Willmore)
2179 Village Alliance	

Summary of representations – Main Issues

Issue – Sustainability Appraisal scoring 1141 suggests that site proposals that would improve the green corridor should be scored more positively in accordance with the policy here. At present sites adjoining GC in SA are scored negatively.

Response SA scoring matters are addressed in the SA Addendum Report.

Issue – Map of Green Corridors 2234 suggests a clearer map is needed including details of proposed extensions into Chilmington Green and Ashford Community Woodland area. 2479 States map is incorrect around Court Lodge and limits the development scope south of Pound Lane within S4. 2584 objects to the pink (future extension area) overlapping with the Willesborough Lees site allocation on the basis that it removes available land from development potential. 2276, 2261 The revised boundaries around Park Farm South East and Finn Farm respectively are incorrect and limits areas of scope for development.

Response The Green Corridor Map has been clarified and revised. See Proposed Main Change MC83. Areas of future extension have been replaced with future potential directions of Green Corridor expansion to reflect the wording of the supporting text.

Issue – extensions to Green Corridor 731, 948, 2215 and 2179 request Green Corridor should be extended in a north easterly direction around Waterbrook and past site U19 from its current eastern extremity near Cheeseman's Green as far as the M20 motorway and incorporating site WE15. This would provide a strategic gap between the village of Mersham (both lower and upper Mersham) and the eastward expansion of Ashford.

Response please see new Policy SP7

Issue – BOAs 1507 suggest a link to BOAs in supporting text.

Response This is already provided in para 5.306.

Issue – relationship with Action Plan 1030, 1508, 2276, 2261 feel the policy cannot be supported/commented on without access to the revised Action Plan.

Response Noted. The revised Green Corridor Action Plan will be consulted upon alongside the main changes to the Local Plan.

Support: 730, 1507, 1806, 2209, 2328, 2379 support this policy. 378 and 379 strongly support the extension of the Green Corridor, particularly the extensions at Bybrook Nature Reserve and Conningbrook Lakes, while support is also received from 2209 particularly supports Green Corridor extensions around Kingsnorth.

Response Support noted.

POLICY ENV3: LANDSCAPE CHARACTER AND DESIGN

Representations have been received from the following consultees:

839; 2259 Lewis	1923 Lois Tilden
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1223 Smarden Parish Council	2098 Gregory Peters
1302 Kent Downs AONB Unit	2258; Spencer King
1510 CPRE Kent	2380 Natural England
1546 Carol Weare	2422 High Weald Joint Advisory Committee
1601 Sandhurst Lane Residents' Association	2481 Canon Woods and Orchard Action Group
1711; 1719 Egerton Parish Council	2696 Gladman Developments
1892 Westwell Parish Council	

Summary of representations - Main Issues

Issue – protection of AONBs 1510 considers that the policy does not provide sufficient protection to AONBs, should refer to resisting development that would have a significant adverse effect on the setting of an AONB and it is essential that minor proposals are suitably located in the AONB, as well as designed to enhance the landscape and scenic beauty.

1302, 2422, 1510 In accordance with the NPPF (para123) the tranquillity of AONBs also needs to be taken into account. 1302, 2422 argue that the natural beauty of the AONBs embraces more than the visual or scenic elements of the countryside and includes the landform, geology, biodiversity and historic and cultural heritage, as set out in the AONB Management Plans.

Response Agreed. Policy ENV3 amended and divided into two parts to create an AONB specific policy. See proposed change MC72.

Issue - Setting of AONBs 1302, 2422, 2481, 2380 Raise concerns about the lack of regard in draft policy ENV3 to the conservation and enhancement of the setting and views in and out of the Kent Downs AONB. 1711 and 1719 consider that the policy wording needs to make clear that this also relates to areas outside AONBs, as the way its currently phrased is a little ambiguous. 1302; 2442; 1892 state that this policy fails to provide protection from the visual impact on the scenic beauty or pollutions from development within the setting of the AONB. Earlier in the Plan, at para 3.67, it is stated that development that would have a significant adverse effect of the setting of the AONBs will be resisted; this intention needs to be carried through into the policy wording. 1601 Policy ENV3 refers to development proposals for sites within the Areas of Outstanding Natural Beauty (AONBs) of Kent Downs and High Weald. However it does not take account of developments in the neighbourhood of these AONBs, which will impact on their environment, including their scenic views and air quality.

Response Policy ENV3 amended and divided into two parts to create an AONB specific policy, and new supporting text added setting out a definition of AONB 'setting' is provided that is in accordance with national legislation and consistent with the AONB units' approach. See proposed changes MC71 and MC72.

Issue - General Landscape 2696 policy ENV3 should be considered against para 113 of the NPPF to ensure consistency and conformity. The policy refers to a landscape SPD which

was adopted in 2011, prior to the advent of the NPPF. 1510 The second half of the policy should set a direction of change. To 'have regard to' does not provide a means by which to secure protection and enhancement of landscape character.

Response *The components of landscape character remain consistent. Reference to tranquillity added, but other components are covered in other policies in this plan.*

Miscellaneous 1711 Green buffers are mentioned in relation to specific proposals in the draft Plan, but do not seem to feature as a general principle. Whilst new Green Belts do not appear to play a part in Government policy, we believe that there should be a more generic statement in the ABC draft Plan to provide for green buffer zones, so as to help prevent the merging of one community with another, maintain their distinct characters and provide a more environmentally pleasant aspect for residents, businesses and visitors.1923 believes there is a need to mention hedgerows specifically.

1546; 2098 Numbers of instances where small parcels of agricultural/amenity land has been taken out of use, thus changing the character of the countryside has increased. It is now common for this type of land to be given permission, in the first instance, for equine use and for stables to be erected thereon. This effectively turns a green-field site into a brown-field and makes the next step for further development easier. The Policy should be worded to stop this happening. 1223 the policy should also include villages where Conservation areas exist and villages and parishes which have intrinsic special qualities which are a special feature of the low weald natural landscape and of historical and special interest.2098 The landscape of High Halden should be protected from further destruction.

Response *There is no Green Belt within the borough, and the local authority is not in a position to designate this. There are no plans for the coalescence of settlements. New Policy SP7 addresses this issue. Conservation Areas and other built features are covered elsewhere within this plan. Hedgerows are referenced in Policy ENV1.*

Support 839, 2258, 2259 support the recognition given to the protection of the AONBs and their distinctive landscape features, the policy is clear and robust.

Response *Noted*

POLICY ENV4: DARK SKIES

Representations have been received from the following consultees:

840 Lewis	2329 Environment Agency (Jennifer Wilson)
1184 Lesley Wickens	2375 Natural England (Nigel Jennings)
1303 Kent Downs AONB Unit (Katie Miller)	2408/2421 High Weald Joint Advisory Committee (Clare Tester)
1504 Newenden Parish Council (Åke Nilson)	2439 High Weald AONB Unit (Claire Tester) [Duplicate of 2408]

1512 CPRE Kent (Ashford District Committee) (Hilary Moorby)	2453 Joanne Robinson
2163 Shadoxhurst Parish Council (David Ledger)	2472 Lee Robinson
2211 Kingsnorth Parish Council (Len Bunn)	

Summary of representations – Main Issues

Issue - Wildlife considerations 1512 requests addition of feeding, roosting and breeding activities to main policy, and addition of reference to such activities in the supporting text.

Response *The impact of light on wildlife receptors is amplified to a large extent in the Council’s adopted Dark Skies SPD. This is guidance that relevant to all site allocations.*

Issue - Boundaries of dark sky zone 1512 requests mention of Kent Downs AONB and High Weald AONB as specific targets of protection.1303 / 2421 also requests that the Kent Downs AONB and its setting should be added to the policy.2163 seeks the inclusion of Shadoxhurst parish in the dark sky zone.

2375 Proximity of site S31 to Hamstreet Woods SSSI should ensure cross reference with Policy ENV4 (Dark Skies).

Response *Guidance for the AONBs and their settings are provided in the Council’s adopted Dark Skies SPD. Shadoxhurst is currently a zone of transition between the “intrinsically dark skies” of Woodchurch and urban Ashford. The policy will ensure lighting is managed appropriately in this location.*

Paragraphs 2.2 and 4.2 of the Plan makes clear that it should be read and interpreted as a whole.

Issue - Need for further restriction 2453 / 2472 Sky glow from Ashford needs further restriction, particularly at larger urban extensions.

Response *The guidance offered by this policy and the Council’s adopted Dark Skies SPD ensures lighting is appropriate and is fully cut-off, thus limiting sky glow.*

Support 1504 supports the policy, but formally requests inclusion of Newenden parish in dark sky zone. 2329 supports the policy, but would like mention of the impact of obtrusive light on seasonal migration of fish, with appropriate mitigation required on development close to riparian margins.

840, 1184, 2211, 2408 and 2439 offer support for policy

Response *Support for the policy is noted. Consideration of the impact of obtrusive light on fish migration is considered to be addressed within the supporting text which acknowledges that harm to biodiversity can result from obtrusive externa lighting.*

A recognised Community Dark Sky Zone must be constituted by coterminous parishes.

POLICY ENV5: PROTECTING IMPORTANT RURAL FEATURES

Representations have been received from the following consultees:

165 BHS East Kent Committee	2212 Kingsnorth Parish Council
1304 Kent Downs AONB	2420 High Weald AONB
1514 CPRE Kent	2513 Egerton Parish Council
1978 Tenterden Town Council	2656 KCC
2095 Cllr Geraldine Dyer	

Summary of representations – Main Issues

Issue – policy coverage Whilst welcoming this policy 1514 is concerned that many important features are not listed and it is not clear how the policy would relate to statutorily protected features, and many other features of value. Perhaps the policy could relate to green infrastructure ‘corridor/network’ features that are important for recreation and wildlife connectivity, such as rivers, historic hedgerows, lanes, footpaths.

1304; 2420 It is considered that there may be other important features in addition to those named in the policy that are worthy of protection and it is suggested that the policy is amended to refer to these.

2513 believe that hedgerows should also be mentioned specifically. 2656 The value of these important features should not be confined only to rural areas. Such features are increasingly valuable within a suburban and urban environment and the Service therefore requests that the policy is amended by removing the words "Rural areas". The inclusion of these words will make it clear that the features are valued throughout the District. As Ashford develops into a wider urban expansion, all efforts should be made to incorporate these elements of its rural heritage without hindering development.

Response Policy ENV1 already safeguards features of nature conservation interest across the borough including those mentioned in representations here. No changes required.

Issue – Countryside Access Improvement Plan 2656 The Borough has received significant benefits from projects delivered by the County Council’s Countryside Access Improvement Plan. Including the words "working with the County Council to deliver its Countryside Access Improvement Plan" will provide opportunities to access additional funding and project development opportunities. It is therefore imperative that this is mentioned in this section.

Response Amend final sentence of 5.322 to refer to the Countryside Access Improvement Plan. See Proposed Main Change MC73.

Issue – equestrianism 165 The only reference to equestrianism is in 5.322. Unfortunately Ashford and the surrounding areas are seriously lacking in safe off-road routes for equestrians, this is either because many of the routes have not been recorded as bridleways on the definitive map in 1952 or the once quiet lanes that are now busy roads. Improving the multi-user network, brings Health Benefits, Access for everyone, Economic Growth, Tourism and sustainable Transport and Travel.

Response noted.

Support 1978 2095 and 2656 support this policy.

Response support noted.

POLICY ENV6: FLOOD RISK

Representations have been received from the following consultees:

1136/1143 James Ransley	2213 Kingsnorth Parish Council (Len Bunn)
1505 Newenden Parish Council (Åke Nilson)	2331 Environment Agency (Jennifer Wilson)
1515 CPRE Kent (Ashford District Committee) (Hilary Moorby)	

Summary of representations – Main Issues

Miscellaneous 1136 The suggestion that location in FZ1 automatically meets obligations with regard to fluvial flooding means it is unsound, as new modelling +climate change indicates increased flood risk in many locations. All current allocations, therefore, must be reassessed based on new climate change guidance.

1136 asks that proposals for development should be required to assess if capacity of existing culverts is sufficient and model blockage scenarios for culverts which could reasonably be thought to cause flooding on any proposed site.

1143 proposes a different approach than that in Paragraph 5.324, in which sites are selected, and that preference should be given to those sites on raised area of the floodplain which, in turn, can lower other areas of the floodplain to provide additional storage (funded by developers).

1515 is not supportive of this policy and the accompanying SFRA unless produced with and signed off by Environment Agency and Kent County Council.

Response The Council has now undertaken fluvial flood modelling + climate change, but it does not indicate increased flood risk in many areas beyond the current FZ3. Culverts are the responsibility of the landowner/owner to maintain. ABC maintains its own; KCC as LLFA

has limited powers of enforcement on other owners. For new development, policy ENV9 will ensure surface water does not adversely impact neighbouring sites.

Support 1505 and 2213 are supportive of policy, with the latter noting that the Council's flood risk map should be updated to mirror that of the Environment Agency's. 2331 is also supportive of the policy as it stands, but suggests addition of a definition of "functional floodplain" to Paragraph 5.329. It is also supportive of the Council's proposals to update relevant flood risk models.

Response *A definition of a functional floodplain is contained within the wording of paragraph 5.329. It is noted that the EA's flood risk maps are the most up-to-date and comprehensive resources.*

POLICY ENV7: WATER EFFICIENCY

Representations have been received from the following consultees:

1516 CPRE Kent (Ashford District Committee) (Hilary Moorby)	2214 Kingsnorth Parish Council (Len Bunn)
1804 Jacqueline Male	2337 Environment Agency (Jennifer Wilson)
2000 Tetlow King Planning (Elaine Elstone) for Rentplus UK Limited (R Connelly)	2545 Kent County Council (KCC) (Barbara Cooper)

Summary of representations – Main Issues

1516 supports the proposed adoption of the lower 110l/p/day requirement for residential, but proposes if South East Water projects different housing numbers than the council, any water stress concerns should trigger a local plan review.

2545 also supports the optional 110l/p/day in residential development, but would require a greater demonstration of the evidence that is present within Ashford's Water Cycle Study within the Local Plan itself, and that it is consistent with South East Water's Water Resources Management Plan. Furthermore it proposes minor changes to Paragraphs 5.336, 5.337 and 5.340 to provide a propelling case.

2000 notes that the draft plan does not adequately demonstrate a clear need for the optional standard proposed, and that a robust viability test is required so as not to prejudice affordable housing that is desperately needed in the region.

2545 supports the policy in general, but seeks consideration of water efficiency in commercial buildings since these often offer excellent opportunities for rainwater harvesting.

Response SEW's Water Resources Management Plan provides for more than enough capacity to meet the objectively assessed housing need in the Local Plan to 2030, which is further supported in the KCC/AECOM report "Water for Sustainable Growth". Ashford's own Water Cycle Study provides further evidence of the need for the optional requirements in this "water scarce" part of the country.

While a requirement for rainwater harvesting in commercial buildings has been considered, the establishment of rigid standards can often have a negative impact on carbon emission aspirations. There is scope for introducing commercial requirements to BREEAM 3 Credits.

Agreed that minor changes to paragraphs 5.336, 5.337 and 5.340 could provide a propelling case for the optional requirements. See Changes MC74.

Support 2214 and 2337 support the policy and consider it sound, as does 1804, but requests new developments to be built with water harvesting apparatus as standard.

Response Residential water harvesting could help meet the water efficiency standards within the scope of the policy. However, an environmental balance must be achieved between water efficiency and energy and carbon implications. There is, for example, no benefit for rainwater harvesting on small roofs. See the Environment Agency report, "Energy and carbon implications of rainwater harvesting and greywater recycling." Report: SC090018. 2010.

The policy, as written, strikes the right balance in requiring the optional 110lpppd while providing flexibility as to how this is achieved.

POLICY ENV8: WATER QUALITY, SUPPLY AND TREATMENT

Representations have been received from the following consultees:

1518 CPRE Kent (Ashford District Committee) (Hilary Moorby)	1926 Lois Tilden
1716 Egerton Parish Council (Richard King)	2339 Environment Agency (Jennifer Wilson)
1922 Home Builders Federation Ltd (James Stevens)	2373 Southern Water (Planning Policy)

Summary of representations – Main Issues

1518 is concerned about the environmental costs of increased water stress, due to climate change and increasing extraction. The quality and quantity of surface water bodies is also a concern, particularly during period of drought. This also needs to be considered when determining the capacity of water supply and waste water treatment facilities. These resources should be mentioned in the policy, as well as groundwater resources.

1922 states that the policy conflicts with legislation requiring undertakers to make provision for new development (S37 and S94 of Water Industry Act 1991), and housebuilders already pay an infrastructure charge to water boards. Draft policy acts as Grampian-style condition. Developers cannot be made responsible for operation and improvement of water supply and treatment, and current draft policy is not clear enough in the ways “reduction in quality and quantity” will be measured.

1926 highlights that windfall and prior approval conversions in rural areas would not be able to connect to existing sewerage networks as required by this policy.

2373 stresses that it is not up to developers to consider impact on wastewater treatment, SW does this if any further infrastructure is required, Southern Water will deal with it in due course through its own funding (price review) mechanisms, but will require support in the Local Plan funding for infrastructure in parallel with development through this mechanism – needs clarification.

2373 states that new housing development should be spatially separated from WTW (as per NPPF para 109) so as not to result in odour disturbance.

Response SEWs Water Resources Management Plan confirms no capacity restrictions will exist in the period to 2030, and Southern Water’s representations state there are no major constraints to growth through the plan period.

The issue of compatibility with legislation (Water Industry Act 1991) is noted. The approach in ENV8 reflects current Core Strategy policy. The Council continues to consider it appropriate to retain a strategic level of control over the provision of water supply and wastewater facilities for new developments across the Borough – proposed change MC75 provides additional clarification. With regard to potential for odour issues arising from developments in proximity to Wastewater Treatment works this is dealt with on a site by site basis.

Support 1716 and 2339 support the policy but ask it to be adjusted to consider isolated rural development where connection is not possible as per Environmental Permitting Regulations for foul effluent discharges to surface water or ground.

Response Support noted. This type of development is covered by existing legislation.

POLICY ENV9: SuDS

Representations have been received from the following consultees:

1519 CPRE Kent (Ashford District Committee) (Hilary Moorby)	2277 Persimmon Homes and Taylor Wimpey (Persimmon Homes and Taylor Wimpey)
2216 Kingsnorth Parish Council (Len Bunn)	2341 Environment Agency (Jennifer Wilson)

Summary of representations – Main Issues

1519 is supportive, but requires reference to habitat network enhancement and multifunctional green infrastructure (ENV1). 2277 requests removal of the final sentence as superfluous – condition discharge is part of a permission, and this wording may conflict and criterion i) is overly restrictive.

Response Paragraphs 2.2 and 4.2 of the Plan makes clear that it should be read and interpreted as a whole. Habitat network enhancement are already referenced in this policy. The Council agrees that the final sentence in the policy be removed as superfluous, but disagrees that criterion i is overly-restrictive - this is the “interception rule” that will maintain water quality within the wider system, preventing HC runoff from the site to the wider area. See Change MC76.

Support 2216 and 2341 are supportive, but need to include need for long-term maintenance, and preference for native species in associated landscaping for biodiversity aims.

Response Biodiversity aims are already covered within the policy.

POLICY ENV10: RENEWABLE AND LOW CARBON ENERGY

Representations were received from the following consultees:

1305 Kent Downs AONB	1979 Tenterden Town Council
1438 Central Ashford Community Forum	2217 Kingsnorth Parish Council
1520 CPRE Kent (Hilary Moorby)	2412/2444 High Weald AONB Unit
1808 Jacqueline Male	2419 High Weald AONB Unit

Summary of representations – Main Issues

Issue - Biomass (including use of wood fuel) 2412, 2444 support the sustainable management of woodland, which is one of its key landscape components. High Weald AONB objective W4 is "To increase the output of sustainably produced high-quality timber and underwood for local markets." Requests opportunities for using wood for fuel and construction to be included in policy. 1305 and 2419 state that this part of the Plan should refer specifically to the opportunities for using wood fuel in Ashford Borough as part of NPPF (paragraph 97) requirement to promote renewable and low carbon energy sources. This would support the Kent Downs AONB Management plan policy WT9 which identifies that new markets for sustainably produced woodland products. 1520 proposes policy should promote community led energy initiatives in support of WT9.

1520 asks to add 'odour' to the list at criteria C if the policy will be used for biomass energy, energy from waste or anaerobic digesters. 1520 For biomass energy, energy from waste or anaerobic digester installations in particular, connections to the highway network, outdoor lighting, building design and impacts of HGV movements may be relevant where the proposal is large scale.

Response Agree. Add two paragraphs to supporting text under sub heading of Biomass. See proposed change MC77.

Consideration of 'odour' already forms a criterion within the existing policy. The issues of outdoor lighting and HGV movements to/from any large development are already considered in policies ENV4 and TRA9 respectively.

Issue - Landscape 1305,1520 and 2419 Reference to a need for the preparation and submission of LVIA's should be included, as well as LCAs, in para 5.374.

1305, 2419 Policy should include reference to large scale renewable and low carbon energy proposals only being acceptable with AONBs and their settings in exceptional circumstances and where it can be demonstrated that they are in the public interest. 1520 policy should state that in the AONBs, and in the setting of AONB's, large scale renewable and low carbon energy will not be permitted.

Response Agreed. Reference to LVIA added to paragraph 5.374. See Change MC77.

The supporting text already states that large-scale proposals will only in exceptional circumstances be acceptable within the AONBs.

Miscellaneous 1520 proposes that the policy should refer to protected habitats and species.1520 states that further supporting justification is needed on the types of renewable and low carbon energy generation that the policy applies to. Biomass energy, heat pumps, geothermal, energy from waste, and anaerobic digestion are not mentioned in the plan. The policy needs to be clear if it is intended to only be used to determine applications on PV Panels, solar technology, and wind farms. These are the only renewable and low carbon energy generation methods mentioned in the text.

2217; 1520 new developments should have PV panels on roofs where they will be efficient or use previously developed sites to restrict the development of Solar Farms on good agricultural land.

1438, asks, why not simply require renewable and low carbon energy on new developments.

1520 Policy should require applicant to show proactive community involvement and demonstrate they have been successful in addressing impacts identified by communities. This is particularly relevant for wind energy development as a result of the June 2015 Ministerial Statement.

Response *The Council can no longer require renewable and low carbon energy on new developments following withdrawal of the Code for Sustainable Homes and equivalent standards.*

Mitigation measures for protected species already forms part of general legislation, but it could usefully be included here in the supporting text. The council also agrees that the policy could be expanded to cover a broader range of renewable energy.

The council is of the opinion that there is not necessarily a link between the installation of PV panels on housing and the development of solar farms. In addition, this plan does not allocate any area as suitable for wind energy development; therefore no applications are expected as per WMS 18/06/15. Effective community engagement is already required in criterion e. Planning policies must be positively prepared.

Support 1305, 1520, 2419 The specific reference to AONBs and their setting and reference to the Kent Downs AONB Position Statement on Renewable Energy is welcomed.

1979 and 1808 also support this policy.

Response Support noted.

POLICY ENV11: SUSTAINABLE CONSTRUCTION

Representations have been received from the following consultees:

1521 CPRE Kent (Ashford District Committee) (Hilary Moorby)	2231 Chilmington Green Consortium (Company)
1981 Tenterden Town Council (Philip Burgess)	2343 Environment Agency (Jennifer Wilson)

Summary of representations – Main Issues

1521 asks that the policy should include more on climate change, for example in design (site layout and housing orientation) including requirement for passive design principles.

Response This is already covered by strategic policy SP6, with explicit advice given in paragraph 3.184.

Support 1981, 2231 and 2343 support this policy as sound.

Response Support noted.

POLICY ENV12 : AIR QUALITY

Representations have been received from the following consultees

1185 Lesley Wickens	2381 Natural England (Nigel Jennings)
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1226 Cllr Paul W Bartlett (Ashford Borough Council)	2451 Joanne Robinson
1523 CPRE Kent (Hilary Moorby)	2471 Lee Robinson
2233 Great Chart with Singleton Parish Council (A Szocs)	

Summary of representations – Main Issues

1523; 2381 states that the Local Plan should demonstrate understanding of impacts of allocations on air quality on human health and protected/important habitats.

2233 The infrastructure in new development should be in place to encourage the usage of public transport. This would help to improve the air quality.

1185; 1226 Policy should include monitoring requirement, and make a positive commitment for continued air quality improvement for health reasons. Attention should be paid particularly to diesel emissions.

1185; 1226 express concerns over cumulative effect of developments around J10 of the M20, and especially the William Harvey Hospital. Concern is particularly focused on CO₂ levels, resulting in the “greenhouse effect”. 1226 considers that ABC should recommence monitoring of NO₂ and PM₁₀ at two locations near J10/M20 (Canterbury Road and Lees Road), given that annual means were being exceeded (as per J10a Preliminary Environmental Report), and given proximity to particularly sensitive receptors. This is a particular concern given the recent planning application for warehouse depot in Sevington and the plans from Highways England submitted to PINS for J10A. These are both near to large residential areas in Willesborough, Sevington and Mersham.

1226; 2451; 2471 Review of existing ambient air quality is needed around allocation sites to ensure annual mean air quality objective for NO₂ (40 ug/m³) is not exceeded; and further general monitoring is required in the context of increased freight movement on the SRM.

1226 More work needs to be done on developing suitable conditions to encouraging public transport, electric cars and charging points. 1226 We have yet to hear from the Kent Network Study as to whether the Ashford / Hastings line will be electrified and whether funding will be secured for the “Ashford Spur” project both which will improve non-road transport links in Ashford. These should be an intrinsic part of the local plan. In TRA2 a car parking policy is required near to the railway station to ensure sufficient capacity to provide commuter parking.

Response Air quality is a specific focus of attention of the Local Plan, and the World Health Organization (WHO) has recently listed one of the most pressing human health issues, responsible for a quarter of global child mortality. It is important, however, to distinguish that CO₂ emissions are not harmful to human health (although they contribute to the greenhouse effect), but other traffic emissions are, notably nitrous oxides and particulates.

An improvement in infrastructure to support the delivery of this Local Plan is an objective of policies TRA4 and TRA5, and is outlined in the separate infrastructure delivery plan.

See Change MC78.

Support

1523 broadly supports this policy (exceptions above)

Response *Noted.*

POLICY ENV13: CONSERVATION AND ENHANCEMENT OF HERITAGE ASSETS

Representations have been received from the following consultees:

377 Kennington Community Forum (Christopher Morley)	1931 Mr and Mrs Jackson
842 Lewis	2002 Tenterden Town Council (Philip Burgess)
1033 South Ashford Community Forum (Robert Shrubb)	2492 The Mersham Estate (Michael-John Knatchball)
1439 Central Ashford Community Forum (Emily Neighbour)	2515 Egerton Parish Council (Richard King)
1524 CPRE Kent (Ashford District Committee) (Hilary Moorby)	2542 Kent County Council (KCC) (Barbara Cooper)

Summary of representations – Main Issues

842 states that the policy dilutes the requirements of the NPPF paragraphs 132 and 134.

1033 seeks the publication of the council's Heritage Strategy as a local plan document.

1524 states that Listed Buildings require a separate policy, offering different levels of protection for designated and undesignated assets. Policy must also highlight provisions of The Planning (Listed Buildings and Conservation) Areas Act 1990, Section 66(1).

Response *The NPPF is a material consideration in the determination of planning applications. National guidance makes clear that local plans should not duplicate national legislation or guidance. It is the Council's view that the wording of this Policy accurately reflects the requirements of the NPPF with regard to the conservation and enhancement of heritage assets.*

The council's Heritage Strategy will be published alongside the Local Plan as a supporting document for consultation.

Support 377, 1931, 2002, 2492, and 2515 support the policy. 1439 supports the policy, but seeks better enforcement and maintenance of historic assets. 2542 supports policy, and

requests continuous engagement with the council with oversight of impact of development archaeological and heritage assets, and seeks responsibility for storage of materials.

Response ABC works with statutory partners and landowners to encourage effective conservation of historic assets. ABC agrees with the need for continuous engagement with KCC for oversight on the impact of development on archaeological and heritage assets. The Council also agrees that first preference over the storage of materials should remain with KCC.

POLICY ENV14: CONSERVATION AREAS

Representations have been received from the following consultees:

570 Julian Green	1929 Mr and Mrs Jackson
1513 Kennington Community Forum (Christopher Morley)	2002/2003 Tenterden Town Council (Philip Burgess)
1721 Egerton Parish Council (Richard King)	2097 Ashford Borough Council (Geraldine Dyer)

Summary of representations – Main Issues

1513 and 1929 Policy should ensure curtilages of all dwellings within Conservation Area are included in that designation.

Response As part of the current Conservation Area reviews, the boundary should be adjusted to reflect this as per Historic England guidance.

Support

570 supports the policy in its aims to preserve the character and appearance of Bethersden and uses it to object to site submission WC33 in the SHELAA.

1721 supports policy, but seeks a review and extension of the Egerton Conservation Area boundary to include “gaps”. Policy should also extend protection in areas adjacent to the Conservation Area, as well as ensure Parish Council inclusion in any review.

2002 supports but requests a review of Tenterden Conservation Area.

2003 and 2097 support this policy as sound.

Response Support noted. Parish Councils are included as a matter of course in planning matters. Conservation Area Management Plans are about managing change within an area recognised for its heritage value. Any boundary review will be as a result of due process as per Historic England guidance. The Tenterden Conservation Area, along with all other

Conservation Areas will be reviewed in due course within the current cycle of reviews. This Plan does not allocate any sites in Bethersden, or other designated neighbourhood areas.

POLICY ENV15: ARCHAEOLOGY

Representations have been received from the following consultees:

2450 Joanne Robinson	2470 Lee Robinson
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Summary of representations – Main Issues

2450 and 2470 call for the policy to state that all large-scale development should be preceded by a full archaeological assessment of the site.

Response A requirement to follow proper process, appropriate desk based assessments or field evaluations, is already included within this policy.

POLICY COM1: MEETING THE COMMUNITY’S NEEDS

Representations have been received from the following consultees:

1 Kingsnorth Medical Practice	1677 Ashford Access
318 Kent Police	1679 Canterbury and Coastal and Ashford Clinical Commissioning Groups
1036 South Ashford Community Forum	1753 Friends Life, AXA Real Estate and DMI Properties Ashford Ltd
1045 Kennington Community Forum	2006 Tenterden Town Council
1186 Lesley Wickens	2487 The Mersham Estate
1328 Sport England	2540/ 2657 Kent County Council
1440 Central Ashford Community Forum	

Summary of representations – Main Issues

Issue – Health 1, 1186, 1677 and 1679 raise concern about provision of health services and the growing population. 1679 raises concern there is insufficient mention of health facilities and required provision, also setting out information on the NHS forward view, where big

changes will be needed in GP services and key objectives that will impact upon local estates strategies.

1 and 1186 consider that additional input is required from the CCG, the GP Federation and other health providers including the hospital and community trust. 1 states that the plan needs to be mindful of the direction of travel of health.

1, 1186 and 1679 consider that developments need to offer designated land or S106 monies to provide for health facilities. 1679 suggests policies on each development site should including a paragraph regarding health. 1677 considers that GP practices should be encouraged to develop their services to provide mini clinics.

318 considers that the Plan does not address the wider links between planning and healthy communities as required by the NPPF. 1186 questions who will staff new health facilities.

Response *The Council has consulted with the CCG and Hospitals Trust through its work on the Infrastructure Delivery Plan. Unfortunately neither has been able to provide detailed proposals for new health facility requirements in the Borough as they are still in the process of development strategies for future healthcare in Ashford and the wider area.*

The Hospitals Trust has indicated that there may be a need to expand the William Harvey in order to accommodate increased demand from housing development in Ashford, and also increased demand from outside of the Borough. The Trust are currently undergoing a Clinical Strategy, which will require public consultation later in 2017, until then it is difficult to predict what the specific infrastructure requirements will be. However the Trust is confident that any expansion requirements can be accommodated on the existing site. The existing policy provides sufficient flexibility to enable this to come forward.

The Plan and supporting Infrastructure Delivery Plan includes information that has been provided by these bodies at the current time. The Council will continue to liaise with these bodies to ensure their requirements can be addressed appropriately in the Local Plan and Infrastructure Delivery Plan where possible, and developments are able to contribute appropriately to the delivery of the infrastructure.

Issue – Policing 318 is of the view that there is a need to ensure that adequate provision is made for policing needs that are generated by development. Police service primary funding is insufficient to be able to add capital infrastructures to support major developments.

Response *It is considered that due to the strategic nature of police services, the Community Infrastructure Levy is the most appropriate source of funding, it is therefore proposed to be included on the Regulation 123 list.*

Issue – Education 2540 sets out KCC's assessment of education requirements, stating that two new 2FE primary schools will be required. KCC will require the sites to be transferred at nil nominal cost, if KCC is required to acquire land, new development will be expected to pay a proportion of the cost. 1186 comments that provision of enough quality school places is important to meet the needs of Ashford growth, questions what provision is made to increase teaching staff and comments the adult education is missing from the document

Response KCC's comments have been taken into account when development the site allocation policies and infrastructure delivery plan which includes the provision of 2 new 2FE primary schools. The provision of increasing teaching staff is not relevant to the local plan, which is funded through central and local government revenue funding. The term education includes adult education, further detail on needs is provided in the Infrastructure Delivery Plan.

Issue - Victoria Park and Watercress Fields Concept Masterplan 1036 states that in omitting reference to the Concept Masterplan the Plan fails to fully reflect the Council's policy, leading to potential conflict.

Response disagree that this needs to be specifically mentioned in the policy.

Issue - Bockhanger Community Centre 1045 considers Bockhanger Community Centre, library, local shops, open space and youth facilities to be key community infrastructure, which requires a specific policy to support refreshed community facilities.

Response Noted, however the Plan cannot deal with existing deficiencies.

General 1328 considers that the last line of the policy should be amended to refer to suitable replacement provision of the same quality and quantity.

1743 and 2487 considers the policy should also promote community led development and those which specifically support strong, vibrant, healthy and sustainable communities. 2487 also states that Parish Council's may wish to bring forward housing or employment as enabling development to provide such facilities. There should be a policy which supports proposals initiated by the community, provided they are justified and have local support.

Response No change required – current wording requiring “suitable replacement provision” offers greater flexibility, since a suitable replacement may well be of a different quantity depending on use.

Policy COM1 does not preclude development coming forward from parish councils. Amend paragraph 5.410 to clarify that the Council will continue to work with developers and providers and community group to ensure the provision of community infrastructure. See proposed change MC79.

Support for policy: 1753 supports the policy. 1328 supports the inclusion of sports facilities within the definition of infrastructure, and the provision of money through S106 where there is localised need. 2657 supports the reference to the Council's Cultural Strategy.

Response support noted.

Other comments: 1440 considers the loss of a youth theatre, without alternative community theatre spaces is a blow the thriving arts scene, suggesting a community theatre could be established near the Elwick development. 1440 questions if murals would be welcome. 2006

states that 'evolving wish lists' from communities and councils should be implemented wherever practicable.

Response noted.

POLICY COM2: RECREATION, SPORT, PLAY AND OPEN SPACES

Representations have been received from the following consultee:

1692 Alan Vaughan	1628 Margery Thomas
2586 Bellway Homes Ltd (Kent)	2278 Persimmon Homes and Taylor Wimpey
167/2238 BHS South & East Kent Committee	1192 Sandyhurst Lane Residents' Association
1958 Brett Aggregates Ltd	2311 Sharon Middleton
1441 Central Ashford Community Forum	1326 Sport England
2724 Crest Strategic Projects	2009 Tenterden Town Council
2210 Kent Countryside Access Forum	2240 Theresa Trussell

Summary of representations – Main Issues

Issue - Sport Facilities and Pitches 1326 objects until such time that the Outdoor Sports and Indoor Facilities Strategy, and associated Playing Pitches Strategy are completed, and the Local Plan can be updated to include the findings. 1326 recommends a separate policy for the protection and provision of indoor and outdoor sports facilities based on the Sport England's policy objectives.

1326 objects as the four criteria (to just losing a facility) do not relate to para 74 of NPPF.

1326 considers that it should be made clear that the Sports Facilities Calculator can be used in the securing of off-site facilities as well as providing evidence to secure on site provision.

2278, 2586 states that the policy is inconsistent as it requires use of both Sports England Calculator and Green Spaces and Water SPD. The use of the Sports England Calculator has not been justified and risks placing considerable additional burden on developments which could stop them coming forward. Also ambiguity over how the outcomes would be applied. Recommends removing reference to Sports England Calculator as this has not been justified. References to GSW SPD must be benchmarked to the July 2012 version, since any future changes could have significant implications where open space requirements to be increased further, making the plan not effective.

2724 objects as the current S106 for the Finberry development does not provide for a 3G pitch.

Response *The findings of the emerging Sports and Indoor Facilities Strategy are included in the Local Plan as the target figure expressed in table 4. This has been updated to reflect the additional population figures up to 2030. The Green Spaces Strategy is an on-going piece of work that will be used to inform a review of the Green Spaces SPD and will inform future planning applications. The approach in the Local Plan, to identify a target, is considered robust and is based on the most up to date evidence available at the time. It is not possible to delay the Local Plan on account of waiting for the final strategies to be in place. In any event, the strategies are iterative in nature and their outcomes will change depending on what is happening at the time.*

It is agreed that reference should be made in Policy COM2 seeking the retention of existing open space, sports and recreational buildings and land, in line with the NPPF, as Policy COM2 only refers to exceptions to new proposals coming forward.

It is agreed that Sports England calculations can identify provision off-site and this should be reflected in the Local Plan. The Sports England Calculator is seen as a useful tool in understanding provision that is needed. It is used frequently by the industry. However, it is agreed that clarity should be provided with regards any conflict between the Green Spaces SPD and the Sports England Calculator. Additional text will be added to the Local Plan to set out that where there is conflict the most up to date evidence should take primacy.

The current S106 for the Finberry development only contributes a proportion of what is needed to deliver a 3G pitch. The remainder will be delivered by way of contributions for the new site allocation (Finberry North West) and other funding sources, as necessary.

See Proposed Change MC80.

Issue - Public Rights of Way (PRoW) 210 objects to the fragmented nature of development proposed in the Plan and request consideration be given to providing an overall integration of the widespread pockets of new housing into a cohesive community with an essential hub being the Ashford Town Centre.

2210 consider that adequate provision be made for the protection and enhancement of existing PRoW, green spaces and countryside access from the outset. New developments need inter-connected routes for pedestrians and cyclists.

2210, 2240 and 2238 strongly supports additional off road multi-user routes, including for equestrianism. 2240 suggests an off-road multi-user route south of Ashford, linking Great Chart in the west with Mersham in the east.

2210 require suitable dog walking areas.

2210 considers that impacts on the borough's rural lanes should be taken into account, and the network should be retained and enhanced through creation of clear, attractive connections to and through new developments.

Response: *It is agreed that accessibility is important in new developments and they should utilise as many sustainable modes of transport as possible, including cycling and walking. The details for such provision should be dealt with at the planning application stage and applicants will be expected to set out how such connectivity will be achieved.*

At the more macro level, the Local Plan protects and seeks enhancement to the Ashford Green Corridor which permeates the urban area and provides sustainable connectivity between the countryside and the town centre. Projects are identified to improve these connections and also expand the Green Corridor where possible. This provides overall integration around the town.

Issue - Multi-user access 167 considers that provision of open space should mean access for all user groups to fulfil the needs of the wider community.

Response: *Agreed and noted.*

Issue – Sandyacres 1192, 1628, 1692, 2311 object to the provision of Sandyacres, as there is no recognition of the effects from noise, light pollution, traffic and parking problems to existing residents.

Response: *Sandyacres is currently a hub and fulfils a range of social, community and sports roles. The position in the Local Plan merely reflects the current position. Any expansion or additional facilities at Sandyacres will need to be explored with the community and parish Council in due course, and the issues set out above will be important considerations for the extent of any future role.*

Issue – Conningbrook 1958 objects to the application of Policy COM 2 across the whole of the Conningbrook Lakes and JRS area and request that part be designated as residential led mixed use development.

Response: *It is clear the Policy COM2 is referencing to the recreational element of Conningbrook Lakes and not the residential part of the area, either the part which has planning permission or policy S19 which promotes additional residential development. Any change is therefore not necessary.*

General

2009 considers that evolving wish lists from communities and councils should be implemented wherever practicable.

1441 considers that there needs to be provision of children's play space in the town centre (within the ring road).

Response: *The Council will continue to liaise with communities and Parish Council's to understand their needs and requirements. Where justified any project identified will be incorporated in the Infrastructure Delivery Plan as it evolves. The desire for children's play within the ring road is noted.*

POLICY COM3: ALLOTMENTS

No representations on this Policy and reasoned justification received.

POLICY COM4: CEMETERY PROVISION

Representations have been received from the following consultees:

536 Kennington Community Forum

Summary of representations – Main Issues

536 considers it necessary to identify sites for cemeteries in this Plan, so that the new cemetery can be provided before existing provision reaches capacity, given relatively long lead in time to identify, acquire and prepare new cemetery.

Response Noted.

POLICY IMP1: INFRASTRUCTURE PROVISION

Representations have been received from the following consultees:

2207 Barton Willmore on behalf of Hallam Land Management Ltd	319 Kent Police
2590 Bellway Homes Ltd (Kent)	1187 Lesley Wickens
1853 Carol Procter	2279 Persimmon Homes and Taylor Wimpey
2394 Chilham Parish Council	1766 Peter Finnis
2549 Kent County Council	253 Wendy Bennett
2164 Shadoxhurst Parish Council	

Summary of representations – Main Issues

Issue - Traffic and congestion 253 and 2164 raise concern regarding the impact of traffic upon existing road network. 253 there are no plans for traffic calming. 2164 raise concerns that the only traffic impact assessment included solely addresses the north of the Town. There will be impacts to the villages to the south of Ashford. ABC should develop a hierarchy and priority with respect to the development the Ashford road network, a transparent vision of which road schemes need to be in place before others and before certain levels of development are begun. 2164 raises the impact of Chilmington on the Local Road Network.

Response *KCC Highways and Transportation support the proposed allocations in the Plan from a highway capacity perspective, stating that 'Transport modelling work has also been undertaken to understand and define the implications of proposed Local Plan allocations on the local highway network. Traffic surveys data has been collated and analysed at three key locations where the Local Plan envisages strategic growth will occur, namely Kingsnorth, Kennington and Eureka Park. The analysis that has been completed demonstrates that traffic movements generated from planned growth across the Ashford urban area will not give rise to a severe highway impact on any of the associated corridors'.*

Issue - Health 253 raise concern that no extra health facilities are being planned. 1631 states that the hospital and emergency services cannot cope and need expanding.

Response *The Council has consulted with the CCG and Hospitals Trust through its work on the Infrastructure Delivery Plan. Unfortunately neither has been able to provide detailed proposals for new health facility requirements in the Borough as they are still in the process of development strategies for future healthcare in Ashford and the wider area.*

The Hospitals Trust has indicated that there may be a need to expand the William Harvey in order to accommodate increased demand from housing development in Ashford, and also increased demand from outside of the Borough. The Trust are currently undergoing a Clinical Strategy, which will require public consultation later in 2017, until then it is difficult to predict what the specific infrastructure requirements will be. However the Trust is confident that any expansion requirements can be accommodated on the existing site. The existing policy provides sufficient flexibility to enable this to come forward.

The Plan and supporting Infrastructure Delivery Plan includes information that has been provided by these bodies at the current time. The Council will continue to liaise with these bodies to ensure their requirements can be addressed appropriately in the Local Plan and Infrastructure Delivery Plan where possible, and developments are able to contribute appropriately to the delivery of the infrastructure.

Issue - Police infrastructure 319 there is no recognition for policing and other 'Blue Light' services. Kent Police acknowledge policing is identified in the CIL Schedule. Information is provided with regard to the policing infrastructure requirements as a result of growth totalling a contribution of £281,844 to provide additional cells and 'start up' equipment for staff, requesting these be provided through S106 contributions.

Response *This issue is addressed in the Infrastructure Delivery Plan which supports this Plan.*

Issue – Telecommunications 1766 and 2164 objects as communications infrastructure is not addressed, in particular fixed and mobile networks. BT has not been consulted. Ashford Borough does not benefit from widespread telecoms infrastructure with most village BT exchanges being at capacity and fibre optic connections sporadic. EMP6 is not sufficient to deal with the issue. Detailed studies and consultations required as well as a Telecoms IDP.

Response *The Local Plan and IDP can only deal with demand generated from new development and not remedy existing deficiencies. Consultation has taken place prior to Reg 19 and during Reg 19 with telecoms providers, however no response has been received.*

Issue – Funding 1853 is concerned regarding the large funding gap for infrastructure. There is no evidence the infrastructure needed will be delivered. Development should not go ahead with the necessary infrastructure.

Response *This issue is addressed by the Infrastructure Delivery Plan which supports this Plan.*

Issue – Viability 2207 raises concern regarding the viability of S31 should the policy requirements and CIL both be required.

Response *Please see response to S31.*

Support 1187 supports use of S106 subject to transparency and the delivery of what was intended. 2207 supports the use of S106 where possible to provide more certain means of delivering specific infrastructure and services, than the use of CIL receipts.

Response *Support noted.*

Other issues 1187 should there be a true allocation for the Sevington Park S106. Will Sevington Church be the sole beneficiary? 1853 considers it reasonable for the community to expect the Council to use discretionary powers to monitor delivery and enforcement of S106 compliance.

Response *noted.*

POLICY IMP2: DEFERRED CONTRIBUTIONS

Representations have been received from the following consultees:

1924 Home Builders Federation Ltd	2592 Bellway Homes Ltd (Kent)
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Summary of representations – Main Issues

1924 and 2726 raise concern regarding additional costs and uncertainty to developers. Decision taking should be based upon ‘current costs and values’ and not capture more value at a later point. 1924 and 2726 object to the lack of a definition of ‘significant’. 1924 and 2592 considers the policy would frustrate development coming forward.

2592 objects as it is a blanket requirement on all development, irrespective of size and whether it is practical or reasonable to require a deferred contributions mechanism. Majority of sites are not large enough to justify this. Should only be required on the largest sites e.g. Chilmington Green.

Response *The principle behind recapturing costs is based on a position where viability improves significantly and then a proportion of any deficit is proposed to be re-captured. This approach has and continues to be implemented at Ashford where justified and it has largely been successful in allowing schemes to come forward. It is unclear as to what ‘uncertainty’ is created, as the position will only apply when based on up to date and robust viability evidence.*

It is also not a blanket restriction as has been suggested. Policy IMP2 sets out that it applies ‘for larger schemes, where a proposal is to be phased over time, or where the opportunity exists to do so’. In these circumstances, a programme of re-evaluating a scheme can be agreed to capture significant changes in circumstances.

POLICY IMP3: PLANNING ENFORCEMENT

Representations have been received from the following consultees:

689 Paul Buggins	1128 Carol Weare
1115 Elizabeth Buggins	

Summary of representations – Main Issues

689, 1115, 1128 state that the policy should be stronger, more punitive, more specific and less tolerant of continued breaches. At present the wording is excessively vague. Greater deterrence is needed and enforcement action should be taken when lack of compliance “adversely or unfairly affects” the wider community, and a more stringent timeframe required (3 months) to comply.

1128 states that the policy should seek to monitor condition compliance, and enforce if these not complied with. 689 states that breaches should prejudice future planning applications.

1128 proposes a policy that disadvantages planning applications made retrospectively.

1128 states that there should be a proactive policy to protect remaining woodlands.

Response

The protection of ancient and semi-natural woodland is addressed in Policy ENV5 of this Plan. Policies ENV1 and ENV3a and ENV3b also apply.

This council puts great value on the quality of life and local environment that local people enjoy – in the borough’s countryside, towns and villages. In all its work on planning and development the council tries to drive a ‘quality agenda’, recognising how important development is in creating economic growth and meeting the community’s needs, but also the need to control inappropriate and unauthorised development. The council, however, must work within the parameters set by national legislation and policy, and cannot be more draconian than that.

POLICY IMP4: GOVERNANCE OF PUBLIC COMMUNITY SPACE AND FACILITIES

No representations were received against this policy.

APPENDICES – GENERAL

Representations have been received from the following consultees:

2171 Kingsnorth Parish Council (Len Bunn)	2235 Great Chart with Singleton Parish Council (A Szocs)
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Summary of representations

2171 requires a better scale map of the proposed urban and fringe area, thus enabling better identification of sites.

2235 seeks safeguarding of land for substantial east-west infrastructure for traffic generated by Chilmington and Kingsnorth developments.

Response *Improved maps and graphic presentation will be included in the final version of the Plan.*

Land safeguarding for east-west infrastructure is covered in policy TRA1.

APPENDIX 5 – HOUSING TRAJECTORY

Representations have been received from the following consultees:

2155 Shadoxhurst Parish Council (David Ledger)	
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Summary of representations – main issues

2155 considers there are a disproportionate number of residential allocations close to and within Shadoxhurst parish. 62% of residents do not support any further housing development in Shadoxhurst, and requests the views of the majority are taken into account and respected. Feels recent housebuilding suffices in Shadoxhurst over medium term.

2155 highlights inconsistency between site policy (S36) figure of 25dw and trajectory figure of 30dw. Original assessment of sites in 2014 was flawed.

Response *Agreed. There was an error in the trajectory figure for site S36 which is allocated for 25 dwellings. This has now been corrected as part of the amended Housing Trajectory. The original assessment methodology was tested and consulted upon as required.*

The council has to meet its objectively assessed need (OAN) for residential development and, while almost 90 percent of this is focused in and around the Ashford urban area, there is both a need for rural housing, and an expectation that rural settlements will take a fair proportion of growth.

APPENDICES

APPENDIX A: OMISSION SITES

REP NUMBER	SHELAA REF	ASHFORD URBAN SITES
ALP/1330	WE30	Site 2 - Land to the rear of Hedge End, Stumble Lane, Kingsnorth,
ALP/1339	WE30	Site 1 - Sarac and Land to the rear of Hedge End, Stumble Lane, Kingsnorth,
ALP/1737; 1742; 1747	WE44	Court Lodge Farm, Sevington (Batts Farm)
ALP/2587, 824; 831	WS4	Church Hill, Kingsnorth
ALP/2260	WE4	Land at Finn Farm, South of Kingsnorth
ALP/2244	WE46	Kingsnorth Glebe - reconfigure Policy S4 boundary
ALP/2714	WE47	Steeds Lane, Kingsnorth
ALP/2715	WE48	Cheeseman's Green
ALP/2716	WE50	Swanton, Cheeseman's Green
ALP/2717	WE51	Waterbrook Gateway
ALP/1886	WE10	Land at South Stour Apiary and Munday Farm House, Cheesman's Green
ALP/1815, 1817	WE15	Sevington
ALP/1942; 1958	NW3	S19 Conningbrook Phase 2 – Extension to boundary
ALP/1844; 2059	NW2	10a Blackwall Road North
ALP/1366	DW9	Land rear of 'Woodside', Westwell Lane, Ashford, A20
ALP/2301, 2302, 1905	BO1	The Warren Park and ride site
ALP/2122	BAE5	Land at 198 Sandyhurst Lane, Kennington
ALP/2493, 2495	BAE2	Former sandpit quarry, Sandyhurst Lane, Ashford

REP NUMBER	SHELAA REF	TENTERDEN AND ST MICHAELS SITES
ALP/2454; 2458; 2459	TS3	Land at Appledore Road/ Woodchurch Road Tenterden
ALP/2530; 34	TS2	Land South of Tilden Gill, Tenterden
ALP/327	SM1	St Michaels - Exclusive Homes extension
ALP/2569	TS13 + TS7	Land south of Tenterden (Sandy Lane and Hopes Grove Farm)

ALP/2712	WC18/9	Land at St Michaels, Tenterden (adjoining Popes House Farm)
ALP/2057	WC85	Land to the east of St Michael's Vicarage
ALP/1888; 1889; 1890; 1895; 1898	TS4 TSRTW2	Hopes Grove Nursery – Tenterden
ALP/2032	RTW2	Extension to Pickhill Business Park, Tenterden

REP NUMBER	SHELAA REF	VILLAGES SITES
ALP/1825	SS5	Land between Roman Road and Goldwell Lane Aldington
ALP/2060; ALP/2061; ALP/2063	SS1	Coopers Field, Roman Road, Aldington
ALP/281; ALP/283; ALP/284	IO28	Magpie Farm, Appledore
ALP/1879	IO29	School Field, School Lane, Appledore
ALP/2109	IO22a	The Walnut Field 1022a, Appledore
ALP/2111	IO22b	The Quillet 1022b garden and fields, Appledore
ALP2249; ALP/2250	IO30	Land west of School Road, Appledore
ALP/1827	WC33	Forge Hill. Bethersden
ALP/1887	WC88	The Old Sawmills, Pluckley Road, Bethersden
ALP/2498; ALP/2236; ALP/1730	BD18	The Old Railway Station,1 Headcorn Road, Biddenden
ALP/1754	BD5b	Land rear of Cheeselands and Sandeman Way (Larger area than BD5a), Biddenden
ALP/2033	BD4	Townland Close, Biddenden
ALP/1831	BAE1	Lenacre Hall Farm, Boughton Aluph
ALP/2072; ALP/2075	BAE4	Land at Rook Toll, Faversham Road, Boughton Lees.
ALP/2074	SS57	Land off Lees Road, Brabourne Lees
ALP/1851	DW37	Squids Gate Farm, Squids Gate Lane, Challock TN25 4DR
ALP/2252	DW2	Pony Park, Canterbury Road, Challock, Ashford, Kent, TN25 4DL
ALP/2314	DW4	Clockhouse Land , Challock

ALP/1342	DN3	Ashford Road Service Station, Ashford Road, Chilham
ALP/1435	DN2	Land at Harvest House, Branch Road, Chilham,
ALP/1795	DN1	Cobbs Hill and Long Hill, Chilham
ALP/1634	DN2	Harvest House, Branch Road, Chilham
ALP/2251; ALP/2237	DN3	Ashford Road Service Station, Chilham
ALP/2316; ALP/2317	DN12	Land between Bagham Lane and Fellborough Close, Chilham
ALP/2319; ALP/2320	DN13	Land between Bagham Road, Arden Grange & Recreation Ground, Chilham
ALP/1790	DW34	South of West Street, Hothfield -SSSI
ALP/1849	DW35	North of West street, Hothfield
ALP/1347	DW36	Kempton Manor Farm Bungalow, Maidstone RD, Hothfield, TN26 1AR
ALP/1796	CH5	land at Charing Hill
ALP/2242	CH30	Land South of Maidstone Road, Charing
ALP/2868	CH17	Land west of Pluckley Road, Charing
ALP/736	WC72	Land at Great Chart Golf Course, Bears Lane, Great Chart, Kent, TN23 3BW
ALP/816; ALP/817; ALP/818; ALP/819	GCS14	Ninn Lane, Great Chart
ALP/1834	WS38b	Land at Warehorne Road, Hamstreet (larger area than original submission)
ALP/126	WS35	Land Adjacent Mountain Farm, Hamstreet
ALP/1830	WC12	Land at Hope House, High Halden Increase on existing allocation
ALP/2222; ALP/2223; ALP/2225	WC74	Church Road, High Halden
ALP/320; ALP/321	WE52	Bower Farm, Mersham
ALP/2497	WE53	Old Rectory Close, Mersham
ALP/2497	WE54	Land at Bower Road, Mersham
ALP/1871	DN29	Land at 1-5 The Oast House, Lower Lees Road, Old Wives Lees
ALP/383; ALP/409; ALP/443; ALP/535	RTW1	Copfield Farm, Rolvenden.
ALP/1939;	WS17	North of Woodchurch road, Shadoxhurst

ALP/1941; ALP/2727 ALP/2728; ALP/2759		
ALP/2532; ALP/2534; ALP/2535	WS33	Land adjacent to Bethersden Rd and Woodchurch Road, Shadoxhurst
ALP/326	WN5	Land between Stanley House and Longmeadow, Smarden
ALP/1836	WN6	Water Lane - Smarden
ALP/156	WN23	Gillets Farm, Smarden
ALP/2685	WN4	Land at The Street, Smarden
ALP/1842	SS58	Land at The Caldecott Foundation site at Smeeth
ALP/1862	SS8	Old Builders Yard, Plain Road, Smeeth
ALP/2497	SS59	Smeeth Playing Fields
ALP/2623	SS42	Bromley Green Road, nr.Ruckinge, Ashford, TN26
ALP/2086	IO25	Land adjoining Poplar Farm, Wittersham IO25
ALP//1360; ALP/1356	WS69	Bournes Field (Land to the north of Bournes Place), Woodchurch
ALP/1828	WS44	Land adjacent HA development at Appledore Road, Woodchurch
ALP/2082; ALP/2083; ALP/2085	WS27	Land south of Rectory Close, Woodchurch

APPENDIX B: RESPONSE TO REPRESENTATIONS RECEIVED TO POLICY SP5

22nd December 2016

Dear Ashley

ASHFORD LOCAL PLAN 2030 – RESPONSE TO INDIGO REPRESENTATIONS

Further to your instruction, this letter sets out our response to the representations made by Indigo Planning Limited ('Indigo') to the consultation draft of the Ashford Local Plan 2030, and specifically their representations on the **Ashford Retail Needs and Leisure Assessment** (ARNLA) prepared by Carter Jonas for Ashford Borough Council in 2015 as part of the evidence base to help inform the preparation of the emerging Local Plan.

We understand that Indigo is acting on behalf of their client – Castle City Estates – with regard to their interest in an out-of-centre site, known as 'The Warren'. Indigo state on page 4 of their representations that the most appropriate use for this site would be for retailing and that there is a "need for retail warehousing that cannot be met at a more central location". They indicate that The Warren could accommodate approximately 8,360 sqm of retail floorspace and that it "should be allocated for retail warehousing in the emerging plan".

Against this background, Indigo state that the ARNLA 2015 "underestimates the need for further retail floorspace, particularly comparison goods floorspace".

The following sets out the main reasons why Indigo believe the ARNLA 2015 underestimates retail capacity, and our response to each of their points.

1. Indigo state the following: "**The quantitative assessment assumes existing retail facilities are trading at equilibrium (see paragraph 7.51). In short, the assessment assumes that the existing trading performance is appropriate for the quantum of floorspace that exists and that there is no latent capacity at the base year. The difficulty with this approach is that retail assessments are often reviewed on a regular basis (for example, every five years). If every subsequent assessment assumes equilibrium, there will never be any capacity identified at the base year and this is likely to mask, or under-estimate, existing need. Given that CJ are able to identify an appropriate sales density for the purposes of estimating future floorspace**

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need, which they advise is 'broadly equivalent to average sales densities of new comparison goods floorspace trading in prime locations' (paragraph 7.59), we consider that it is not necessary that the assessment assume equilibrium at the base year".

The assessment of "equilibrium" is a standard and widely accepted approach used to inform evidence-based retail assessments. In this case there is no evidence from the qualitative and quantitative research undertaken to inform the preparation of the retail study to indicate that existing centres and retail facilities are "overtrading" at the base year, and that there is therefore any "pent up" capacity for new retail floorspace as Indigo claim to support their client's out-of-centre site.

Where a centre or retail facility is significantly "overtrading" this would manifest itself on the ground in terms of overcrowding and congestion in stores and parking, which would be an possible indication that existing provision is unable to cope adequately with consumer demand. However, there is no supporting evidence from the health checks and market research surveys to indicate that existing centres and stores are "overtrading" at the base year. Indeed the key performance indicators (KPIs) for Ashford show:

- relatively high vacancy levels – the ARNLA 2015 identified 52 vacant units, equating to a vacancy rate of 16%, which was above the Experian Goad UK average at the time (11.5%);
- decline in pedestrian footfall in the town centre between 2009 and 2012 as evident from Springboard data;
- falling market demand, with no requirements identified in 2015 for fashion or other comparison retailers; and
- static and falling Prime Zone A rents; etc – the ARNLA 2015 indicated that Prime Zone A rents had not recovered since the recession.

On the basis of the evidence it is our judgement that "equilibrium" represents a robust and sound approach in this case. It is also an approach that takes into account the impact of the Designer Outlet Village on shopping, expenditure and trading patterns in Ashford Town Centre and across the defined study area; the impact of recent developments and new retail commitments; and the impact of wider trends in the retail and property market sectors that are impacting on the trading performance of town centres and stores.

2. Indigo state: ***"The quantitative assessment relies on population projections provided by Experian's Micromarketer (MMG3) GIS System. The projections do not take into account local housing growth or the Council's housing targets outlined in the SHLAA. While we note that a sensitivity test has been undertaken to allow for a 10% population growth scenario, this does not appear to be related to the Council's SHLAA, which is a more robust approach to estimating likely population growth for the purposes of assessing retail need"***.

The retail capacity assessment has been robustly prepared to represent a "low" and "high" population growth scenario, and the Council has indicated that the population growth is likely to be somewhere between the 'base scenario' and 10% sensitivity test. On this basis we consider that the retail assessment provides a robust and sound basis for plan-making at this stage.

3. Indigo state: ***"CJ effectively exclude all on-line expenditure from their analysis, presumably because they assume that it is not physically spent in retail units. Research undertaken by CACI indicates that nine out of ten retail transaction types still involve physical retail outlets. This may include online retail transactions that have been researched in-store, or for the pick-up or return of the product, or indeed in-store purchases following on-line research. In***

other words, although evidence indicates online channels are becoming increasingly used for shopping purposes, a physical presence is still vital to most retailers business strategies. Indeed research by Verdict indicates that the amount spent on 'pure' on-line retailers (i.e. they have no high street presence) is similar now to what was when shoppers purchased goods from catalogues. The approach which removes on-line expenditure as a 'pot of money' that is available to support new retail floorspace does not recognise this".

We have adopted a standard and widely used approach to inform retail assessments. In response to Indigo, this approach does not effectively exclude all on-line expenditure from the capacity forecasts as they appear to claim.

By way of background and clarification, our approach is informed by Experian's *Retail Planner Briefing Note 12.1* (RPBN12.1 - October 2014), which is a standard source for retail capacity and impact assessments. Specifically Appendix 3 of RPBN12.1 sets out the market shares of non-store retail (comparison and convenience goods) sales derived from the Office for National Statistics (ONS). Non-store retail sales is commonly referred to as '**Special Forms of Trading**' (SFT), and comprises sales via the internet, as well as other non-store retail sales (including via mail order, telephone sales, door-to-door sales, etc.). The ONS provides a comprehensive estimate of SFT in retailing.

The ONS data shows that internet sales accounted for an increasing market share of total retail transactions; increasing from 4.7% in June 2008 to 11.7% in mid-2015. Experian's forecasts show that the growth in non-store retailing will continue to outpace traditional forms of spending, due to the impact of new technology. In RPBN12.1 the ONS forecasted SFT's share of total retail sales reaching 18.5% by 2020 rising to 20.3% by the mid-2030s. The more recent *Retail Planner Briefing Note 14* published by Experian in November 2016 sets out the revised forecasts for SFT's share of total retail sales, and show a higher share of 20.4% by the mid-2030s.

Experian deal directly in their RPBN with the issue of how the demand/capacity for retail floorspace will be affected by the forecast growth of SFT. While they state that it is "*undeniable that the challenge to traditional store-based shopping will continue to grow strongly*", they also state that "*a number of crucial factors temper the threat*". Experian explain that these factors include the fact that:

- Many stores sell online but source sales from regular stores rather than warehouses, implying an increase in required store floorspace to cater for rising internet sales.
- Click-and-collect is a key driver of current and future internet growth, but since this requires a bricks-and-mortar presence in easily accessible locations this is largely space demand neutral.
- Most retailers opt to distribute from stores rather than a centralised warehouse. While warehouse space has increased, growth has been through relatively modest additions to space.
- An increasing numbers of retailers are using bricks-and-mortar stores as a showroom for products, a service location and collection/drop-off points for online orders.

Given these factors Experian acknowledge in their forecasts that it is not appropriate to use total retail spending to calculate future demand for retail space; nor is it satisfactory to use retail spending excluding SFT. In this context Experian provide revised growth rates for total and for convenience and comparison goods that take into account the proportion of trading using traditional floorspace. For comparison goods, Experian exclude 25% of SFT sales to provide their best estimate of the proportion of growth that is effected through stores and floorspace; and for convenience goods 70% of sales are excluded.

Based on current trends in the retail sector, including the impact of the internet on market demand, we consider that Experian's forecasts provide a robust and sound basis for the assessment of retail capacity. As we state above, this is an approach that is widely used and accepted for similar evidence-based retail assessments.

4. Indigo state: ***"CJ assumes that 40% of the turnover for the extension to Ashford Designer Outlet Centre (DOC) will be derived from within the Study Area. This does not reflect the findings of the survey undertaken at the DOC which confirms that only 20% of expenditure is drawn from within 30 minutes' drive which is likely to encompass the majority of the Study Area (see paragraph 5.12 ARNLA 2015). By assuming that a greater proportion of its turnover will be drawn from the Study Area, the ARNLA 2015 reduces the comparison expenditure capacity"***.

Firstly, we maintain that the study area for the ARNLA 2015 broadly compares to 30min (off peak) drive time isochrones. This has been verified from CJ's in-house GIS system. With regard to the assumptions on inflow, these were informed not just by the visitor survey carried out in support of the Ashford Outlet application, but also by the findings of the household survey commissioned for the ARNLA 2015. Summary findings of the visitor survey are set out in Figure 5.1 of the RIA. Here the findings state that 20% of consumer expenditure is drawn from shoppers living within a 30 minute drive time, 24% between 30 and 45 minutes, and the remainder beyond a 45 minute drive time. Rather than apply a 80% inflow estimate to account for expenditure beyond a 30 minute drive time (broadly correlating to the study area) we chose to apply a more conservative estimate of 40% on the basis that the household survey identifies a relatively strong market share for the Outlet Centre for clothing and footwear from within the study area (14.7%¹) and certain zones within (e.g. 23% for Zone 4). In other words, the visitor survey may under-estimate the Outlet Centre's catchment draw from within a 30 minute drive time. This is also supported by other evidence on the trading characteristics of Designer Outlet Centres.

5. Finally Indigo state: ***"Given the amount of housing that is proposed in and around Ashford, we consider that there will not only be a quantitative need for bulky goods retailing, but also a qualitative need. Although John Lewis at Home as opened, Homebase has closed and many of the bulky goods operators that could be expected to be present in a town the size of Ashford are missing. The ARNLA 2015 confirms that expenditure is leaking to stores and centres elsewhere. A new retail warehouse park will improve choice in competition, increase Ashford's market share and claw back expenditure currently leaking elsewhere"***.

From our experience in testing population uplift relating to additional housing growth it generally requires a very significant increase in population to have any notable increase in forecast capacity for new retail floorspace. With regard to Indigo's comments on potential qualitative need, the market share assessment provided in Appendix 5 of the ARNLA 2015 set out expenditure retention for various comparison goods categories including those counted as 'bulky goods'. The table below provides a summary of market shares for the total study area and also for zones that broadly correlate to the Borough area (Zones 1a/b to 4)

¹ Figure is derived from total expenditure on clothing and footwear that includes SFT. Therefore, the actual market share would be higher when excluding SFT.

Table 1: Bulky Goods Market Shares – Total Study Area

	Audio Visual	Domestic Appliances	Furniture, Carpets, Floor Coverings, & Soft Furnishings	DIY and Gardening
Ashford Town Centre	18.6%	15.6%	24.1%	8.0%
Edge/ Out of Centre	22.9%	19.1%	11.8%	48.3%
Rest of Borough	2.5%	3.8%	3.2%	3.7%
Total Borough Retention	44.0%	38.5%	39.1%	60.0%
Leakage to other centres	26.3%	33.3%	49.9%	38.7%
SFT	29.7%	28.1%	11.0%	1.3%
Total Market Share	100%	100.0%	100.0%	100.0%

Source: Tables 4, 5, 8, & 9, Appendix 5, ARLNA 2015. Note:

Percentages may not add up to 100% due to rounding

Table 2: Bulky Goods Market Shares – Borough Area (Zones 1a/b to 4)

	Audio Visual	Domestic Appliances	Furniture, Carpets, Floor Coverings, & Soft Furnishings	DIY and Gardening
Ashford Town Centre	27.9%	25.8%	40.5%	14.8%
Edge/ Out of Centre	31.9%	29.8%	17.9%	75.4%
Rest of Borough	5.7%	7.7%	5.5%	5.1%
Total Borough Retention	65.5%	63.3%	64.0%	95.3%
Leakage to other centres	5.5%	11.3%	25.1%	4.0%
Special Forms of Trading	29.0%	25.4%	10.9%	0.6%
Total Market Share	100.0%	100.0%	100.0%	100.0%

Source: Derived from market share expenditure which informed Tables 4, 5, 8, & 9, Appendix 5, ARLNA 2015.

Note: Percentages may not add up to 100% due to rounding

Indigo state that many bulky goods retailers are not represented in the Borough and that there is likely to be a qualitative need to support new bulky goods floorspace. However, the above tables show that expenditure retention for bulky goods related purchases are relatively strong for the Borough area (Zones 1a/b to 4) with almost all of expenditure on DIY and gardening products retained by stores in the Borough. Table 2 also shows that with the exception of furniture, carpets and textiles, the main source of competition for these types of goods is from Special Forms of Trading (SFT) rather than leakage to competing centres. While leakage for furniture, carpets and textiles is higher compared to the other categories, this level of leakage is not considered to be high. If SFT is excluded then the balance between Borough retention and

leakage to other centres would be greater for the former. It is notable that Ashford Town Centre retains some 40.5% of expenditure.

Overall, we consider that the Borough is well served by retailers selling bulky goods products with major brands already located out of centre, some of which include: John Lewis at Home, B&Q, Carpetright, Currys/PC World, Harveys Furniture, Halfords, Pets at Home, Dunlem, Argos, Dreams, Tapi Carpets, Wickes, etc. We have also identified numerous independent/local furniture and flooring retailers at town centre and other out of centre locations in the Borough.

Furthermore, we understand that there are currently available units at Gallagher Retail Park, Ashford Retail Park and Warren Retail Park (informed by letting availability from Completely Retail), which could accommodate additional bulky goods retailers.

While the provision of new bulky goods floorspace could help to reduce expenditure leakage to other centres for furniture, flooring and household textiles, the distribution of expenditure suggests that there is a greater risk that expenditure could be diverted from Ashford Town Centre. A similar scenario could unfold for the other bulky goods sub-categories.

We trust that this is all the Council requires in response to Indigo's representations. However, if there are any queries, or points that require further clarification, please do not hesitate to contact Carter Jonas directly.

Yours sincerely



Dr Steven Norris BA MPhil PhD MRTPI

Partner National Head of Retail and Town Centre
Consultancy

For and on behalf of Carter Jonas