

Ashford Borough Council

‘Main Changes’ to Regulation 19

Local Plan 2030

Consultation Statement

November 2017



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Regulation 19 Consultation on ‘Main Changes’ to Local Plan and Sustainability Appraisal Addendum

1. Introduction

This Consultation Statement describes how Ashford Borough Council has undertaken community participation and stakeholder involvement in the production of the ‘Main Changes’ to the Local Plan at its Regulation 19 stage, setting out how such efforts have shaped the Plan and the main issues raised by consultation / representations (Regulation 20). 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.

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 and first Regulation 19 stages of the preparation of the Local Plan.

2. 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.

In June 2016 Ashford Borough Council published its first draft Local Plan 2030 for the borough (Regulation 19). Following that, the Government published new household projections which increased the quantity of housing the new Local Plan needs to provide for and the Housing White Paper which signals a number of changes to national planning policies for housing.

To respond to these significant changes, a series of proposed revisions to the draft Local Plan were proposed which included the allocation of further land to meet the increased housing requirement (including the achievement of a deliverable five year housing land supply). It also responded to the consultation responses from the 2016 public consultation and reflected national planning policy changes that occurred. This consultation was called the 'Main Changes' to the Local Plan 2030 and also included an Addendum to the Sustainability Appraisal.

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.

3. 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.

4. ‘Main Changes’ Consultation procedures and events

This section sets out the main consultation/community engagement events that have taken place during the consultation of the Main Changes to 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 Main Changes to Local Plan 2030 consultation took place between 7th July 2017 and 31st August 2017, 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 and first Regulation 19 stages) 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 (pg.7). 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 published
- Consultation notice (Statement of representation procedure Appendix C)
- News release/advert
- Electronic communication
- Online Consultation portal on website

“Informal consultation techniques for Local Plans”:

- Informal consultation documents such as summary leaflets and FAQ’s (Appendix F)

- Staffed exhibitions
- Informal adverts and newspaper articles
- Social Media (Appendix G) and Websites (Appendix H)

Formal consultation documents

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

- 'Main Changes' to Ashford Local Plan 2030 Regulation 19 Version (As 2 document parts)
- Addendum to Sustainability Appraisal
- Statement of Representations procedure

The documents were also made available for viewing online and commenting on the Council's consultation website at <http://www.ashford.gov.uk/consult>

Hard copies of documents, including supporting documentation, summary leaflets and statement of representation procedure, 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 and additional supporting 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, and also provided electronic copies to be downloaded and returned by email.

It also gave the option of submitting representations in writing on a specific representation form (see Appendix D). This was made available for free 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

Please note, that although completion of the form was encouraged, representations were accepted in alternative written formats.

Consultation Notice

A formal advert notifying residents of the consultation was placed in the local paper, the Kentish Express (Ashford and District) on Thursday 7th July 2017, which also advertised the availability of documents as per Regulation 35(1) of the Town and Country Planning (Local Planning) (England) Regulations 2012.

ASHFORD BOROUGH COUNCIL



Public Notice: Consultation 7th July to 31st August 2017

'Main Changes' to the draft Local Plan 2030

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

Ashford Borough Council is 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. A draft of the Plan, was formally published and made available for consultation during the summer of 2016.

Ashford Borough Council are now consulting upon a series of 'Main Changes' to that Publication Draft of the Local Plan. These changes are intended to resolve issues that were raised during public consultation on the previous draft of the Plan, meet increased housing need projections and ensure that the Local Plan and supporting evidence is up to date and meets the requirements of current national planning policy and guidance.

The 'Main Changes' consultation documents, including background documents and addendum to the Sustainability Appraisal, will be available for inspection between **7th July and 31st August 2017** at these locations:

Online: www.ashford.gov.uk/consult

In Hard Copy, during the opening hours at:

- Ashford Gateway, 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 'Main Changes' to the Local Plan 2030 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 the end of 31st August 2017. 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 on these Main Changes throughout the consultation period.

Further information is available from:

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

Email: planning.policy@ashford.gov.uk

Telephone: (01233) 330229

Figure 1: Public Notice in the Kentish Express

Letters and Emails

Consultee letters (Appendix B) 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

Public Exhibitions

These were programmed to cover a cross section of the whole of the Borough during the consultation period as follows:

Location	Date	Time
Tenterden Town Hall	Tues 18/07/2017	16.00-19.00
Hothfield Village Hall	Fri 21/07/2017	16.00-19.00
High Halden Village Hall	Tues 25/7/2017	16.00-19.00
Charing Village Hall	Thurs 27/07/2017	16.00-19.00
Hamstreet Sports Pavilion	Mon 31/07/2017	16.00-19.00
Aldington Village Hall	Thurs 03/08/2017	16.00-19.00
Park Mall, Ashford Town Centre	Tues 08/08/2017	12.00-14.00
Kingsnorth School Hall	Wed 09/08/2017	16.30-19.00
Wittersham Village Hall	Thurs 10/08/2017	16.30-19.00
Farriers Arms, Mersham	Tues 15/08/2017	16.30-19.00
Challock Memorial Hall	Wed 16/08/2017	16.00-19.00

At these events, which were well-advertised through multiple means in advance (as outlined in Appendix J), poster displays guided attendees through the process of production of the Main Changes to the Local Plan and presented revised and new

site allocations, and policy text in a logical way. Each session was tailored to some extent to give primacy to development proposals in the immediate vicinity of the venue.

Copies of the Main Changes to the Local Plan (2 consultation documents) and the SA (including addendum 2017) supporting the local plan were available for inspection, along with other key background documents such as the SHELAA.

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

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

- Local Plan Representation Form and Guidance Notes
- Guidance Note 2 on Legal Compliance and soundness
- SA Addendum Representation Form F
- Summary leaflet explaining the key Main Changes and FAQs

Officers provided guidance, desk space and stationery to enable attendees to complete forms, and accepted these at the events or allowed participants to take them away with them.

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 in the following locations. *To view copies of adverts see Appendices G & H.*

Resource	Date	Detail
Ashford Voice	Mid July 2017	'Have your Say on local projects'. Details what the local plan is and how to have your say. (Figure 6)
Kentish Express	07/07/2017	Consultation advertisement for Main Changes 2030. (Figure 7)
Kent Online Article	04/07/2017	More houses to be built across Ashford and Tenterden (Figure 19)
Kent Invicta Chamber of Commerce Website	16/06/2017	Planning Our Future together-Local Plan Proposed changes (Figure 17)

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

- Ashford, Charing, Tenterden and Wye Library
- Ashford Farmers Market- 2nd July
- Ashford International Station
- Boughton Lees Post Office
- Challock Post Office
- Civic Centre Reception (with banner)
- County Square Leaflet Information Stand
- Cosy Kettle Cafe, Hamstreet
- Gladstone Road
- Hamstreet Fish and Chip Shop
- Hamstreet GP Surgery
- Newtown Post Office
- Newtown Stores
- St Michaels Post Office
- Singleton Shop
- South Willesborough Newsagents
- Stour Centre Information Stand
- Tenterden Town Hall
- The Barn Shop, Challock
- Waitrose - Repton Park

Parish Councils and Community forum contacts were emailed (Appendix I) 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

More information on the advertisement of Exhibitions can be found in Appendix J.

Letters and Electronic communications

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 was undertaken on electronic platforms, including that detailed above, but complemented by the following:

- Carousel banner promotion on the Ashford Borough Council website home page.



Figure 2: Ashford Borough Council Banner

- Email signature advertising the consultation added to all external emails.



Figure 3: Email Signature

- Articles in Ashford Voice (monthly residents e-magazine sent to 2,000 subscribers each month).
- Branded memory sticks, containing all consultation documentation and response information.
- Article in Root & Branch (staff monthly e-magazine)

Social Media advertising

The council used the opportunities presented by Social Media to promote the consultation and associated events. Specifically, it established the following:

- Dedicated Facebook page <https://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 can be found in Appendix G, along with other media content.

5. Outcomes of the consultation

Upon closure of the public consultation on the Main Changes of the Local Plan 2030, a total of 1177 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 K).

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

Main Change	Policy Name	No of reps received
	PART 1-MAIN CHANGES TO 2016 LOCAL PLAN	//
MC1	<i>Amendments to Introduction Section</i>	29
	STRATEGIC POLICIES	//
MC2	<i>Proposed changes to 'Vision' paragraphs in Chapter 3</i>	10
MC3	<i>Amend Policy SP1 – Strategic Objectives</i>	8
MC4	<i>Delete all existing paragraphs within Strategic Development Requirements (paras 3.15 – 3.80) and Policy SP2 - The Strategic Approach to Housing Delivery, and replace with the following text and new policy</i>	43
MC5	<i>Amend paragraph 3.128 with regards to convenience retail need</i>	0
MC6	<i>Town centre boundaries reference map correction in paragraph 3.130</i>	1
MC7	<i>Amend paragraph 3.160 in Promoting High Quality Design – The Design Process</i>	2

MC8	<i>Promoting High Quality Design - Amend para 3.174 criterion e) of Key Design Qualities</i>	3
	SITE POLICIES	//
MC9	<i>Changes to Policy S2 – Land NE of Willesborough Road, Kennington</i>	35
MC10	<i>Edit supporting text and Policy S3 – Court Lodge</i>	6
MC11	<i>Proposed changes to supporting text and Policy S4 – Land north of Steeds Lane and Magpie Hall Road</i>	16
MC12	<i>Amendment to supporting text and Policy of S5 – Land South of Pound Lane</i>	7
MC13	<i>Amendments to supporting text and Policy S6 – Newtown Works</i>	2
MC14	<i>Amendments to supporting text of Policy S7 – Klondyke Works</i>	1
MC15	<i>Add new policy criterion e) in Policy S8 – Lower Queens Road</i>	1
MC16	<i>Amend paragraphs 4.107 to 4.113 of Policy S9 - Kennard Way and Policy</i>	3
MC17	<i>Add 2 new paragraphs after 4.120 supporting text for Policy S10 Gasworks Lane</i>	2
MC18	<i>Changes to Policy S11 – Leacon Road; Amend Policy Map S11 to remove northern part of the site boundary area. (This area is now covered by a separate Policy S11a – Bombardier Works- see MC87)</i>	3
MC19	<i>Changes to Policy S12 – Former K College, Jemmett Road</i>	2
MC20	<i>Add paragraph after 4.147 - Policy S13 Former Ashford South School</i>	0
MC21	<i>Amend wording of supporting text and Policy S14, Park Farm South East</i>	4
MC22	<i>Amend supporting text to Policy S15 - Finberry North West</i>	4
MC23	<i>Changes Policy S16 – Waterbrook; Amend Policy Map S16</i>	8
MC24	<i>Amendments to Supporting text and Policy S18 – William Harvey Hospital</i>	2
MC25	<i>Amendments to Policy S19 – Conningbrook Residential Phase 2</i>	13
MC26	<i>Amendments to Policy S20 – Eureka Park</i>	14
MC27	<i>Amend paragraph 4.245 in S21 – Orbital Park</i>	1
MC28	<i>Amend Policy S23 – Henwood Industrial Estate</i>	1
MC29	<i>Amendments to Policy S24 – Tenterden Southern Extension Phase B</i>	22
MC30	<i>Amend Policy S25 – Pickhill Business Par; Amend Policy S25 Map</i>	2
MC31	<i>Policy S26 – Appledore – The Street</i>	4
MC32	<i>Amend paragraphs in Policy S27 Biddenden North Street</i>	1
MC33	<i>Amendment to text of S28 – Charing Northdown Service Centre</i>	1

MC34	<i>Amend criterion d. of Policy S30 – Egerton, Land on New Road</i>	2
MC35	<i>Amendments to S31 – Hamstreet – North of St Marys Close</i>	7
MC36	<i>Insert additional policy criterion to Policy S32 Hamstreet – Land at Parker Farm</i>	1
MC37	<i>Amendments to S33 – High Halden – Hope House</i>	9
MC38	<i>Amendments to S34 Hothfield – East of Coach Drive</i>	4
MC39	<i>Amendment to criterion c. within Policy S35 – Mersham, Land adjacent to village Hall</i>	0
MC40	<i>Amendments to criterion c within Policy S36 – Shadoxhurst – Rear of Kings Head PH</i>	1
MC41	<i>S37 – Smarden, Land adjacent to Village Hall</i>	3
MC42	<i>Amendments to S38 – Smeeth – Land South of Church Road</i>	18
MC43	<i>DELETION OF SITE ALLOCATION POLICY S39</i>	1
MC44	<i>Amendments to S40 – Woodchurch, Front Road</i>	3
MC45	<i>Amend site name and title references on Policy S41</i>	8
MC46	<i>Extend site boundary of Policy S42- St. Michaels – Beechwood Farm (Exclusive Homes Site for 3 dwellings)</i>	0
MC47	<i>Amend site policy S44 – Westwell Watery Lane map to include revised access point (black arrow) and site A and B boundaries (Changes in Aqua blue)</i>	1
MC48	<i>The Affordable Housing section under Chapter 5 Topic Policies, Section A – Housing (HOU1)</i>	13
MC49	<i>Change criterion c. of policy HOU2 – Local Needs / Specialist Housing</i>	2
MC50	<i>Delete Paragraphs 5.38-5.55 under Residential Windfall Development and existing policies HOU3 – Residential development in the Ashford Urban Area and HOU4 – Residential Development in the rural settlements and replace both with new text and revised singular policy (renamed HOU3a)</i>	75
MC51	<i>Delete paragraphs 5.56 – 5.67 and Policy HOU5 - Residential windfall development in the countryside in Housing developments outside settlements section and replace with the following text and revised policy HOU5</i>	53
MC52	<i>Changes to Policy HOU6 – Self and Custom Built Development</i>	7
MC53	<i>Modification to paragraph 5.82 under Annexes</i>	1
MC54	<i>Insert additional paragraph after para 5.96 within text before Policy HOU12 – Residential Space Standards (internal)</i>	1
MC55	<i>Delete paragraph 5.98 (Has been relocated - See MC54 above) and delete Policy HOU13 – Homes Suitable for Family Occupation</i>	0
MC56	<i>Amendments to supporting text and Policy HOU14 – Accessibility Standards</i>	2

MC57	<i>Amendments to supporting text and Policy HOU16 – Traveller Accommodation</i>	6
MC58	<i>Amendment to policy HOU17 – Safeguarding existing Traveller sites</i>	1
MC59	<i>Amendments to Policy EMP2 Loss or redevelopment of Employment Sites and Premises</i>	2
MC60	<i>Amendments to paragraph 5.203, and Policy EMP9 Sequential Assessment and Impact Test</i>	0
MC61	<i>Amendments to Local and Village Centres section and Policy EMP10</i>	3
MC62	<i>Amendments to text and Policy EMP11 – Tourism</i>	2
MC63	<i>Amended and additional supporting paragraphs within Section C – Transport</i>	2
MC64	<i>Changes to supporting text in Public Parking Facilities serving the Town Centre and Policy TRA2 – Strategic Public Parking Facilities</i>	0
MC65	<i>Changes to Residential and Non-residential Parking Standards section and Policy TRA3 (a)</i>	2
MC66	<i>Addition to paragraph 5.272 - in Planning for Pedestrians – Policy TRA5</i>	1
MC67	<i>Changes to Provision for Cycling supporting paragraph 5.275 and Policy TRA6</i>	1
MC68	<i>Addition to Paragraph 5.278 under Assessing Transport Needs and amend TRA8 – Travel Plans, Assessments and Statements</i>	2
MC69	<i>Amend first bullet point of 5.283 under The approach to Heavy Goods Vehicles , and subsequent Policy TRA9 amendments</i>	0
MC70	<i>Changes and additions to supporting text within Biodiversity section and Policy ENV1 – Biodiversity</i>	6
MC71	<i>Proposed amendments to Landscape Character Assessments section</i>	8
MC72	<i>Delete Policy ENV3 and replace with the revised Policies</i>	13
MC73	<i>Amend final sentence of 5.322 within Protecting Important Rural Features</i>	1
MC74	<i>Amend supporting text within Water Resources and efficiency</i>	1
MC75	<i>Add paragraphs before 5.342 within Water Quality, Supply and Treatment, and amend paragraph 2 of Policy ENV8</i>	2
MC76	<i>Delete final sentence of Policy ENV9 – Sustainable Drainage</i>	3
MC77	<i>Amend final sentence of paragraph 5.374 within Renewable Energy</i>	1
MC78	<i>Amend paragraph 5.390 within Air Quality section</i>	0
MC79	<i>Edit first sentence within paragraph 5.410 - Meeting the Needs of the Community</i>	5

MC80	<i>Amend text and Table within Sport, Recreation and Play and Policy COM2</i>	2
MC81	<i>Edit paragraphs 6.1- 6.3 and insert new paragraph within Monitoring and Review Chapter 6</i>	2
MC82	Updated Key Diagram – Revised Ashford Urban Area Figure 2 Insert	2
MC83	Topic Policy Detailed Maps - Updated Green Corridor Diagram	3
MC84	Revised Housing Trajectory	11
	PART 2-NEW POLICIES AND APPENDIX	//
MC85	<i>Policy SP7 - Separation of Settlements</i>	20
MC86	<i>Policy HOU18 - Providing a range and mix of dwelling types and sizes</i>	8
	NEW SITE ALLOCATION POLICIES	//
	URBAN AREA	//
MC87	<i>Policy S11a – Former Bombardier Works</i>	4
MC88	<i>Policy S45 – Land South of Brockman’s Lane (Bridgefield)</i>	4
MC89	<i>Policy S46 - Chart Road (A28), Ashford</i>	1
	A20 CORRIDOR	//
MC90	<i>Policy S47– Land east of Hothfield Mill, A20</i>	38
MC91	<i>Policy S48 - Land to the rear of the Holiday Inn, Hothfield (A20)</i>	30
MC92	<i>Policy S49 - Land at Tutt Hill, Westwell (A20)</i>	42
MC93	<i>Policy S50 – Land at Caldecott, A20 Smeeth</i>	14
	RURAL AREA/VILLAGES	//
MC94	<i>Policy S51 – Aldington, Land north of Church View</i>	19
MC95	<i>Policy S52 - Aldington, Land south of Goldwell Manor Farm</i>	22
MC96	<i>Policy S53 – Brook, Nat’s Lane</i>	18
MC97	<i>Policy S54 – Challock, Clockhouse</i>	11
MC98	<i>Policy S55 – Charing, Land adjacent to Poppyfields</i>	80
MC99	<i>Policy S56 – Chilham, Branch Road</i>	127
MC100	<i>Policy S57 – Hamstreet, Warehorne Road</i>	24
MC101	<i>Policy S58 - High Halden (A28) – Stevenson Brothers</i>	12
MC102	<i>Policy S59 – Mersham, Land at Old Rectory Close</i>	12
MC103	<i>Policy S60 – St.Michaels, Pope House Farm</i>	19
MC104	<i>Policy S61 – Wittersham, Land between Lloyds Green and Jubilee Fields</i>	54
MC105	<i>Policy S62 – Woodchurch, Appledore Road</i>	10
MC106	<i>Appendix 6 - Monitoring Framework (to be inserted after Appendix 5)</i>	2
	<i>Omission Sites Submitted During MC Consultation</i>	61

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

6. Equality Impact Assessment

Although there is no legal requirement to do so, an Equality Impact Assessment (EIA) was carried out on the Main Changes to Regulation 19 of the 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) or Neutral
AGE Elderly	Low	Positive
Middle Age	Low	Positive
Young adult	Low	Positive
Children	Low	Positive
DISABILITY Physical	Low	Positive
Mental	Low	Positive
Sensory	Low	Positive
GENDER RE-ASSIGNMENT	Low	Positive
MARRIAGE/CIVIL PARTNERSHIP	Low	Positive
PREGNANCY/MATERNITY	Low	Positive
RACE	Low	Positive
RELIGION OR BELIEF	Low	Positive
SEX Men	Low	Positive
Women	Low	Positive
SEXUAL ORIENTATION	Low	Positive

Glossary

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.

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 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 Main Changes 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 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 (Call for sites and later)**
- **Other landowners in database**
- **Ashford “Development Update” and Inovem planning database subscribers**
- **Those who took part in previous consultations, including Reg 19 2016 consultation responders (as per the Inovem Database)**

Appendix B: Formal Letters sent to Consultees

Planning & Development

Email: planning.policy@ashford.gov.uk

Direct line: (01233) 330 229



ASHFORD
BOROUGH COUNCIL

Civic Centre
Tannery Lane
Ashford
Kent TN23 1PL
01233 331111

www.ashford.gov.uk

 @ashfordcouncil

 AshfordBoroughCouncil

Monday 10th July 2017

Dear Sir/Madam

CONSULTATION ON:

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

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

The Proposed Main Changes to the Ashford Local Plan 2030 documents as well as the SEA Addendum will be available for public consultation from **until midnight on Thursday the 31st August 2017.**

I have enclosed a memory stick that includes the relevant documents and supporting material.

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

Comments can also be made in writing on the representation form.

If you have any questions or requests for forms please contact 01233 330229 and we will be happy to assist.

Yours sincerely,

Mr Simon Cole
Policy Manage





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01233 331111

www.ashford.gov.uk



@ashfordcouncil



AshfordBoroughCouncil

Planning & Development

Email: planning.policy@ashford.gov.uk

Direct line: (01233) 330 229

Monday 10th July 2017

Dear Sir/Madam

PROPOSED 'MAIN CHANGES' TO THE ASHFORD LOCAL PLAN 2030 AND ADDENDUM TO THE SUSTAINABILITY APPRAISAL ENVIRONMENTAL REPORT

The following documents will be available for public consultation **until 23:59 Thursday 31st August:**

- The two documents containing Proposed 'Main Changes' to the Local Plan 2030 in accordance with Regulation 19 of the Town and Country Planning (Local Planning) Regulations 2012.
 - Part 1 – Amendments to text and content within Regulation 19 - June 2016 Version of the Local Plan 2030
 - Part 2 – New Policies to be included within Local Plan 2030
- The addendum to the Sustainability Appraisal Environmental Report in accordance with Regulation 13 of the Environmental Assessment of Plans and Programmes Regulations 2004

The documents are available for inspection and comment at the following locations:

Online: www.ashford.gov.uk/local-plan-2030 or www.ashford.gov.uk/consult

Hard copy:

- 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, Manor Row, Tenterden, TN30 6HP
- Wye Library, 6 Upper Bridge Street, Wye, Ashford, TN25 5AF

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

Yours faithfully

Simon Cole



Appendix C : Statement of Representations Procedure

ASHFORD LOCAL PLAN 2030 REGULATION 19 VERSION 'MAIN CHANGES' CONSULTATION JULY 2017

STATEMENT OF REPRESENTATIONS PROCEDURE

Subject matter:	<p>Ashford Borough Council is consulting on Proposed Main Changes to the draft Ashford Local Plan 2030 that was published in June 2016 and its supporting Sustainability Appraisal Addendum.</p> <p>The Council is proposing 'Main Changes' to the policies and supporting text of the Regulation 19 version of the Ashford Local Plan (published in June 2016) to address a range of issues raised during public consultation, to ensure it is up to date, reflects the latest evidence base and meets the requirements of the latest national planning policy. It is considered necessary to address these issues before the Local Plan is submitted to the Secretary of State to be examined by an independent Planning Inspector.</p> <p>The consultation is focused only on the Main Changes. The consultation is not an opportunity to repeat or raise further representations about other parts of the Regulation 19 draft Local Plan or to seek wider changes. All previous comments are to be retained and will be submitted to and considered by the Inspector, alongside any additional comments received.</p>
Representation period:	The period for representations begins on midday Friday 7 th July and ends on Thursday 31 st August 2017.
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 please specify in your representation. 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

In addition to the Main Changes schedule and the 2016 Regulation 19 Local Plan 2030 document being available, the documents listed below are made available for reference during the Main Changes consultation period.

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

*Where these contain replacements or addendums to the previously published version, or have not been published previously they are **identified in bold text**:*

1. Sustainability Appraisal (SA) and SEA of the Ashford Borough Local Plan – Regulation 19 Version (2016)
 - **Addendum to the Sustainability Appraisal and SEA (2017)**
2. **Ashford Strategic Housing and Employment Land Availability Assessment (SHELAA) 2016/17**
3. Ashford Strategic Housing Market Assessment (SHMA) and Updates (2014 & 2015)
 - **SHMA Update January 2017 - Implications of the 2014-based Sub-National Population Projections and Household Projections**
4. Ashford Strategic Employment Options Report (2012)
5. Ashford Borough Council Viability Study - Local Plan and CIL Viability Report (2016)
 - **Ashford Borough Council Viability Study Update 2017**
6. **Ashford Borough Infrastructure Delivery Plan 2017**
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)
 - **Updated Appendices C and E (2017)**
15. **Habitat Regulation Assessment and Appropriate Assessment (2017)**
16. Gypsy, Traveller and Travelling Showpeople Accommodation Assessment and Update Paper (2014 and 2016)
17. Ashford Draft Cultural Strategy (2015)
18. **DRAFT ASHFORD BOROUGH PLAYING PITCH STRATEGY 2017 -2030**
19. Ashford Tourism Strategy (2013-2014)
20. **Draft Open Space Strategy 2017**
21. **Draft Green Corridor Action Plan 2017**
22. **Draft Heritage Strategy 2017**
23. **Landscape and Visual Appraisal 2017**
24. **Feasibility Report A20 Development Sites – Access Assessment 2017**
25. **Consultation Statement**
26. **Water Cycle Study 2016**
27. **Duty to Co-operate Statement**

Appendix D: Main Changes Representation Form

Ashford Borough Council Ashford Local Plan 2030 Regulation 19 – Main Changes



For office use only

Reference No:

Date received:

Representation Form

The preferred and most efficient method for receiving comments is online via the consultation portal. You can register to access the consultation portal at: www.ashford.gov.uk/consult. If you are unable to use the online method of submitting comments you may still submit comments by using this form. Please use this form to set out your representation on the 'Main Changes' to the Ashford Local Plan to 2030: Publication Version. All representations received will be considered as part of a public examination by an independent Planning Inspector.

You must use a separate form for each 'Main Change' comment. If you have commented on the Local Plan previously, you need not make the same comments.

All comments submitted previously remain valid unless you advise us otherwise. Guidance Notes for submitting a representation can be found at the end of this form. Please read these notes before completing your response.

This form must be returned by the end of Thursday 31st August 2017

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 – To which 'Main Change' number does this representation relate?

MC:

Question 2 - To be "Sound" a Plan should be Positively Prepared, Justified, Effective and Consistent with National Policy (see guidance)

Do you consider this 'Main Change' is sound (support/agree)?

Yes No

If you consider the 'Main Change' is unsound, on which grounds do you consider it so (see guidance)?

Not positively prepared Not justified
Not effective Not consistent with National Policy

Question 3 – Please set out your representation here, relating to “soundness”. If applicable, what changes do you propose to make the document “sound”?

To help the independent Planning Inspector manage the examination, we ask that representations are concise and, where they are necessarily detailed, that you provide a concise summary setting out your main points.

(Attach additional sheets only if necessary)

Question 4 – Do you consider it necessary to participate at the oral part of the examination?

Yes No

Question 5 – Does your representation relate to a new or a previously-submitted omission site (see guidance)?

New Submitted Previously Not Applicable

If either of the first two options apply, you must supply details of the omission site, including a site location plan, contact details of the landowner, and a full case as to why it might be more suitable, on a separate sheet and return it with this completed form.

Signature:	Date:
Print name:	

Additional questions - To enable us to process your representation more effectively, we would be grateful if you could respond to the following optional questions as relevant. You may continue your response on a separate sheet if you wish. For more information on Legal Compliance, Guidance Note 2 is available for reference.

If you have previously commented on the Local Plan, as a result of this ‘Main Change’ do you wish to withdraw, replace or add to any previous comments?

Withdraw in entirety Replace /Substitute
Add to existing comment Not Applicable – this is a new representation

Do you consider that this ‘Main Change’ is Legally Compliant in accordance with the relevant regulations?

Yes No Don't know

Guidance notes for submitting a representation

Data Protection Statement: The information collected will be processed and stored in accordance with the Data Protection Act 1998. Copies of representations will be made available for public inspection, and unfortunately we cannot accept any confidential or anonymous submissions. Once the consultation period has closed, all representations will be available to view on the Council's consultation portal www.ashford.gov.uk/consult.

The Data Protection Act places a requirement on the Council to hold personal data only if it is accurate. Therefore we will redact any comments or information that is derogatory or offensive in nature. Please see the www.ashford.gov.uk/data-protection for further details.

ALL RESPONSES MUST BE RECEIVED BY: Thursday 31st August at 23:59.
We cannot accept your representation if it is received later than this date.

1. What is this consultation about?

Last summer we consulted on a new Local Plan to 2030 for Ashford Borough. During the eight weeks of consultation we received 2866 individual representations. These still stand and many of these have been incorporated into these 'Main Changes'. Since then, new government projections have required us to significantly increase the number of homes we have to plan for during this plan period. These are also reflected in the 'Main Changes'.

The 'Main Changes' consultation document should be read in conjunction with last year's draft Local Plan to 2030, but it is different insofar as this time we are only seeking comments on the changes rather than the whole document.

If you've already submitted comments, you don't need to submit them again. We have them and the issues raised will be put before the independent Inspector. The Inspector will assess whether the plan has been prepared in accordance with the Duty to Co-operate, legal and procedural requirements, and whether the plan is "sound". To assist the Inspector your representation should relate to these issues, and the relevant 'Main Change' reference number should be identified.

2. Using the representation form.

We encourage everyone to use the Consultation Portal www.ashford.gov.uk/consult. This has a number of benefits: it is quick and easy to use, it will save time as you only need to complete personal details once, and you can view or modify your comments at any time during the process. 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 acceptable.

3. Who should make a 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 any future correspondence will be sent to them.

4. 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 respond to the questions as completely as possible, and remember to sign and date each form you use. Continuation sheets can be used, but to assist the independent Inspector 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 the representation to which they relate.

5. The questions ask me to address “soundness” issues - what does this mean?

If you think that the change is “sound” it means that you agree with it or support it. If you think it is “unsound” you disagree with it or object to it. Please use the form to state whether you think the Local Plan is sound (support/agree) or unsound (object/disagree/think information is missing). Please try to be constructive – you should try to support any objection with evidence showing why your objection and alternative approach is preferable. There are four areas to consider when looking at whether or not the ‘Main Changes’ to the Local Plan 2030 are “sound”, as follows:

<p style="text-align: center;">Positively prepared</p> <p>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.</p>	<p style="text-align: center;">Justified</p> <p>Our Local Plan must be set on a robust and credible proportionate evidence base, ensuring the choices made in our Local Plan are backed up by solid facts and research¹. Our Local Plan should be the best approach when considered against reasonable alternatives.</p>
<p style="text-align: center;">Effective</p> <p>This means we must be reasonably sure that the policies and proposals in our Local Plan can actually happen and are deliverable.</p>	<p style="text-align: center;">Consistent with national policy</p> <p>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).</p>

If you believe the Local Plan is unsound, please detail precisely why you are objecting, considering these four tests. Further information on the issue of “soundness” can be found in the National Planning Policy Framework (NPPF) Paragraph 182 (page 43) <https://www.gov.uk/government/publications/national-planning-policy-framework--2>. In addition, further guidance is available at www.ashford.gov.uk/local-plan-2030.

6. What is an Omission Site?

The Local Plan allocates sites for development. Any site not allocated for development may be submitted to the Council as an ‘omission site’ (i.e. missing from the Plan). In submitting an ‘omission site’ you are saying that your site should be considered for inclusion as an allocation in the final Plan. If you are submitting an ‘Omission Site’ you must supply details of the site, including a site location plan, contact details of the landowner, and a full case as to why it might be more suitable than already allocated, on a separate sheet and return it with a completed representation form.

All sites are assessed on the same basis through the SHELAA (Strategic Housing and Employment Land Availability Assessment) and the SA (Sustainability Appraisal) processes.

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

If you make a representation through the portal you will receive an email notification for each comment received. Once your representation has been moderated (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 accepted.

8. Where should I send my hard copy form?

Planning Policy Team,
Planning and Development,
Ashford Borough Council,
Tannery Lane,
ASHFORD,
Kent TN23 1PL
Or via email to planning.policy@ashford.gov.uk

¹ For a list of supporting evidence base documents, please visit <http://www.ashford.gov.uk/local-plan-2030-evidence-base>

Appendix E: A5 leaflet advertising exhibition dates



Ashford
local plan

Help shape our Local Plan to 2030

'Main Changes' consultation

Ashford Borough Council is currently consulting on a number of 'Main Changes' to the draft 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 changes include new and amended housing site allocations.

The consultation starts on **7th July** and runs until **31st August 2017**. To view the changes and have your say visit www.ashford.gov.uk/consult or come along to a public exhibition - details on reverse.



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Planning our future **together**



Ashford
local plan

'Main Changes' to Local Plan consultation exhibitions

For more details, come along to one of the following exhibitions in the borough.

Please note: If you can't make your nearest event the format is the same at each location so please come along to any one.

Tenterden Town Hall	Tues 18/07/2017	16:00 – 19:00
Hothfield Village Hall	Fri 21/07/2017	16:00 – 19:00
High Halden Village Hall	Tues 25/07/2017	16:00 – 19:00
Charing Village Hall	Thurs 27/07/2017	16:00 – 19:00
Hamstreet Sports Pavilion	Mon 31/07/2017	16:00 - 19:00
Aldington Village Hall	Thurs 03/08/2017	16:00 - 19:00
Park Mall, Ashford Town Centre	Tues 08/08/2017	12:00 - 14:00
Kingsnorth School Hall	Wed 09/08/2017	16:30 - 19:00
Wittersham Village Hall	Thurs 10/08/2017	16:30 – 19:00
Farriers Arms, Mersham	Tues 15/08/2017	16:30 – 19:00
Challock Memorial Hall	Wed 16/08/2017	16:30 – 18:30



ASHFORD
BOROUGH COUNCIL

Planning our future **together**

Appendix F: Summary Leaflet and FAQ Sheet

(Available online, at deposit points and at Exhibitions)



Ashford
local plan

Local Plan 2030 - 'Main Changes' consultation

Ashford Borough Council is proposing a number of 'Main Changes' to the policies and supporting text of the Regulation 19 version of the Ashford Local Plan (published in June 2016). These changes address a range of issues raised during public consultation, to ensure the Local Plan is up to date, reflects the latest evidence base and meets the requirements of the latest national planning policy.

Consultation on the 'Main Changes' will run to the end of **Thursday 31st August 2017** and can be viewed and commented at www.ashford.gov.uk/consult

During this period a series of exhibitions will be held that will enable local residents to ask questions and find out more about the 'Main Changes' to the Local Plan 2030.

For more information about the exhibitions and guidance visit www.ashford.gov.uk/local-plan-2030



ASHFORD
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ASHFORD

Planning our future **together**

Ashford local plan

The Local Plan to 2030 aims to make sure that future development within Ashford is well planned, helping to create great places and strong communities and provides a consistent approach to planning across the whole borough.

What is the Local Plan 2030?

The Local Plan 2030 allocates 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.

It addresses housing, employment, retail, leisure, transport, community infrastructure and environmental issues such as adapting to climate change and ensuring high quality design.

The general principle of the Local Plan is to encourage growth within the economy of Ashford to provide homes, employment, retail floor space and infrastructure such as community facilities and green spaces.

Whilst growth in the economy is important, the plan also seeks to protect Ashford's valued assets such as heritage, leisure, nature and open spaces.

A draft of the Local Plan 2030 (Regulation 19 Version) went out for an eight week public consultation in June 2016.

What are 'Main Changes'?

The council is now proposing 'Main Changes' to some of the policies and supporting text of the June 2016 version of the Local Plan for a number of reasons:

- To address a range of issues raised during the 2016 public consultation
- To ensure it is up to date and in accordance with national planning policy
- It reflects the latest evidence base, such as the revised population forecasts

It is considered necessary to address these issues before the Local Plan is submitted to the Secretary of State to be examined by an independent Planning Inspector.

'Main Changes' are changes to policies, maps and supporting paragraphs which are significant in nature and which represent a fundamental change to the way in which the policy could be interpreted. There are a number of 'Main Changes' that are completely new topic or site policies. It is therefore important that interested parties are given an opportunity to consider and respond to these changes.

The consultation is focused only on the 'Main Changes'. The consultation is not an opportunity to repeat or raise further representations about other parts of the Regulation 19 draft Local Plan or to seek wider changes. All previous comments are to be retained and will be submitted to and considered by the Inspector, alongside any additional comments received.



Summary of the significant 'Main Changes'

This document has been prepared to provide an overview of some of the key matters linked to the consultation on proposed 'Main Changes' to the Regulation 19 version of the Ashford Local Plan 2030. More information is available at www.ashford.gov.uk/consult including the consultation documents and background studies that have helped inform the Councils in the plan making process.

Part 1 of the 'Main Changes' consultation contains amendments to text and content within the Regulation 19 – June 2016 Version of the Local Plan 2030. Part 2 of the consultation contains a number of completely new topic and site policies and a new appendix. All 'Main Changes' are given a reference number with the prefix 'MC'.

Summarised here are some of the most significant 'Main Changes':

- The overall requirement for housing has increased from 14,680 to 16,120 dwellings. This reflects the new national population projections. Policy SP2 – Strategic Approach to Housing Delivery has been replaced to reflect this increase (see MC4)
- Increased capacities are proposed on housing sites: S4 and S5, South of Kingsnorth (MC11 & MC12), S14 Park Farm South East (MC21), S16 Waterbrook (MC23), S19– Conningbrook (MC25), S20 Eureka Park (MC26), S24– Tenterden Phase B (MC29), S26 Appledore (MC31), S33, High Halden (MC37) and S38– Smeeth (MC42)
- In addition, and in order to also address the 5 year housing land supply issue, a number of additional housing allocations have been identified across the borough in the following locations: Ashford, Bridgefield, A20 (Hothfield, Westwell and Smeeth), Aldington, Brook, Challock, Charing, Chilham, Hamstreet, High Halden, Mersham, St.Michaels, Wittersham and Woodchurch (See MCs 88-105 in Part 2 of the consultation for full details)
- Deletion of the proposed Park and Ride site at the Warren (MC64) and Lower Road, Woodchurch housing site S39 (MC43)
- Windfall housing policies have been amended to provide a reasonable balance between the longstanding Local Plan policy of resisting any new general market residential development outside the built up confines of identified settlements and the NPPF's less restrictive approach to rural housing, particularly where such development could be regarded as "sustainable development". (MC50 and MC51)
- Affordable housing Policy HOU1 has been amended to reflect new guidance to remove the starter homes reference and require an amended mix of affordable home ownership products being included in the policy requirement in different parts of the borough (MC48)
- New policy HOU18 promotes a range and mix of dwelling types and sizes to be provided on sites of 10 dwellings or more (MC86)
- New policy SP7 seeks to resist the coalescence or merging of two or more separate settlements or the erosion of a gap between settlements resulting in the loss of individual identity or character (MC85)
- A new policy for the former Bombardier works site at Chart Road for commercial uses but which safeguards the area of the site adjacent to the railway including the railway sidings for operational railway use (MC87)
- The overall level of allocated land for economic development has been increased to 22 hectares by increasing the site area of the Waterbrook S16 allocation (MC23)

'Main Changes'

Frequently Asked Questions

I made comments on the draft Local Plan in 2016 so do I have to comment again?

The comments received in response to consultation on the Regulation 19 draft Ashford Local Plan last summer have been analysed and, as considered necessary, have resulted in the 'Main Changes' that are now subject to consultation. A number of supporting documents are published with the 'Main Changes' including a Consultation Statement, which provides an account of the comments made in 2016 and the council's related response. This document is available on the council's website.

Comments made during the previous consultation on the Local Plan in 2016 will be taken forward alongside comments received during this consultation on the 'Main Changes' to be considered by the Planning Inspector at the Examination of the Plan. Comments made previously in 2016 do not therefore need to be repeated in this consultation, but can be added to, replaced or withdrawn if related to a proposed 'Main Change'. **As such, new or repeated representations relating to parts of the Local Plan that are not subject to a 'Main Change' will not be accepted.**

Why does Ashford need this additional housing when the Government's Localism Act allows local communities to determine their own housing growth?

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 (SHMA), to ensure that general market and affordable housing needs are fully met until 2030. The SHMA was updated in 2017, which is why many of these changes have been made and additional sites have been allocated.

A general misunderstanding of the Localism Act is that the Government allows local communities to simply say NO to development. The choice is more about where the development needed should best be located.

Where can I find more information and make comments on these 'Main Changes'?

The consultation documents are available on the council's consultation portal, where you can register and make comments online at www.ashford.gov.uk/consult

A number of exhibitions are being held across the borough during the consultation period.

More information is available at www.ashford.gov.uk/local-plan-2030

In addition, there are hard copies of the documents, additional guidance notes and representation forms available at the Civic Centre and main libraries. Forms can also be requested to be posted or emailed out.

Any member of the Planning Policy team at Ashford Borough Council will be able to provide further assistance. You can contact them:

- 01233 330229
- planning.policy@ashford.gov.uk

What happens after my comments have been made?

Following public consultation, it is the council's intention to assess the comments made, and if no further changes are required, submit the draft Local Plan and 'Main Changes' (along with relevant supporting documentation and comments received on both) to the Secretary of State. There will then be an independent examination where an appointed Planning Inspector will consider the 'soundness' of the Local Plan having regard to all of the comments received.

At the Examination in Public, the Inspector will look at the plan, the evidence supporting it and representations received at the Publication round of consultation (June 2016 and July 2017) and judge whether it is sound and whether it meets the legal requirements. Further information will be provided on the Examination process as this stage of the plan making process commences, and if you have made comments on the Local Plan in 2016 or during this 'Main Change' consultation, you will be kept informed.





Local Plan 2030 and 'Main Changes'

Frequently Asked Questions

What is the Local Plan 2030 and 'Main Changes'?

The draft Local Plan to 2030 (2016) and the 'Main Changes' proposed to it (2017) have been prepared by Ashford Borough Council. It sets out the vision, policies and proposals to guide future development and the use of land within the whole of Ashford.

It will give a degree of certainty to developers and members of the public as to where development is likely to take place and guide decision makers on the most appropriate forms of development over the plan period to 2030.

As a place-shaping document, everyone can be affected so everyone should contribute – it is therefore important to engage with the whole community in the preparation of the Local Plan.

Why does Ashford need this additional housing when the Government's Localism Act allows local communities to determine their own housing growth?

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 (SHMA), to ensure that general market and affordable housing needs are fully met until 2030. The SHMA was updated in 2016, which is why many of these changes have been made and additional sites allocated.

A general misunderstanding of the Localism Act is that the Government allows local communities to simply say NO to development. The choice is more about where the development needed should best be located.

Where are the additional jobs and infrastructure to meet all the new residents' needs?

The delivery of additional jobs and key infrastructure over the plan period to 2030 is a critical requirement for the delivery of a successful Local Plan. The plan provides for approximately 80 ha of land for new economic development, supporting the growth of 11,100 new jobs in the borough.

Also, as part of the documentation that runs alongside the Local Plan, the council has prepared an 'Infrastructure Delivery Plan', which identifies the need for new infrastructure resulting from development.

New developments are required through various policies in the draft Local Plan to provide the infrastructure needed to support it.

The schools, roads, water/sewerage services, GP's and William Harvey Hospital are over capacity – Are you going to improve these services before you build more houses?

The Infrastructure Delivery Plan has been prepared in consultation with all the relevant stakeholders relating to services, including KCC Highways & Education, water companies and the Environment Agency, the Ashford Clinical Commissioning Group and the East Kent NHS Trust.

It is the responsibility of these 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.

These stakeholders will also be formally consulted on these draft plans during this consultation stage, and we will continue to work with them in understanding the borough's infrastructure needs.

Why are you developing 'greenfield' sites when there are previously developed (brownfield) sites that could meet the housing need in Ashford?

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 will encourage the re-use of previously developed sites where environmental constraints allow and sites are sustainably located.

Please note that Greenfield sites are not designated 'Green Belt', which is nationally protected land. There is no 'Green Belt' designation in the Ashford borough.



ASHFORD

Planning our future **together**

Have the site allocations within the Local Plan and 'Main Changes' already been decided?

Extensive evidence gathering, consultation and sustainability appraisal has been carried out on alternative development site options.

The outcomes from these tasks has informed the council's selection of preferred development sites to the extent required to meet needs, most significantly for housing and employment sites.

However, the 'Main Changes' are still draft proposals and the current consultation provides the opportunity for comments to be made and further changes proposed. Amendments can still be made to the draft Local Plan 2030 and if changes are made it may require a further round of public consultation.

In addition, planning permission will still have to be obtained for Local Plan allocated sites and planning applications must be made and determined in the usual ways, assessed against all the policies within the local plan.

What happens to the sites already identified and allocated in Ashford's current Local Plan/development plan documents?

Do these remain allocated or will the new Local Plan make them defunct?

The new Local Plan 2030, including the 'Main Changes' (once adopted), will replace all existing site allocations and policies contained in the saved Local Plan 2000, The Core Strategy 2008, The Town Centre Area Action Plan 2010, The Tenterden and Rural Sites Development Plan Document 2010 and the Urban Sites and Infrastructure Development Plan Document 2012.

Some allocations from those documents have been revised and replaced within the draft Local Plan 2030, others will be removed.

Is the Chilmington Green development to be reviewed as part of this Local Plan?

No. The Chilmington Green plans will not be reviewed as part of this Local Plan. The housing proposed at Chilmington Green will contribute to the borough's housing need and is taken into account when determining how many additional sites needed to be allocated in this plan.

I made comments on the draft Local Plan in 2016 so do I have to comment again?

The comments received in response to consultation on the Regulation 19 draft Ashford Local Plan last summer have been analysed and, as considered necessary, have resulted in the 'Main Changes' that are now subject to consultation. A number of supporting documents are published with the 'Main Changes' including a Consultation Statement, which provides an account of the comments made in 2016 and the council's related response. This document is available on the council's website.

Comments made during the previous consultation on the Local Plan in 2016 will be taken forward alongside comments received during this consultation on the 'Main Changes' to be considered by the Planning Inspector at the Examination of the Plan. Comments made previously in 2016 do not therefore need to be repeated in this consultation, but can be added to, replaced or withdrawn if related to a proposed 'Main Change'.

In conclusion, comments are invited on all the 'Main Changes' but new or repeated representations relating to parts of the Local Plan that are not subject to a 'Main Change' will not be accepted.

What happens after my comments have been made?

Following public consultation on the 'Main Changes', it is the council's intention to assess the comments made, and if no further changes are required, submit the draft Local Plan and 'Main Changes' (along with relevant supporting documentation and comments received on both) to the Secretary of State at the end of 2017. There will then be an independent examination where an appointed Planning Inspector will consider the 'soundness' of the Local Plan having regard to all of the comments received.

At the Examination in Public the Inspector will look at the plan, the evidence supporting it and comments received at the Publication rounds of consultation (June 2016 and July 2017) and judge whether it is 'sound' and whether it meets the legal requirements. Further information will be provided on the Examination process as this stage of the plan making process commences, and if you have made comments on the local plan in 2016 or during this 'Main Changes' consultation, you will be kept informed.

Appendix G: Media and Social Media materials

Figure 4: Facebook Campaign (selection, not all)

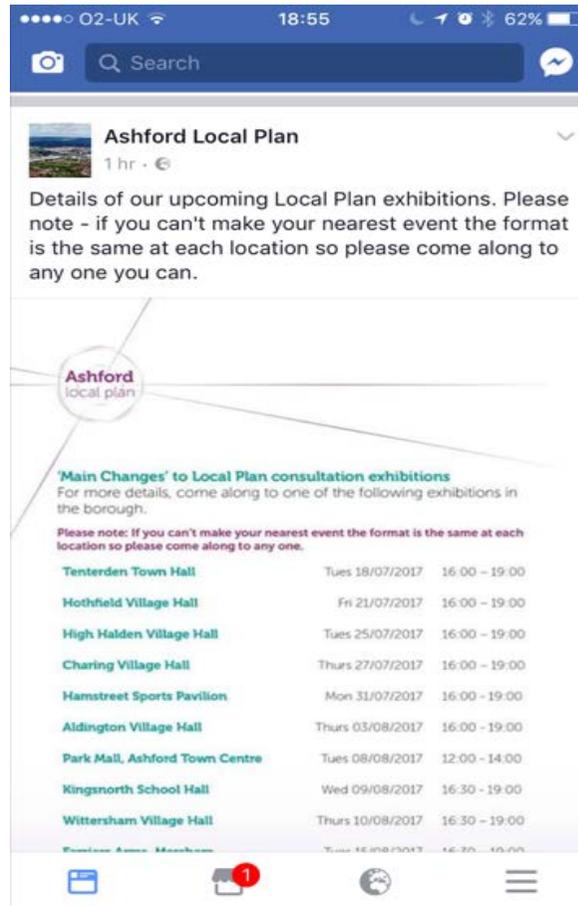
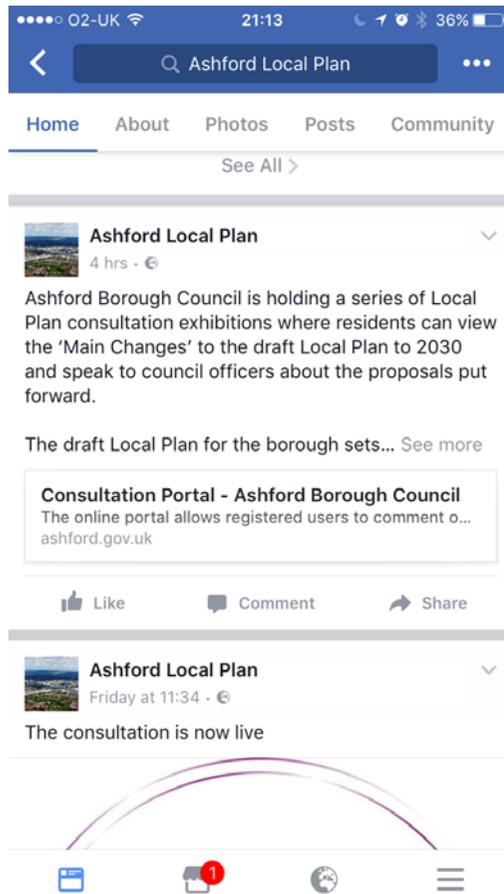


Figure 5: Twitter Campaign (Selection)



Figure 6: Ashford Voice Website



Have your say on local projects

The borough has a rich heritage but is also embracing growth with its ambitious plans for the future. Have your say on major projects which emphasise this ambition and illustrate how the council will deliver new jobs, housing, retail and cultural facilities for Ashford

View consultations and voice your opinion on various upcoming projects including:

[Draft Local Plan](#)
[Chilmington Green](#)
[Heritage Strategy](#).



Council seeks views on 'Main Changes' to draft Local Plan



Ashford Borough Council is consulting on a number of 'Main Changes' to the draft 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 changes include new and amended housing site allocations.

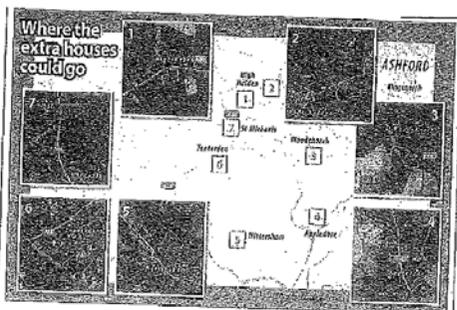
Figure 7: News Paper articles - Kentish Express

Media Update

Local Plan

KE Tenterden

13th July 17



Village homes sites revealed

by Aidan Barlow
abarlow@thetmgroupp.co.uk
aidanbarlow@11

Hundreds of new houses could be built in villages surrounding Tenterden after council planners revealed how they would meet growing demands for housing.

Last week the KE revealed the government wants developers to build a further 1,250 houses, on top of the 12,000 that were set out in Ashford Borough Council's Local Plan in 2016.

The planners have revealed new sites for development, and also earmarked more homes to be built on sites that had already been identified.

It means that in phase B of the Tenterden development, the number of houses would increase from 175 to 225.

Land off The Street in Appledore has been earmarked for 20 houses, and land at Hope House off the A26 in High Halden could get 25 houses.

The council has also identified four new sites, which include 20 houses off Appledore Road in Woodchurch, 50 houses off the A26 at St Michael's, 40 houses off Jubilee Field in Wittersham, and 50 houses on the former Stevenson Brothers classic cars garage near Filch Hatton.

Development limit agreed

Tenterden Town Council clerk Phil Burgess said the increase in the number of homes in Tenterden from 175 to 225 next to Smalhythe Road, did not involve a greater area of land, while the omission site at St Michael's north of Shoreham Lane for 50 houses off

EXHIBITION DATES

- Tenterden Town Hall - Tuesday July 18 - from 4pm to 7pm
- High Halden Village Hall - Tuesday July 25 from 4pm to 7pm
- Wittersham Village Hall - Thursday August 6 from 4.30pm to 7pm

An extra 225 houses could be built in the Tenterden area, taking the overall total to 500 homes to be built in the area by 2028.

The council is encouraging residents to have their say on development plans for the revised Local Plan.

Planning and development portfolio holder Cllr Paul Clarke said: "We are now out to consultation on the main changes proposed to our draft Local Plan.

"This is an important document, and one which will have a big impact on the borough's future. Therefore we have arranged for a series of exhibitions where council officers will be on hand to explain the proposed changes.

"We hope residents take the opportunity to find out more and take part in this consultation."

For more information, visit www.ashford.gov.uk/local-plan-2028.

the A26, considered after the initial Local Plan, fell under High Halden's control. Ashle from 154, a statement said the town council had reached "broad agreement" with ABC "that there should be no further housing development in Tenterden beyond the 500 homes currently being built behind the Leisure Centre at Church View and Three Fields, and 120 houses at 72den Gill".

Stuart Barton

Our columnist with his unique view of Ashford life



A race to pave over our paradise

It was some time ago, when the council was busy agreeing to the destruction of Chilmington Green that I suggested it would not be too long before development plans would be set in motion for any number of the borough's villages, adding to the "dormitory" status of the area and, yes, providing extra homes - but for people who, by and large, will neither work in the area nor shop in the town.

A couple of weeks ago, surprise, surprise, the KE reported that representation had been made to the Ashford Borough Council cabinet on behalf of Shadoxhurst, Orlestone, Aldington and Bonnington, Brabourne, Charing and Brook, all of whom were concerned about the destructive effect of proposed development plans.

There appears to be an almost maniacal determination to cify our once beautiful borough with office blocks and housing estates, demonstrating a brutal disregard for the wishes of the very folk to whom the council owes a duty of care and respect.

This kind of steamrolling is a direct consequence of a council without any credible opposition. The current "accept what you're

given" approach is a poor reflection on the ideals of democracy

■ A significant addition to the town's cultural life is the recent opening of the Knole Gallery in Bank Street. I called in there last Friday and was met by a charming lady - Kim McGuire - who told me the art gallery is the brainchild of Chris Hallett who has recently retired from his position as chief clerk to a London firm of barristers.

■ I'm always amused to read the reasons given by large companies for any changes they make to their services.

The most recent of these concerns the "Little and Often" bus service between the town centre and Park Farm.

The change, they say, is to improve the journey for residents. This has been shown not to be the case for some "Park Farmer" pensioners, who say the new service follows a different route from the old one, giving at least one elderly soul a 20-minute walk to catch the bus outside Tesco.

This so-called "improvement" in the service, I suspect, not to make the journey easier, but to reduce the cost of running double-decker buses in which I, sometimes, was the only passenger.

KENTISH ASHFORD AND DISTRICT

KM EXPRESS

www.kentonline.co.uk/ashford Trusted news since 1855 Issue 1024 THURSDAY, JULY 6, 2017 £3.30

- Shoppers flock to closing sale
- Bigger store opening in centre
- Set to take over old BHS site

POUNDLAND ON THE MOVE

TURN TO PAGES 2 AND 3 FOR FULL STORY

Yet more houses

Government tells council to build an EXTRA 1,250 new homes - as well as the 12,000 already planned. Full story on page 11

INSIDE

Is it you? Winning £90,000 ticket bought in Ashford

Exclusive - inside new trampoline centre

Cute Kids - enter our competition



Diversion signs causing problems for HGV drivers

Signposting for the closure of Kilmington Road, a vital link for HGVs, is causing confusion for drivers. The signs are not clear and are causing delays.

It is a sad state of affairs that when Ashford Borough Council is told to allocate a further 1,200 homes to its local plan, which is already far too high when considering the local infrastructure, it of course complies.

Only last week Communities Secretary Sajid Javid said the government was determined to build where people want to live, regardless of the local communities.

So far as local consultations and public opinion is concerned, don't bother. It's a total waste of time. We are engaged in a process that has already been decided. The extra homes will be built.

In our area we appear to be at a disadvantage to other parts of the country. We comply totally to government policy, while some councils have not even completed a plan and others are out of date.

It was left to sort out Operation Stack with very little financial help from the government, then forced into the crazy god idea of a huge lorry park.

So yes Kent, so it supposed Troy Iordanski, gets a bad deal from this government.

All the many thousands of houses are not for local needs. Thousands of people are being driven to the area, which cannot cope with this influx. The villages are being ruined and Ashford town centre has already lost the plot.

John Denton Ashford

New homes figures just don't add up
I refer to your article last week 'Ye more homes', where 'council chiefs' have been 'told by the government that they must build even more houses in the borough'.

Finally I would question whether such a directive has been given, rather the uplift has been prompted by a document called the 'Implications of 2016 Census, the National Population Projections and Household Projections - January 2017'. This has revised the housing need upwards despite the following issues.

The latest (2016), 70th quartile affordability ratio is 2209 9.6 times earnings, up from 8.15 in 2016 and getting worse.

Property for those who are starting out is becoming increasingly unaffordable and with financial institutions unwilling to lend at rates than say six or seven times earnings, how do young people



MERCURY

WINDOWS

DOORS

CONSERVATORIES

Mercury Windows is a leading manufacturer of high quality windows, doors and conservatories. We offer a wide range of products to suit all tastes and budgets.

Our conservatories are built to last and provide a bright, airy space for your home. We offer a range of designs and finishes to suit your taste.

Our doors are made from high quality materials and are designed to provide security and insulation. We offer a range of styles and finishes to suit your home.

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Tel: 01233 713111

DEVELOPMENT UPDATE

Plans revealed in bid to meet housing demands

Plans to build 1,200 new homes in Ashford have been revealed in a bid to meet the borough's growing housing needs. The plans include a mix of housing types and are expected to be completed by 2025.

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Points of view

Say no to demand for more houses

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Only last week Communities Secretary Sajid Javid said the government was determined to build where people want to live, regardless of the local communities.

So far as local consultations and public opinion is concerned, don't bother. It's a total waste of time. We are engaged in a process that has already been decided. The extra homes will be built.

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New homes figures just don't add up

I refer to your article last week 'Ye more homes', where 'council chiefs' have been 'told by the government that they must build even more houses in the borough'.

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This has revised the housing need upwards despite the following issues. The latest (2016), 70th quartile affordability ratio is 2209 9.6 times earnings, up from 8.15 in 2016 and getting worse.

Property for those who are starting out is becoming increasingly unaffordable and with financial institutions unwilling to lend at rates than say six or seven times earnings, how do young people

Public opinion sought on sites for even more homes

The story in last week's Express detailing the government's announcement that Ashford Borough Council had to increase its housing build target again

get on the property ladder? The report makes an assumption that there is a 5% improvement in affordability, increasing the housing stock needed, without any justification as to how this might be achieved.

The assumption is that the government will somehow make property cheaper, but Holy Trinity and other schemes have not made property more affordable, on the contrary the situation has become worse.

If you are a house builder, why would you build houses at lower profit margins? There is no pressure to do so. Planning permissions are not taken away if you sit on a land bank.

House builders develop at a quicker rate, supply is unlikely to exceed demand and prices will remain high.

Ashford council is now proposing over 16,000 additional houses before 2031, at a rate of 700 dwellings per annum. Over the years 2011 to 2030 the report shows that only 265 properties on average were built in the borough.

So how are Ashford council going to ensure that this happens? Giving out more permissions doesn't make it happen. I believe there are already over 11,000 on the council's books.

Lastly this report is primarily based on statistics up to 2014, projections for a population growth that might be so far from the mark as to be embarrassing if central government tries to control external migration and the economy slows down.

Planning Practice Guidance gives councils the right to say why they think the rates of growth in the Strategic Housing Market Assessment are unachievable and to protect lower levels of growth. Isn't it time our council stood up for the existing residents, (as well as those



The story in last week's Express detailing the government's announcement that Ashford Borough Council had to increase its housing build target again

who will move here in the future) and challenges this endless increase in housing numbers? Martin Hughes Kilmington

Build in Midlands, not the South East

Yes, we do constantly need new housing, especially affordable, but why always in the South East?

If someone objects via the parish council they will say that the borough has improved regeneration. Then the borough will say that they are conforming to government targets. But what about Midlands regeneration, the 'Northern Powerhouse' and other areas that would welcome development? We know about the inability of the infrastructure here to cope, ie medical facilities, schools, roads, water supply, waste disposal.

And why decisions of London on a new runway at Heathrow or Gatwick? No, main H at Birmingham, with a vast catchment area. Just drive on the M6 around our 'second city' and see the hundreds (thousands) of brownfield sites crying out for regeneration.

It is time for the south eastern councils to stand up and be counted and say 'No, we are not accepting tens of thousands of new homes'. Probably the majority will be bought by people fleeing London and the suburbs. The KM recently headed Midlands development being purchased en masse by London investors.

Grasp the nettle. What are 'they' going to do - send in the Army? Alan VERA The Hill, Charing

Yes, we do constantly need new housing, especially affordable, but why always in the South East?

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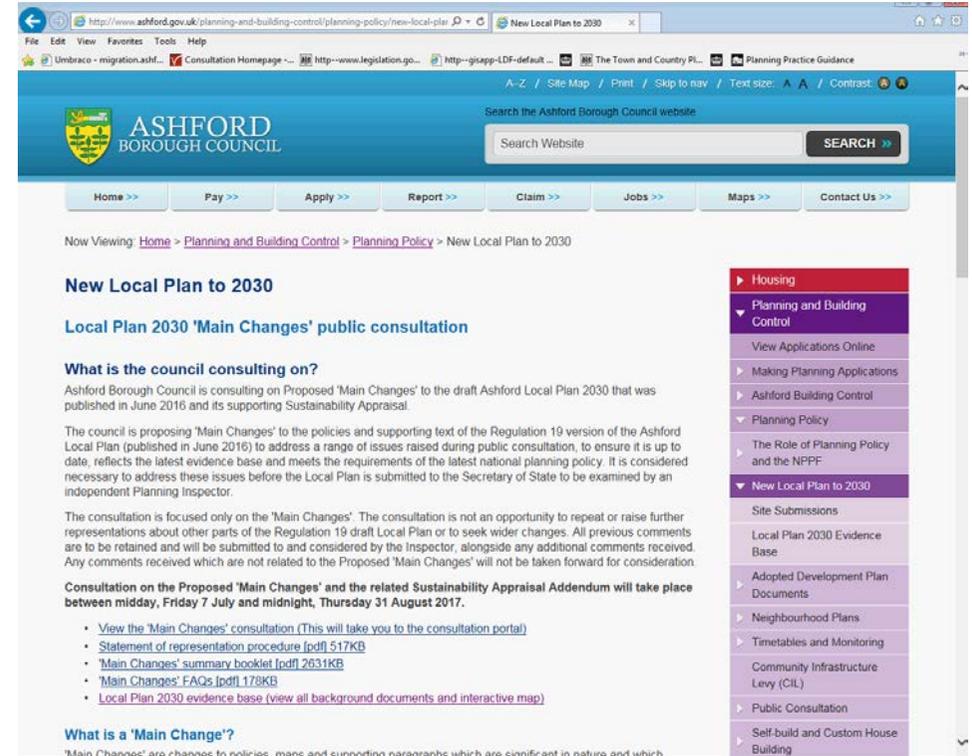
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Figure 8: ABC website

Rolling 'news' section article on front page of website

Local Plan Webpage



http://www.ashford.gov.uk/planning-and-building-control/planning-policy/new-local-plan

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Umbraco - migration.ashf... Consultation Homepage... Htp--www.legislation.go... Htp--gsapp-LDF-default... The Town and Country Pl... Planning Practice Guidance

What is a 'Main Change'?

'Main Changes' are changes to policies, maps and supporting paragraphs which are significant in nature and which represent a fundamental change to the way in which the policy could be interpreted. There are a number of 'Main Changes' that are completely new topic or site policies. It is therefore important that interested parties are given an opportunity to consider and respond to these changes. 'Main Changes' which are edits to 2016 Local Plan text are shown underlined for new text and deletions are struck through.

How do I make comments?

The documents relating to the 'Main Changes' to the Publication Draft (June 2016) of the Ashford Local Plan 2030 can be viewed and commented on:

- Online through the consultation portal
- A number of hard copy document viewing locations

If required, hard copies of the Schedule of Proposed 'Main Changes' can be purchased from Ashford Borough Council at a cost of £5 plus £3 post and packaging. Please note that copies will be printed on demand and therefore notice will be required before copies may be collected in person.

Hard copy Representation forms (comment forms) and guidance can be requested free of charge.

Who can I speak to further with regard to these 'Main Changes' proposal to the local plan?

The council are holding a number of Public Exhibitions across the borough. For more details, come along to one of the following exhibitions in the borough.

Please note: If you can't make your nearest event the format is the same at each location so please come along to any one.

'Main Changes' Exhibition dates

Venue	Date	Time
Tenterden Town Hall	Tues 18/07/2017	16.00 – 19.00
Hothfield Village Hall	Fri 21/07/2017	16.00 – 19.00
High Halden Village Hall	Tues 25/07/2017	16.00 – 19.00
Charing Village Hall	Thurs 27/07/2017	16.00 – 19.00
Hamstreet Sports Pavilion	Mon 31/07/2017	16.00 – 19.00
Aldington Village Hall	Thurs 03/08/2017	16.00 – 19.00
Park Mall, Ashford Town Centre	Tues 08/08/2017	12.00 – 14.00
Kingsnorth School Hall	Wed 09/08/2017	16.30 – 19.00
Wittersham Village Hall	Thurs 10/08/2017	16.30 – 19.00

Was this page helpful?
 Yes No

Name

Telephone

Email

Comments

Self-build and Custom House Building
Local Land Charges
Major New Developments
Planning Enforcement
Design and Planning
Building Conservation
Street Naming and Numbering
Trees and Hedges
Planning for Business
Benefits and Council Tax
Councillors, Meetings and Elections
The Environment
Licensing
Business
What's On
Your Community

http://www.ashford.gov.uk/planning-and-building-control/planning-policy/new-local-plan

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Park Mall, Ashford Town Centre	Tues 08/08/2017	12.00 – 14.00
Kingsnorth School Hall	Wed 09/08/2017	16.30 – 19.00
Wittersham Village Hall	Thurs 10/08/2017	16.30 – 19.00
Farriers Arms, Mersham	Tues 15/08/2017	16.30 – 19.00
Challock Memorial Hall	Wed 16/08/2017	16.00 – 19.00

Any member of the Planning Policy team at Ashford Borough Council will be able to provide further assistance regarding the content of the Local Plan and 'Main Changes'.

For further information on the Local Plan or to discuss the consultation process please [contact us](#). You can telephone 01233 330229 or [email the Planning Policy Team](#).

Next stages: Examination in public

Following the consultation stages outlined at the top of the page, the next stage in the process would be for ABC to submit the final draft of the Local Plan to the Secretary of State and Planning Inspectorate, which will commence the Examination in Public (EIP) process. This 'submission stage', is expected in December 2017.

At an Examination in Public, an Inspector will look at the Local Plan 2030 and Main Changes, the evidence supporting them and all comments received during the consultations and judge whether it is 'sound' in relation to the National Planning Policy Framework and whether it meets the legal requirements set out in legislation.

If you made comments during consultations you will be kept informed of the progress of the Local Plan and the Examination stages.

For more information on the purpose, process and Local Plan Regulations and legislation please [view the national planning practice guidance](#).

What is the Local Plan 2030?

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.

Public Consultation on the Regulation 19 (draft) version of the Local Plan 2030 ran between the 15 June and 10 August 2016.

The consultation is closed but you can:

- [View comments made \(representations\)](#) (This will take you to the consultation portal where you can view the 2016 draft plan and comments made by others)
- [View background documents and the interactive map for the draft Local Plan 2030 \(2016 and 2017\)](#) by visiting [Local Plan 2030 evidence base](#)

Comments

Post My Comments

Ashford Local Plan evidence base page

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Now Viewing: [Home](#) > [Planning and Building Control](#) > [Planning Policy](#) > [New Local Plan to 2030](#) > Local Plan 2030 Evidence Base

Local Plan 2030 Evidence Base

Local Plan 2030 map

- [Interactive Policies Map for Local Plan 2030 - Regulation 19 Draft Publication Version and 'Main Changes' Consultation](#)

Background documents

Below are the background 'Supporting' documents which support the Local Plan 2030 and 'Main Changes' (Regulation 19) Publication version.

2017 'Main Changes' update: Where these documents contain replacements or addenda to the previously published version, or have not been published previously they are *identified in italic text*:

1. Sustainability Appraisal (SA) and Strategic Environment Assessment (SEA) of the Ashford Borough Local Plan 2030: Regulation 19 Version and Addendum 2017

- [SA Final Main Report \[pdf\] 2MB](#)
- [Gypsy and Travellers Sustainability Appraisal \[pdf\] 1MB](#)
- [Appendix 1 - SA SCOPING REPORT Sept 2014 \[pdf\] 2MB](#)
- [Appendix 2 - Minor changes to the vision following initial assessment \[pdf\] 164KB](#)
- [Appendix 3a - List of Reasonable Alternatives and site assessments \[pdf\] 216KB](#)
- [Appendix 3b - Ashford Town and Urban Area Sites \[pdf\] 839KB](#)
- [Appendix 3c - Ashford Urban Edge and Strategic Sites \[pdf\] 1MB](#)
- [Appendix 3d - Sites in Rural Settlements \[pdf\] 2MB](#)
- [Appendix 4 \[pdf\] 2MB - Assessment of reasonable alternatives \(Other site options\)](#)
- [ERRATUM to SA-SEA Appendix 4 \(August 2016\) \[pdf\] 409KB](#)

[Addendum to Sustainability appraisal \(SA\) and Strategic Environment Assessment \(SEA\) of the Ashford Borough](#)

- Housing
- Planning and Building Control
 - View Applications Online
- Making Planning Applications
- Ashford Building Control
- Planning Policy
 - The Role of Planning Policy and the NPPF
 - New Local Plan to 2030
- Site Submissions
- Local Plan 2030 Evidence Base
- Adopted Development Plan Documents
 - Neighbourhood Plans
 - Timetables and Monitoring
- Community Infrastructure Levy (CIL)
- Public Consultation
 - Self build and Custom House Building

Ashford Consultation Portal Home Page

ASHFORD BOROUGH COUNCIL

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Home >> Pay >> Apply >> Report >> Claim >> Jobs >> Maps >> Contact Us >>

Now viewing: [Home](#) > [Your Community](#) > [Consultations](#) > [Main Changes to Local Plan 2030](#)

Main Changes to Local Plan 2030 Public Consultation - Friday 7th July to Thursday 31st August 2017

Ends: 31 Aug 2017

Ashford Borough Council are preparing a new Local Plan to 2030. It is being prepared with the aim of ensuring that future development within Ashford is well planned and managed effectively whilst having a positive impact on local communities, the economy and the environment. The new Local Plan will provide a consistent approach to planning into the future across the whole of the borough. Once adopted, the Local Plan 2030 will form the statutory development plan. A draft of the Plan was formally published and made available for consultation during the summer of 2016.

Ashford Borough Council are now consulting upon a series of Proposed Main Changes to that Publication Draft of the Local Plan. These changes are intended to:

- resolve issues that were raised during public consultation on the previous draft of the Plan;
- meet the increased housing need requirements identified through an update of national population projections;
- ensure that the Plan is up to date; and
- make sure that it meets the requirements of current national planning policy and guidance.

It is considered appropriate to address these issues before the Local Plan 2030 is submitted to the Secretary of State to be examined by a Planning Inspector.

Have your Say

The Council is inviting you to have your say on these Proposed Main Changes to the Local Plan 2030 from **Friday 7th July 2017**. Comments must arrive **no later than midnight on the 31st August 2017**. In commenting on the Proposed Main Changes to the Local Plan the emphasis should be on whether the Local Plan, subject to the Proposed Main Changes, is legally compliant and that it is "sound". [Guidance notes to explain those terms and aid making comments](#) on the Proposed Main Changes is provided below.

Please note that the consultation is limited to the opportunity to comment on the parts of the Local Plan that are subject to Proposed Main Changes (i.e. those parts that are shown as a change, deletion or new text).

- Housing
- Planning and Building Control
- Your Community
 - Parks and Play Spaces
 - The Arts
 - Healthy Lifestyle
 - Visit Ashford and Tenterden
 - Enjoying the Countryside
 - Young People
 - Community Safety
 - Grants and Funding
- Consultations
 - Current
 - Closed
 - Search
 - Calendar
- Benefits and Council Tax
- The Environment

Appendix H: Other Websites Advertising

Figure 9: Boughton Aluph Neighbourhood Plan Newsletter

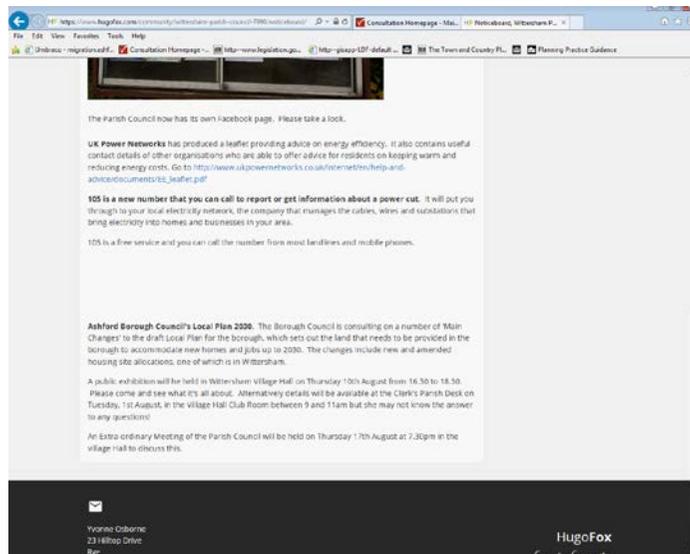


Figure 11: Wittersham Parish Council Website

Figure 10: Bethersden Website

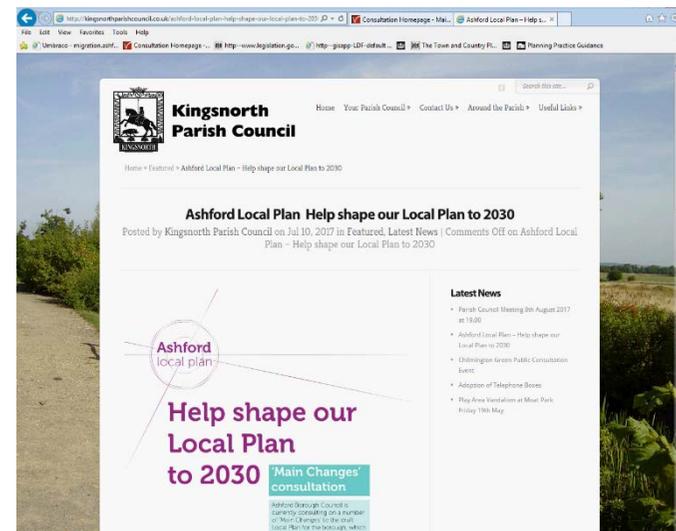
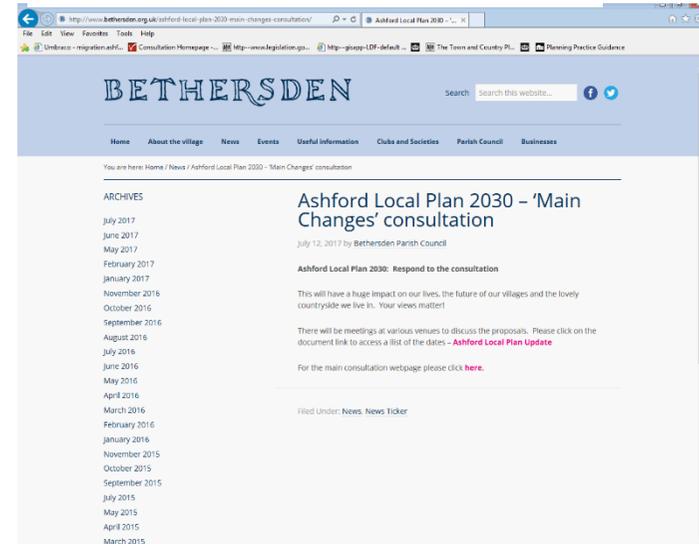


Figure 12: Kingsnorth Parish Council Website

Figure 13: Mersham with Sevington Parish Council Website

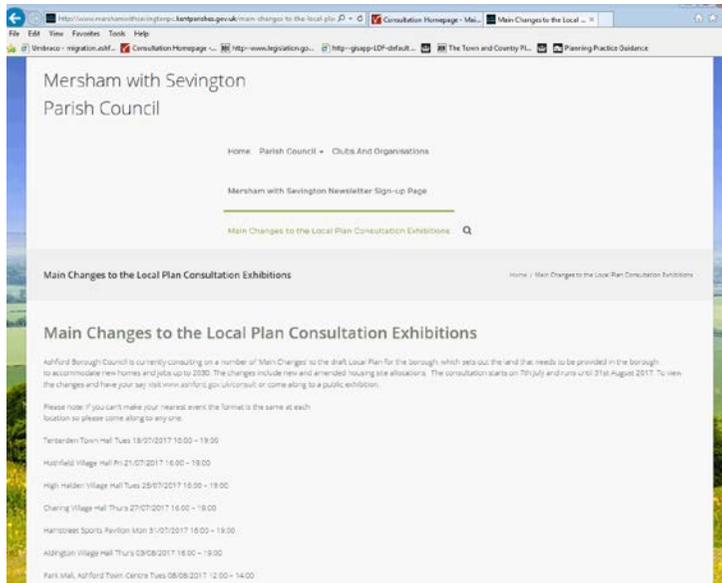


Figure 14: Aldington and Bonnington Community Website

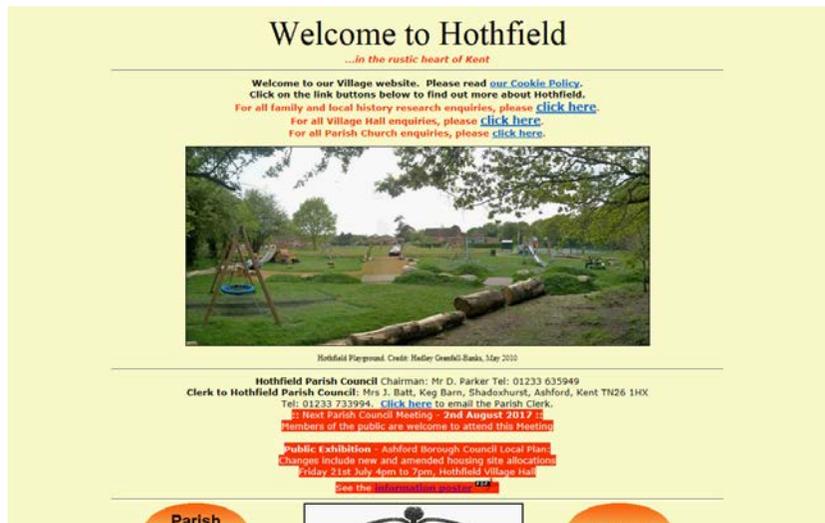
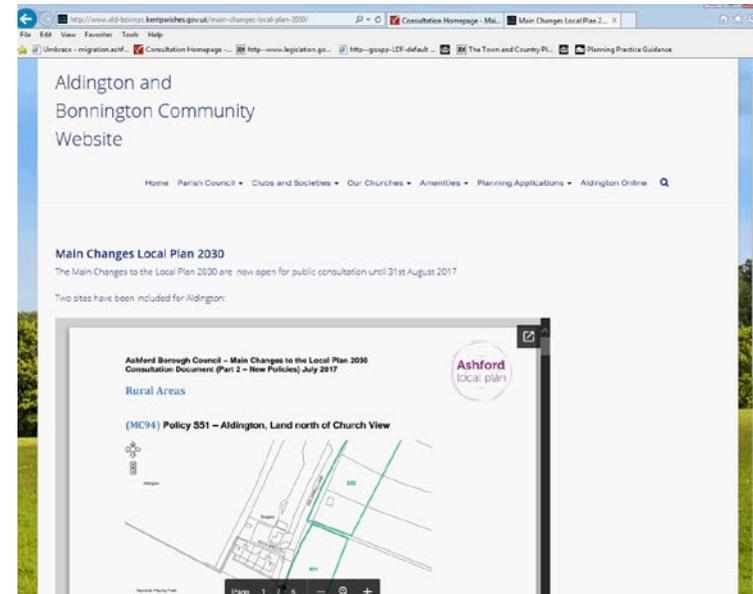


Figure 15: Hothfield Parish Council Website

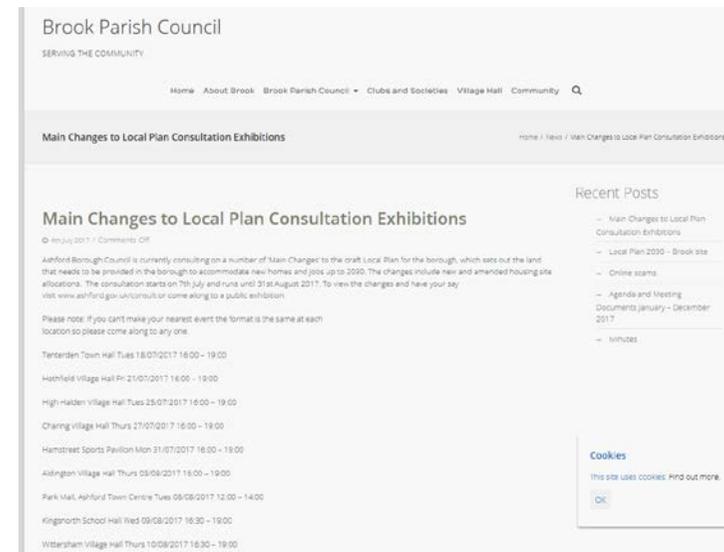


Figure 16: Brook Parish Council Website

Figure 17: Kent Invicta Chamber of Commerce Website

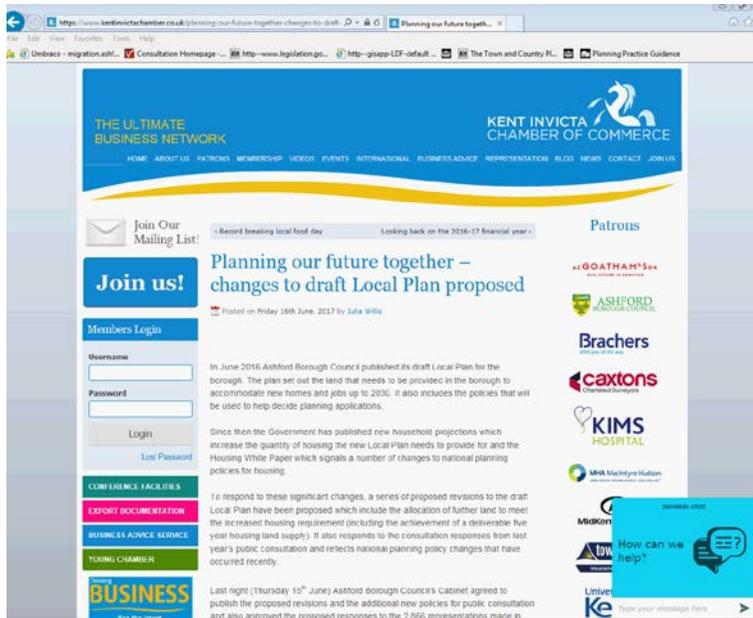


Figure 18: Challock Parish Council Website

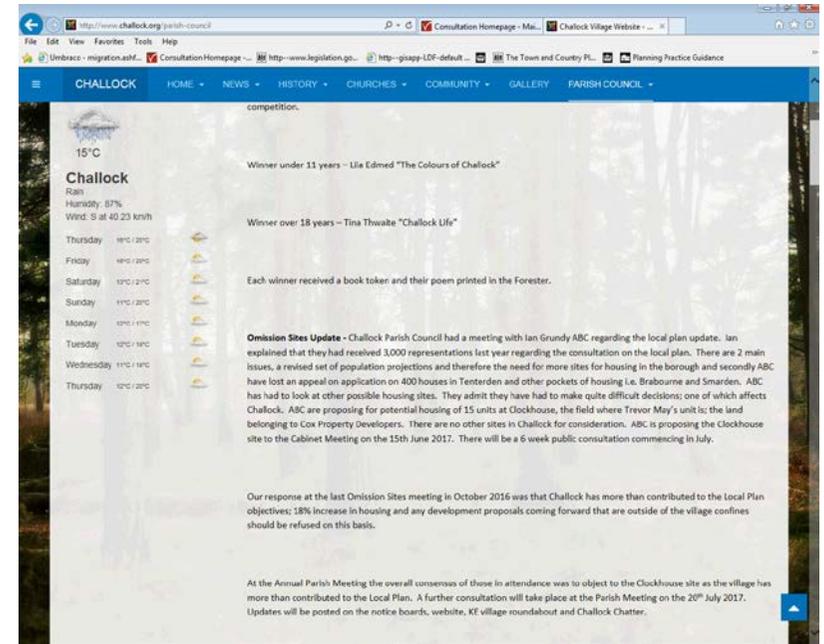


Figure 19: Kent Online Website

Figure 20: Ashford Conservatives Website

ashfordconservatives.com

ashfordconservatives
Conservatives

Ashford Borough Council seeks views on 'Main Changes' to draft Local Plan

Like Share Tweet

Monday, 3 July, 2017

ABC Council seeks views on 'Main Changes' to draft Local Plan

Ashford Borough Council is consulting on a number of 'Main Changes' to the draft 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.

Figure 21: DHA Planning Newsletter

Ashford Borough Council Local Plan

Ashford Borough Council is currently consulting on Proposed Main Changes to the draft Ashford Local Plan 2030 that was published in June last year.

To address a range of issues identified during public consultation the Council are reviewing the draft plan to ensure it is up to date and meets the requirements of current national planning policy and guidance. The council has identified 19 additional sites, circa 1,250 houses, for inclusion in the emerging local plan to meet the Borough's increased housing need requirements up to 2030. It has also made other changes to policy wording arising from responses to last year's consultation.

In addition, the Council has sought to improve their immediate housing supply figures by looking to allocate sites for development within the next five years.

The Council consider it necessary to address these issues before the Local Plan is submitted to the Secretary of State to be examined by an independent Planning Inspector.

The Consultation is now open and will close on 31st August 2017 and DHA would be happy to make representations on your behalf.

For more details or to discuss this further please contact [Jonathan Buckwell](#) or [David Bedford](#) on 01622 776226

DHA Planning
Eclipse House, Eclipse Park, Sittingbourne Road, Maidstone, Kent ME14 3EN
01622 776226 www.dhaplanning.co.uk

Figure 22: South Ashford Community Forum Website

southashford.org.uk

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South Ashford
the website of South Ashford Community Forum

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MENU

ABC Local Plan changes

Bob Shrubbs | 7 July 2017 | 0 Comments

Ashford Borough Council, Consultation, News, Planning and Development, Planning Policy

Appendix I: Email to Parish Councils

Helen Garnett

From: Helen Garnett
Sent: 03 July 2017 13:32
To: 2-PARISH COUNCILS
Subject: Consultation on the Main Changes to the Ashford Local Plan to 2030
Attachments: Aldington.docx; Ashford.docx; Challock.docx; Charing.docx; Hamstreet.docx; High Halden.docx; Kingsnorth.docx; Mersham.docx; Tenterden.docx; Wittersham.docx; FAQs.pdf; Hothfield.docx

Dear Chairs

I am writing to inform you that the consultation on the Main Changes to the Local Plan will commence on the 7th July and will run until 31st August this year. During the consultation, interested parties may view and comment on the changes proposed to the Local Plan.

Copies of the Main Changes will be made available at deposit points around the Borough, and members of the public will be able to view and comment on the Main changes via the online consultation portal. In addition, we will be holding a number of events across the Borough in which members of the public may view and discuss the Main Changes documents with officers.

I have attached a copy of the events posters so that you are aware of the dates and venues, and would be grateful if you could circulate details of the closest event within your parish or community area.

With kind regards

Helen Garnett
Policy Planner
Ashford Borough Council
(01233) 330229

Appendix J: Exhibition Photos and Event Posters

Park Mall Exhibition





local plan Planning our future together

Help shape our Local Plan to 2030

'Main Changes' consultation

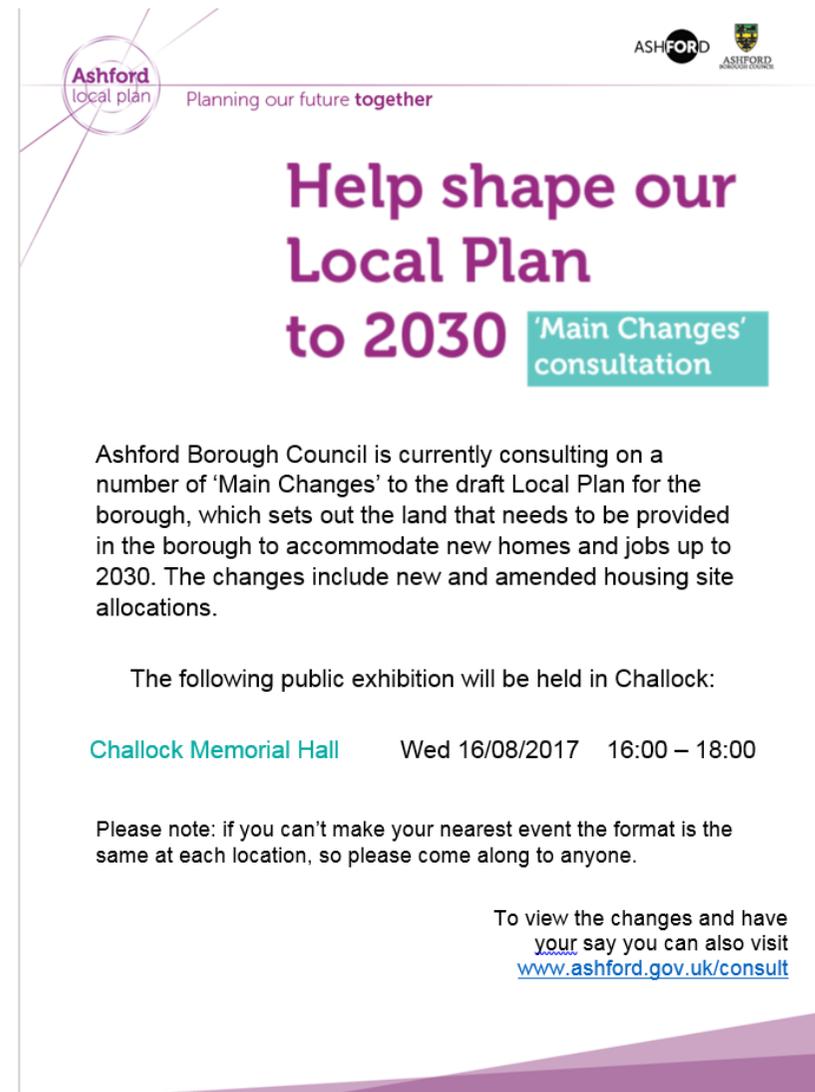
Ashford Borough Council is currently consulting on a number of 'Main Changes' to the draft Local Plan for the borough, which sets out the land that needs to be provided in the borough to accommodate new homes and jobs up to 2030. The changes include new and amended housing site allocations.

The following public exhibition will be held in Hothfield:

Hothfield Village Hall Fri 21/07/2017 16:00 – 19:00

Please note: if you can't make your nearest event the format is the same at each location, so please come along to any one.

To view the changes and have your say you can also visit www.ashford.gov.uk/consult



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'Main Changes' consultation

Ashford Borough Council is currently consulting on a number of 'Main Changes' to the draft 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 changes include new and amended housing site allocations.

The following public exhibition will be held in Challock:

Challock Memorial Hall Wed 16/08/2017 16:00 – 18:00

Please note: if you can't make your nearest event the format is the same at each location, so please come along to anyone.

To view the changes and have your say you can also visit www.ashford.gov.uk/consult

Appendix K: Responses to Representations made on Main Changes to Local Plan consultation

Ashford Borough Council

Appendix K of Part 3 Consultation Statement.

Proposed Main Changes: Responses to representations

November 2017



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INTRODUCTION

The Proposed Main Changes to the Ashford Local Plan 2030 Regulation 19 Version were published for public consultation in July 2017. The consultation ran from 7th July 2017 to the 31st August 2017.

1,177 representations were received. The following Report summarises these representations and provides a response to the main issues raised by consultees. Four representations were invalid as they were made against the Regulation 19 version and not against the Proposed Main Changes. 10 late representations and one anonymous representation were received. These are listed in Appendix 1 but were not responded to.

Where alternative sites were proposed for allocation in representations, these are listed as Omission Sites in Appendix 2 to this report and are addressed in the SHELAA Report.

Appendix G of the Regulation 19 Consultation Statement which set out the responses to the representations to the Local Plan 2030 Regulation 18 Version (2016) erroneously omitted responses to the Monitoring and Review section and Appendix 2 of the Plan. An addendum to that report is published separately.

Finally all representation numbers include the prefix MCLP/ . For ease of reference in this report the prefix has been omitted.

MC1 - Introduction

Representations have been received from the following consultees:

17 Steve Ansell	420 Kent Invicta Chamber of Commerce (R Lavender)
88 National Grid (S Jefferies)	407 Rolvenden PC (Denise Curtain)
1182 Gladman Developments (M Evans)	728 Charing PC (Jill Leyland)
131 Natural England (S Hanna)	788/805 Tonbridge and Malling Borough Council (I Bailey)
137 Tunbridge Wells Borough Council (K Hinton)	809 John Strike
164 Cecil Horn	897/898 Shadoxhurst Parish Council (J Batt)
191 D Potter	902 Mark Moran
1127 Graham Hall	963 KCC (S Gasche)
387 Irene Hitchings	1005 Bilsington PC (P Setterfield)
399 Trevor Elson	1033 Wye with Hinxhill PC (V McLean)
400 Sarah Elson	1070 Aldington and Bonnington PC (P Setterfield)
401 Eileen Elson	309 Egerton Parish Council

Summary of Representations – Main Issues

Issue - SHMA

17 believes that the SHMA fails to relate housing requirements to that of the local environment. With the UK voting to leave the EU and the housing market changing, any decision to build more houses should be delayed. There is no housing crisis, just a population crisis. There is a disproportionate amount of houses being allocated to the Borough compared to neighbouring Boroughs and the North of London. The government promised that local decisions will be made by local communities and this directive contradicts this pledge.

Response: *The SHMA covers Ashford's housing market area and deals with its specific needs. Government policy requires local planning authorities to determine their own housing*

needs based on such assessment of housing need to ensure that general market and affordable housing needs are fully met, as well as taking account of national household and population projections, in preparing its Plan. The result of the EU Referendum does not alter the population forecasts, the Local Plan must allocate based on the current position. No change necessary.

Issue – SHELAA

309 The planning department has been lazy in identifying suitable sites for travellers to satisfy the shortfall by choosing current sites that do not have permission but are occupied illegally. For example the Land at Brockton Farm paddock listed in the SHELAA is unsuitable as a traveller site as it is not within keeping of the surrounding area and has been declined by the council and inspectors for the last 17 years.

Response: *The Council is currently preparing a Gypsy and Traveller DPD, with an Issues and Options document currently being finalised and due out for consultation in January 2018.*

Issue - Duty to Co-operate

137 confirms that changes made to the draft Local Plan will have no direct consequence on Tunbridge Wells. Although interaction between the housing market areas of Tunbridge Wells, Maidstone and Ashford is relatively weak, Inspectors will raise issues of cross authority co-operation in the accommodation of an authority's development need regardless of the specific market areas and planning constraints that apply. Evidence from recent examinations, such as Maidstone, reiterate this therefore suggest that it would be best practice to continue duty to cooperate discussions, as although the Issues and Options consultation makes no mention of an adjoining authority accommodating any of the Borough's housing requirement, that does not mean that such a need will not arise in the future. It is anticipated that the Tunbridge Wells Borough Local Plan will be submitted in 2018, so an update on progress to all adjoining authorities will be provided at the earliest opportunity.

1182 ABC must be able to demonstrate that it has worked with neighbouring authorities as it has alluded to in the Duty to Cooperate Statement from July 2017. However, moving forward the Plan should continue to work with both London and surrounding districts to ensure that cooperation is both effective and ongoing.

Response

Comments are noted.

Issue – HRA and air quality

131 requests that consideration is given to the recent Wealden judgement with regard to the screening of air quality impacts on European Sites in the HRA. 805 also draws attention to this judgement, whilst acknowledging that it has not read the updated HRA.

Response: *Noted. Ashford Borough Council undertakes air quality monitoring in the Borough via a network of diffusion tubes (measuring NO₂ concentrations) in various locations. It also has a statutory duty to periodically review and assess air quality, including comparing*

measured and predicted pollutant levels to national air quality standards and objectives. The Council's 2017 Air Quality Status Report (ASR) confirmed that air quality in Ashford continues to meet the relevant air quality objectives, with no significant changes in existing emissions sources being identified and no new relevant industrial installations or significant new commercial or domestic sources of emissions being identified.

Consideration of the Wealden District Council v Secretary of State for Communities and Local Government High Court judgement of March 2017 (Case No: CO/3943/2016) is addressed in the Habitat Regulations Assessment (December 2017) which accompanies the Submission Version Local Plan 2030.

Issue - Sustainability Appraisal

1182 the Council needs to be clear about why some policy options have progressed whilst others have been rejected. Although ABC have published an SA addendum to update the previous SA in a number of areas, it is clear that the SA deficiencies mentioned in the previous round of consultation are still present. Whilst the sites allocated in the Local Plan have been the subject of a SA, alternative sites put forward have only in certain instances been the subject to SA appraisal.

Response: *The site assessment for all sites, whether omissions or original submissions follow the same assessment process. This commences with the SHELAA, where the sites are appraised and screened through 3 stages to address their availability, suitability and Achievability. Sites are only taken through to the more detailed SA site assessment process, if they pass through the 3 screening stages of the SHELAA.*

Issue - Infrastructure Delivery Plan

191 and 1070 believe that more planning is needed on the development of infrastructure and these plans need to be in place before development is agreed. In most areas, once development starts, more building is agreed and small villages will lose their community feel. 399, 400 and 401 note that in their opinion residents of Ashford have had enough of construction vehicles, pollution and the deterioration of roads due to heavy construction vehicles.

898 and 1070 are concerned about the repercussions of development on neighbouring villages and communities and that financing the considerable infrastructure improvements that need to come with large developments does not seem to have been established nor quantified, especially with regards to the roads. In particular that there has been no indication that cumulative impact of development in neighbouring parishes (including Otterpool Park the planned new town of up to 12,000 new homes being progressed by Shepway District Council) has been considered. 898 and 1005 suggest that the road network in the Borough is looked at with future capacities in mind to avoid or minimise disruption of communities that have narrow roads.

902 suggests that the lack of regular public transport into Ashford from rural areas is an issue that isn't being addressed - there seems to be a lack of care for infrastructure. Village services are closing and it's more difficult to get an appointment in a surgery. 1005 Although Bilsington has not received any allocations, inevitably more cars will come through from

neighbouring areas, whilst a poor bus service exacerbates the problem. 1005 and 1070 note that consultations regarding public transport were held by ABC with Stagecoach but the minutes show no involvement with KCC who support smaller operators in rural parts of the borough. 1070 a lot of emphasis is placed on sustainable transport, but this appears to have been overlooked in the rural area.

1005 S106 received from larger developments is often spent in the immediate locale of the development and not on rural roads between developments. However the funds are only released at certain stages of the development, which result in the infrastructure not in place and people using cars over the bus service.

1005/1070 although Southern Gas and Network Power have been consulted, it hasn't been considered that a lot of rural parishes do not have access to mains gas. Sourcing LPG, oil, solid fuel and renewables will be more expensive and place further strain on roads.

1005 broadband provision in rural areas is still poor.

963 the Infrastructure Delivery Plan needs to be corrected in the case of the breakdown of funders to the Ashford Spurs project in the Transport Projects Funded by Local Growth Fund. The total spend for this project is correctly listed but the composition of that total is slightly different from the breakdown given.

Response: *The Council seeks to ensure that infrastructure is properly planned so that it can be in place to support development when it comes forward and is needed. It achieves this through ongoing liaison with the relevant providers so they understand when and where development is likely to occur. This position is reflected in the Infrastructure Delivery Plan (IDP) that supports the Local Plan 2030 which shows the extensive range of discussion the Council has with providers (and continues to have). The IDP is an iterative document and is updated annually so it can reflect the most up to date position.*

However, the Council also recognises that delivery of provision cannot be treated in isolation and is subject to a range of factors, including the cost of providing it, difficulties securing financial contributions to forward fund any provision (if needed) and the changing nature of how some providers want to actually deliver their services. The Council recognise these limitations and adopt as flexible approach as possible in order to ensure the needed provision is actually delivered on the ground. It does this through working closely with providers and developers (where applicable) when a planning application is submitted.

Regarding public transport in the rural areas, the Council regularly liaise with KCC and relevant partners about ways in which the service could be improved and frequency increased. However this desire must be balanced with the reality that rural bus services tend to rely on heavy subsidy from the public purse – a resource that has reduced significantly in the past and continues to be restricted. When planning applications are submitted the Council and its partners work with the developer to ensure that proportionate contributions are secured to improve local public transport in rural areas.

With regards the gas network, the Council are aware that some areas of the borough are not able to utilise the mains network. This can be a factor in determining locations for future development within the borough, in terms of trying to utilise existing infrastructure wherever

possible, particularly for larger scale development. However it is not – in itself – a showstopper for development coming forward. Developers are required to ensure that new development will be served by key utilities. The cost of delivering such provision will have been taken into account, as it is a general build cost associated with all new development.

The comments about the Ashford Spurs project are noted and the Infrastructure Delivery Schedule will be altered to reflect the correct breakdown.

The provision of better rural broadband is being addressed in the Local Plan 2030 through policy EMP6.

Issue - Neighbourhood Planning

387/407 state that the NP in Rolvenden will soon be ready to go out for consultation and as currently drafted is planning for 24 houses, not 40 as stated in the revised housing trajectory. 407 request this is amended to reflect the Rolvenden NP.

728 consider that the last sentence of para 2.8 does not comply with NPPF para 184 which states “Neighbourhood Plans must be in general conformity with the strategic policies of the Local Plan. To facilitate this, local planning authorities should set out clearly their strategic policies for the area”. Para 2.8 states that all policies, including site specific policies, should be strategic (i.e. NPs should conform to them) and this is far too sweeping a statement. 728 feel it may be reasonable for Ashford to consider the total amount of housing that a parish should take as “strategic” but to then suggest that neighbourhood plans in preparation should consider the actual sites as strategic is going too far. This will prevent better sites from coming forward in the Neighbourhood Planning process. Site policies should not be considered strategic, particularly when a NP is being developed. 728 request the final sentence is deleted and ABC define strategic policies clearly.

1033 consider para 2.8 to be unsound as it gives no introduction or detail concerning the function and weight of an adopted NP. Proposes alternative wording to clarify the position, including that adopted neighbourhood plans sit alongside the Local Plan, and form part of the statutory development plan to shape and direct development within their respective neighbourhood plan areas.

Response: *In terms of the Rolvenden NP, at the time of the publication of the Main Changes to the Local Plan in July 2017 the Council had not seen draft NP and could not be certain about the proposed allocations that were to be included. The estimate of 40 dwellings was based on a reasonable assessment of what a parish such as Rolvenden could accommodate bearing in mind its relative sustainability and the previous allocations that had been made in the Tenterden and Rural Sites DPD that covered the period to 2021. As the draft NP progresses the Council will be in a position to re-assess the scale of proposed allocations to be made in Rolvenden that is reflected in the Local Plan.*

The Council's position is that the policies in the Local Plan set the overall context for a Neighbourhood Plan and as such all the policies of the Local Plan should be considered as strategic matters. The policies within Neighbourhood Plans should complement the local plan policies and not duplicate them. In this context the Council considers it reasonable to treat the Local Plan policies as strategic matters.

In terms of the overall role of Neighbourhood Plans there is no need, within the Local Plan, to set out the role and status of Neighbourhood Plans and repeat national guidance.

Issue - The consultation process

897 Both the consultation periods have been in July and August when most people are on holiday, whilst only those in the developer and planning fraternities have the expertise to comment authoritatively. Many things said in the 2016 submissions appear to have been glossed over or ignored.

Response: *The consultation periods for both the Regulation 19 consultation version of the Local Plan (15 June – 10 August 2016) and the Proposed Main Changes (7 July – 31 August 2017) ran for 8 weeks, two weeks longer than the statutory requirement to take account of these periods overlapping with school holidays. Each period encompassed school term and school holiday time to reflect the fact that those with school age children frequently take summer holidays. Response rates and attendance at the public exhibitions held to discuss the Plan across the borough were high, with council officers in attendance to answer questions and discuss all aspects of the Plan.*

All matters raised in representations to the 2016 Regulation 19 version are addressed in the Regulation 19 Consultation Statement (July 2017).

Issue - Local needs housing/affordable housing

898 is concerned about the lack of 'Local Needs Housing' in the draft Local Plan. Too much of the housing growth is aimed at people moving into Ashford, whilst rural house prices are far too high for the younger generation.

1182 the more significant the affordability constraints and the strength of other indicators of high demand, the larger the improvement in affordability needed and the larger the additional supply response should be. An increase in the total housing figures included in the local plan should be considered where it could help to deliver the required number of affordable homes. The wording of a number of the specific development management policies with regard to affordable housing and the environment require further clarification and amendment to ensure they are consistent with the NPPF.

Response: *please see responses to MC48.*

Issue - Housing White Paper

1182 summarises the key aspects that came out of the Housing White Paper, particularly the shortage of national housing and contends that Charing is an ideal location that will help alleviate housing pressures. Rural areas should be identified by Local Authorities for development so that they are allowed the opportunity to thrive, with additional support services and availability/affordability of houses provided consequently. It is therefore important that a range of sites are included within Local Plans to enable sustainable expansion of rural areas. It is important that the Plan incorporates points raised within the

Housing White Paper, particularly as some proposed changes are due to come into force by November 2017.

Response: *The Draft Local Plan, including the proposed Main Changes, has taken account of the government's consultation Housing White Paper, to which the Council has responded, including on the issue of the allocation of housing sites in rural areas. Generally speaking much of what is proposed in the White Paper reflects the approach taken in preparing Ashford's Local Plan. There are many similarities in the White Paper with the approach taken in the draft Local Plan, and much of the criticism of the planning system contributing to delay and uncertainty would not apply in the case of Ashford. No change required.*

Issue - Windfall sites

898 expresses concerns that lots of land parcels will come forward as potential windfall sites in rural areas in the next few years. There is now a perception that 'anything goes' as housing figures are not achieved. Therefore ABC must carefully consider every application and the impact/harm of approving them.

Response: *All windfall applications that are submitted over the Plan period will be carefully considered by the planning authority and will have to comply with the policies of the Local Plan.*

Issue - Miscellaneous

164 suggests removing the speed bumps at Ulley Road to take pressure off Nettlefield 'rat run' as Nettlefield is currently unsafe for children.

Response: *This does not relate to an allocated site and is not a matter for the Local Plan but rather one to be taken up with Kent Highways.*

1070 comments on Policies IMP1, EMP6, TRA4 and TRA7 of the June 2016 version of the Plan. However, as documentation of this consultation makes clear only Main Changes can be commented on during this consultation. Previous comments made on the June 2016 version of the Local Plan remain and do not need to be made again.

Response: *No action required.*

Support

88 has no further comments to make. 309, 420, 1127 support the proposed changes to the Plan.

Response: *Noted.*

MC2 – Vision

Representations have been received from the following consultees:

1035 Wye with Hinxhill Parish Council (V McLean)	865 Emma Haffenden
694 Charing Parish Council (Jill Leyland)	113 Natural England (Sean Hanna)
697 Boughton Aluph and Eastwell Parish Council (Erica Lasparini)	699 Carter Jones on behalf of The Trustees of the Wheler Foundation
771 KCC (Council)	958 Lanndia Development Services Limited (Tim Allen)
149 Felicity Fleming	

Summary of Representations – Main Issues

Issue - Protection of historic centres wording and natural assets

865 suggests that the removal of the objective to conserve villages is unsound and indicates by its omission an aim to overdevelop without care to protect the community, beauty and levels of public safety. There are other brownfield or new garden town options which could be taken instead of bolting big developments onto existing villages whose infrastructure and highways were never designed to support them. 694 considers the removal of the phrase ‘with care taken to conserve and enhance their historic centres’ unsound (para 3.10). The historic centres of villages are fragile and can be damaged by development. 1035 objects to the proposed Main Change as unsound, unjustified and illogical given the proposed retention of this phrase in relation to unnamed “smaller rural settlements” and suggests an amendment to paragraph 3.10

771 suggests that it is not clear from the proposed text if Charing, Hamstreet and Wye are included in the ‘smaller rural settlements’ that will also provide smaller scale new development, to help sustain local communities whilst conserving and enhancing historic centres and heritage assets.

697 suggests a slight modification in paragraph 3:10 enabling a shift from focus in new development in three specifically named rural service centres to include new proportionate development in smaller rural settlements to sustain local communities.

113 considers that paragraph 3:10 should make reference to rich natural assets of the settlements in addition to the historic and heritage assets. A suggested amended worded is provided - ‘...and enhancing historic centres, heritage and natural assets’.

Response: *The Council does agree that the proposed Main Change leaves the paragraph ambiguous in relation to the protection of the historic centres of the 3 main service centres.*

This was not the intention of the change - the final sentence was intended to cover protection of historic centres in all rural settlements mentioned within the paragraph. An edit to text is proposed below to clarify this point.

With regard to Natural England's request that 'natural' assets are also covered in this section of the vision relating to the rural settlements, although this is covered elsewhere in the vision, the Council also agrees this minor wording amendment.

The following minor change to the paragraph is therefore proposed to clarify these points:

The other rural service centres of Charing, Hamstreet and Wye will remain important providers of shops and services, whilst delivering new development of a scale appropriate to the individual characteristics of the settlement. Smaller rural settlements will also provide smaller scale new development, to help sustain local communities, ~~whilst conserving and enhancing~~. Development within all the rural settlements must conserve and enhance the historic centres and heritage and natural assets.

The Council does not agree with the proposed wording amendment relating to design, materials and scale mentioned in 1035 above, as this is too detailed to be included within the 'vision' of the Local Plan, and the specifics of design requirements is covered in more detail within an overarching strategic policy SP6.

Issue – Developments in the Brabourne Lees area

149 strongly objects to the proposals for housing developments within the area of Brabourne Lees considering them ill-conceived as they do not give consideration to the far-reaching impact they will have on life within the community and at a wider level outside the village, including impact on capacity of village schools, GP surgeries, local shops and amenities, roads and the local hospital.

Response: *At the time of writing an appeal against the Council's decision to refuse a large speculative application in the village of Brabourne Lees is due to be heard in January 2018. The Local Plan does not allocate any sites in Brabourne Lees. With regard to development in the general Brabourne Lees area, the Plan allocates only one site (MC42), with an indicative capacity of 35 houses, in the nearby village of Smeeth. It is considered that such a scale of additional development in the village of Smeeth is sustainable and proportional to the local infrastructure. (A second proposed allocation on the A20 but in Smeeth Parish (MC93) with an indicative capacity of 50 dwellings has been deleted as the site is no longer available).*

Issue - Aldington as service centre

958 states that in Paragraph 3.10 the text recognises Charing, Hamstreet and Wye as rural service centres, on the basis of the facilities that they are able to provide to local residents. Whilst Wye is a noticeably larger settlement than Aldington, Charing and Hamstreet are not dissimilar to Aldington in terms of their scale and the type of facilities that they make available. Therefore, it is surprising that Aldington is not referenced as a local service centre in this context.

Response: *Although a relatively large settlement, the Council does not agree that Aldington acts as a rural service centre in the same way as Hamstreet, Charing and Wye. This is mainly due to the lack of train services and public transport offer and lack of GP provision. As a result the village is not considered to serve the infrastructure needs of surrounding smaller rural settlements, in the way that the three main rural settlements do, and as a result is not classified as a main ‘rural service centre’.*

Support 697 supports the greater emphasis on sustainability in transport, use of energy technologies, building design, enhancing green networks and the location and layout of new development including sustainability in drainage and water usage in adaptation to climate change. 699 supports the proposed changes to paragraph 3:10. 113 welcomes the proposed change to paragraph 3:11.

Response: *Support noted.*

MC3 – Policy SP1 Strategic Objectives

Representations have been received from the following consultees:

142 Julian Green	1036 Wye with Hinxhill Council (V McLean)
700 Boughton & Aluph and Eastwell Parish Council (Erica Lasparini)	702 Carter Jones on behalf of The Trustees of the Wheler Foundation (Kieron Gregson)
772 KCC Council	310 Egerton Parish Council (Richard King)

Summary of Representations – Main Issues

Issue - Heritage

142 states that many historic villages around Ashford has already been compromised by over-large housing estates with a ‘suburban-feel’. This should be avoided especially in the heart of Ashford/conservation areas.

Response: *Noted. The policy includes a Main Change to criterion c to reflect the importance of the borough’s heritage assets in order to conserve and enhance them proportionately to their significance and to take into account place-based heritage when considering design.*

Issue - Flood Risk and drainage

700 recognises that the Local Plan should take a more proactive approach to the effects of major and minor developments on flood risk. However, the proposed wording ‘reducing’ in criteria i. is unsound as it does not reflect NPPF and does not respond to local

circumstances or consider the impact of flooding outside of Ashford town. 142 suggests that point i. should include effective drainage measures at the developers' cost. This should be used in assessing new development to identify any issues that can arise when attempting to add capacity to already stretched drainage systems.

700 states that the policy does not align fully with the NPPF and does not extend protection to soils and surface geology.

Response: *The Local Plan should be read as a whole. Policy ENV9 requires all developments in the borough to include appropriate sustainable drainage systems (SuDS). The installation of such measures are the responsibility of developers. Wherever relevant, additional criteria are added in liaison with Southern Water to ensure existing drainage systems can accommodate development.*

The Council is content that the word 'reducing' in relation to vulnerability to climate change mitigation is appropriate and reflects current government guidance in which climate change is deemed a threat. The reduction in vulnerability is a suitable strategic aim as supported by other policies in the plan – no change required.

NPPF paragraph 109 already requires the protection and enhancement of geological conservation interests and soils, and the prevention of unacceptable levels of soil pollution or land instability. Local policy need not repeat national guidance.

Support 702 supports the change and specifically part 'g' that will ensure new development, bringing forward new housing types and sizes to meet the changing housing needs. 772 supports the change related to historic environment. 310 supports the changes to paragraph 'g' as the wording is particularly relevant to Egerton to work towards specialist housing for older local residents wishing to downsize and remain in the community.

Response: *Support noted.*

MC4 – Policy SP2 – Strategic approach to Housing Delivery

Representations have been received from the following consultees:

1183 Gladman Developments (Mat Evans)	1121 Peter Brett Associates (Tim Allen)
1148 MPD Trust	1158 Tim Piper
997 LRM Planning Limited (Owen Jones)	1007 Bislington Parish Council (P Setterfield)
1029 Home Builders Federation (Mark Behrendt)	1042 Weald of Kent Protection Society (Peta Grant)
1079 Smeeth Parish Council (Sue Wood)	936 Hamlin Estates
947 CALA Homes	966 Telereal Trillium (Damian Molony)

1182 Gladman Developments (M Evans)	979 Carol Procter
990 LRM Planning Limited (Owen Jones)	851 Millwood Designer Homes Limited (Millwood Designer Homes)
840 Morghew Park Estate	757 Elizabeth Buggins
7 John Faulkner	705 Carter Jones on behalf of The Trustees of the Wheler Foundation (Kieron Gregson)
701 Boughton Aluph and Eastwell Parish Council (Erica Lasparini)	749 James Ransley
775 KCC (Council)	886 Shadoxhurst Parish Council (J Batt)
1049 The Church Commissioners for England	1066 Aldington and Bonnington Parish Council (P Setterfield)
1117 Aviva and DMI Properties Ltd	1155 Dean Lewis Estates Limited (Tim Dean)
1165 Judith Ashton Associates (Judith Ashton)	459 Kent Downs AONB Unit (Katie Miller)
444 Charlotte Burke	507 NHS Ashford and NHS Canterbury & Coastal CCGs (Louise Matthews)
517 Rydon Homes Ltd (Kevin Willcox)	589 Highways Agency (Kevin Bown)
602 Hurrell	429 Sally Cunningham
960 Lanndia Development Services Limited (Tim Allen)	351 The Boyd Family
290 Callum Knowles	102 Mr Witt
83 Maidstone Borough Council	42 John Crawford
18 Courtley Planning Consultants Ltd (Howard Courtley)	

Summary of Representations – Main Issues

Several representations raise detailed issues around the scale of the appropriate housing target the Council should be planning for through the Local Plan, citing a variety of reasons why this should be the case. These issues are briefly summarised below alongside the Council's overall response to these points with a more detailed response to be set out in a Housing Topic Paper that will be submitted as part of the Council's evidence base

supporting the examination of the Plan (Document reference SD08). More specific representations on MC4 are then set out and responded to in the usual way.

Many representations made against MC4 also relate to ‘omission site’ representations made on behalf of the same landowner / developer for various locations around the borough. Omission sites are addressed in Appendix 2 of this document.

Issue: Scale of housing requirement

Representations 1029, 1075, 970, 947, 936, 18, 851, 840, 1165, 1182, 1183, 351 and 749 all consider that the scale of housing requirement the Plan should be seeking to address should be higher. The following reasons are cited – failure to properly address the needs of other local authorities and London through the Duty to Co-operate; the Objectively assessed Housing need for the borough should be increased to take greater account of market signals and affordability issues in the borough and the need to accommodate higher levels of economic growth; the contingency level for the Plan is not high enough; the Plan will not deliver a 5 year housing land supply as some sites will not come forward as quickly as anticipated and national guidance on the 5 year calculation is not being followed; whether regard has been given to any further scope within the ABC area (most suitably at Ashford) to address RDC's acknowledged unmet housing need, as previously advised to the Borough Council.

Response: *A more detailed response to some of these points will be set out in the Council's Housing Topic Paper accompanying the Submission version of the Plan.*

However, in summary, the Council disagrees with the points raised and the suggestion that the housing target in the Plan should be raised. The Council's evidence on housing need is set out at some length in the most recently updated version of the Strategic Housing Market Assessment (SHMA) which takes full account of the most recently published sub-national population projections in accordance with government guidance. It is noted that no issues are raised with the soundness of this. The principal point of dispute lies around the scale of uplift that should be applied to the base OAN figure to account for ‘market signals’ with the SHMA assuming a 5% uplift. The evidence in the SHMA is strong that the housing market in Ashford has traditionally delivered a consistent rate of housing development across economic cycles of c.500-700 dwellings per year, although with some years exceptionally delivering higher and lower than this range. The view of GL Hearn (the Council's SHMA consultant) is that any larger uplift in housing targets would not be likely to be achievable on the ground given the nature of the local housing market. Given that housing developers have not constructed dwellings at greater rates throughout the ‘Ashford Growth Area’ years despite large scale and numerous Plan-led allocations, this strongly suggests that the natural limits of any local housing market need to play a significant role in establishing the realism of the Local Plan target. In any event, the proposed Plan target is challenging in its own right and will require a step change in developer behaviour in the Ashford market to deliver to the targets the Plan is setting.

The Council's position on the Duty to Co-operate is set out in its Duty to Co-operate Statement to be submitted for examination alongside the Local Plan. There is currently no established unmet housing need from any neighbouring district or London that would require

the Council to consider an increase in housing supply in Ashford. The only potential exception (raised by some objectors) is an unmet housing need from the Hastings / Rother Housing Market Area identified at the adoption of their respective Core Strategies in 2013/14. It is unclear what the scale of any unmet may be now or of the potential to remedy all or part of that within the Hastings / Rother HMA. There are limited connections between these districts and Ashford borough and the shared boundary with Rother is sensitive in relation to landscape designation and flooding issues, however the Councils have agreed to a Statement of Common Ground that accepts the need for the respective next reviews of each district's Local Plan / Core Strategy to be undertaken in the context a wider formalised collaborative approach that should involve a broader range of cross county boundary districts that may more fully understand the potential opportunities and constraints for meeting established housing need at the time.

The Council agrees that the Local Plan should be the principal vehicle by which a deliverable 5 year housing land supply should be provided, albeit on the understanding (based on the current guidance) that the ability to achieve this relies to a large degree on developers delivering new housing on the ground. Objections relating to the potential deliverability of various sites in the Council's land supply are not supported by any evidence and are disagreed. The strategy embedded within the Local Plan of focusing the majority of new development in the most sustainable locations, in particular in and around Ashford remains by far the most sound approach to the planning and delivery of new development in the borough. As, almost without exception, the objectors on this point are also promoting 'omission sites' in Tenterden or the villages, the consequence of addressing 5 year land supply on the terms they suggest would result in significantly more land needing to be allocated in rural areas. The proposed approach, as set out in the Plan, of addressing 5 year land supply over more than just the next 5 years is considered to be the most sound approach and one which has recently been supported by the Planning Inspectorate in recent Local Plan examinations in Kent.

The Council's evidence base on potential job growth considered a number of possible scenarios which have also been tested against the housing requirements needed to support them. The increase in the OAN outlined as a result of the updated SHMA in January 2017 indicates that housing requirements would now be able to cater for the significantly enhanced levels of job creation associated with the 'upper end' job creation scenarios even if these remain less likely outcomes than the 'baseline trajectory' of job creation the Plan is based on. Therefore, no further uplift in housing numbers are needed.

As it stands, the Plan envisages a contingency of just over 1,000 dwellings above what would be required. This is a significant number and there is no justification for a further uplift in housing numbers as a consequence.

Issue: Main Road Corridors

1007 - The potential impact on the rural roads has not been taken into consideration or the impact on flows that will result from construction. Other sites along A20 have been recognised to have good access also.

Response: *The traffic generation from the sites along the A20 corridor would be expected to utilise the A20 itself in the large majority of instances as this will provide the quickest and most direct vehicular access to services, especially those in Ashford. Consequently, the impact on the rural road network is considered to be low and of a scale that would not cause any congestion or impact on the character of the area. Individual proposals for those sites will need to demonstrate specific trip generation and distribution through Transport Assessments if they are of a scale where such assessments are necessary.*

Issue: Infrastructure

757- Concerns over 'early liaison' with the supplier and connection to the nearest connection seem to ignore the massive impact on the sewage infrastructure and possibly of flooding, waste sewerage causing problems in community.

1042- A major concern is the way infrastructure plans lag behind those for housing. ABC needs to collaborate more with KCC and NHS to ensure coordinated approach for planning in this area is met. Otherwise, there will be infrastructure shortages facing residents in the future.

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. Insofar as sewerage is concerned, Southern Water, where deemed necessary, requested the inclusion of a criterion in site policies requiring that a connection be made to the nearest point of adequate capacity.*

Issue: Over-reliance on windfalls

517, 1182, 1883 - Ashford is too heavily reliant on a significant amount of housing coming through as 'windfall' rather than planned development. This is despite the LPA being aware of sustainable developments that could contribute to the planned provision of housing during the plan period.

Response: *Disagree. The Council's reliance on windfall residential schemes contributing to housing supply is based on compelling evidence of delivery over a long period of time. Evidence suggests the rate of planning permissions being granted for windfall schemes is increasing and extension of permitted development rights for changes of use to residential use is also enhancing this supply source. The Council's approach is conservative and assumes a significant proportion of consented schemes will not be implemented.*

Issue: Allocation of sites in the Strategic Corridors

1183 and 749 consider that the proposed allocations alongside the A20 should be deleted as they consider that the evidence base does not justify the decision to allocate a number of the sites and have outlined in the section discussing the SA how poorly a number of the sites

have scored in terms of their sustainability. An example of this can be found with reference to allocations S48 and S49 to the rear of the Holiday Inn and land north of Tutt Hill, the sites score poorly as they are detached from any services. They believe there are alternative readily available sustainable locations (which score better in the SA) which they are promoting as ‘omission sites’.

Response: *Disagree. The Council considers that the approach to identify appropriately scaled housing along strategic corridors is appropriate and supported by evidence. The score through the SA is an important factor, but not the sole determining factor when identifying sites to allocate in the Local Plan.*

It is self-evident that the strategic corridor housing allocations will score less well than a number of potential site allocations which adjoin a settlement. However this fails to recognise that the corridor sites are accessible their own right, most having excellent access to Ashford itself. In addition, most don't need infrastructure and also are consistent with the character of the area and sit sympathetically in the landscape. They also alleviate pressure on more sensitive rural settlement and edge of settlement locations.

The proposed corridor allocations also help to provide a wider choice for the housing market which is advocated in government guidance. The objector's proposal would cram a large amount of new development into one location with consequently less choice, greater local impact on services and facilities and a significant cumulative impact on the environment and character of the village.

Issue: Distribution of Development – should focus on urban areas

602 - The plan is based on carrying burden of urban development within the borough for the next 5-7 years. Rural areas seem to be expected to develop at high rates of population increase. Ashford and Tenterden should be carrying more of the numbers required to meet guidelines.

Response: *The large majority of new development in the Plan is still based in or around Ashford. Limited additional development in the rural areas is proposed to ensure a smoother profile for delivery of new housing in the short to medium term and help the borough achieve a deliverable 5 year housing land supply without resorting to a model which is not sustainable or well related to access to services and facilities.*

Issue: Distribution of Development – should focus on rural areas

1183 – considers that whilst clearly given the role of Ashford it is correct that significant growth should be allocated there, the objector believes that this should not be at the expense of rural areas, which need development to retain their services and vitality in accordance with the Framework and PPG.

In any event, they disagree that the distribution of development is the most appropriate strategy for meeting the plans development needs. For example in determining what is a proportionate level of development for a settlement, much depends on the needs of that

settlement and the constraints it may have, previous planning policy in Ashford has severely restricted development in the rural areas. There is therefore a very significant back log of need for both market and affordable housing in the rural areas, the lack of housing in rural locations will have a detrimental effect on the very same issues of sustainability which are referenced in the Borough Profile.

840 - considers the strategy places too great a reliance on larger sites in Ashford to deliver. There should be more focus on Tenterden as the largest rural service centre to support the delivery of housing growth.

Response: *Disagree. Much is made of the Council's previous planning policies restricting development in rural areas but these policies over many years have been thoroughly examined at successive Local Plan Inquiries / examinations and found to be a sound approach every time. It is contended that this is because the fundamental strategy for housing development in the borough of focusing the majority of development in and around Ashford is the most sustainable form of development where services, jobs and excellent road and public transport links are readily available. In contrast, the rural parts of the borough are, by comparison, relatively poorly served with Tenterden and a handful of rural service centres providing a limited range of facilities but inevitably requiring travel to access higher order services and facilities and many employment opportunities. The inherent qualities and character that make the rural areas attractive in the first place are also important considerations and whilst national policy is now clear that the countryside should not be protected for its own right, much of the rural area within the borough is designated as AONB or otherwise provides the characteristic landscape setting for the villages that generate the 'Garden of England' image.*

The general thrust of this approach remains sound although this Plan has recognised the need for a limited scale of new development to be able to come forward across the rural areas through a broader range of allocations and a more permissive policy for residential windfall development in accordance with the NPPF. There is little or no evidence to support the contention that large scale development in the rural areas is needed to support local services.

Issue: Reserved sites for allocation

1049 - The Local Plan should identify additional safeguarded/allocated housing sites to mitigate periods when the Council cannot demonstrate a five year housing land supply. This would provide an appropriate basis to plan for the longer term growth of the Borough. Land at Cheeseman's Green and Swanton would be appropriate sites. The inclusion of these additional sites would make the Local Plan effective and positively prepared.

Response: *The provision of 'reserve' sites in a Local Plan is an unnecessary requirement, particularly if Local Plans are to be reviewed more frequently in line with the proposals in the Housing White Paper. Such reservations would need to be demonstrably able to come forward within the 5 year period in any event to be able address any shortfall in 5 year housing land supply.*

Issue: Landscape Protection Policy

1121 - The changes to the Local Plan now recognise that there are parts of the Borough that do not have a formal landscape designation, but which are valued in their own right. This suggests that the policy framework of the plan should respond to this in an appropriate way with policies that allow the landscape to be protected in any event against the impacts of inappropriate or excessive development. It is considered that the proposed Landscape Protection Policy would achieve this, without prejudicing the ability of legitimate and desirable development to take place

866 / 1079- The Landscape Protection Policy identifies aspects of the villages that could be affected by development and is an approach to development that looks at the cumulative effect of developments. This policy would be enhanced with inclusion of the LPP.

Response: *This Plan, which should be read as a whole, contains a range of environmental policies to protect the green spaces, rural landscapes and wildlife areas of the borough. With regard to the unique characteristics of rural villages and protected green areas between settlements around the Ashford urban area, the Council responded to concern expressed at the Regulation 19 Stage (2016) about the growth of urban development principally on the edge of Ashford affecting the individuality of nearby villages, with the addition of new Policy SP7 (MC85). This new ‘separation of settlements’ policy is clear that the need to avoid coalescence of settlements should be regarded as an important determinant of whether a proposed development is acceptable or not and to this end states that development that would result in coalescence or the significant erosion of a gap between settlements resulting in the loss of individual identity or character will not be permitted.*

With regard to the protection of significant landscape features in rural areas across the borough, new Policy ENV3a includes a criterion that proposals shall demonstrate particular regard for “any non-designated, locally-identified, significant landscape features justified in a Parish Plan or equivalent document”. These policies are considered sufficient to address the matters and protect the aspects of landscape referred to in these representations. No changes required.

Issue: Overly restrictive to village development

1158 and 1148 - support the general approach but it is suggested that there may be other sites within villages that 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 Ashford urban area, this could restrict housing development in some settlements and prevent sustainable settlements expanding.

Response: *The scale of allocations proposed in the Plan relate to the potential reasonable residential capacity of a particular site and the broad level of housing development that could be readily absorbed into a village in the short term without harm to its character. Alternative sites may also be acceptable in their own right and should be judged against the criteria for windfall development set out in the Housing Chapter policies of the Plan.*

Miscellaneous

444 – asks what consideration has been given to housing plans in neighbouring boroughs and their effect on Ashford residents, in particular Otterpool in Shepway and questions

whether unsuitable sites now may become ‘sustainable’ in the future if delivery targets are not met.

Response: *The Council has had due regard to the emerging and adopted development plan proposals in neighbouring authorities through its Duty to Co-operate obligations. The proposed ‘garden town’ at Otterpool is at a very early stage and it is accepted that a development of up to 12,000 new houses close to the borough border will inevitably have some impacts on residents in the borough. Informal meetings with Shepway officers and members are already being held to discuss key issues. The suitability of sites can change over time as places evolve and change and new needs must be addressed but this will be a matter for future Local Plans to address in due course.*

7 considers there is a need for smaller, mixed developments rather than large schemes of over 1000 units.

Response: *There is a need for developments of all sizes to create variety in the housing market but also to enable the delivery of local infrastructure improvements and to plan for the most sustainable forms of developments which cannot be achieved with solely small, piecemeal allocations.*

429 questions the validity of the rules for 5 year housing land supply.

Response: *The council shares concerns over the fairness of the current NPPF / PPG advice on the calculation of 5 year housing land supply but this is a matter determined at national level. The Local Plan proposes a locally appropriate solution to this matter.*

102 the country should be focusing on building more in the Midlands and less in the south east of England.

Response: *This is a matter for national government not the Local Plan.*

589 seeks comfort that the impact on the strategic road network of the increase in the proposed development quantum set out in the ‘main changes’ can be adequately accommodated.

Response: *the Council has been working with Highways England and KCC to prepare the necessary evidence to indicate that the likely impact on the SRN by the end of the Plan period in 2030 would be reduced from that envisaged during the Core Strategy / GADF work undertaken in the last Plan-making round for the borough. This work now forms part of the evidence base to the submission Plan and it is anticipated that a Statement of Common Ground will be agreed with HE on this point.*

979 refers to the question of what ‘sustainable development’ actually means and is concerned that changes will erode village character.

Response: *There is no precise definition of ‘sustainable development’ set out in the NPPF although the guidance there provides decision-makers with a series of key issues to consider. The policies contained in the Local Plan are designed to avoid the erosion or loss of village character both in the scale of allocation and the approach to windfall development.*

966 relates to the question of the need for a masterplan for the former WYE3 site allocation in the absence of an adopted masterplan for the site.

Response: *A masterplan for the former WYE3 site has been prepared and is out to public consultation.*

1066 considers that Aldington has 'done its fair share' for providing for housing need in the borough and further development there would be out of scale with the locality.

Response: *Aldington is allocated a total of 30 additional dwellings in the Local Plan. Over the period to 2030, this is not considered to be out of scale or character with this settlement.*

459 is concerned that the policy does not meet the requirements of the Countryside Rights of Way Act.

Response: *See response to Policy ENV3 Landscape Character and Design which deals with this issue.*

Support/further comment:

42, 290, 701, 708, 960, 990, 997, 1117 and 1155 all consider this part of the Plan to be sound.

83 believes the Plan to be sound, however consideration for the additional dwellings at Lenham when considering the implications of locating these additional sites for traffic on the A20. Main Modification MM32 to the Maidstone Borough Local Plan would see these homes start to be delivered from 2021, 5 years earlier than anticipated in the submission version of the Maidstone.

775 - It will be hoped that the Heritage Strategy will not only provide information on constraints provided by heritage assets but also outline ways in which heritage can be enhanced during development to improve livelihoods. Heritage should be treated appropriately so that it is conserved and enhanced to include the local community. An example of this being the local community archaeology programme and hopefully more can be developed.

Response: *Support comments are noted.*

MC5 – SP4 update regarding convenience retail need

No representations received.

MC6 – SP5 Delivering a Sustainable Town Centre

Representation has been received from the following consultee:

1011 Ashford Investor Limited	
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Summary of Representations – Main Issues

Issue – Town Centre boundary

1011 notes that the new town centre boundary covers a smaller area than the adopted Town Centre AAP (in particular it omits the Phase 3 land which includes the HS1 surface car park directly to the north of the Ashford DOC) and continues to object to this omission which, given the policy position adopted by Policy SP5, would seriously undermine the potential for Phase 3 to be brought forward undermining the acknowledged benefits of doing so in granting planning permission for Phase 2.

Inclusion of this land within the town centre boundary on the proposal map would not obviate the need to address other retail tests (as per Phase 2) but it would avoid an in-principle policy objection to retail use of this land. Continue to maintain that the Phase 3 land should be included within the town centre boundary, with clarification provided that any proposals on this land should come forward only as an extension to the existing DOC to deliver improved connectivity between the DOC, the stations and the town centre as per AAP Policy TC15.

Also note that the adopted ‘International Station Quarter’ allocation is due to be deleted, with no re-provision of a similar allocation or policy. Given the significant investment that the Phase 2 proposals make towards meeting the important objective of improving connectivity to Ashford town centre and providing mixed-use development to achieve this, object to the Local Plan omitting this.

Response: *The Town Centre boundary has been revised since the 2010 TCAAP to reflect the desire for a more compact core to the town and reflect the changing pressures on the retail market.*

The DOC is not considered to be part of the Town Centre, and was permitted as an edge of town retail centre under those relevant policy requirements. The area of Phase 3 DOC land is a station car park and not part of the Town Centre area.

There remains a desire to enhance connections between the TC and stations area which is reflected in the Commercial Quarter policy S1, and parts of the International station quarter boundary remain as part of the TC policy. However, the developments proposed within the previous policy did not come forward as expected, and therefore, as guidance suggests, the policy requirement was reviewed and it was deemed that the proposals were not deliverable and therefore did not qualify for re-allocation.

No changes to TC boundary are proposed.

MC7 – SP6 The Design Process

Representations have been received from the following consultees:

1037 Wye with Hinxhill Parish Council (V McLean)	365 Sport England
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Summary of representations:

1037 objects to lack of reference to neighbourhood plans in paragraph 3.160.

Response: *Accepted. Paragraph 3.160 to be amended to include reference to Neighbourhood Plans as part of the package of supporting design guidance*

“local design guidance including adopted neighbourhood plans, the Kent Design Guide, development briefs [...]”

Support 365 is pleased to note the new inclusion of its Active Design guidance in this section and fully supports this change.

Response: *Support noted.*

MC8 – Policy S6 Key Design Qualities

Representations have been received from the following consultees:

98 Stella Marina Harris	1038 Wye with Hinxhill Parish Council (V McLean)
1051 Weald of Kent Protection Society	

Summary of representations:

Issue - Equality and Human Rights

98 considers that the plan is not sound as it is not effective. Design is too male orientated in its focus on large buildings and the plan does not do enough to address the historic imbalance. Buildings should be smaller with greater use, as in Spain, of enclosure and lower rise buildings. There is great scope within SP6 to redress the balance and make it comply with the Equality Act 2010. It also may not comply with the Human Rights Act 1988. This

should be rectified through amended wording to policy SP6, and efforts should be made to ensure the wording of the entire plan is made at the very least gender neutral

Response: *Ashford Borough Council seeks to ensure that the plan seeks to deliver design that addresses the needs of all its residents. Although there is no legal duty to produce an Equality Impact Assessment the Council must have due regard to the Equality Act 2010. Equality Impact Assessments are recognised as the best method of fulfilling that duty, and as such the Council continues to assess the impact of plans and policies in this way (see background submission document SD14). In turn, this type of assessment ensures that the plans and policies are in accordance with Article 14 of the Human Rights Act.*

Issue - Crime reduction

1038 supports the proposed amendments. However, the effectiveness and clarity of this policy would be improved by a minor amendment to reflect the most common form of low level crime in residential areas. This amendment would be consistent with Para 3.174 e) and the specific reference to anti-social and other behaviour in Section 17 a) of the Crime and Disorder Act 1998 “crime and disorder in its area (including anti-social and other behaviour adversely affecting the local environment)”.

Response *As the Crime and Disorder Act defines crime as encompassing anti-social behaviour the proposed addition is not considered necessary.*

Issue - Relationship to other plans

1051 states that design options need to be in sympathy with local neighbourhood plans and parish design plans. And the need for housing for a genuinely mixed demographic should be respected as is not the case at present.

Response: *This policy makes reference to Neighbourhood plans and village design statements. Housing mix is addressed in Policy HOU18 (MC86). No changes required.*

Issue - Materials and Innovative design

1051 considers that the policy should be stronger on the need for innovative design in accordance with para 63 of the NPPF. The quality of construction details does not form part of this document but we would like to record that this is an important factor when detailed permission is sought.

Response: *This policy is clear in seeking to promote the delivery of high quality design in new development across the borough. Whilst the policy does not refer specifically to innovative design, this does not of course prevent innovative approaches coming forward at application stage and recent permissions in the borough reflect the Council’s successful track record of support for innovative approaches to design where appropriate.*

Miscellaneous

1038 considers that the capitalisation of the points a. to j. is inconsistent and unjustified. Clarity would be improved if capitalisation was restricted to the first letter of each bullet point.

Response: *Noted*

Support

1038 supports the establishment of the Quality Monitoring Initiative.

Response: *Support noted.*

MC9 – Policy S2, Land North East of Willesborough Road, Kennington

Representations have been received from the following consultees:

75 A Roake	454 L Wood
167 C Horn	662 / 666 C Woolgar
170 T Bray	524 A Waite
871 J Firman	525 J Waite
711 J Longman	626 Environment Agency
670 / 672 Kennington Community Forum	395 C White
671 S Firman	437 / 438 / 439 /440 / 441 / 442 P Neal
623 W Brooks	375 R Pomfrett
620 E Brooks	373 R Creasey
619 A Brooks	312 K Hendrick
776 KCC	305 Wilkinson
594 T Atkins	1039 Wye and Hinxhill PC
578 N Firman	1086 Canon Woods and Orchard Action Group
463 Kent Downs AONB Unit	1184 Gladman Developments

Summary of representations:

It should be noted that many of the representations received reiterate comments made in the initial consultation on the Regulation 19 draft version of the policy in June 2016 and do not specifically relate to the proposed main Changes which were the subject of this consultation. However, for completeness, a response to all representations is included below.

Issue – Housing numbers

671 is concerned that the deletion of 'up to' results in the maximum 700 dwellings. 670, 662 object to 'up to' being replaced by 'indicative capacity'. They feel that the change in wording will result in an inability to secure 'infrastructure' to suit the planning when the volume of housing is an unknown quantity. Additional, unaccounted for dwellings will increase; the volume of traffic on the roads, emergency vehicle delays, the need for local 'health' services, the need for educational services, the need for transport services and the strain on the local sewage network. 578 consider the deletion of 'up to' 700 dwellings offers no flexibility. It guarantees the worst possible impact on the inadequate local roads and local healthcare resources which already can't cope with the current population.

Response: *For major site allocations in the Local Plan the term 'up to' was replaced with the more flexible term 'indicative capacity'. As the policy itself requires a flexible, design led approach to be taken to the site design through a masterplanning exercise, it is considered appropriate that this also will lead to determining the resulting capacity of the site, rather than a design being proposed to meet the maximum number. Based on the site size, infrastructure requirements and identified constraints, it is unlikely that the resulting capacity will be significantly different to the 700 homes proposed, but the terminology allows a design led approach which could propose a lesser amount of housing is suitable, not necessarily a higher amount. The Local Plan is focused on promoting high quality places with a positive sense of place (Policy SP1 (d) and Policy SP6) in addition to providing the relevant infrastructure (COM1, COM2 and IMP1) and therefore it is appropriate to allow flexibility in capacity on these major sites to enable those aims to be achieved. No changes proposed.*

Issue – Railway Crossing

776 have concerns regarding public safety of the existing at-grade Public Rights of Way railway crossings. The developing Conningbrook County Park will be a desirable destination for new residents and significant increases of the existing at-grade crossings are inevitable. Consequently, consider that the delivery of the proposed bridge crossing must be a requirement of this development. Supports the changes made to Policy S2 (d) and highlights the need for a new bridge crossing as part of this development. However, it should be amended to remove the word "investigate" to ensure a bridge is built that ensures public safety.

Response: *Support for the wording changes relating to the PRow and pedestrian and cycle route footbridge at criterion d) is noted. However, following discussions with Network Rail who support the principle of the footbridge replacing the at-grade crossings, it has been made clear that the developers of the site cannot action this provision, or the closure of the at-grade crossings themselves without agreement with Network Rail. Therefore the word 'investigate' must remain in the policy criterion to enable the developers and Network Rail to work together on a suitable, agreed proposal which is feasible. Paragraph 15 of the supporting text clarifies this position and the preference to provide the bridge and retain the PRowS as far as possible.*

Issue - Infrastructure provision

594 local services are already under threat and will be put under even further pressure by S2, Conningbrook Lakes, Julie Rose, The Orchard and The Croft.

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 / provide infrastructure as part of their developments. In this case, it is expected that the site will provide new services and facilities to serve the population of the local area, including a new 2FE primary school.

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.

Issue -Traffic and congestion

1086 the 'Local Plan Traffic Impact Assessment – Summary Report' (March 2016) lacked consideration of the existing issue of congestion on the Willesborough Road, and provided little confidence that existing problems on the road network will not worsen as a result of the development of Site S2, and other development proposed on the adjacent Conningbrook site. Furthermore note that Highways England emphasise concern at the lack of transport evidence directly assessing the impact of this site on the SRN.

524,525, 594 and 454 an additional 700 homes and a school will generate traffic the local road network will not be able to cope with, especially a single access junction to Kennington Road. Traffic is already heavy and emergency vehicles need easy access to/from William Harvey Hospital - with the proposed developments this will become much more difficult. 373 also note how the site is unsuitable for housing as there is already significant congestion to the William Harvey Hospital.

305 the local road infrastructure is unable to support an increase in traffic and proposed development is therefore unsustainable as this is one of the primary considerations of the NPPF. Previous applications at this site were refused and upheld by the Planning Inspector with traffic generation being one of the primary considerations. 305 traffic at peak times along the main Willesborough Road from the Conningbrook roundabout towards the hospital is dreadful. The traffic trying to join from George Williams way to the Canterbury Road is always congested, the roads cannot take a further influx of cars to this level.

167 objects to this site on the grounds of traffic in north east Kennington which will be severely exacerbated by the development of 1170 homes in the area. 167 the speed humps

should be removed on Ulley Road to alleviate traffic pressure and minimise the risk of fatality at Nettlefield. 167 Nettlefield will become a rat run once these developments are built.

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’.*

Transport policies TRA7 and TRA8 will apply to the development proposals, which will include ensuring appropriate capacity on the road networks and undertaking an appropriate Transport Assessment or Travel Plans. The policy itself 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. This may include restrictions on the local residential road network such as Nettlefield, if evidenced as an issue.

The policy already requires no residential occupations at the site until M20 Junction 10a is complete which will create significant additional capacity on the strategic road network.

Issue - Impact on the AONB

463 welcomes the inclusion of a new para following 4.17 and criterion J referring to the impact on the Kent Downs AONB, but feel it does not go far enough to ensure appropriate mitigation of the potential impacts of development. The proximity of the site to the AONB, the significant scale of the development proposed and extensive views over the site from a large section of the AONB means that development here could have a significant adverse impact on the AONB. Extensive planting both along north east and south east boundary and also throughout the development are required - due to the topography of the site, with land rising up to the west, (some 10 + metres from east to west) planting along the eastern boundary only would not be sufficient mitigation. It will also be vital to limit development to two stories and impose restrictions on external lighting. To further mitigate, it will be appropriate to require structural planting to be proved in advance of development commencing, or at least as a first phase of development. It is considered imperative that these restrictions are set out in the policy wording as without this the allocation fails to comply with para 115 of the NPPF.

463 suggests alternative wording to criteria j. including requirement for a maximum of two storey building heights and the use of low level lighting. 1039 also suggest alternative wording requiring the mitigation of any impact on views from the Kent Downs AONB, a generous landscape buffer, wildlife corridors and the use of non-reflective building materials.

1086 S2 will cause significant harm to the setting of the North Downs AONB¹. The site falls within the Special Landscape Area originally designated in the Kent Countryside Local Plan

¹ This is taken as referring to the Kent Downs AONB.

(1983). The Council's Landscape Area Study (2005) also identified the site as a characteristic feature of the area with its views of the North Downs. Development will be particularly visible from the AONB and will be a significant incursion into the open countryside. From an NPPF perspective (para 115), greater weight should be given to the setting of the AONB. The Kent Downs AONB Management Plan 2014-2019 mentions that considerable weight should be given to decisions that apply to the views to and from the scarp of the North Downs. (pg 28, 'the setting and views in and out of the AONB [should be] conserved and enhanced', and if they are threatened by development, this will be opposed unless it can be suitably mitigated). The landscape and visual impact on the setting of the Kent Downs AONB, as well as the significant incursion into the North Downs AONB would cause substantial harm to the views at the Wye Crown. If the Council decides to proceed to submission without the required evidence base, it should be made explicit in the Policy that the process of preparing and agreeing the masterplan will involve stakeholders from the local community and include inclusive and meaningful consultation events (such as workshops).

871, 578 and 373 considers the visual impact assessment regarding the North Downs AONB as totally ineffective. S2 should be deleted from the Plan.

711, 623, 620, 619, 170 and 375 believe there is insufficient evidence that a site the size of S2 could be accommodated within this landscape without causing harm to the existing qualities of the North Downs AONB. The proposed allocation represents a significant incursion into open countryside at the base of the North Downs and would cause substantial harm to views to and from the Wye Downs escarpment, which is a landscape quality instrumental to the AONB designation.

672, 666, 623, 620, 619 and 170 object to the proposed change to incorporate a 'master plan' which could consider the impact of the development upon views from the AONB, with information from a Landscape and Visual Impact Assessment prior to determining appropriate landscaping and building heights, on the grounds that it is too late to defer this assessment to the planning application stage. 454 argues that full assessment of the impact on the AONB should take place before the planning applications stage so proper consideration can be given to the proposed development.

671 this development as well as Conningbrook will have a devastating effect on the environment. Views from the Kent Downs AONB will be impacted whatever impact assessment is carried out. S2 should therefore be removed from the Plan (at least until the impacts of a completed Conningbrook and J10a can be assessed).

594 There has been no real assessment of the impact on the local area of natural beauty, this should take place before examination stage.

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 is not considered to 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. This is required by criterion J of the Policy.

Development within and adjoining the AONB with specific mention of management plans is further referenced in policy ENV3b (Landscape Character and Design within the AONBs) and its supporting text and it is not necessary to duplicate this within the site policy itself.

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.

The planning application stage is the time in the planning process where detailed layout, design, materials and building heights are determined taking into account the masterplanning and evidence which supports it and will ensure the additional requirements of policies mentioned above are met adequately.

Issue - Loss of quality agricultural land

1086 the development of the land at S2 would result in the loss of the highest quality land surrounding Ashford. 60% of the site falls within a narrow strip of Grade 1 agricultural land. In light of Brexit, it will be even more important to retain valuable land, a consideration which is reiterated in para 112 of the NPPF. 1086 feels that the Plan does not provide a clear rationale why the importance of the development outweighs the weight that should be given to BMV believe it should be a priority of the Local Plan to seek to focus development away from Ashford's limited resources of Grade 1 agricultural land and instead focus on developing those areas of lesser quality land.

711, 623, 620, 619, 395 and 373 argue 60% of the site is versatile Grade 1 quality agricultural land and therefore it should be a priority to focus development away from these limited resources and on areas of lesser quality land.

594 and 454 it's important that we keep our good quality Grade 1 Agricultural Land, particularly with Brexit in mind so that we can farm as locally as possible. 524, 594 and 375 there is sufficient lesser quality land in the Ashford area available for housing development and this should be used before good quality Grade 1 land.

312/170 there is still no mention of Grade 1 agricultural land which the Government stipulates should not be built on. 305 also note how the NPPF suggests that Grade 1 land is 'Only to be considered in exceptional circumstances'. There are no exceptional circumstances here and the site should therefore be dismissed.

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 - Issues of odour in the area

524/525/373/167 there is a serious problem of smells in the area which will be exacerbated by additional housing.

Response: *With regard to the proximity to the WWTW at Bybrook, 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. The site lies some distance from the WWTW and a large number of existing properties lie much closer. On balance whilst this site may on rare occasions 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 – Air Pollution

305 If S2 goes ahead people will use the Little Burton estate as a cut through causing air pollution.

Response: *Air quality is covered by Policy ENV12, and will not permit proposals which result in National Air Quality Objectives being exceeded. Also see response to Traffic concerns above. No Change required.*

Issue - Flooding

373 the site is unsuitable due to a history of flooding.

Response: *A small area of the site along its eastern boundary with the railway line is located within Flood Zone 2. A full Flood Risk Assessment in consultation with the Environment Agency is therefore required by this policy. No change required.*

Issue - Vibrations from the train

373 the site is unsuitable for housing due to the rail line vibration and passing goods trains that can be felt on Canterbury Road.

Response: *Criteria i. requires that a noise and vibration assessment is undertaken as part of the preparation of development proposals for his site. No change required.*

Issue - Junction 10a

1086 and 375 expresses doubts over deliverability in view of the site's reliance on Junction 10a. It is unclear how the delivery of Junction 10a will address the traffic impact on A2070 Willesborough Road leading to Junction 10. 10a is proposed 700m east of the existing Junction 10, and thus existing and future development traffic will continue to use the Willesborough Road to gain access to the M20 via Junction 10 or Junction 10a beyond.

711, 623, 620, 619, 441, and 170 also contend that there is uncertainty over the delivery of the M20 Junction 10a, particularly given with the delivery programme has been put back from March 2019 to May 2020, and questions how the extra congestion on Willesborough Road that will arrive as a result of the development of S2 and Conningbrook will be relieved by Junction 10a.

454 also thinks it is not clear how Junction 10a will help relieve traffic problems in the area, particularly if the local developments planned for Site S2, Julie Rose, Conningbrook Lakes, The Orchard and The Croft go ahead. 594 and 454 Junction 10a is still under review and is key to enabling the new developments. Nothing should progress until it is clear what infrastructure will be in place.

75 The revised wording in the Main Changes 'Strategic Development Requirements' notes an expectation that the Junction 10a works will be 'completed mid-2019'. The wording in TRA1 suggests that a limited amount of development could be brought forward by the end of the year. The wording in TRA1 is more flexible than the proposed text in Policy S2, as it recognises that once Junction 10a has commenced, it provides a level of certainty to the planning authority that the junction improvements will be carried out and therefore it is reasonable to permit occupation of some new residential units. The differences between S2 and TRA1 are confusing and need clarification - suggest that Policy S2 should be amended to read as follows 'No occupation of the residential development shall take place until the Development Consent Order for the proposed M20 Junction 10a is granted, where after residential occupation can become available within this site for occupation, in accordance with the limitations set out within Policy TRA1.' This change would enable compatibility between S2 and TRA1.

Response. *The policy is clear at paragraph 14 of the supporting text and the final paragraph of the Policy that there will be no occupation of the dwellings on this site or prior to the completion of Junction 10a, in accordance with Policy TRA1. Highways England submitted the proposals to the Secretary of State (SoS) on 01 September 2017. A decision on the project is expected from the SoS on 1st December 2017.*

The delivery of Junction 10a will assist in freeing up capacity at the existing Junction 10 interchange which will benefit traffic movements along the A2070 from the north such as from this site.

As explained in paragraph 5.226 in TRA1, once the Development Consent order is granted for 10a, a limited amount of development may be brought forward prior to completion but this is expected to release earlier committed developments in existing plans and/or with extant planning permission such as the first phase of Conningbrook and Finberry which are shown as being delivered in advance of new allocations in the Housing Trajectory.

Issue - Mineral safeguarding and Contamination

1086 - most of the site is a mineral safeguarding area established by the KMWLP (July 2016). Much of the site will potentially therefore require extraction before development can take place which will seriously hinder the rate of delivery at the site. Note KCC previously mentioned a Minerals Assessment would be required. Since making those comments, KCC has adopted a Mineral Safeguarding Supplementary Planning Document (April 2017). Not aware of a Minerals Assessment being produced since the previous consultation, and there continues to be a lack of regard to this constraint in Policy S2 and its supporting text. This should be addressed before Examination.

623, 620, 619 and 170 questions how mineral safeguarding issues at the site will affect deliverability and therefore believe this consideration requires further assessment.

594 believe that an assessment of the impact on mineral safeguarding at the site is required. 454 and 442 are concerned about the impact S2 will have on mineral safeguarding and suggest it requires further investigation.

1086 concerned that a former Orchard Lane Landfill site is located on the northern boundary of the allocation, and there is evidence of soil contamination on parts of the site. It appears this viability issue has been fully investigated to ensure that any land contamination can be appropriately dealt with prior to development taking place.

623, 620, 619 and 170 questions how contamination at the site will affect deliverability and therefore believe this consideration requires further assessment. 454 and 442 are concerned about the contamination at the site and suggest it requires further investigation.

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 Criterion v. requires any land contamination issues are satisfactorily resolved or mitigated as the supporting text specifically requires this to be dealt with prior to development taking place.

Issue - Biodiversity considerations

1086 the potential impacts of the development on the Great Stour Local Wildlife Site (LWS), which borders Site S2 to the east, have not been adequately investigated. It remains unclear as to whether it is suitable and appropriate for a site of the scale proposed in the allocation to be located next to the Great Stour Local Wildlife Site and Conningbrook Country Park. This Policy is unsound on the basis that this information is still absent.

623, 620, 619 and 170 questions how impact on the adjacent LWS and the protected species within will affect deliverability and therefore believe this consideration requires further assessment. 594 the adjacent LWS will be scarred forever by this development. 454 and 442 are also concerned about the impact S2 will have on the LWS and suggest it requires further investigation.

Response: *The policy for the site (criterion f) 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.*

Issue - Previous representations ignored

1086 feel that the majority of their previous representations relating to S2 have effectively been ignored. 454 believe that many of the previous proposed changes made in comments last year have not been taken into account and therefore the site should be removed.

312 and 170 does not think that the changes made suitably address the objections they and others made in the last round of consultation. Thus the site should be removed from the Plan prior to submission for Examination.

Response: *All matters raised in representations to the 2016 Regulation 19 version are addressed in the Regulation 19 Consultation Statement (July 2017).*

Issue - SA inconsistencies

1086 note that this site assessment is inconsistent when compared with the assessment of other Urban Edge and Strategic Sites. Despite their concerns previously mentioned in the first round of consultation, 1086 note that the site was re-assessed but the site score stayed the same.

Response: *Noted. The overall 'score' on the sustainability appraisal process is not the only determining factor for site allocation selection, and the more detailed written 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 also the overall 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 elsewhere in the borough.*

Issue - Dual ownership issues arising from masterplanning and criterion 'c' amendment

75 object to the requirement for a 'detailed and inclusive masterplanning exercise' for the proposed allocation area as a whole although the continued allocation is supported, it may prove difficult for a joint masterplan (mentioned in para 4.16 amendments) to come forward

as the land falls within two different ownerships. The smaller parcel of land providing access onto Canterbury Road is ready and available to proceed. It would be inappropriate to delay the smaller site from coming forward whilst awaiting for a significantly larger scheme to be prepared.

Response: *On a large site such as this, particularly where infrastructure is to be provided on-site, it is appropriate that a masterplan that covers the whole site is submitted and approved. This prevents the site being developed in a piecemeal way which does not consider the overall design and infrastructure requirements or prejudice the ability of the site to be delivered comprehensively, including any on and off-site infrastructure requirements. The Local Plan is focused on promoting high quality places with a positive sense of place (Policy SP1 (d) and Policy SP6) in addition to providing the relevant infrastructure (COM1, COM2 and IMP1) and therefore it is appropriate to ensure these issues are addressed for the whole site to enable those aims to be achieved. It is entirely standard for sites in more than one ownership to be subject to such requirements. No changes proposed.*

Support

1184 supports as a sensible sustainable location which can help meet development needs across the district.

1039 supports paragraphs 4.17 and 4.24, including a new pedestrian / cycleway bridge over the railway in order to provide safer access into the Country Park from the site and wider area.

626 welcome the requirement to consider the impact upon views from the Kent Downs AONB, informed by a landscape and visual impact assessment.

312 are pleased that the impact of development on the views from the Wye downs will now be considered.

75 support the continued allocation of the land at Orchard Farm.

Response: *Support noted.*

MC10 – Policy S3 – Court Lodge

Representations have been received from the following consultees:

26 Colin Harris	744 James Ransley
334 Ian Wolverson	777 KCC
612 Joanne Atkins	991 LRM Planning (Owen Jones)
627 Environment Agency (Jennifer Wilson)	

Summary of representations – Main Issues

Issue - Masterplanning and integration

26 supports a considered masterplan for development to the south of Ashford. 334 believes that the linking and joint planning of adjoining sites in the area, including Chilmington Green, is imperative for good placemaking and technical results.

991 reference in each policy to a masterplan exercise should be on the basis of a co-ordinated strategy from the three South Ashford allocations.

Response: *Noted. It will be important for the three adjoining allocations at sites S3, S4 and S5 to consider matters of infrastructure and service provision in a comprehensive and co-ordinated way. It is agreed that there is no need for individual allocations to be predicated on the delivery of another and that is already implied within the respective policies. However, for clarity, a minor amendment to the supporting text of the three policies to reflect the need for and benefit of a co-ordinated approach is proposed:-*

Add the following text to the end of paragraph 4.43:

Masterplanning of this site shall need to take account of any emerging proposals for Sites S4 and S5 in this Plan, in particular the approach to the provision of infrastructure and services in the area.

Issue - Contribution to sports and community facilities

334 queries whether an extended Discovery Park would be managed by the Chilmington CMO for continuity. It does not make sense for management regime on the two sites to be different.

612 community facilities for the development should be provided by an improved offer at Singleton Environment Centre.

991 In light of the site enabling the extension of Discovery Park, requirement for off-site sports and recreation contributions should be removed from supporting text.

Response: *The need for Site S3 to be co-ordinated and planned alongside the emerging proposals for Chilmington Green and, in particular Discovery Park, is acknowledged and accepted. The detailed arrangements for the delivery and maintenance of any elements of the wider Discovery Park can be considered as part of any detailed proposals for the site in light of the eventual arrangement of open space and built development at site S3 and the Chilmington CMO is one option that should be considered. Similarly, in respect of access from the west (Chilmington), the need for this to be masterplanned in the context of existing and proposed allocations is enshrined in the policy and will need to be subject to detailed traffic modelling in due course. However, it is clear that a route through the development*

from west to east is needed as any significant additional traffic on Magpie Hall Road would not be acceptable.

The approach to developer contributions in respect of sport and recreation facilities is complex as the sports facilities planned for Discovery Park are not intended to be fully delivered by the Chilmington Green development and hence additional contributions from other sites will be needed to mitigate the additional demand created. It is accepted that the Court Lodge site developer may be creating additional amounts of informal natural greenspace beyond that strictly required to mitigate the demands from the Court Lodge site itself but it is anticipated that the net additional costs of this where justified would be off-set by developer contributions towards its delivery from other sites. No change is therefore proposed.

Issue - Landscape, Environmental and amenity Impact

612 there is no reassurance for local residents of any recognition for the need of visual separation between Court Lodge and Merino Way/Knights Park and Washford Farm areas. Supportive of application of a Landscape Protection Policy for this area, to maintain accessible open spaces. Development here will prejudice ability of existing adjacent residents to walk out of their houses directly into open countryside, and therefore their wellbeing and the proposal will undermine dark skies of the area, and will negatively impact on local air quality

627 welcomes the phased approach for the development, with an initial phase to include the delivery of the enabling works to the floodplain and the establishment of the ecological reserve areas to allow translocation of protected species.

Response: *The concerns highlighted in this representation are acknowledged and undoubtedly the delivery of a significant new housing allocation in this area will change its character. However, the Council considers this to be a logical and sustainable location for new housing development given it will be well served by local facilities and infrastructure created as part of the new Chilmington development but is also of a scale and critical mass that will enable the delivery of its own local services and facilities (e.g. a new 2FE primary school) that will provide greater local provision for residents at Brisley Farm, Washford farm and Knights Park, all of which have no local services to speak of. The development of this area also provides the chance to complete the delivery of the strategic Discovery Park project, envisaged in the adopted Core Strategy, as part of a comprehensive approach to open space and recreational facilities in the town.*

The Local Plan should be read as a whole, and complementary topic-based policy protection for Dark Skies exists as Policy ENV4.

Issue - Flooding

26 considers that there is further potential for the development of riverside facilities and park and the development of 'Little Venice' within the flood plain. The failure to confront the EA with construction solutions that would enhance this area, is perhaps the biggest failure of this and historic town plans.”

627 prefers a solution in which development is located on Flood Zone 1 and 2, and designs for layouts indicate quantum of development is deliverable on site.

744 is of the opinion that much of the site is within the functional floodplain, and there is no evidence that the sequential test / exemption test has been performed. Remodelling the flood plain could lead to a significant increase in surface water flood risk off site. It will prove very difficult to identify enough land for flood compensation. The land above the floodplain owned by ABC, for example, is subject to archaeological constraints (a Roman Settlement) and will not be able to be remodelled. It will not be possible to deliver safe access and egress because none of the proposed access points to the site can meet will be safe during 1 in 100 plus climate change event. The proposed link through to Site S4 and then to Ashford Road is subject to considerable surface water flooding.

Response: *The EA's comments are noted and welcomed. The opportunity to reach an agreed position with the developer and the EA over the development strategy for this site is important and it is anticipated that a Statement of Common Ground with the respective parties can be reached to resolve this issue.*

The objections raised here are based on a series of assumptions. In respect of flood risk, the Main changes to policy S3 and its supporting text reflect the potential for the development at Court Lodge to be developed in different ways, including wholly outside the floodplain.

Issue - Pound Lane Link Road

612 supports the proposed link road, but is unconvinced that it will draw traffic from existing roads.

777 concerned over short-term requirement and deliverability (given this site is the only contributor)

991 commissioned highway modelling, the scope of which was agreed with the County Council and Highways England, demonstrates that there is no highway benefit of the Pound Lane Link Road to the development of this site.

Response: *The reliance of the scheme on the proposed Pound Lane Link Road will be determined through more detailed transport modelling that considers the impacts from this site and the nearby allocations at sites S4 and S5 but in any event, if and when the Link Road is required as a necessary piece of infrastructure, this can be justified through the Exception Test set out in national policy. The concerns identified around the short term requirement of the Link Road are acknowledged and it is accepted that alternative ways to suitably accommodate traffic movements in the area onto the strategic road network may be able to be demonstrated by detailed technical modelling. However, the Council considers the proposed Link Road will have an important strategic role in the future at some stage during the Plan period as development at site S3 and at Chilmington Green comes forward and it may enable less traffic from the west to use existing rural roads than would otherwise be the case. For this reason, the Link Road should remain in the Local Plan and the Borough and County Councils work together towards a deliverable implementation strategy for it.*

Issue - Highways and highway capacity

334 states that site should be able to accommodate traffic movements from Chilmington Green.

612 points out that the speed limit on the corner of Long Length and Chart Road must be reduced, since accidents are common at the bend where Long Length.

744 is of the opinion that modelling work by Highways England under J10a scheme indicates Orbital roundabout and dual carriageway will exceed theoretical capacity. There is a general lack of highway capacity in the vicinity, which is a barrier to development of other neighbouring sites, and that cumulatively from a transport point of view development is unsustainable.

Response: *With respect to highways and transportation matters, it is clear that Junction 10a will provide for the strategic capacity at the M20 to serve both site S3 and other allocated sites south of Ashford. The Council's evidence base indicates that the overall levels of traffic on the strategic road network will be significantly lower in 2030 than that planned for in the Core Strategy and the Greater Ashford Development Framework that underpinned it. The Council has worked closely with Highways England and KCC to agree trip generation rates and trip distribution assumptions from this site. There is no suggestion from any party that additional lanes over HS1 are required to accommodate traffic from this Local Plan. Furthermore, it is not clear why objector MCLP/744 considers there is more capacity at J10 from development to the north (i.e the site he is promoting). Committed developments in existing plans and/or with extant planning permission currently would utilise any spare capacity at the junction prior to Junction 10a being available to traffic.*

Support

991 support that the capacity of the site is now referred to in an indicative fashion rather than a ceiling.

Response: *Support noted.*

MC11 – Policy S4 – Land north of Steeds Lane and Magpie Hall Road

Representations have been received from the following consultees:

26 Colin Harris	729 / 740 Kingsnorth Parish Council (Len Bunn)
38 Jarvis Land (SE) Ltd	737 James Ransley
39 Pentland Homes Ltd	778 Kent County Council
40 Jarvis Homes Ltd	877 Maxine Hills
144 Jennie Matthews	909 P.M. Fagg

427 Nathalie Stival	929 CPRE Kent Ashford District (Hilary Moorby)
468 Jennifer Taylor	1076 Canterbury Diocesan Board of Finance Ltd
628 Environment Agency (Jennifer Wilson)	

Summary of representations – Main Issues:

Issue - Over-reliance on large urban sites

1076 believes that excessive reliance on large urban sites in Ashford Borough has had a number of consequences including serious underperformance in regard to the housing trajectory, while land has failed to come forward in sufficient quantities even to meet the Government target of a five-year supply. Rural communities and elected representatives are now looking to secure a measure of development in order to enable their communities to thrive.

Response: *The large majority of new development in the Plan is still based in or around Ashford. Limited additional development in the rural areas is proposed to ensure a smoother profile for delivery of new housing in the short to medium term and help the borough achieve a deliverable 5 year housing land supply without resorting to a model which is not sustainable or well related to access to services and facilities.*

Much is made of the Council's previous planning policies restricting development in rural areas but these policies over many years have been thoroughly examined at successive Local Plan Inquiries / examinations and found to be a sound approach every time. This is because the fundamental strategy for housing development in the borough of focusing the majority of development in and around Ashford is the most sustainable form of development where services, jobs and excellent road and public transport links are readily available. In contrast, the rural parts of the borough are, by comparison, relatively poorly served with Tenterden and a handful of rural service centres providing a limited range of facilities but inevitably requiring travel to access higher order services and facilities and many employment opportunities. The inherent qualities and character that make the rural areas attractive in the first place are also important considerations and whilst national policy is now clear that the countryside should not be protected for its own right, much of the rural area within the borough is designated as AONB or otherwise provides the characteristic landscape setting for the villages that generate the 'Garden of England' image.

Issue - Masterplanning

26 argues that a considered masterplan should be required for development planned to the south of Ashford.

38, 39, 40 state that all reference to compatibility with the Court Lodge development should be deleted. It is unnecessary for either development to be linked in policy wording. The LPA can consider if either scheme is acceptable in its own right as standalone developments.

Response: *It will be important for the three adjoining allocations at sites S3, S4 and S5 to consider matters of infrastructure and service provision in a comprehensive and co-ordinated way. The site policies are not predicated on the delivery of another. However, for clarity, it is accepted that a minor amendment to the supporting text of each the three policies to reflect the need for and benefit of a co-ordinated approach is appropriate:*

Add the following text to paragraph 4.46:-

Masterplanning of this site shall need to take account of any emerging proposals for Sites S3 and S5 in this Plan, in particular the approach to the provision of infrastructure and services in the area.

Issue - Buffer zone around Kingsnorth village

144 This site serves as a natural buffer between Kingsnorth, Shadoxhurst, Hamstreet, Great Chart and Mersham, so should not be developed

1076 - The area immediately to the south of the village has a sense of enclosure, creating an opportunity for limited, contained development which would give the settlement a more compact character - more village like and less like ribbon development. It is more sensible to plan for proportionate village development at Kingsnorth Village by allocating housing on the The Glebe and then creating a southern buffer to ensure there is no coalescence with this allocation.

Response: *The site policy S4 makes specific provision for a green and open buffer to separate the southern extent of Kingsnorth village from the northern extent of built development on this site. This follows the natural topography of the land south of Kingsnorth which rises to a shallow ridgeline before falling again to Steeds Lane. This buffer will ensure the separate identity of Kingsnorth village as has been provided for on its northern boundary with the buffer zone with the Park Farm development.*

Development of the land promoted by representation 1076 would erode this southern buffer and provide an element of backland development on the southern side of Church Hill which is not characteristic of existing development here. Kingsnorth village is essentially linear in character and so a 'compact' form of development would not be appropriate.

Issue - Environmental, Landscape and Visual Impacts

877 believes that development will negatively impact on flora and fauna

1076 The site lies in a prominent position in open countryside completely divorced from any existing settlement both functionally and visually. Development should therefore be contiguous with the village of Kingsnorth.

Response: *Rigorous attention is required in the proposed policy to the conservation and enhancement of flora and fauna on site (criterion d) and the land is not designated as either*

SSSI or as a Local wildlife site. The agricultural use of the land will have limited the existing biodiversity value here. The relationship with Kingsnorth village is discussed in the response above.

Issue - Local benefit and impact

468 considers that recent nearby housing developments in this area – Park Farm and Bridgefield – are suffering from minor disruption and vandalism that comes from housing density. Further development will continue this trend.

427, 877, 909 Any development that is approved should include affordable homes for local people. Housing in the vicinity is not affordable for local people.

Response: *The Local Plan should be read as a whole, and the delivery of affordable housing is one of the most important aspects of housing delivery in the Council's view. Policy HOU1 requires a proportion of all major residential development to deliver affordable housing as per its location within the borough. There is no evidence to suggest that allocation of this site would result in additional vandalism or criminal activity.*

Issue - Highway issues

737 is concerned that modelling work by Highways England under J10a scheme indicates Orbital roundabout and dual carriageway will exceed theoretical capacity and that the proposed link through this site and then to Ashford Road is subject to considerable surface water flooding. There is a general lack of highway capacity in the vicinity, which is a barrier to the granting of planning permission on the current planning application for this site, and therefore cumulatively from a transport point of view development is unsustainable. However, there is existing capacity north of junction 10 that could be utilised by allocating sites in this location (Such as omission site NW1, Lees Farm) before J10a is delivered).

144, 427, 468, 877, 909 – Development will result in increased congestion, exacerbating existing issues along narrow formerly-rural lanes.

877 – Development at Otterpool Park will put additional pressure on roads near this site.

Response: *With respect to highways and transportation matters, it is clear that Junction 10a will provide for the strategic capacity at the M20 to serve both site S4 and other allocated sites south of Ashford. The Council's evidence base indicates that the overall levels of traffic on the strategic road network will be significantly lower in 2030 than that planned for in the Core Strategy and the Greater Ashford Development Framework that underpinned it. The Council has worked closely with Highways England and KCC to agree trip generation rates and trip distribution assumptions from this site. There is no suggestion from any party that additional lanes over HS1 are required to accommodate traffic from this Local Plan. Furthermore, it is not clear why the objector (MCLP/737) considers there is more capacity at J10 from development to the north (i.e the site he is promoting). Committed developments in existing plans and/or with extant planning permission currently would utilise any spare capacity at the junction prior to Junction 10a being available to traffic.*

Localised traffic impacts will need to be properly addressed to minimise traffic growth along rural lanes, in conjunction with a co-ordinated and masterplanned approach to traffic

management and distribution alongside the adjacent allocations at S3 and S5. However, it is expected that traffic from this site will largely flow onto the Ashford Road as the principal means of distributing traffic from the site.

Ashford Borough Council is engaging with Shepway District Council over the emerging plans for a Garden Town focused at Otterpool. These plans are not well advanced, and are not yet part of that district's planning policy. No changes required.

Issue - infrastructure

144, 877, 427 object on the grounds of lack of broadband, not enough thought has gone in to infrastructure planning, “sewage issues” at Bromley Green Road and insufficient GP and hospital facilities in the town in general with high waiting times.

Response: *The Local Plan should be read as a whole and, as an example, Policy EMP6 promotes the roll-out of high speed broadband across the borough.*

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.

It should be noted that policy S4 provides for additional community facilities to be provided as part of the development and further developer contributions towards off site provision of other infrastructure and services in accordance with policy IMP1 will also be required.

Issue - Sewerage

38, 39, 40 Criterion f disregards viability and is overly prescriptive. It is requested that the wording be deleted and replaced with: "The development hereby permitted shall not be commenced until such time as a scheme for the provision of foul and surface water drainage is submitted to and approved in writing by the Local Planning Authority".

Response: *This issue will be explored in conjunction with the site promoter and statutory undertaker in more detail. It will be important for the three adjoining allocations at sites S3,*

S4 and S5 to consider matters of infrastructure and service provision in a comprehensive and co-ordinated manner.

Issue - Heritage

778 There is high potential for archaeological remains given proximity to Westhawk Farm , and evidence of historic industrial activity. A phased programme of archaeological mitigation will be required. Pre-determination evaluation would be necessary to determine where development is possible within site.

Response: *Noted. The Local Plan should be read as a whole. Policy ENV13 requires consideration of heritage assets on or near to the site, while Policy ENV15 requires an appropriate assessment of archaeological assets to be undertaken on sites of known potential. No further changes therefore required.*

Support

628 supports inclusion of drainage criteria that recognises the need to co-ordinate drainage with neighbouring Court Lodge site.

729 supports increase in numbers as development footprint remains unchanged.

778, 729, 740 and 929 support criterion d) and the protection of ecologically important areas, especially Isaacs Wood Ancient Woodland.

Response: *Support noted.*

MC12 – Policy S5 – Land South of Pound Lane

Representations have been received from the following consultees:

145 Jennie Matthews	738 Kingsnorth Parish Council (Len Bunn)
604 Joanne Atkins	774 Molly Miller
629 Environment Agency (Jennifer Wilson)	779 Kent County Council
736 James Ransley	

Summary of representations – Main Issues

Issue - Sustainability and local infrastructure

145 argues that there is a lack of broadband and health infrastructure and 736 that the site is not deliverable or sustainable. 774 does not consider increased numbers on site to be suitable for rural area.

Response: *The Council’s opinion is that this site is both deliverable and sustainable, as part of the Ashford Urban Area’s planned expansion in conjunction with developments already permitted at Chilmington Green, and in conjunction with Policies S3 and S4, providing a sustainable and well-equipped community. It will be important for the three adjoining allocations at sites S3, S4 and S5 to consider matters of infrastructure and service provision in a comprehensive and co-ordinated way. For clarity, a minor amendment to the supporting text of the three policies to reflect the need for and benefit of a co-ordinated approach is proposed.*

Add the following text to paragraph 4.62 :

‘Masterplanning of this site shall need to take account of any emerging proposals for Sites S3 and S4 in this Plan, in particular the approach to the provision of infrastructure and services in the area.’

In terms of infrastructure, the Local Plan should be read as a whole. As an example, Policy EMP6 promotes the roll-out of super high speed broadband across the borough.

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.

Issue - Flooding

736 much of this site is within the functional floodplain, and there is no evidence that the sequential test has been performed.

Response: *Disagree. The entirety of this site is within Flood Zone 1, at the lowest risk of flooding. None of this site is within the functional floodplain.*

Issue - Highways and highway capacity

145 is concerned that development will create highway danger for horse riders, cyclists and dog walkers.

736 is of the opinion that modelling work by Highways England under J10a scheme indicates Orbital roundabout and dual carriageway will exceed theoretical capacity. However, there is existing capacity north of junction 10 that could be utilised by allocating sites in this location (Such as omission site NW1, Lees Farm) before J10a is delivered.

145, 736 states that there is a general lack of highway capacity in the vicinity, which is a barrier to development of other neighbouring sites, and that cumulatively from a transport point of view development is unsustainable.

Response: *With respect to highways and transportation matters, it is clear that Junction 10a will provide for the strategic capacity at the M20 to serve both site S5 and other allocated sites south of Ashford. The Council's evidence base indicates that the overall levels of traffic on the strategic road network will be significantly lower in 2030 than that planned for in the Core Strategy and the Greater Ashford Development Framework that underpinned it. The Council has worked closely with Highways England and KCC to agree trip generation rates and trip distribution assumptions from this site. There is no suggestion from any party that additional lanes over HS1 are required to accommodate traffic from this Local Plan. Furthermore, it is not clear why objector MCLP/736 considers there is more capacity at J10 from development to the north (i.e the site he is promoting). Committed developments in existing plans and/or with extant planning permission currently would utilise any spare capacity at the junction prior to Junction 10a being available to traffic.*

Criterion g) requires the development to improve local pedestrian and cycle routes (including those for dog walkers) without creating danger.

Issue - Flood implications of the Pound Lane Strategic Link Road

736 states that delivery of this site is dependent on the Pound Lane Link Road. No evidence that a sequential test for the PLLR has been performed. Sequential Test should be performed to demonstrate that the additional transport capacity cannot be delivered using reasonably available alternative routes or modes of transport which could be constructed on sites at a lower risk of flooding.

Response: *The reliance of the scheme on the proposed Pound Lane Link Road will be determined through more detailed transport modelling that considers the impacts from this site and the nearby allocations at sites S3 and S4 but in any event, if and when the Link Road is required as a necessary piece of infrastructure, this can be justified through the Exception Test set out in national policy. The concerns identified around the short term requirement of the Link Road are acknowledged and it is accepted that alternative ways to suitably accommodate traffic movements in the area onto the strategic road network may be able to be demonstrated by detailed technical modelling. However, the Council considers the proposed Link Road will have an important strategic role in the future at some stage during the Plan period as development at site S3 and at Chilmington Green comes forward and it may enable less traffic from the west to use existing rural roads than would otherwise be the case. For this reason, the Link Road should remain in the Local Plan and the Borough and County Councils work together towards a deliverable implementation strategy for it.*

Issue - Landscape and visual impact

604 there is insufficient evidence in supporting text that there will be a ‘visual separation’ between the development site and Kingsnorth, the cluster of homes on Pound Lane, Washford Farm and Knights Park. Supportive of application of a Landscape Protection Policy for this area, to maintain accessible open spaces.

145 objects to change of land use away from farmland, and development will result in the Ashford urban area consuming villages.

Response: *The Local Plan should be read as a whole. The separation of settlements policy SP7 seeks to maintain the individual integrity of settlements. The allocation does not seek to achieve ‘visual separation’ with Kingsnorth village and other property in Pound Lane but with the adjoining allocation at S3. The supporting text to the Policy emphasises the need to establish an appropriate scale and density of development that can be in keeping with nearby residential development.*

Issue - Heritage

779 There is high potential for archaeological remains given proximity to Westhawk Farm (Roman), and evidence of historic industrial activity. A phased programme of archaeological mitigation will be required. Pre-determination evaluation would be necessary to determine where development is possible within site.

Response: *Noted. Policy ENV13 requires consideration of heritage assets on or near to the site, while Policy ENV15 requires an appropriate assessment of archaeological assets to be undertaken on sites of known potential. No further changes are therefore required.*

Support

629 supports provided a buffer zone of 8m is maintained from the top of the Whitewater Dyke riverbank.

738 supports increase in numbers based on development footprint not changing.

Response: *Support noted. Under the terms of the Water Resources Act 1991, and the Land Drainage Byelaws 1981, the prior written consent of the Environment Agency is required for any proposed works or structures, in, under, over or within 8 metres of the top of the bank of a main river. Therefore this repetition is not required in Policy.*

MC13 – Policy S6 Newtown Works

Representations have been received from the following consultees:

780 KCC	630 Environment Agency
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Summary of representations:

Support 780 supports Policy S6 (g) and the addition of a new paragraph after 4.78 and requests that the Transport Assessment includes details of measures proposed to mitigate any impact of development and to improve connectivity of the Public Right of Way and Cycle Route Network, both locally and towards Orbital Park. 630 supports the additional text and policy steer in respect of Southern Water Services' requirements.

Response: Support noted. With regard to the content of Transport Assessments (TAs), Policy TRA8 states that the Council will liaise with the relevant authorities with regard to the content of TAs on a site by site basis.

MC14 – Policy S7 Klondyke Works

Representation has been received from the following consultee:

781 KCC	
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Summary of representations:

Support 781 supports the addition of new paragraph after 4.95 and requests that the Transport Assessment includes details of measures proposed to mitigate any impact of development on the Public Right of Way and Cycle Route Network, taking opportunities to improve the sustainability and connectivity of the development site.

Response: Support noted. With regard to the content of Transport Assessments (TAs), Policy TRA8 states that the Council will liaise with the relevant authorities with regard to the content of TAs on a site by site basis.

MC15 – Policy S8 Lower Queen's Road

Representation has been received from the following consultee:

631 J Wilson (Env Agency)	
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Summary of Representations – Main Issues

Support 631 support the new policy criterion to 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.

Response: *Support noted.*

MC16 – Policy S9 Kennard Way

Representations have been received from the following consultees:

1078 South East Water	782 KCC
632 Environment Agency	

Summary of Representations – Main Issues

Issue – Location of access

1078 agrees that the primary vehicle access should be from Kennard Way. However the location of the access will be determined based on the design and layout of the scheme overall, once various constraints have been taken into account. There are not considered to be significant advantages in planning or highways terms of a centrally located access. As such it is proposed that the words 'preferably in the centre of the site' be removed.

Response: *The Council believes that the term 'preferably' is sufficiently flexible. This wording was requested by Kent Highway Services. No change proposed.*

Support 1078 continue to support the allocation, and support the removal of reference to terraced or semi-detached properties. 782 support the addition to criterion (d) regarding the connections between Henwood, Kennard Way and Local Services. 632 welcomes the recognition of the need to protect groundwater.

Response: *Support noted*

MC17 – Gasworks Lane

Representations have been received from the following consultees:

783 KCC (Council)	633 Environmental Agency (Jennifer Wilson)
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Summary of Representations – Main Issues

Issue: Transport Assessment

783 states that the Transport Assessment would need to include details of mitigation of any impact of development on the Public Right of Way and Cycle Route Network, improving sustainability and connectivity of the site.

Response: *With regard to the content of Transport Assessments (TAs), Policy TRA8 states that the Council will liaise with the relevant authorities with regard to the content of TAs on a site by site basis.*

Support 633 welcomes the addition criterion

Response: *Support noted.*

MC18 – Policy S11 Leacon Road

Representations have been received from the following consultees:

634 J Wilson (Environment Agency)	784 KCC
732 James Ransley	

Summary of Representations – Main Issues

Issue - Amendment to policy

634 Given the alteration to make this site purely residential, and the previously identified requirement to make a positive contribution to the setting, role, biodiversity, accessibility and amenity value of the adjoining green corridor area, suggest the planning criterion includes a clause to provide contributions towards the provision, enhancement and maintenance of Watercress Field / Victoria Park.

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 – Flood Risk

732 suggest the Main Change is unsound as the Policy S11 site that is now allocated solely for residential purposes falls completely within a flood zone 3. When you compare this to Policy S11a which is allocated for employment use and in a flood zone 2, the Main Change cannot be considered sound. There is no safe access and egress when the river is in flood, whilst the site is also downstream from the Hothfield reservoir. ABC should be avoiding intensification of areas shown on the reservoir failure map – which includes S11 and 11a

Response: *The reservoir at Hothfield was designed and constructed to protect Ashford from the effects of flooding. There is no evidence to suggest that the reservoir structurally unsound.*

Issue - Heritage

784 note that the site lies on River Terrace Gravels and Alluvium with potential for early prehistoric remains. Significant archaeology could be dealt with through suitable conditions on a planning approval.

Response: *Policy ENV15 of the draft Plan deals with archaeology. Policies ENV13 of the draft plan will ensure that heritage assets are given full consideration in the assessment of any development proposals for the site. Policy ENV15 deals with archaeology and will ensure that the issue is dealt with when detailed development proposals are considered.*

MC19 – Policy S12 Former K College

Representations have been received from the following consultees:

785 KCC	366 Sport England
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Summary of representations:

Issue – loss of playing fields

366 refers to previous statement that development that would either involve the loss of the playing field or prejudice the use of the playing field would be strongly resisted by Sport England and generally this remains the case. However Ashford is now in the late stages of finalising a Playing Pitch Strategy which was developed with support from the National Governing Bodies and Sport England in line with its most recent guidance. Subject to the formal adoption of this document, Sport England would withdraw its objection to these site allocations, as the development is likely to meet Exception 1 of its playing pitch policy.

Response: Noted. At the time of writing progress with finalising the Playing Pitch Strategy remains ongoing.

Issue - Miscellaneous

785 text should be corrected to read 'in accordance with recommendations from Kent County Council Highways and Transportation'.

Response: Agreed. Amend final sentence of paragraph 4.134 to read “[..] with recommendations from ~~Kent Highway Services~~ Kent County Council Highways and Transportation.”

MC20 – Policy S13 Former Ashford South School Jemmett Rd

No representations received.

MC21 – Policy S14 Park Farm South East

Representations have been received from the following consultees:

1179 Persimmon Homes & Taylor Wimpey	635 Environment Agency
786 KCC	724 Kingsnorth PC

Summary of representations:

Issue: Site capacity

1179 welcomes the change to the policy and supporting text acknowledging that the site has an 'indicative capacity of 325 dwellings'. Note that the supporting text continues to state that the site 'depending on size and layout considerations and could achieve net residential densities to reflect the adjoining development at Bridgefield'. Having regard to the densities achieved at Park Farm East/Bridgefield, and to the emerging technical assessments and master planning for the site, reiterate that the site is likely to have a capacity of approximately 375 dwellings. Whilst consider that the capacity of the site will be greater than the 325 dwellings identified in the Policy, given that this is an 'indicative' capacity, and noting that the policy requires a flexible, design led approach to be taken to the assessment of the site capacity, do not request that this figure is increased. However, reserve the right to comment further on this during the examination if necessary.

Response *Following representations made at the Regulation 19 consultation in 2016 the Council has increased the dwelling capacity of the site to 325 and amended paragraph 4.149 refers to “development with an indicative capacity of 325 dwellings” and it is noted that the respondent does not seek an increase in that figure.*

Issue : Access

1179 consider the requirement for the Finn Farm Road Access Arrangement undeliverable and unnecessary. Confirm that the thin strip of land is in the ownership and control of Network Rail and preliminary feedback indicates that they would not be minded to hand over control of the land necessary to deliver the Finn Farm Road Arrangement. Further, topographical surveys confirm that, given the level difference from the existing Finn Farm Road junction to the site, the creation of an additional vehicular access at this point would have substantive land take implications, which would reduce the development capacity of the site and would also negatively impact upon the character and appearance of the site and wider landscape.

It should be noted that at present there is no dedicated footpath or segregated cycleway provision along Finn Farm Road on the approach to the bridge arrangement from the west of the A2070. In particular, the bridge that crosses the Railway Line is very narrow and does not have sufficient width to accommodate a safe pedestrian/cycle route, which is part of the reason why the existing three-way traffic signal arrangement is in place as the available road width is too narrow for two vehicles to pass simultaneously. Argue there is no technical impediment to providing the primary vehicular access from Park Farm East. As proposed previously and supported by the highway authority at that time. Recent discussions with the local bus operators, Stagecoach, and the Kent County Council Public Transport Coordinator identified that an appropriate means of access to the Site by public transport would be via a more direct route, i.e. via the Park Farm East development. This would ensure that Policy S14 (c) can be achieved.

Also note that preliminary pre-application discussions with the Council have acknowledged the logic of an access arrangement from Park Farm East in urban design and layout terms. This arrangement would help tie the site into the recent development to the north, as well as providing a clearly legible route through to the additional site allocation to the south of the Site (Policy S45, Land South Brockman’s Lane).

Whilst the flexibility written into the policy will provide a basis for an alternative site access arrangement to be secured these points demonstrate that the policy requirement for the Finn Farm Road Access Arrangement is undeliverable and unnecessary. It is thereby unjustified and ineffective, making the Policy unsound as currently worded. In addition, even if Compulsory Purchase powers could be used to facilitate the provision of the new access, and it is not clear that this would be possible, this would lead to a delay in the delivery of units, again undermining the Local Plan housing trajectory and the housing delivery strategy. Given the above comments we consider Policy S14 preference for the Finn Farm Road Access Arrangement is contrary to NPPF paragraph 177 which states “It is equally important to ensure that there is a reasonable prospect that planned infrastructure is deliverable in a timely fashion”.

786 The County Council has been made aware of an issue in providing an access directly off the existing signal controlled junction at Finn Farm Road. Network Rail has claimed they have ownership of the embankment between the road and the proposed development site, but no evidence has been provided to show ownership. If it is found that the embankment in question is owned by Network Rail, then the Borough Council in its role as Local Planning Authority will need to potentially use its CPO powers if discussions with Network Rail do not lead to an amicable solution through voluntary acquisition.

Response *The Council is still convinced that the optimum access solution for this site involves a direct access off the Finn Farm road access arrangement. The development of this site presents the opportunity to improve what is currently an unsatisfactory junction arrangement. The Plan as drafted includes the requirement to “investigate the potential to provide a primary vehicle access from the traffic controlled junction at Council at Finn Farm Road” so that this issue can be addressed as part of the development of a detailed development proposal for the site. The Council is aware that more detailed discussions are currently underway regarding the development of the site.*

Ashford-Hastings Railway Line – New Rail Station

1179 note that despite the land for a new rail station being secured through the Section 106 attached to the Park Farm East Planning Permission, this has not been realised since Network Rail consider the operation of an additional rail halt unviable. There has been no evidence provided in support of the Local Plan which demonstrates that Network Rail's position has changed. Whilst it is noted that Policy S14 provides flexibility concerning the provision of the rail halt, we nevertheless consider that it is not appropriate for this requirement to be simply 'rolled forward' into a new plan without evidence that it is deliverable during the plan period i.e. that it is supported by Network Rail. Failure to provide this evidence would make the policy 'unjustified' and also contrary to NPPF Paragraph 177. We also note that uncertainty regarding this requirement could lead to a delay to delivery of units, again undermining the Local Plan housing trajectory and the housing delivery strategy.

Response *The Council's position is that there is provision to be made for a rail halt at Park Farm and this has been a long standing requirement that has been set out in previous versions of the Local Plan. This requirement is reflected in the revised policy S14.*

Issue : Site boundary

1179 Insert Figure 2 unnecessarily cuts off development on the Site's western boundary which is developable for which there is no justification.

Response: *Figure 2 of the local plan is a diagrammatic indication of the main Plan proposals. The diagram indicatively shows the identified development area of policy S20.*

Heritage This site has been subject to preliminary archaeological evaluation, which located prehistoric activity that may be associated with the prehistoric and Roman remains found at Park Farm East to the north. A phased programme of archaeological mitigation will be required. Significant archaeology could be dealt with through suitable conditions on a planning approval.

Response: Any development proposals for this site will have to comply with policy ENV15.

Issue : Flooding

635 welcomes the recognition that the eastern part of the site lies within Flood Zones 2 and 3 which are generally unsuitable for more vulnerable development. Point out that Flood Zone 3 is unlikely to provide a suitable location for sustainable drainage. The area of Flood Zone 3 could aid the conveyance of water and provide open space.

In addition as this site is adjacent to the Ruckinge Dyke, a main river any development at this site must respect the river corridor through provision of a suitable buffer zone of at least 8m from the top of the river banks. Rivers form an important wildlife corridors and ecological networks which Section 117 of the NPPF specifies need to be preserved and restored.

Response Noted.

Support

1179 in-principle support for the site allocation.

724 support the additional housing proposed to 325 provided that cramming does not result. We support the provision of landscaping throughout the development, not just at the boundaries and the extension to the Green Corridor Action Plan.

786 supports the additional text after paragraph 4.152 and requests that the Transport Assessment includes details of measures proposed to mitigate any impact of development on the Public Right of Way and Cycle Route Network, taking opportunities to improve the sustainability and connectivity of the proposed site.

Response : support noted.

MC22 - Policy S15 - Finberry North West

Representations have been received from the following consultees:

725 Kingsnorth Parish Council	1025 Carter Jonas
787 Kent County Council	1056 Church Commissioners for England

Summary of representations:

Issue – connectivity

1056 suggests that wording should be amended to add underlined “incorporated within or connected to the Green Spine”

Response: *Bridleways within the green spine will not stand in isolation from the wider bridleway network. Details of the connection of bridleways into the Green Spine will be dealt with at planning application stage.*

Issue - Employment land provision

1056 is concerned that a number of elements raised in the previous consultation, specifically related to the site boundary, the scale of residential development/need for employment land, and the inclusion of Live/Work units, have not been addressed by the main changes. Proximity of Waterbrook and competition with the employment land identified for Finberry North West is an issue. The enlarged area of employment land at Waterbrook would be sufficient to replace the proposed employment land at Finberry North West, in a location that is easily accessed from Finberry by sustainable and active transport modes. Consider that the addition of new employment development at Waterbrook is a more suitable location and removes the need to allocate land for employment uses at Finberry North West. The land that has been identified for employment space should be converted to residential use and brought forward as part of an agreed masterplan

Response: *Disagree. The nature and scale of the employment offer being proposed in the Local Plan 2030 at Finberry is deemed appropriate in the circumstances. The employment provision is also seen as an important place making element of the development as a whole. It will provide variety and activity, particularly during the daytime, and in doing so will complement the range of other uses being proposed at the centre of the development. The central theme of the development is to create a 'sustainable village' and appropriately scaled employment provision is considered an important component of realising this ambition.*

Issue - Live Work

1056 notes that it is not clear where the Council has identified a need for more Live/Work units in the borough or this location. The reference to the need to provide 10 Live/Work units should be removed.

Response: *Live/ Work units have been successfully delivered elsewhere in Ashford and such uses provide much needed variety of employment space, mainly catering for the smaller scale business 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 accords 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).*

Support 725 and 1025 support the new indicative capacity of up to 300 dwellings on this site. 787 supports the amended text.

Response: *Support noted.*

MC23 - Policy S16 Waterbrook

Representations have been received from the following consultees:

1027 Carter Jonas	727 James Ransley
1057 Church Commissioners for England	1116 Aviva
789 Kent County Council	636 Environment Agency
914 GSE Waterbrook Ltd	109 British Horse Society

Issue – land use

1116 objects to this amended employment allocation as Sevington East is the preferential location for further commercial uses in the Borough. Waterbrook is remotely located and has a lack of existing infrastructure to support further development. Sevington should be the preferred location for employment uses, especially following the development of the Sevington West land.

1057 considers that this additional land could support a mixture of uses including retail. This would help to support the proposed employment and residential uses.

Response: *Waterbrook is a strategic site which is in a sustainable location which is well served by existing infrastructure. Its location close to other commercial and residential uses means that this is the preferred location for mixed residential and commercial use.*

Issue - Housing numbers

914 contends that the site is capable of accommodating 400 houses and request that the indicative number in the policy is raised to reflect this.

Response: *The indicative capacity of 350 dwellings is considered appropriate. No change required.*

Issue - Flood risk

636 notes that the amended Policy Map to include the additional area (shown in blue) includes a substantial area within Flood Zone 3 and is adjacent to the East Stour. .

727 argues that the increase in development quantum at this site and the proposed allocation itself is unsound as it is inconsistent with Planning Policy Guidance on flood risk and there is insufficient evidence to justify the allocation. The revised Environment Agency climate change allowances for flood risk assessments (February 2016) and the Planning Policy Guidance on flood risk mean the relevant design event for flood risk assessments should be 1 in 100 years plus 105% climate change allowance (relevant allowance for the south east). Moreover, sites downstream should be tested to a design flood level which includes the need for an emergency drawdown of the reservoir to add to flood levels (PPG Reference ID: 7-014-20140306). Flooding extents upstream of the Finberry site are likely to be underestimated. In addition, Waterbrook site is downstream from Aldington Reservoir and

the residential area is almost entirely on the reservoir failure map, contrary to PPG
Reference ID: 7-006-20140306.

Response: *The reservoir at Aldington was designed and constructed to protect Ashford from the effects of flooding. There is no evidence to suggest that the reservoir is structurally unsound. The policy acknowledges that some of the site falls within the flood zones, and accordingly it states that a flood risk assessment should be carried out to inform the development on the site.*

Issue - Ecology

636 for wildlife and ecological reasons any development at this site must respect the river corridor through provision of a suitable buffer zone of at least 8m from the top of the river banks in accordance with Section 117 of the NPPF.

Response: *The 8m buffer lies wholly within the flood zone which means that the built footprint will not extend into this. In addition, under the terms of the Water Resources Act 1991, and the Land Drainage Byelaws 1981, the prior written consent of the Environment Agency is required for any proposed works or structures, in, under, over or within 8 metres of the top of the bank of a main river. Therefore this repetition is not required in Policy.*

The policy text refers to the East Stour river corridor and the need for proposals to demonstrate how they will enhance this corridor. This position is further reinforced by other policies within the local plan, specifically Policy ENV1 which requires that proposals safeguard features of nature conservation interest and, conserves and enhances biodiversity making specific reference to Local Wildlife sites.

Issue - PROW and equestrian access

789 Changes will directly affect Public Bridleway AE667A and Public Footpath AE345. Bridleway AE667A links to Restricted Byway AE250 and forms part of the strategic green corridor around the South of Ashford. Consideration should also be taken to locate these routes within green open space to help mitigate the impact of the development.

109 believes that the byway AE350 needs to be screened and consideration needs to be given to the safety aspects of the equestrian route through the site.

Response: *Noted. These considerations will be dealt with through the development management process.*

Issue - Heritage

789 The site contains multi-period remains. A phased programme of archaeological mitigation will be required. Significant archaeology could be dealt with through suitable conditions on a planning approval.

Response: Noted

Support

1057 and 914 support this Main Change. 1027 welcomes the identification of Finberry in part e) of this policy.

Response: Support noted.

MC24 - Policy S18 William Harvey Hospital

Representations have been received from the following consultees:

13 Nick Lester-Davis	835 Jane Struthers
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Summary of representations:

Issue - Transport and traffic

13 believes that requiring additional car parking will exacerbate existing congestion. Public transport should be encouraged. 835 argues that there should be shuttle buses between the train station and the hospital.

Response: KCC Highways and Transportation support the proposed allocations in the Plan. Transport modelling work has been undertaken which 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. Public transport is encouraged with regular and frequent buses between the train station and the hospital.

Miscellaneous

835 the hospital is already so big, the houses aren't needed for hospital staff.

Response: This main change does not allocate housing on the William Harvey Hospital site.

MC25 - S19 Conningbrook Phase 2

Representations have been received from the following consultees:

3 Donkersley	674 Kennington Community Forum (Christine Woolgar)
28 Lee Robinson	722 James Ransley

505 Kent Downs AONB Unit (Katie Miller)	791 KCC
581 Neil Firman	872 Jacqueline Firman
585 Kent Wildlife Trust (Vanessa Evans)	1040 Wye with Hinxhill PC (V McLean)
637 EA (Jennifer Wilson)	1123 Network Rail (Elliot Stamp)
673 Samantha Firman	

Summary of Representations – Main Issues

Issue: Infrastructure

722 The expansion of sports and recreational offer at the Julie Rose Stadium to meet the growing population and supporting a hub approach to sports facilities, as recommended in the Councils Draft Playing Pitch Strategy 2017-2030. The Lawn Tennis Association is undertaking high level feasibility work for new facilities at the stadium. Such an approach could also help rationalise car parking for the various sporting facilities to deal with the overflow parking. There is a need to manage overflow parking from large events at the Julie Rose Stadium. The vehicles that would need to be accommodated at the Premier Food Car Park by an overflow car park would likely exceed given some spaces would need to be retained for employees. There was a failure to secure a footpath/cycleway over this land with the landowner.

674 There is an inability to secure an infrastructure to suit the planning when the volume of housing is an unknown quantity. Additional dwellings increase the volume of traffic on local and main roads, emergency vehicle delays, the need for local ‘health’ services, the need for educational services both primary & secondary, the need for transport services and a the strain on the sewage network.

28 This site aligned with other potential options being proposed along the Willesborough Road access and utilities would struggle to find a safe and sustainable solution.

Response: *It is accepted that any new development will affect existing infrastructure. Therefore, providers are consulted at all stages of the plan making process to avoid not be able to cope with the pressure of a new development in the area. The provision of overflow parking will be addressed as part of the Conningbrook masterplan.*

Issue: Railway Crossing

1123 There is concern that the proposed development could have significant impact on the usage and safety of the at-grade pedestrian crossings situated within the area. The site should 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 PRoWs as far as possible. There will need to be an engagement with Network Rail’s at an early stage in order to discuss the proposed plans for a footbridge and the required consents /licenses that would need to be agreed.

1040- wish to see policy amended to require that new pedestrian and cycle routes are to be provided throughout the development with connections to existing routes, the PRowS running through the site should be maintained and incorporated within the development, where possible and that proposals must investigate, and deliver, if feasible, a pedestrian and cycle bridge crossing over the railway line to replace the existing at-grade pedestrian crossings, and maintain the PRow and provide access to the proposed primary school within Policy area S2, and other destinations.

Response: *Additional supporting text as part of MC25 addresses the issue of the provision of a new pedestrian / cycleway crossing of the railway in co-ordination with Site S2. No change required.*

Issue: Sewage Treatment

3The Sewage Treatment plant is causing a nuisance with smell pollution. The only chance of the growing level of smell pollution dissipating away from existing housing, is via the Stour Valley to the NE of the site, from the usual SW prevailing wind. The only escape route for the smell is being blocked which will only escalate the problem, with the worsening smell pollution.

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: Flood Risk

722 Three of the four proposed flood storage areas are within Flood Zone 3 and there is a fundamental concern that the storage areas would be inundated with river water when expected to store surface water. This could lead to flooding on site and has potential to increase flood risk downstream.

Response: *Flood prevention measures will form part of the masterplanning of this site.*

Issue: Landscape and Biodiversity

673 The increase from 120 to 170 dwellings will have serious environmental consequences on the country park and the wildlife in the surrounding areas. It will also impact on local roads and M20 j10/10a and health services.

505- The retention of the row of mature trees that are located on the western boundary of the proposed extended site is important. To help filter views from the Kent Downs AONB of the proposed allocations to the west on this site and the proposed allocation-Policy S2. A requirement would help ensure compliance with the NPPF, in paragraph 115 and Section 85 of the Countryside and Rights of Way Act 2000.

581 The increase in dwellings to 170 from 120 has a major impact on the overall balance between development and the country park. It will have a detrimental impact on the environment and wildlife of the park. It will also have an impact on development S2 and the surrounding areas. The original number of dwellings (120) should be retained.

585 Mitigation measures such as translocation of species necessary as a result of Phase 2 has been questioned and whether this been accounted for within Conningbrook CP. 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. Failure to do this will not meet the legal requirements for mitigation for protected species. The retention and continued management of areas set aside in Conningbrook to accommodate additional homes and increased recreational use would need to be ensured.

637 This site is adjacent to the Great Stour, a main river therefore any development at this site must respect the river corridor through provision of a suitable buffer zone of at least 8m from the top of the river banks. Rivers form an important wildlife corridors and ecological networks which Section 117 of the NPPF specifies need to be preserved and restored.

872- The increase from 120 to 170 dwellings is inconsistent with the original proposal. It will have a significant impact on the Country Park and environment. Combined with Policy S2 there will be a detrimental effect on local services and highways. The original plan of 120 dwellings should be retained.

Response: *Criterion f) acknowledges mitigation measures that are needed on this site to ensure that all species are protected. No change required.*

Issue: Heritage

791- This site has high potential for significant Palaeolithic remains, some of which may be of regional or national importance. Although the site has been subject to quarrying, recent geoarchaeological assessment has demonstrated the survival of Pleistocene deposits. Intensive geoarchaeological assessment works are needed to clarify archaeological mitigation, including potentially preservation in situ and detailed post excavation assessment works of past informal collections of Pleistocene fauna and stone artefacts. This site also contains the remains of Conningbrook Manor, which includes a designated historic building. A phased programme of archaeological mitigation will be required. Pre-determination evaluation would be necessary to determine where development is possible within site.

Response: *Noted*

Issue: Strategic Park

585: 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 master planning 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.

Response *This allocation is clear that it is additional to the original allocation at Conningbrook, as its name implies. The site does however fall within the boundary of the Conningbrook masterplanning Area, and therefore, has been considered from the earliest planning stages. It should also be noted that, as the Local Plan should be read as whole, Policy ENV1 will apply to any development coming forward on this site.*

MC26 – S20 Eureka Park

Representations have been received from the following consultees:

945 Millwood Designer Homes	638 Environment Agency
845 Sandyhurst Lane Residents Assoc	605 Thompson
841 D Porter	417 Thomas Bates & Son
675 Kennington Community Forum	687 Quadrant Estates and Trinity College
792 KCC	16 Jane Hart
695 Boughton Aluph and Eastwell PC	6 G Hillier
582 Kent Wildlife Trust	2 Graham Skinner

Summary of Representations – Main Issues

Issue - Scale of residential development/mix of uses

945 notes the indicative capacity of the site has increased from 300 to 375 dwellings. Eureka Park is located close to Lenacre Hall Farm and is also on the edge of the built up area.

841, 845 oppose the proposal to increase the number of dwellings from 300 to “an indicative capacity of 375 dwellings” on the grounds firstly, that this represents a 25% increase in the proposed number of dwellings. If the build density is to be proportionately increased to build on the same area as the 300 previously proposed, the plots will be 20% smaller, which implies a much lower quality of housing and is contrary to paragraph 4.230, or will result in a serious reduction in communal facilities. In addition, whilst the change to paragraph 4.230 is welcomed, the increase in housing density will make it significantly less likely that the development will not “have a significant adverse effect on the AONB”, the 25% increase in the number of dwellings will produce a commensurate increase in vehicle movements putting even greater pressure on the local road infrastructure. Vigorously oppose any temptation to allow any vehicular access from Sandyhurst Lane which would be contrary to para. 4.232 and to Policy TRA7 in the draft Local Plan. The SLRA should be active participants in any master-planning group (para 4.226).

6, 675 object to the change in the volume of housing from 'up to 300 units' to 'indicative capacity of 375 units' due to the inability to secure 'infrastructure' to suit the planning when the volume of housing is an unknown quantity.

695 note that the number of new dwellings has been increased from 300 to "an indicative capacity of 375 dwellings" plus 20 hectares of commercial development. While a sizeable proportion of this strategic site falls outside of Boughton Aluph and Eastwell Parish, the Parish Council has serious concerns about the impact of the development on local infrastructure. Would encourage the development at Eureka Park to be an exceptional site or exemplar which recognises its position within a rural parish and proximity to the Kent Downs Area of Outstanding Natural Beauty (AONB). Development must preserve the parkland setting and biodiversity area within Eureka Park with easy access to the surrounding countryside. We welcome the commitment to a lower average density of residential development and hope this will not be eroded by the 25% increase in the number of new dwellings. In addition, there must be adequate spacing and screening between commercial and residential development to minimise the visual impact of businesses on adjacent homes. Rather than pattern book red brick, high quality design and innovation is encouraged in the development proposals taking inspiration from the award winning architecture of Goat Lees Primary School. Quality of life for existing and new residents would be significantly enhanced by the resurfacing of the adjacent section of the M20 motorway. Welcome an inclusive period of consultation.

417 object to increase in the allocation from 300 units to an indicative capacity of 375, plus 20 hectares of employment. No evidence that this increase in provision within the existing allocation is viable and deliverable. It is dependent upon a masterplanning exercise, transport impact assessment and likely impact upon the Warren Local Wildlife Site. The policy also assumes that Ashford Golf Club i.e. land to the south, will relocate. No such proposals have come forward and the assumption that this land will form an extension to Eureka Park is without foundation. In the absence of such a relocation there are potential conflicts of access between the proposed development and the Golf Club. Long term development southwards towards the M20 and Ashford will also breach the new policy SP7 that seeks to resist coalescence or merging of two or more separate settlements, or the erosion of a gap between settlements, resulting in in the loss of individual identity or character. Object to the proposals to increase provision of new dwellings at Eureka Park and call for this to be distributed more widely in the Neighbourhood Plan area of Boughton Aluph and Eastwell where it will not breach to objectives of new policy SP7.

2 believes that this allocation will result in problems with the current water course to Eureka Lake and have a detrimental effect on the varied wildlife habit, and that increasing the number of house to 375 would just make matters far worse.

687 proposes an increase in the residential capacity of the site to an indicative capacity of between 500 and 670 dwellings with a commercial land allocation of between 15 and 20 hectares.

Response *The Local Plan has to make housing allocations to meet an overall housing requirement that is established in the Strategic Housing Market Assessment. The up-date of the SHMA established the need to find an additional dwellings and consequently the Council identified a number of additional housing sites for allocation in the Proposed Main Changes*

that were the subject of public consultation in July 2017. As part of that process of identifying additional housing numbers the Council has re-assessed the potential capacity of a number of the larger new allocations that were part of the Regulation 19 consultation in June 2016. The Council's view is that there is the potential at the Eureka Park site to accommodate an additional 75 dwellings, increasing the site capacity to 375 units. In addition, there is a specific that detailed development proposals for the site shall be designed and implemented in accordance with an agreed masterplan that will ensure all the relevant matters are assessed in the determination of the final layout and design. The Council has to ensure that there is a reasonable balance of uses on this strategic site. It is clear that the site could accommodate additional residential development but this would impinge on the available land for employment. The proposed mix of uses proposed in the draft policy represents a reasonable balance of employment and residential uses.

The site adjoins the Ashford Golf Club course but the policy S20 does not cover that area. The development of the S20 is not dependent upon the Ashford Golf course site.

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.

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.

Issue - Heritage

792 This site lies within an area of high potential associated with prehistoric and Roman activity. Iron Age and Roman cremations have been found to the north along with ditches and pits suggesting considerable activity. A valley with stream runs through the site and this would have been favourable situation for prehistoric settlement. A phased programme of archaeological mitigation will be required. Pre-determination evaluation would be necessary to determine where development is possible within site.

Response *Policies ENV13 of the draft plan will ensure that heritage assets are given full consideration in the assessment of any development proposals for the site. Policy ENV15 deals with archaeology and will ensure that the issue is dealt with when detailed development proposals are considered.*

Issue – biodiversity

582 notes the text references to the need to take into consideration the Local Wildlife Site of The Warren in S20 Eureka Park. However, it is concerning that with more dwellings this will further increase the recreation pressure that this site is already under as a result of nearby development. Would value some further details being written into this policy, in particular a commitment to measures being implemented on the ground at The Warren to assist in reducing the potential negative impacts; and also wording to make it clear that financial support must be provided through legal agreement for future management of the site.

In addition to this, it is of particular importance that this policy makes it clear that sufficient on-site alternative greenspace will be provided for the needs of the new residents, in order to reduce any increased visitation pressure on this Local Wildlife Site. By increasing the dwelling numbers, it will increase the “squeeze” that this proposed site is subject to and therefore make it more difficult to provide this recreation land and almost entirely isolates this Local Wildlife Site from any ecological network in the surrounding area. It is imperative that any development needs to be designed with the need for green infrastructure in mind, in order to avoid complete ecological isolation of this site of county importance.

638 highlights that there are a number of ponds on this site. In the event that development plans threaten these ponds, measures to ensure mitigation or compensation should be included. Section 117 of the NPPF specifies that Priority Habitats should be protected by the planning system and, in the Natural Environment and Rural Communities Act 2006, Ponds are classified as Priority Habitat.

16 points out that if the footpath which leads from Trinity Road down to the fishing lake, becomes an alleyway between houses, then the area will have lost a valuable amenity and wildlife too will suffer.

Response *The Main Changes proposed to the policy in section (f) require the detailed masterplan for the site to have particular regard to ecological mitigation and enhancement measures at the Warren Local Wildlife Site and throughout the whole site. The policy also requires a comprehensive landscaping and open space strategy that would incorporate a linear park based around the existing lake.*

Issue - Access and transport

695 welcome the emphasis on ensuring that traffic movements resulting from development proposals are sustainably managed and the commitment in paragraph 4.234 to providing a Transport Statement/Transport Assessment in accordance with Policy TRA8. This is critical as the new development will put c.750 additional cars plus commercial vehicles on already stretched local roads. Respondents to the Parish Council's Neighbourhood Plan household survey 2016 flagged more than 9,000 specific traffic and road safety concerns. In addition, when considering the commercial development on the site it is essential there is adequate parking provision so that past problems are not repeated with the loss of residential parking amenity at Goat Lees due to an overspill of cars belonging to workers at the Eureka Business Park onto residential roads. Bus service schedules and connections will need to be improved if workers are going to be able to commute to work at Eureka Business Park by public transport.

605 is concerned that the new development will create significant new levels of traffic on the A251 Trinity Road impacting negatively on the existing residents access to and from their properties through the only route available to them. The Traffic Impact Assessment – Summary Report by Amey on the surrounding junctions confirms e.g. the A251 Faversham Road/ Trinity Road junction is still expected to suffer from significant queuing and delay as it will be over capacity. Mitigating actions need to be provided so that existing and new residents, as well as local businesses, aren't adversely impacted by traffic congestion.

687 suggest that in terms of the adjoining golf course land, the reference in para 4.237 to constructing access roads to the site boundary is removed.

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*

In terms of the provision of necessary access roads being constructed to the site boundary to potentially access adjoining land in the future, this is considered to be a reasonable requirement to ensure that future access is available.

Support

792 supports the addition of new paragraph 4.234 and would ask that the Transport Assessment includes details of measures proposed to mitigate any impact of development on the Public Right of Way Network, taking opportunities to improve the sustainability and connectivity of the proposed site.

695 welcomes the recognition of the proximity of the Kent Downs AONB at the site's western boundary and the inclusion of a generous landscaped buffer to reduce the impact and provide some visual separation to adjacent properties on Sandyhurst Lane and would expect this commitment will not be eroded by the requirement to build 25% more new homes.

687 supports the wording changes to policy S20.

Response *support noted.*

MC27 – Policy S21 Orbital Park

Representation has been received from the following consultee:

793 KCC (Council)	
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Summary of Representations – Main Issues

793 states that the Transport Assessment would need to include details of mitigation of any impact of development on the Public Right of Way and Cycle Route Network, improving sustainability and connectivity of the site.

Response: noted. With regard to the content of Transport Assessments (TAs), Policy TRA8 states that the Council will liaise with the relevant authorities with regard to the content of TAs on a site by site basis.

MC28 – Policy S23 Henwood Industrial Estate

Representation has been received from the following consultee:

639 J Wilson (Env Agency)	
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Summary of Representations – Main Issues

639 welcomes the recognition of the need to protect groundwater in para 4.260

Response: Support noted.

MC29 – Policy S24 Tenterden Southern Extension Phase B

Representations have been received from the following consultees:

1154 Sarah Beecham	1017 David and Linda Warner
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1014 Patricia Vernon	1023 Katrina Jenkins
1045 Weald of Kent Protection Society	985 Julian Cheese
842 Morphew Park Estate	794 KCC
1030 Nicola Chappell	1166 Judith Ashton Associates
513 Alan Bates – Tenterden and District Residents Association	583 Kent Wildlife Trust
339 Albert Poole	1018 D R Brooker
1026 Margaret Crawford	390 Steven Croke
261 Peter Mills	186 Douglas Smith
114 Natural England	549 Tenterden Town Council
1012 Albert Poole	277 Peter Mills

Summary of Representations – Main Issues

Issue – Phasing

1045 believes that the site should only be developed once TENT1A is complete

513 question whether the Phase B site will actually become available for building before 2027 owing to a punitive "overage clause" affecting the entire Phase B area. No planning appears to have commenced for Phase B site to date despite Phase A being well advanced.

Response: *The supporting text of the policy at paragraph 4.267 is clear in the aims for the phasing of the two developments to be correctly timed to ensure a cohesive development is created and that Phase B is not occupied without clear structure and links to the Town through phase A. The removal of the requirement that all of Phase A must be complete before Phase B is 'commenced' has been removed, however Phase A must be complete prior to 'occupation' of the Phase B housing.*

The landowners have not notified the council of any concerns relating to the deliverability of the site prior to 2027 and have presented representation to the contrary which state the site is immediately available.

Issue – Additional numbers not required in Tenterden

549 does not support the increased number of homes and wish it to return to 175.

1154 Tenterden is a rural town, with most local jobs in low quality retail and tourism, plus some farming. A bypass would kill the town centre, and destroy a lot of what makes

Tenterden an attractive place to live. It will become a dormitory town for Ashford. It would likely also impact severely on the tourist trade, which for Tenterden is significant.

1154 fails to see how this increase in numbers is necessary, given that more than this number of houses has been allocated to Tenterden via the Tilden Gill site, due to be built out within the next 5 years. Tenterden is already carrying an extra burden of houses for the borough - 20% over original allocation - and will not get infrastructure to support those for several years, given section 106 restrictions. Any further requirements would be better placed in or around Ashford not in rural villages on the North Downs where there are the employment and transport links to service the extra population. Believe this was Ashford's original plan, when the bulk of building was allocated to Ashford for these very reasons.

513 In 2007 Tenterden and District Residents Association drew up detailed "Criteria for Selection of Development Sites" which were used to evaluate 23 sites under consideration at that time. These criteria remain valid today and include that allocated housing development should be within easy walking distance of the Town Centre (900 metres / 15 minutes) ie lateral development rather than the linear development.

Response: *Please see response to MC4 regarding the overall Borough requirements and the role of Tenterden as the second largest settlement in meeting these requirements. The Main Changes include a number of new and amended site policies across the borough, and the majority of housing numbers are being met in and around Ashford. The appeal permission of the windfall site at Tilden Gill has been considered within the Local Plan Housing Trajectory.*

Issue – Infrastructure Provision

549 requests that section 106 payments from developers should provide for additional GP and healthcare facilities, increased primary school capacity, High Street improvements to streamline traffic flow without letting through traffic dominate the use of the High Street as a local facility, extra provision for parking near the High Street, by introducing decking in one or more existing car park and improved sports facilities.

1154 objects to the lack of infrastructure provision including capacity and quality of roads, public transport, school capacity, affordable housing and jobs.1014, 1018, and 1045 believes that no more development should take place in the town without a major review of the traffic and highways situation.

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.

Issue – Community facilities on-site

549 a low-cost workers car park could be included provided measures were introduced near the town centre to deter workers parking in residential areas.

1154 No amenities were included in Tent 1a as they were to be given space in Tent 1b, Under the plan changes, there are now extra houses where those amenities would go due to increased density.

Response: *The provision of on-site community facilities is referenced within paragraph 4.269 and para 2 of the policy where it states that this issue will be dealt with by the masterplan/development brief. This community infrastructure required under the relevant Local Plan COM policies will include public open space, play and recreation and the site policy is worded flexibly so that there will be opportunity to promote more strategic requirements, such as the 'workers' car parking, through this masterplanning stage.*

Issue – AONB Setting, Green Corridors and LWS AS05

583 disappointing that no reference has been made in the policy wording of this allocation to green corridors or the nearby Local Wildlife Site, despite increasing the proposed allocation by fifty dwellings since the last consultation.

114 the amended text makes reference to the setting of the High Weald Area of Outstanding Natural Beauty (AONB). It would also appear appropriate for reference to be made within the supporting text that in addition to respecting the setting, development of the site should deliver landscape enhancements in accordance with the AONB Management Plan and other policies within the Local Plan.

513 Areas that are important to the setting of the town together with "green lungs" need to identified and protected. The character of the entrances to the town (gradual transition from countryside to town) should be retained. Contiguous development that avoids major access road construction should be given priority. Green walk-through routes should be encouraged. Green lungs should be incorporated into housing developments, retaining and sustaining existing natural features.

Phase B of Tent1 possibly has capacity in terms of land area for 50 additional houses (225, not 175 as originally proposed) but this would mean 5 acres less open space – no green lung? in the development, smaller gardens and a continuation of the dense housing of Phase A rather than a gradual transition to the countryside. This should be rejected.

Response: *The requirements for the 'green' linear area of open space which connects with the first phase of development is set out in paragraph 4.264 and policy criterion e). It is the Council's position that the location of the additional areas of informal green space, such as*

green corridors (or lungs), which will be required as part of this development, will be addressed as part of the masterplanning/development brief and more detailed design stages. This is clear in this regard at para 4.269 and the policy itself.

The requirement of a substantial woodland buffer and wetland of at least 20m on the southern and eastern boundaries (where the LWS woodland is located) is already required by the policy under paragraph 4.265 and second paragraph of the policy. However, with regards to the Local Wildlife Site AS05, it is agreed that this should be specifically mentioned within the supporting text of the policy and will be inserted into this paragraph – Proposed edit.

4.265 “..joining the existing woodland to the east (including Local Wildlife Site AS05), and effectively [...]”

The site itself is not within the AONB designation, so reference to the AONB within this policy and supporting text is referring to ‘setting’ of the AONB, which is made clear in Policy criterion f) and within paragraph 4.265 already. This paragraph also details the requirements which would be expected with regards to the landscaping in this area. Development within and adjoining the AONB with specific mention of management plans is further referenced in policy ENV3b (Landscape Character and Design within the AONBs) and its supporting text and it is therefore not necessary to duplicate this within the Tenterden site policy itself.

Issue – Archaeology

794 A large number of metal finds (PAS) have been located on this site, mainly medieval or post medieval. This may have been the site of a medieval fair and a main routeway extends through the eastern part of the site. A phased programme of archaeological mitigation will be required. Pre-determination evaluation would be necessary to determine where development is possible within site.

Response: *Noted. Policy ENV15 – Archaeology, will be applied to all applications.*

Issue – Omission site in Appledore Road/Woodchurch Road

261, 277, 1154, 1030, 1018 all comment that this alternative ‘Omission’ site is not suitable for development. 1026 would wish to see this area proposed a designated public open space.

1166 promotes the inclusion of this additional site in the ALP.

Response: *This site is not a proposed Local Plan housing site allocation and therefore no response is required to the objections. Representations relating to the promotion of new ‘Omission sites’ are dealt with in Appendix 2.*

Support 186, 261, 339, 1014, 1017, 1023, 985, 1030, 1012, 1018, 1026, 390 supportive of the main change and housing numbers currently allocated to Tenterden on TENT1B and do not wish to see any further changes or new site allocations.

842 supports all the Main Changes to policy.

794 supports additional text relating to historic and existing routes at criterion (b)

Response: Support noted.

MC30 – Policy S25 Pickhill Business Park

Representations have been received from the following consultees:

398 Robert J Sancto	58 C & E Holmes
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Summary of Representations – Main Issues

Support 398 and 58 support this change.

Response: Support noted.

MC31- Policy S26, Appledore The Street

Representations have been received from the following consultees:

795 KCC	473 Southern Water
640 Environment Agency	354 The Boyd Family

Summary of Representations – Main Issues

Issue – Heritage

795 - The site lies within the north western extent of the historic town of Appledore. There are no indications of archaeology on this site but there is some potential in view of the known early medieval and medieval activity in the general area. Significant archaeology could be dealt with through suitable conditions on a planning approval.

Response – Noted

Issue – Sewerage and WWTW

473 - SW request the following criterion to be included within the policy:

f) Provide a connection to the nearest point of adequate capacity in the sewerage network is provided, in collaboration with the service provider.

g) Provide sufficient distance between Appledore wastewater treatment works and sensitive land uses, such as housing, to allow adequate odour dispersal on the basis of a noise, vibration and odour study to be undertaken in consultation with Southern Water.

Response ABC agrees with the request for criterion f) to be inserted to the policy as a minor change which would be consistent with other site policies within the Local Plan.

Add criterion

f) Provide a connection to the nearest point of adequate capacity in the sewerage network is provided, in collaboration with the service provider.

With regard to criterion g), This MC has allocated an additional area further from the WWTW – not closer.

Issue – Ponds

640 notes that there are a number of ponds in this site. In the event that development plans threaten these ponds, measures to ensure mitigation or compensation should be included. Section 117 of the NPPF specifies that Priority Habitats should be protected by the planning system and, in the Natural Environment and Rural Communities Act 2006, Ponds are classified as Priority Habitat.

Response – Criterion e) of the policy contains a specific reference to the ponds and the requirement for these to be utilised as an informal nature reserve area, in addition to a biodiversity survey being undertaken prior to development.

Issue – Deliverability and capacity of the site

354 The majority of the Main Changes expansion area of S26 is in Flood Zone 2 and 3 and adds just under .3ha (.7acres) outside the flood plain. When considering the full allocation area and the likely SUDS requirements for 20 dwellings (SUDS required to be outside the flood zone) it is unlikely that 20 dwellings can be delivered on this allocation without a form a development which may be detrimental to the conservation area.

The need to accommodate the existing PROW will add further constraint. One of the sites listed in the current land supply (small extant permissions) is the field to the north 16/01328/AS (4 dwelling net additions) on Magpie Farm. Superimposing this permission on the S26 allocation to illustrate design issues which may impact delivery on of 20 dwellings this site. Whilst Magpie farm is fully outside the conservation area, the design statement for this development highlights design issues applicable to the S26 area. A higher density development in this part of the conservation area would not be in keeping with the area and would be detrimental to the sense of openness from The Street.

From Land Registry details, the two main fields within the area allocated in S26 are shown to be in separate owner. Unless there is a robust joint delivery and promotion agreement there may be legitimate concern about capacity to deliver a sensitive layout and design across multiple ownerships.

Response – The supporting text and policy itself identifies the developable area of the site is at around 1.2ha (not the whole site area of 1.52ha). The policy is flexible in its allocation, and the capacity is clearly defined as ‘up to’. If the design of the development, once the detailed layout is prepared, does not allow for a design to meet the requirements of the policy itself, and the other policies that apply, then capacity will be reviewed at this stage, but a development of under 20dph is considered to be low, not high as suggested, and therefore appropriate for the village location and Conservation Area.

The permission of the site to the north does not alter the suitability of the allocation, in fact, it makes development of this area more suitable, which is one of the considerations taken when enlarging this site allocation boundary.

At Magpie Farm, there is a large pond within the site to the north which has reduced the capacity, and the developer has promoted a particular executive style of home. The site allocation will require a mix of housing sizes and types to be provided, and therefore the density is expected to be considerably higher.

The site was submitted jointly by the two landowners (one of which is the Parish Council). All site and deliverability discussions have taken place with both landowners and there is no concern that the site, or part of the site, is not deliverable.

Support

795 support changes to Part c of Policy regarding PRoW.

Response: Noted.

MC32 - Policy S27 – Biddenden, North Street

Representation has been received from the following consultee:

797 KCC	
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Summary of Representations – Main Issues

Support

797 supports the additional text at criterion c

Response: *Support noted.*

MC33 – S28 Charing Northdown Service Station

Representation has been received from the following consultee:

134 V Glass	
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Summary of representations:

134 concerned about the capacity of local infrastructure including road network, water supply, doctors surgery, schools and bus and train 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.

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.

MC34 - Policy S30 - Egerton, Land on New Road

Representations have been received from the following consultees:

798 KCC	318 Egerton Parish Council
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Summary of Representations – Main Issues

Support 795 KCC supports the amendment to Policy S30 (d) and would like to highlight the location of the regionally important Greensand Way, promoted walk, which runs adjacent to this proposed site, the County Council would therefore wish to ensure that policy protects the route within open space.

Response: Noted. Amend criteria d. to state “[..] connections to existing rural routes, **including the Greensand Way**, **facilitating connections to the countryside**, Harmers Way and local services;”

318 Egerton Parish Council has been gifted a plot of land which abuts the proposed New Road development site at its northern apex. Egerton Parish Council has earmarked this additional site for development in respect of accommodation to meet the needs of older and disabled local residents. Discussions with ABC and KCC have already confirmed that in principle this would be appropriate development in addition to that on the New Road site. Access to and from the additional site would be need to be via the New Road site. Consequently, the following wording should be used to reflect this change in circumstances:

"d. Provide new pedestrian and traffic routes throughout and through the development to provide access from the adjacent land abutting the Northern section of the site, to connect with existing rural routes; and facilitate safe access between Harmers Way, New Road and local services."

Response – Noted. *The Council is unable to support the request to require the site to provide a vehicle connection to an additional site through this policy without agreement of the landowner due to viability issues. This issue should be addressed with the landowners of both sites, and can be dealt with through the Neighbourhood Plan process when considering allocating the site to the north.*

MC35 – Policy S31 Hamstreet, Land North of St Mary’s Close

Representations have been received from the following consultees:

53 David White	533 Jean Gilbert.
61 Orlestone Parish Council (Susan Stiffell)	799 Kent County Council
115 Natural England (Sean Hanna)	879 Emma Haffenden
472 George Alan Hurst	998 LRM Planning Limited (Owen Jones)
481 Paul Alan Hurst	

Summary of Representations – Main Issues

Issue – housing numbers

61 promotes a “Plan for Hamstreet” as an alternative approach to development in the village. Concerned that more dwellings than allocated in policy will be delivered, and allocation of sites for 150 in many communities would appear excessive and unreasonable. 998 argues that wording should be changed from “up to 80 dwellings” to “an indicative capacity”.

Response: *Noted. Hamstreet is one of the more sustainable settlements in the borough and is therefore designated as one of three Rural Service Centres in the Local Plan. It enjoys a full range of local services, including a primary school, post office, shop, public house, and a regular train service to Ashford and Hastings. The Strategic Objectives of this Plan as set out in Policy SP1 include the focusing of development in the most sustainable locations, an objective which complies with the NPPF. Site allocations have been focused here and in other equivalent settlements in a proportionate manner and taking into consideration capacity.*

The Main Change included a text change to “an indicative capacity”. No further change required.

Issue - Local needs provision

61 argues that there should be a proportion for local needs with local connection test.

Response: *The Local Plan should be read as a whole document. Policy HOU2 of the Local Plan makes provision for local needs housing.*

Issue - Drainage and flooding

53, 472, 481 point out that the gradient differential between site and St Mary’s Close (1.8m) could cause flooding, with runoff from site an existing issue.

Response: *Despite the gradient, development does not necessarily increase flood risk. The Council’s Sustainable Drainage SPD notes examples in which flood risk can diminish as a result of development. However, such concerns are noted and fall to be considered at planning application stage. Policy ENV6, which requires that all new development contribute to an overall flood risk reduction will apply.*

Issue - Residential amenity and privacy

472 and 481 state that a buffer is needed to protect residences in St Mary’s Close from sound and noise.

Response: *Criteria d of the Policy requires that development here be designed and laid out to take account of the residential amenity of neighbouring occupiers. No change required.*

Issue – Highways

53, 472 and 481 state that the impact of this development will make Ashford Road unsafe. 533 requests that developers of all sites in Hamstreet work together to coordinate approach to traffic alleviation on Ashford Road.

Response: *Noted. 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.

Issue - Ecology, landscape and nature conservation

115 request that the word “fully” to be added in criterion k) concerning potential impacts on the Dungeness, Romney Marsh and Rye Bay SSSI to ensure “...how they can be avoided or fully mitigated”. 998 believes that there is a need for clarity in criterion k) since a full EIA may not be required based on the results of screening.

481 notes that there is an abundance of wildlife on the site while 53 considers that development will erode the rural nature of the village.

Response: *The Local Plan should be read as a whole, and the protection of biodiversity is addressed in Policy ENV1. However, it is accepted that a minor clarification as to the nature and degree of acceptable mitigation is appropriate on those development allocation sites where a significant impact on one or more European Sites is possible. ‘Adequate’ is considered to embody a more appropriate and reasonable level of scrutiny than ‘fully’ and has been accepted for inclusion in the policy wording of other Local Plans.*

With regard to the statutory screening phase, it is accepted that the current wording fails to appropriately reflect the methodology of this.

Policy to be amended “provide an Environmental ~~Impact~~ Assessment Study to address any potential adverse impacts [...] and how they can be avoided or adequately mitigated”.

Issue - Phasing

998 object to the deletion of the requirement for phasing.

Response: *Noted. The phasing requirement was changed to accord with the Housing trajectory.*

Issue - Railway crossing

998 considers criterion h still too restrictive given developer lack of influence over third party land, and the fact that Network Rail may actually prefer the closure of the crossing.

Response: *This criterion, which requires developers to work with relevant authorities to enable improvement of the pedestrian crossing as part of improving pedestrian routes to the village centre, is not considered unduly onerous and is line with criteria for other site allocation policies in this Plan which require similarly coordinated approaches to the delivery of improvements to pedestrian linkages across ownerships.*

Support

799 supports this Policy as a result of the additional texts in criteria (f) and (h). 879, in comparison to Site S57, supports this site which provides “care for the elderly, nature based activities, football field which is highly visible and accessible for the community can use, traffic and road safety by virtue of some form of traffic calming near the school.”

998 supports that there is no reference to the care home facility within the Policy, thereby providing flexibility.

Response: Support Noted.

MC36 – S32 Hamstreet: Land at Parker Farm

Representation has been received from the following consultee:

116 Natural England (Sean Hanna)	
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Summary of Representations – Main Issues

116 states that text is amended to, "...how they can be avoided or fully mitigated"

Response: *The Local Plan should be read as a whole, and the protection of the biodiversity of the national and internationally protected sites is addressed in Policy ENV1. However, it is accepted that a minor clarification as to the nature and degree of acceptable mitigation is appropriate on those development allocation sites where a significant impact on one or more European Sites is possible and thus that an EIA is required as part of planning applications.. 'Adequate' is considered to embody a more appropriate and reasonable level of scrutiny than 'fully' and has been accepted for inclusion in the policy wording of other Local Plans. It is also noted that the current wording fails to appropriately reflect the staged methodology of the statutory screening process.*

Policy to be amended "provide an Environmental ~~Impact~~ Assessment Study to address any potential adverse impacts [...] and how they can be avoided or adequately mitigated".

MC37- Policy S33 High Halden, Hope House

Representations have been received from the following consultees:

663 Blanchard	678 High Halden Parish Council
751 Elizabeth Buggins	800 KCC
1177 Natalie Edwards	508 Ringrose
159 Sally Sullivan	32 Paul Buggins
12 Gardner Crawley	

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Summary of Representations – Main Issues

Issue – Object to increased housing in village

12 and 1177 believe there is already sufficient housing in High Halden. 32 objects to the increase in site size as not appropriate for High Halden. 663 and 678 refers to a petition against this development (see planning application 17/00952/AS) signed by over 80 residents. 751 believes that the increase from 25 to 35 does not seem justified and will make it harder to integrate this new estate into the village.

159 states that High Halden has been allocated too many houses by ABC while 678 accepts the difficulties Ashford Borough Council will face in trying to achieve national objectives but expects it to act fairly - High Halden is one of 39 parishes in Ashford Borough, i.e. approx 2.5 % of the total, yet taking 8.8% of the additional 1250 units of housing included in the Main Changes document. This is unfair and will put a disproportionate pressure on the local infrastructure.

Of the 3 specific sites proposed in the Main Changes document, the Parish Council would comment that S58 and S60 are the more acceptable. However, both risk narrowing the space between High Halden and the adjoining village, thus compromising the separate identity of these settlements. They are also 'ribbon development', which is contrary to the NPPF. Social cohesion would be adversely affected by these isolated settlements, which are also counter to policy HOU4.

508 and 678 consider the plan is not sound because it is not justified in relation to other plans for the village area. There are already 2 significant approved planning developments in the village 25 houses on the former Kent Highways Depot site (16/01198/AS) and 13 houses/flats on the Precinct 13 site (17/00538/AS).

Response: *The concerns relating to the increased housing numbers and current applications in the village are noted. However, of the total borough need, the Local Plan allocates 135 dwellings within the Parish of High Halden. This is consistent with the overall strategic approach to housing delivery for the borough in SP2 and is a very small portion (less than 1%) of the overall borough requirements of 13,969 homes. It should also be noted that Policy S60, Pope House Farm, although in the Parish, is not within the settlement and is in fact adjoined to the settlement of St. Michaels, and Policy S58 is also located outside of the built settlement, on the boundary with Bethersden village.*

Issue - Housing need

508 there is a need for bungalows for expanding elderly community and small homes for local families.

Response: *Policy HOU18 requires developments of 10 or more to provide a suitable range and mix of housing types to deliver homes which meet local needs.*

Issue – Infrastructure capacity

159, 508, 678 and 1177 believe the existing infrastructure, primary school, doctors, hospital, drainage, roads and traffic to be inadequate.

663 and 678 notes that flooding and sewage are a major issue, the situation of many listed buildings surrounding the development have not been considered sufficiently, the varied wildlife will be under threat, the topography of the field means many residents will have their human rights affected. Many comments on the last consultation have not been considered in the revised plan.

663 The plan is not effective because of concerns regarding land drainage issues that will occur because of development of the agricultural land. It is clay and drainage is poor.

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.

Issue – Highways, Access and footpath

508 - The plan is not effective because it does not take into account traffic safety issues at this site. There is currently no footpath from the site and the proposals for a footpath to the bus stop raise several safety concerns. 678 and 663 considers that the site should be rejected due to inadequacy of sight lines for access. 751 considers that the exit onto the A28 which will already be a challenge will be far worse with the addition of a further 10 houses.

800 Kent Highways cannot support a reduction in the speed limit along the A28 past the site to 30mph, as there is no frontage development along this part of the A28. The site promoter has however now submitted an outline planning application for the site and proposes suitable visibility splays for the current speed limit of 40mph. A dropped kerb pedestrian crossing is being promoted as part of this application. A footpath is only required between the site access point and Oakland, as a footpath in a westerly direction will not connect with anything and encourage pedestrians to cross where visibility is restricted.

Response: Kent Highways advice is that a safe access and visibility splays can be achieved and footpath connections will be provided towards St.Michaels.

KHS additional comments about removal of speed reduction requirement is noted. This issue can be dealt with at the planning application stage (which has commenced at the time of writing).

Issue – Heritage

800 the 1st Edition Ordinance Survey map indicates the site of one or more former farm complexes. These 19th century or earlier buildings may still survive on site although extensive plough damage has probably occurred. A phased programme of archaeological mitigation will be required. Significant archaeology could be dealt with through suitable conditions on a planning approval.

Response: Noted. Policy ENV15 – Archaeology will be applied to all applications.

Issue – confines of the village

32 the separate piece of work to review, establish and consult on the "confines of the village" must be allowed to complete before this or other similar policies are allowed to be progressed. Whilst ABC may see the establishing "confines" as "informal". Strongly believe it must be a formal part of the planning process as it would provide all villages, and their inhabitants, with clarity in establishing both the existing confines of their village and how and where the village might change in the future. High Halden for example, should not continue to expand in a linear way along the A28 otherwise very soon there will be a continuous string of development from Tenterden through St Michaels to High Halden, contrary to other proposed policies. It could be argued, and potentially supported by residents, that the village of High Halden needs a clear "centre" and is able to develop in a controlled manner away from the A28

Response: The aim of Policy SP7 – Separation of Settlements is to ensure that settlements do not coalesce, and applications which propose to 'join up' settlements through ribbon development will be resisted on these policy grounds.

The village confines exercise which has commenced in this settlement, is separate from the Local Plan process, but is still given weight as a material consideration when determining planning applications, along with the local plan policies for residential windfall developments HOU3a and HOU5. However, it should be noted the National Planning Policy Framework and the principle of sustainable development must be given relevant weight and therefore the confines exercises cannot be adopted as policy as it may restrict growth in areas which are not considered to be isolated and countryside locations.

MC38 – S34 Hothfield, East of Coach Drive

Representations have been received from the following consultees:

5 Brian Merritt	790 Crabtree and Crabtree (Hothfield) Ltd
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421 Hothfield Parish Council (Batt)	878 Rachel Heron
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Summary of Representations – Main Issues

Issue - Ecology and impact on designated sites

878 states that policy does not mitigate sufficiently for pedestrian/car traffic on Hothfield Common SSSI, and protected tree line and protected species here and in land adjacent to site. In addition, allocation contradicts several national policies regarding rural development.

Response: Supporting text and policy already reference the importance of the SSSI, and the text has been further clarified with regard to mitigation requirements on the SSSI, particularly relating to increased recreation pressure. This is in accordance with the avoid-mitigate-compensate hierarchy set out in paragraph 118 of the NPPF and Policy ENV1 of the Local Plan. The Council has also clarified the role of the BOA and its guidance within the Policy. The Council is satisfied that this allocation is in accordance with national policies on rural development.

Issue - Access

421 requests that traffic calming introduced to Station Road and at junction with A20 in event site is built out. 790 seeks access point to be moved further to the north along Station Road to a gap in the woodland.

Response: Noted.

Increase in allocation number

790 In light of allocations along A20 not in proportion with surrounding settlements, seek increase in numbers on this site to 70 units given size and capacity, and need for Council to meet OAN.

Response: Noted. The capacity of this site is based in part on its sensitive environmental context, as is made clear in the wording of the supporting text and Policy. No change required.

Support

5 supports the change given its retention of the tree line and recognition of the importance of Hothfield Common SSSI. 790 supports the allocation given proximity to Hothfield as a service centre.

Response: Support noted.

MC39 – Site 35 Mersham Village Hall

No representations received.

MC40 – S36 Shadoxhurst Rear of Kings Head PH

Representation has been received from the following consultee:

887 Shadoxhurst Parish Council (J Batt)	
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Summary of Representations – Main Issues

Issue – Infrastructure

887 contends that this allocation ignores community value, heritage and local village amenity. There is a limitation on existing unites networks; drainage and water and no mobile phone access in most areas within the village. There has been a removal of open space, no retail space or FP facilities.

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.

MC41 – S37 Smarden Land adjacent to Village Hall

Representations have been received from the following consultees:

1185 Gladman Developments (Mat Evans)	755 Crabtree and Crabtree (Hothfield) Ltd
138 Smarden Parish Council (Smarden Parish Council Sarah Ellison)	

Summary of Representations – Main Issues

Issue – update to reflect appeal decision

1185 states that the site is now consented for up to 50 dwellings under appeal reference APP/E2205/W/16/3159895. The plan should be changed to reflect this.

Response: *In advance of construction it is not considered necessary to alter the site policy. The Housing trajectory reflects the appeal decision.*

Support

755 and 138 find the main change to be sound.

Response: *Support noted.*

MC42 – S38 Smeeth Land south of Church Road

Representations have been received from the following consultees:

1203 ABC Jane Martin	1080 Smeeth Parish Council (Sue Wood)
1091 Allegiance Holdings Ltd	685 Alan Fineman
690 Messrs Barden and Mansfield	864 Charlotte Rosslyn
801 KCC (Council)	587 Mary Hedges
597 Hurrell	163 Barry Lightfoot
105 British Horse Society South & East Kent Committee (Barbara Winham)	108 Gary Winham
96 Graham Lilley	64 Graham Lilley
51 Angela Williams	45 John David Jamieson

27 Emma Matthews	734 Mike Courage
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Summary of Representations – Main Issues

Issue - Housing

1203 Of the housing needs survey 2011 for the area, almost no local needs homes have been delivered from those identified and yet market homes continue to be developed adding inward migration.

864 This is a large scale development in relation to the number of existing houses and population of Smeeth. There is awareness of the need for housing, but if developed there is a concern that the policy for using brownfield sites in Ashford should take precedence over rural farmland. This will impact the residents of Smeeth and Brabourne quality of life negatively leading to further unnecessary risks and dangers. There needs to be a more balanced response to local housing needs taking into account other proposed and intended large scale developments close to and affecting Smeeth.

96- There is a concern over the amount of housing after being previous proposed 20-25 houses but now there is a proposal of 35 houses. There should be no more than an additional 10-20 houses. There should be affordable housing for first time buyers in the village but there is no guarantee this will happen and they should not be 'estates'.

51 - Policy HOU4 para 5.39 says : The scale and quantity of housing development proposed should not be out of proportion to the size of the settlement and services present. This proposed development site does not adhere to of the number of dwelling or the scale, whether it is a site within the Plan or a Windfall. 685 considers the additional houses proposed for the site is excessive.

Response: *The overall housing needs for the borough and distribution of development, is dealt with by strategic Policy SP2 (Please see responses to MC4). The local plan proposes the delivery of 14,029 dwellings over the plan period, with the majority of these dwellings planned within the or on the edge of the Ashford urban area (and on Brownfield land where this has been identified as available and suitable). This site is considered suitable for the quantum of development proposed, there are no constraints to the deliverability of the site and it is located adjoining a sustainable settlement with good access to local services.*

As the site will deliver 35 homes, Policies HOU1 (Affordable Housing) and HOU18 (Range and Mix of Housing) will be applied to the site proposals so 40% of the development will be a mix of affordable housing offer and house types to suit a range of housing needs.

Policy HOU2 allows for the development of local needs housing (this is different to usual affordable housing) where a specific need is identified, on an exception basis. Local need housing comes forward on exception sites, it is not allocated in developments.

Issue - Infrastructure

108, 685 There is no infrastructure to accommodate the amount of additional residents. The two schools are oversubscribed, the nearby Sellindge Surgery is at capacity and the village roads are narrow and busy with traffic. The William Harvey Hospital is part of the East Kent NHS Trust which was recently reported as having the longest A&E waiting times in the Country.

45 states that the nearby primary school is virtually full and the local doctor's surgery is struggling to cope with its workload. The village of Smeeth is totally unsuited to further development of this size due to all roads into/out of the village being narrow and busy.

587 a connection to the Mains Drainage and Sewage infrastructure will be expensive and difficult as the existing main sewerage pipelines are some distance away. This area of Southeast Kent already suffers from freshwater supply problems with lower flow rates and pressures for 10 years. This village has suffered 2 major water pipe failures within the last 2 months (suggesting the infrastructure is old and possibly unable to cope with even more demand). Also at times there can be drought conditions with restricted water supplies, so more housing will only put additional pressure on an already overloaded system.

51 The proposed number of dwellings on this site would overwhelm our rural village, because dangerous traffic chaos and pile more numbers into the already creaking, overfull amenities. There is insufficient sewerage infrastructure to serve the proposed development so Church Road would have to be closed to enable pipe laying which will cause traffic problems 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. Insofar as sewerage is concerned, Southern Water have raised this as an issue and have requested the inclusion of a criterion requiring that a connection be made to the nearest point of adequate capacity. No concerns have been raised by water companies in respect to water supply.*

Issue - Highways

45 The access/entrance/exit would be on to an extremely busy, narrow country road and opposite/adjacent to existing playing field entrance.

1080 Should the development go ahead it is considered essential that extensive traffic calming measures be introduced rather than the removal of existing pinch points.

864 The protracted building works and infrastructural changes during the completion of the housing development will cause considerable stress on the existing single track roads to and from the site and add to the danger of Church Road which currently struggles to accommodate traffic during peak times. The proposed site is also opposite the playing field, 100 metres away from the local primary school, approximately 50 metres from a blind 90 degree bend and extremely close the Church Road and The Ridgeway junction.

163 The Council has already stated the Church Road "narrows to a single lane at points close to this site" and yet still plans that the access point to/from this site should be very close to this narrow. The proposed access point is almost opposite the entrance to the community children's' playground and the entrance to the playing field car park. The proposal significantly increases the risk of road accidents on Church Road and also jeopardises the safety of children and other pedestrians using the community recreational facilities.

685, 597, 587, 105, 864, 1080, 51, 108, 27 and 734 argue that more cars pose a safety risk. Access to Church Road could be dangerous as it will be opposite the Playing Field entrance and within 15m of the junction between Church road and The Ridgeway. Church Road and The Ridgeway are narrow, subject to speeding, have a number of pinch points and have high usage and narrow footpaths which causes a danger to road users, cyclists, equestrians and pedestrians. They would be unable to handle the additional traffic.

597, 105, 864, 1080, 51 believe that additional traffic on the A20 will cause dangerous queues. Taking into account policy TRA7, it is impossible to see how the Church Road site is viable or sustainable.

597, 1080, 864, 96, 734 state that the volume of traffic in and out the village applies to 30 to 60 vehicles in and out of the development directly onto an already dangerous road with numerous pinch points and directly opposite a village recreation playing field. This will be exacerbated by nearby developments at Otterpool.

Response: *The concerns about highway provision and traffic are noted. KCC Highways have reviewed the proposed allocation and have not raised concerns about highway capacity, safety or visibility splays and have not objected to the delivery of this scale of development on the site.*

Issue - Public Footpath

801- There is no objection to the increase in site size and number of dwelling but consideration should be given to Public Footpath AE411 and measures to improve path to help mitigate increased use.

Response: *Footpath improvements request noted. It is considered more appropriate to deal with this issue at the Planning application stage, using the requirements set out under Policy TRA5 – planning for pedestrians.*

Issue - Impact on landscape and natural environment

734 This would cause considerable disruption, noise and increased road danger during construction.

864 is concerned that the additional houses would alter the character of the village in Smeeth.1091 also argues that the development does not readily integrate with the built form of the village and creates a new skyline feature of built form that will be intrusive in the countryside and cause harm to the openness and rurality of the village.

734, 51 state that noise and light impact from the development will be unacceptable in what is a rural setting close to an AONB. 685 feels the location is a quiet, agricultural site of natural beauty. The extra houses would cause noise and visual disturbance.

Response: *A suitable condition can be imposed on any permission to mitigate the impact that construction works and associated infrastructure delivery will have on the area.*

The NPPF, Policy ENV4 of this draft Local Plan and the Dark Skies SPD seeks to preserve areas unaffected by light pollution and reduce the amount of light pollution from development in general. Whilst the village of Smeeth does not fall within close proximity to the area of the borough with the lowest levels of light pollution, development will nevertheless be subject to the requirements set out in these policies.

Residential development is not a significant generator of noise and the site is set within an area that contains existing residential development and large agricultural structure.

Whilst any development would be visible, development on this site would not unduly impact on the character of the area due to the surrounding uses and Policies such as ENV3a – Landscape Character and Design, and ENV5 – Protecting important rural features, will ensure that the design proposals coming forward demonstrate particular regard to the landscape characteristics of the area.

Issue - Heritage

801- The site lies in an area of small outcrops of River Terrace Gravels, which have potential for Palaeolithic remains. An Iron Age coin was found on the site and further prehistoric remains could survive on site. Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval.

Response: *Noted.*

Issue - Drainage and Flood risk

734, 51 the site is at risk from flooding and has flooded in the past. There is no main drainage to the West of “Peelers”, and would therefore need to be provided to this site.

Response: *The land is not at risk from river or sea flooding, and any surface water collection on the site can be mitigated through drainage improvements which will need to be provided as part of the development. See policy ENV9 – Sustainable Drainage which requires all new developments include appropriate drainage systems.*

Issue - Alternative Site promotion

1091 promotes the land at Calland, off Plain Road Smeeth for development.

Response: *Omission sites are responded to in Appendix 2 of this Report.*

Issue - Support

690 Support; there are no constraints to the development of the site.

Response: *Noted*

MC43 – S40 Woodchurch, Lower Road

Representations have been received from the following consultees:

1104 Lorenzo Castelletti	1016 Woodchurch Parish Council (Rob Woods)
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Summary of Representations – Main Issues

Support the removal of this site

1016 following the first tranche of housing submissions in 2015, pleased that the Borough Council listened to arguments and has deleted this site from the Plan.

Response: *Noted.*

Issue: Landscape and Infrastructure

1104 Green spaces, rural landscapes, wildlife areas and the unique character of the rural village should be protected. The green belts between settlements should be protected, including around the Ashford urban area so that urban sprawl is prevented. There are concerns of infrastructure, services and amenities which are becoming overstretched. This could cause a detrimental effect to the lives of a rural parish.

Response: *Noted (This is a duplicated representation – please also see responses to MC44)*

MC44 – S41 Woodchurch, Front Road

Representations have been received from the following consultees:

1105 Lorenzo Castelletti	1016 Woodchurch Parish Council (Rob Woods)
554 Stafford	

Summary of Representations – Main Issues

Issue - Landscape

1105 Green spaces, rural landscapes, wildlife areas and the unique character of the rural village should be protected. The green belts between settlements should be protected, including around the Ashford urban area so that urban sprawl is prevented.

554- The views of locals need to be preserved since the site is difficult being on a rising bend and elevated above Front Road.

Response: *Noted. Whilst any development would be visible, development on this site would not unduly impact on the character of the area due to the surrounding uses. Furthermore, Policies including ENV13 – Conservation and enhancement of Heritage Assets, ENV3a – Landscape Character and Design, ENV5 – Protecting important rural features, and SP7 Separation of Settlements, will ensure that the design proposals coming forward demonstrate particular regard to the landscape characteristics of the area and conserve and enhance the Conservation Area, as set out within the policy wording and supporting text of the policy.*

Issue - Infrastructure

1105- There are concerns of infrastructure, services and amenities which are becoming overstretched. This could cause a detrimental effect to the lives of a rural parish.

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.

Issue - Site constraints

554 There is an inability to acknowledge the vendor that has reduced the size of the site and placed restrictions on dwellings built. There is no controlling interest in a broad strip of land through the middle of the site, restricting any dwellings to two blocks either side. The site can only successfully support six market homes, not eight.

Response: *The Council has noted the land registry update and has amended the policy site boundary to reflect this legal land ownership position in this consultation.*

If the landowner wishes to retain part of the site as an access to the field beyond, the Council is unable to influence this decision at this stage. However, if when application is received the layout of the proposed development does not meet the requirements of the existing or emerging site policy and/or other relevant design policies the council will be able to suggest changes or refuse the application on those grounds.

Issue - Housing Mix and local need

1016 Affordable, low cost or smaller footprint housing should be of priority due to the demographic statistics of the village. The imbalance is considered to be detrimental to the future sustainability of the village, its infrastructure and the view of the residents. There should be a reduction in the maximum of six market homes to achieve targets and provide right type of accommodation. Instead, increasing target to eight homes, offering a mix of smaller, terraced and semi-detached properties. Planning Inspector previously recommended that the Council should be clearer when defining what should be built in the village. The village does not need large market homes therefore the wording should be reviewed.

Response: *The provision of housing mix and range in Woodchurch is addressed in new policy S62 Appledore Road Woodchurch for 30 homes, and by the requirements of Policy HOU18 which requires a range and mix of dwelling sizes and types on sites over 10 dwellings.*

The policy has been amended to include details of design and layout, as recommended by the appeal Inspector. This includes paragraphs relating to the connections to the countryside and openness with views between buildings and varying plot sizes, proximity to road frontage, scale and massing, storey heights, conservation area setting and current built form and landscaping. This is very detailed for site policy wording, and covers all the aspects relevant to this site. The Council cannot through policy specifically limit or design the scheme in any greater detail than is currently proposed, due to the requirements for flexibility and presumption in favour of sustainable development. It is for the planning application stages to deal with the more detailed design aspects of any scheme coming forward.

MC45 – Policy S41 – Chilham, Mulberry Hill

Representations have been received from the following consultees:

337 D Cawdron	965 Doug Marriott
446 Colin Litten-Brown	1164 Justine Becci
873 Jane Martin	1180 Edwin Roording
916 Brian Davis, Ms Maureen Taylor & Mr Richard Andrews	1181 Jennifer Roording

Summary of Representations – Main Issues

Issue - Over-development in Old Wives Lees

337 considers Old Wives Lees to have had its fair share of development.

Response: *This site is proposed for two dwellings only. Such a quantum of development is considered appropriate to its setting and to represent only a minor addition to this settlement.*

Issue - Poor infrastructure provision

337 and 446 mentions that there is a poor water supply within the area. 446 highlights that there is no doctor's surgery in Old Wives Lees, nor a regular bus service. 337, 446 and 965 state that there are no footpaths between Chilham and Old Wives Lees. 965 stresses that there are a number of commuters that walk down Mulberry Hill early morning and late afternoon in order to get to the Chilham train station, where there is inadequate parking due to an oversight by ABC in the Car Parking Management Plan. The lack of carparking space is further pressurised by local employees at the adjacent industrial estate arriving for 06.00 start precluding train passengers.

Response: *This site proposes only two dwellings, which in the Council's view could be accommodated without significant additional pressure placed on local infrastructure.*

Issue - AONB intrusion

873 feels that no development should be allowed within the AONB. 965 appreciates that the NPPF does allow for properties in the AONB that are of outstanding design and quality, but feels that sentences included within S41 effectively rule out future development in Old Wives Lees. These include: 'must not harm the immediate or wider setting', 'should be located on the eastern side of the site', 'Chilham is particularly important in heritage terms' and 'design proposals must indicate how the immediate setting will be enhanced'.

Response: *As the site is only proposed for two dwellings, it is unlikely that it will have a significant impact on the AONB. The policy stipulates that the development will have to sensitively consider the setting of the AONB, and that the properties will have to be of exceptional quality in order to comply with this Policy and with paragraph 55 of the NPPF.*

Issue: Wrong type of housing

873 believe that although this site is in keeping with rural developments in terms of scale, the market requires local needs housing and not expensive market homes.

Response: *In order to provide a wide range of housing in the Borough the Council considers there is a need to provide for a limited housing which is of an 'exclusive' nature, at the top end of the housing market, in the Plan.*

Issue - Amendments to policy

916 requests a number of changes to the wording of paragraph 4.398 in particular and queries the justification for inclusion of para 4.399 on the basis that there are actually few

heritage assets within close proximity of the site, whilst the Conservation Area is at least 500m away.

Response: *The Council consider the siting provisions in para 4.398 are required due to the potential for impact on the AONB, whilst the reference to heritage assets in the supporting text relates to the large number of designations within close proximity in the local village of Chilham and should therefore remain.*

Support

446 believes the plan to be sound.

1164, 1180 and 1181 believe that the Council have made sustainable and considerate decisions with regards to Old Wives Lees and are therefore pleased with the process that has been undertaken.

Response: *Support noted.*

MC46 – Policy S42 St. Michaels, Beechwood Farm.

No representations were received against this Main Change.

MC47 – Policy S44 Westwell Watery Lane

Representation has been received from the following consultee:

466 Kent Downs AONB Unit	
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Summary of Representations – Main Issues

Issue Site access and impact on AONB

466 - The new access is preferable but original objection to the site stands.

Response: *Noted.*

MC48 – Policy HOU1

Representations have been received from the following consultees:

Summary of Representations – Main Issues

1186 Gladman Developments (Mat Evans)	974 Tetlow King Planning Ltd (Elaine Elstone)
1149 MPD Trust (DHA Planning Emma Hawkes)	982 Carol Procter
1159 Tim Piper	731 Lee Evans Planning (Nathan Anthony)
1028 Carter Jonas (Conchie)	888 Shadoxhurst Parish Council (J Batt)
1031 Home Builders Federation (Mark Behrendt)	834 Jane Struthers
1041 Wye with Hinxhill Parish Council (V McLean)	347 David Lock Associates (Katie Christou)
1043 Weald of Kent Preservation Society (Peta Grant)	

Issue – overall quantum of affordable housing

1186 - The percentages prescribed in policy HOU1 would lead to the delivery of circa 2,200 affordable dwellings over the plan period. The last assessment of affordable housing need, taken from the 2014 SHMA, indicates an annual net need of 368 affordable dwellings per annum, or 6,253 over the plan period 2013-2030 (when accounting for rounding errors). There would clearly therefore be a very considerable shortfall in meeting the affordable housing needs of the plan over its life time. Of this broad figure Table 34 of the 2014 SHMA indicates that 2,635 dwellings will be required in the rural area. This further highlights the need for additional housing in the rural areas.

1149 and 1159 consider the affordable housing in rural areas should be limited to 30%.

982 - This is the one type of housing we really do need. Many local people in Shadoxhurst cannot afford to rent or buy local housing, despite the complicated array of so called 'affordable housing products' on the market. Believe you should have an actual target for affordable homes i.e. actual numbers. Why do you not have a target number?

Recent research by CPRE shows a pattern emerging where developers claim, through a viability assessment, that they can no longer build the requisite proportion of affordable homes on their development. In these cases, you say you will consider flexibility on a case by case basis. Do you have a public record available to show the number of times this is happening, and which developers are involved? It seems we have no guarantee that we will ever get the affordable houses we need. Yet how many planning permissions are originally granted, at least in part, because affordable houses are offered? As market forces are failing

to meet local people's needs, why are you not building council houses? The new housing white paper says it supports council house building.

834 - feels that there should be no affordable housing policy in the Local Plan and believes this is the main problem in stoking demand for housing in this district. The more affordable our housing is, the more people will want to buy it and the more that will need to be built to continue this vicious cycle. It should be for the markets to decide what housing is needed and where.

Response: *This response to 1186 is considered under the representations and responses to draft policy SP2 (MC4) in this document although it is noted that the objector does not appear to question the affordable housing percentages proposed in the policy.*

The Council's viability evidence has comprehensively tested the potential viability of different amounts and tenure splits for affordable housing provision across different parts of the borough. The objector presents no evidence as to why affordable housing proportion in the rural area should be limited to just 30%, given this would be a reduction from the adopted policy requirement of 35%. No change is needed.

The Local Plan doesn't identify an overall target as it would have different targets for different areas and some schemes won't be eligible to deliver affordable housing on account of their size. The scale of need is also likely to be variable over the Plan period as house prices and household incomes vary. It is acknowledged that to meet the whole affordable housing requirement indicated in the SHMA would require either much higher affordable higher proportions on development sites (unviable) or massively higher amounts of development (unsustainable and undeliverable in practice).

The position proposed by 834 is wholly unsound and would clearly not meet the requirements in the NPPF for the Plan to address the different housing needs of the borough.

Issue – Thresholds for affordable housing

1031 - The threshold for requiring affordable housing contributions is not consistent with national policy. PPG clearly sets out in paragraph 031 (Ref ID: 23b-031-20161116) that contributions should not be collected on development of 10 or fewer homes where the gross floor space is no more than 1000 sqm. 1031 also expresses concerns that the rates of affordable housing being proposed in conjunction with other local plan policies could lead to some key sites being unviable leading to questions of the deliverability of the housing requirement. Whilst the additional work is noted, this new evidence suggests that some allocations will have weaker viability resulting from the proposed changes. To make the policy sound there may be a need to scale back contributions on specific allocations and potentially across Ashford Town Centre.

731 - Draft Policy HOU1 should be reworded to make reference to schemes of '11 or more dwellings'. The Written Ministerial Statement 2014 sought to remove the burden upon small scale residential development schemes by excluding them from a requirement to provide, or contribute financially towards, affordable housing provision. It states "for sites of 10-units or

less, and which have a maximum combined gross floor space of 1,000 square metres, affordable housing and tariff style contributions should not be sought".

It is acknowledged that the Housing White Paper makes reference to sites of '10 units or more providing affordable housing' but the White Paper is a document intended to set out the broad range of reforms that Government plans to introduce in the short term future. It is not a binding document upon authorities, nor does it introduce statutory legislation or policy. The intention to introduce the above threshold may not come forward for some time or ever. Until such time as this does occur the Written Ministerial Statement is the primary reference on the issue.

1149 and 1159 state that the dwelling number threshold of 10/site size 0.5ha is too low and will impact on viability and should be amended to reflect the Court of Appeal order of May 2016 which gives legal effect to policy set out in the written ministerial statement of November 2014 and refer to 11 dwellings or more.

Response: *Disagree. The Housing White Paper clearly makes reference to sites of '10 units or more providing affordable housing'. This position postdates the written ministerial statement in 2014 and the subsequent high court judgement of 11th May 2016. The Council therefore considers that this position is material and represents the most up to date position from Government and thus supersedes the previous views and current guidance in the PPG. In addition, the viability evidence that supports the Local Plan shows that the thresholds set out are viable and deliverable for the market and the evidence from the SHMA indicates a significant need for affordable housing in the borough.*

In response to 1031, the Council disagrees. The viability evidence that supports the Local Plan takes into account the wider policy aspirations and demonstrates that the approach is viable and deliverable. Policy HOU1 already makes provisions for a lack of viability in the town centre area through its requirements for 0% affordable/social rented dwellings.

Issue – Thresholds in AONBs

1041 The proposed borough-wide approach to affordable housing thresholds is unsound as it forgoes opportunities to target affordable housing in rural areas and villages in the AONBs, where typically there are small developments, very high house prices and pockets of unmet housing need. Specifically, the Council has not taken the option to implement in parallel a lower threshold of 5-units or less, beneath which affordable housing and tariff style contributions should not be sought. This option is only available in designated rural areas (S157 Housing Act 1985), which includes Areas of Outstanding Natural Beauty. Requests amendment to require that where a site is within an AONB boundary, the lower threshold of 5 units will apply.

Response: *Disagree. There is no viability evidence to suggest that affordability is any more of a problem in the AONB designated parts of the borough and hence to justification for taking the approach suggested.*

Issue – split sites

1041 supports the final sentence of the revised HOU1 but considers that it is not clear whether this additional paragraph refers only to the Ashford Town area or is borough wide. As sequential applications could arise in both Ashford Hinterlands and Rest of Borough sites, it follows that the policy should apply across the borough. Clarification can make this policy sound, and accord with the objectives to “deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities” (NPPF para. 50), and take local circumstances into account (NPPF para 10). This amendment to address common ownership of sites is particularly necessary in rural areas where there are unmet local housing needs, and as rural development sites are typically small and below the threshold, and ownership may be fragmented (NPPF 54).

Response: *There is no reason in the policy drafting that suggests that this element of policy only applies to particular geographical locations – no amendment is necessary.*

Issue – Tenure Split

1041 welcomes the differential approach to thresholds and tenure mixes as ways to meet local housing needs and reduce the current imbalance under the present system. However, given that the NPPF states that such policies should be sufficiently flexible to take account of changing market conditions over time, the proposed split of 3/4 provided as affordable home ownership products, and 1/4 affordable/social rent is an unjustifiably arbitrary approach. As written this will not allow the flexibility to meet local conditions or local needs, nor does it accord the Rest of Borough with the same flexibility for case-by-case decision making, allowed in Ashford Town area, as reflected in the wording of Policy HOU1, 2 and 2a.

1043 considers that the proposed social renting provision is too low and that the policy must be amended to increase the rental percentage. In addition, affordable shared ownership homes should have covenants placed on all schemes to prevent extensions/conversions, etc., so that they remain affordable in perpetuity.

347 considers that less prescriptive wording would be beneficial to provide greater flexibility in the approach to affordable housing given the current uncertainties around Government policy, and the realities of delivery of affordable housing. Indeed, the significant changes in the draft policy since the previous version only one year ago lend support to this view. In particular, the onerous requirement to provide independent verified viability evidence before a change in tenure mix beyond the ranges set out runs counter to the flexibility sought by NPPF paragraph 50 that affordable housing policies should be sufficiently flexible to take account of changing market conditions over time.

Response: *The general tenor of the policy approach is to try to ensure as much needed affordable housing is delivered as possible. The mix reflects both the evidence in the SHMA in terms of what is needed, but also the extent that any mix can be delivered in terms of viability.*

The overall policy approach is considered flexible, but it is right that the policy should set out the reasonable expectations for delivery of affordable housing across the borough given it has been tested for viability alongside other plan policies in the Plan’s evidence base. Viability evidence should be produced by applicants in order to justify any departure from the policy expectations. The tenure split identified in the policy is a means by which to ensure

that a mix is at least provided and addresses different forms of affordable housing need identified in the SHMA. Whilst the SHMA indicates a greater proportion of social rented accommodation is needed, the viability evidence the council has undertaken shows this would not be viable unless the overall proportion of affordable housing was reduced meaning less affordable housing in total would be delivered.

Issue – categorisation of Shadoxhurst

888 - The definition of 'Ashford Hinterlands' in paragraph 5.8 includes "the northern part of Weald South". In paragraph 5.9 the rest of the borough refers to "...the southern area of Weald South." These are woolly and not properly defined and therefore are meaningless. Whilst these paragraphs specifically refer to the level of "Affordable Home Ownership Products", we are concerned that the term 'Ashford Hinterlands' may well be used in other parts of the Local Plan.

The agreed changes to the Borough Ward boundaries may not have been settled when the 2016 Draft LP was written and the northern part of the ward includes the Stubbs Cross and Magpie Hall Road parts of Kingsnorth. However, when the boundaries change in 2019, these areas will no longer be in the Weald South ward. If these particular parts of Kingsnorth are considered to be in the Ashford Hinterland, then we would need this term to be both geographically and more specifically defined.

The Parish of Shadoxhurst is understood to not be part of the 'Ashford Hinterlands'. We are most certainly rural, and fit in well with the other rural Weald South parishes of Woodchurch, Orlestone and Warehorne. With the Boundary changes removing part of Kingsnorth Parish, we will become the most northerly parish in Weald South. As it stands in the Local Plan, for the life of the plan this means we are now, by default, in the defined 'Ashford Hinterlands' and we strongly protest at the delineation and ask this to be withdrawn.

We contest that we are one of the closest parishes outside the 'Ashford Hinterlands' and ask this to be confirmed and the notation in 5.8 to be removed or corrected, although there may need to be an acknowledgement left, with respect to the pre and post January 2019 boundary change situation, if deemed appropriate. We also ask that the item in 5.9 also be altered to reflect the ward boundary changes. We suggest that this simply means that the reference regarding the rest of the borough will read to include the whole of Weald South.

In terms of the "Affordable Housing Ownership Products" itself, we emphasise that we are rural and need to fit into the "rest of the Borough" category as affordable housing is a critical issue in our village, particularly for young people and the higher figure needs to apply. Small developments escape this requirement and can also avoid Sec 106 contributions, yet 10 sites of 5 houses can result in 50 houses being built without complying with either of these elements. There will also be a strong desire to build big houses to maximise profit and young people will miss out on local opportunities. Where we do have major developments, then the higher 40% banding is very necessary.

Response: *The Council considers that the 'affordable housing viability areas map' (Map 6 in the Plan) clearly shows where the various viability areas are located and subsequently where the respective elements of Policy HOU1 will apply. The ward of weald south needed*

to be divided to reflect the size of the ward and the consequential differences in house prices of the urban market compared to the more rural one.

The village of Shadoxhurst falls within the ‘rural hinterlands’ area which reflects its largely rural nature. Therefore the policy of HOU1 would require 40% affordable housing on qualifying sites here.

It is acknowledged that any subsequent ward or parish boundary changes could affect the intended aims of the policy and a proposed minor amendment to the supporting text at para. 5.6 is proposed:-

Add the following sentence to the end of para. 5.6:-

The implications of any subsequent boundary changes at ward or parish level on the implementation of this policy will be considered in an updated version of the Affordable Housing SPD.

Issue – reference to ‘rent to buy’

974 seeks reference to ‘rent to buy’ products within the definition of affordable housing in paras. 5.4 and 5.5.

Response: Agree. Para. 5.4 to be amended to read as follows:-

‘Affordable housing for the purposes of this policy includes affordable/social rent and affordable home ownership products which includes starter homes, rent to buy and shared ownership products, as set out in the Housing White Paper 2017.’

2nd sentence of para.5.5 to be amended to read as follows:-

‘Within this requirement, the policy also seeks a minimum requirement for shared ownership and rent to buy products specifically, reflecting the requirement to meet local needs in the borough, balanced with what development can afford to deliver’.

Support 1028 - supports the proposed modifications to this Policy.

Response Support noted.

MC49 – Policy HOU2 Local Needs/Specialist Housing

Representations have been received from the following consultees:

1047 Wye with Hinxhill Parish Council (V McLean)	752 Terry Ransley
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Summary of Representations – Main Issues

Miscellaneous

1047 states that the introductory sentence should read “...following criteria are met.”

Response: correction noted.

752 states that not all rural settlements have a Parish Council, or may have more than one settlement.

Response: This representation is not made against a proposed Main Change. (All rural parishes in the borough have a Parish Council, with the exception of Crundale which has a ‘Meeting’). No change is proposed as the process for dealing with proposals for local needs or specialist housing would be developed with the accountable Parish body be it titled a Council or a Meeting.

MC50 – Policy HOU4 Residential Windfall Development within Settlements

Representations have been received from the following consultees:

1150 MPD Trust	1160 Tim Piper
1032 Home Builders Federation (Mark Behrendt)	1050 Weald of Kent Protection Society (Peta Grant)
1053 Wye with Hinxhill Parish Council (V McLean)	1073 Peter Brett Associates (Tim Allen)
1075 Kirk Short	1081 Smeeth Parish Council (Sue Wood)
939 Millwood Designer Homes Ltd	967 Diane and Keith Ralph
980 Carol Procter	987 Elizabeth Asteraki
913 Lee Evans Planning (C Foley)	710 Carter Jones on behalf of The Trustees of the Wheler Foundation (Kieron Gregson)
664 High Weald AONB Unit (Claire Tester)	693 Boughton Aluph and Eastwell Parish Council (Erica Lasparini)
802 KCC (Council)	866 Jennie Mathews
889 Shadoxhurst Parish Council (J Batt)	1067 Aldington and Bonnington Parish Council (P Setterfield)

1173 ABC (Jane Martin)	1174 ABC (Jane Martin)
469 Kent Downs AONB Unit (Katie Miller)	452 Susan, Neil and Paul Jordan
494 Angus Rorison	497 Sam Rorison
498 Meghan Rorison	503 Debra Rorison
523 K Uncle	526 V Davies
530 M Adkins	531 F.M. Uncle
536 RW Bell	538 Phillippa Mills
542 Pam Rogers	543 David Mills
564 Jennifer Roording	566 Richard Spencer-Tanner
569 Jane Marriott	572 Hastingleigh Parish Council (T Block)
907 Terry Button	930 CPRE Kent Ashford District (Hilary Moorby)
443 Charlotte Burke	431 Sally Cunningham
405 Joanne Hobday	406 Mark Hobday
415 Thomas Bates & Son Ltd (Joshua Bates)	419 John & Jacqueline Johnson
571 Doug Marriott	558 Norman Andrews
362 Simon Betty	359 Adrian Davies
352 The Boyd Family	555 Olivia Creaney-Birch
316 Egerton Parish Council (Richard King)	325 Joan Champion
338 D Cawdron	550 Joanne Hobday
552 Mark Hobday	574 Edwin Roording
182 Ann Mary Tong	335 D Cawdron
183 Howell Tong	546 Marilyn Sansom
226 Mr & Mrs J Schofield	540 Geoff Meaden
143 Julian Green	187 DW and IR Ward
94 R Jones	89 Alan Rogers
87 Paul Buggins	68 Brook Parish Council (Clerk to Brook Parish Council)

72 Mersham with Sevington Parish Council (Tracey Block)	55 Angela Williams
11 Stephen Penny	

Summary of Representations – Main Issues

Issue: Object to the reference to Old Wives Lees in the policy plus the omission sites in the settlement

Reps 967, 1075, 987, 452, 494, 497, 498, 503, 523, 526, 530, 531, 536, 538, 542, 543, 564, 566, 569, 405, 406, 419, 571, 558, 359, 555, 325, 338, 550, 552, 574, 182, 335, 183, 564, 226,540, 187 and 89 all raise the same objection that Old Wives Lees as a village is unsuitable for development. It is quite separate, different and remote from Chilham village and does not have any services. Old Wives Lees has no school, no pub, no post office, no shop and no doctors surgery. There is one bus a day to Canterbury plus school bus in term time. The bus does not go to Chilham station and neither does it connect with the Chilham bus service.

Response: *The inclusion of Old Wives Lees in the list of settlements included within the policy was not a proposed change from the Regulation 19 draft Plan published in June 2016. The response on omission site proposals are set out in Appendix 2 of this document. Old Wives Lees is a small settlement with limited opportunities for new development but it is more than a hamlet or sporadic collection of dwellings and so should not be regarded as ‘countryside’ and is appropriate for inclusion in the list of settlements in the policy.*

Issue: the Policy is over restrictive to new development

1032 considers that some criteria in the policy are too restrictive and could be used to restrict development as they are subjective. Criterion (h) is considered to be contrary to the NPPF.

939 feels that all the criteria should be deleted. 913 seeks deletion of supporting text at paras. 5.51, 52 and 54 plus amendments to 5.39 as it considers them to be contrary to the NPPF.

Response: *Disagree that the policy is too restrictive. It provides a balanced approach to considering new windfall development within settlements. The criteria in the policy are all matters that are key to ensuring that development proposals are of a sufficient quality to be regarded as acceptable in planning terms. All are matters typically found in a criteria-based development management policy of this type. Subjective policy criteria are standard and rely on evidence and proper objective assessment on a case by case basis. In respect of criterion (h), it is also reasonable for any material considerations in respect of replacement facilities be set alongside the policy requirement if appropriate.*

The supporting text reflects the written definition of built up settlement confines that has been contained within various iterations of Local Plans over many years and is fundamental

to the operation of a policy related to development within settlement confines and should be retained. The suggested amendment to para. 5.39 to refer to ‘development’ rather than redevelopment’ is accepted as it brings it into line with the rest of the policy.

Proposed minor amendment- first sentence of para. 5.39 to read as follows:-

5.39 In line with the NPPF and supporting PPG, it is important that suitable redevelopment opportunities for housing within the built up confines of particular settlements are allowed to come forward.

Issue: Settlements should be excluded from the policy

572 considers Hastingleigh should be excluded from the list of settlements in the policy as development there could not be regarded as sustainable. 362 and 68 considers Brook and 72 considers Mersham should be excluded for the same reason. 1053 also refers to Crundale and Molash in this regard.

Response: *All the villages mentioned were contained in the initial version of the policy contained in the Regulation 19 draft version of the Plan (June 2016) and so none have been included as part of any change to the policy. However, all are identified villages of varying size, scale and facilities within which limited and proportionate scaled development may be considered acceptable in accordance with NPPF.*

Issue: Landscape Protection Policy

1073 supports the policy but promotes the concept of a landscape protection policy that would add an extra layer of protection for development in smaller scale rural settlements. 1174 makes reference to deleted policy HOU4 and suggests that local landscape protection policies should be included in policy whilst 431 advocates a LPP in the context of Shadoxhurst, whilst 55 and 1081 feels that there should be LPP coverage for Brabourne / Smeeth.

Response : *With regard to the protection of significant landscape features in rural areas across the borough, new Policy ENV3a includes a criterion that proposals shall demonstrate particular regard for “any non-designated, locally-identified, significant landscape features justified in a Parish Plan or equivalent document”. In addition the Plan, which should be read as a whole, contains a range of environmental policies to protect the green spaces, rural landscapes and wildlife areas of the borough.*

With regard to the unique characteristics of rural villages and protected green areas between settlements around the Ashford urban area, the Council has responded to concern expressed at the Regulation 19 Stage about the growth of urban development principally on the edge of Ashford affecting the individuality of nearby villages, with the addition of Policy SP7 (MC85). This new ‘separation of settlements’ policy is clear that the need to avoid coalescence of settlements should be regarded as an important determinant of whether a proposed development is acceptable or not and to this end states that development which would result in coalescence or the significant erosion of a gap between settlements resulting in the loss of individual identity or character will not be permitted. These policies are considered sufficient to address the matters and protect the aspects of landscape referred to in these representations. No changes required.

Issue: Policy not protective enough / cumulative impact

1050 are concerned that this policy may result in the building to the rear of existing houses, infill and ad hoc expansion to villages without suitable controls. 1173, 1067, 866, 431, 55 and 443 raise concerns about the cumulative impacts of small developments on the character of settlements.

Response: *It is not agreed that the policy may result in additional backland or ‘tandem’ developments as garden land developments are more specifically controlled by policy HOU10. The policy and supporting text do not currently refer to a cumulative impact from small developments and it would be reasonable to make a minor addition to the supporting text to ensure that this is covered as a material consideration to the application of the policy. This is also consistent with the approach in draft policy HOU5.*

Proposed minor amendment –Extend the end of para. 5.44 to read as follows:-

Within these settlements, appropriate smaller scale development is acceptable in principle although this should also take account of the cumulative effects of any allocated sites and any other developments with extant planning permission in the area.

Issue: Policy is confusing or unclear

316 considers the policy is confusing as it encompasses Ashford and small settlements. The absence of Kennington, Willesborough and Singleton is queried. 980 feels there is a lack of clarity in respect of the appropriate scale for development in Shadoxhurst.

Response: *It is felt more appropriate to have a single policy encompasses the principle and criteria associated with any development within a settlement than have separate policies for Ashford and the rural settlements. An appropriate scale of development will obviously vary widely depending on the nature of a settlement and the services within it or close by but the detailed criteria by which schemes should be designed will be largely the same. Development in Kennington, Willesborough and Singleton would all be regarded as within Ashford in the context of the policy and do not require individual reference.*

The Local Plan does not attempt to set out proportionate or ‘appropriate’ levels of new housing development for individual villages although allocations are scaled to reflect the level of services, accessibility and overall sustainability of a location. It should be for windfall proposals to justify why they are not disproportionate and meet the relevant criteria in the policy given the context.

Issue: Settlement confines

87 considers that a locally defined village envelope should be in the policy not just the supporting text. Additionally all named settlements should be supported by the Borough Council in completing the village envelope exercise during the coming months and that this and periodic reviews (at least every 5 years) are embedded within the plan policy. 11 considers the definition of built up confines is too tight by the exclusion of curtilage land. 889 reflects a general concern about the lack of adherence to settlement confines in new

development. 177, 1150 and 1160 feel the policy should cover sites on the edge of the built confines to be acceptable too

Response: *The Council has expressed its support in principle for local village envelope exercises as a means of generating a specific, map-based ‘built-up’ confines to assist determination of planning applications against this policy. Where such an exercise occurs outside the formal Plan-making process, it would be unreasonable to make specific reference to the outcome of such an exercise in the draft policy itself. As at Challock previously, the locally defined village envelope was adopted as a relevant material consideration for development management purposes and has been used as such subsequently.*

Curtilage land has traditionally been excluded from the definition of built up confines in successive Local Plans and there is no justification to amend the definition now. As some curtilage areas are significant in scale, this could have considerable adverse consequences. The release of land on the edge of villages should be governed through Plan allocation or the assessment against the criteria in proposed policy HOU5. Government policy in the NPPF is clear that development may still be acceptable in principle beyond settlement ‘confines’ and that they may no longer justify an ‘in principle’ objection to development per se.

Miscellaneous

664 considers the last sentence of the policy to be unnecessary as it is already covered by the NPPF and policy ENV3. 693 support the policy in general but wish to add ‘scale’ to criterion (a). 802 promotes the role of historic landscape characterisation in assessing schemes.

1053 objects and seeks a series of minor amendments to the policy and supporting text. The main objection is that the policy promotes a dispersed, unserviced and inherently unsustainable form of development, and therefore it is unsound. The removal of some settlements from the policy is proposed and two amendments to the policy proposed as follows:-

- The addition of ‘scale’ to criterion (a) of the policy
- Insertion of a new criterion (i) to state ‘It sits within an appropriately sized plot that can accommodate at least one tree to enhance the street scene, and where appropriate, a landscape buffer to the open countryside.’

Response: *The inclusion of the last sentence in the policy is considered appropriate for completeness to include in this policy and HOU5.*

There is no need to include ‘scale’ in criterion (a) as it is already referred to in the first sentence of the policy. The role of historic landscape characterisation is noted but there is no need to amend the policy or supporting text as this is adequately addressed by other criteria.

In response to objection 1053, the Council disagrees that the policy promotes a dispersed form of development as it is clear that the scale of windfall development needs to be closely related to the sustainability of local settlements including the services available locally or

accessibility to nearby local service centres. The large majority of new development proposed in the Plan is centred in and around Ashford but the policy also recognises national policy in the NPPF which seeks to enhance or maintain the viability of rural communities. The assertion that any development in some smaller rural settlements, some of which have local facilities, is inherently unsustainable is not justified or consistent with the NPPF.

The proposed criterion (i) is considered to be too detailed and prescriptive for inclusion in the policy and the matters referred to may be dealt with under other criteria in the policy, in particular under questions of character, design and landscape impact.

Support

Reps 710, 469, 352, 143 and 94 support the proposed changes.

Reps 907, 342 and 91 are omission site reps and make no comment on the proposed changes under MC50 so are dealt with in Appendix 2.

MC51 – Policy HOU5 Housing Development Outside Settlements

Representations have been received from the following consultees:

1187 Gladman Developments (Mat Evans)	1151 MPD Trust
1161 Tim Piper	1034 Home Builders Federation (Mark Behrendt)
1055 Wye with Hinxhill Parish Council (V McLean)	1074 Peter Brett Associates (Tim Allen)
1082 Smeeth Parish Council (Sue Wood)	956 J Ainsworth
968 Diane and Keith Ralph	981 Carol Procter
920 Lee Evans Planning (C Foley)	852 Millwood Designer Homes Limited
712 Carter Jones on behalf of The Trustees of the Wheler Foundation (Kieron Gregson)	665 High Weald AONB Unit (Claire Tester)
717 Michael-John Knatchbull	721 Michael-John Knatchbull
762 Terry Ransley	471 Kent Downs AONB Unit (Katie Miller)
495 Angus Rorison	496 Sam Rorison
499 Meghan Rorison	501 Debra Rorison
527 V Davies	528 K Uncle

529 M Adkins	532 F.M Uncle
539 Philippa Mills	541 Pam Rogers
545 David Mills	565 Jennifer Roording
567 Richard Spencer-Tanner	911 Terry Button
416 Thomas Bates & Son Ltd (Joshua Bates)	573 Doug Marriott
559 Norman Andrews	570 Jane Marriott
364 Adrian Davies	556 Olivia Creaney-Birch
326 Joan Campion	551 Joanne Hobday
553 Mark Hobday	575 Edwin Roording
537 RW Bell	185 Ann Mary Tong
336 D Cawdron	547 Marilyn Sansom
229 Mr & Mrs J Schofield	544 Geoff Meaden
188 DW and IR Ward	95 R Jones
86 Paul Buggins	47 Catherine Feather
19 Courtley Planning Consultants	379 Foster & Payne

Summary of Representations – Main Issues

Issue: Object to the reference to Old Wives Lees in the policy plus the omission sites in the settlement

Reps 968, 495, 496, 499, 501, 527, 528, 529, 532, 539, 541, 545, 565, 567, 573, 559, 570, 364, 556, 326, 551, 553, 575, 537, 185, 336, 184, 547, 229, 544 and 188 all raise the same objection that Old Wives Lees as a village is unsuitable for development. It is quite separate, different & remote from Chilham village and does not have any services. Old Wives Lees has no school, no pub, no post office, no shop and no doctors surgery. There is one bus a day to Canterbury plus a school bus in term time. The bus does not go to Chilham station and neither does it connect with the Chilham bus service.

Response: *Old Wives Lees is not referenced in policy HOU5, although the policy cross references to the list of settlements in policy HOU3a where Old Wives Lees does appear. The criteria in the proposed policy provide appropriate safeguards against inappropriately scaled or located development near to the settlement and it is not considered that a blanket*

restriction on all new housing development would be either appropriate or in accordance with the guidance in the NPPF.

Issue: Policy is too restrictive

1034 considers the policy to be ineffective as the criteria create too many onerous conditions on development and act as a brake on development which is inappropriate if the council is relying on windfall development to meet housing targets.

19 considers the policy is unsound as it is not supportive of brownfield redevelopment opportunities and considers that brownfield sites may still be suitable even if they are in more isolated locations than allowed for by the policy. Similarly, the objection objects to criterion (c) of the 'isolated' development part of the policy and suggests there is no need to prove a building is redundant or disused. 956 repeats the concern that brownfield sites are not specifically addressed and proposes a third category of site within the policy to address this 'vacuum'.

379 considers the policy to be incomplete and an additional criterion needs to be added to state that the development would deliver an essential local service that would not only make that development proposal more sustainable but would also enhance the sustainability of the existing settlement.

717 / 721 considers the policy to be ineffective if the application of a 800 metre walking distance to basic services is applied to inflexibly.

Response: *It is not agreed that the proposed policy is too restrictive. The NPPF at para 55 seeks to restrict isolated residential development in the countryside and the proposed changes to the policy reflect the national guidance that appropriately scaled schemes adjoining or near to settlements which can adequately support those developments may be regarded as sustainable. The criteria in the policy set out the circumstances that sites and schemes should be able to meet in order to be regarded as properly sustainable and not 'isolated' in respect of NPPF policy. Compared to existing adopted policy which seeks to restrict new housing development beyond the built up confines of any settlement unless there are exceptional circumstances is far more restrictive than the proposed HOU5.*

The policy does not specifically address brownfield sites and it is not agreed that such sites are inherently sustainable wherever they are located or should be treated in a different way within the policy. The approach to redevelopment of brownfield sites needs to be set in a wider context and there is no blanket support for brownfield site redevelopment for housing in the NPPF. Criterion (c) of the policy mirrors precisely the wording in para 55 of the NPPF and so should not be amended.

It is not agreed that the separate specific criterion sought by 379 should be introduced as this would create an additional test for development which goes beyond that in national policy. If a scheme can genuinely indicate an improvement in sustainability of a settlement through delivery of an essential local service, then that would be a positive material consideration to set alongside the policy requirements.

The walking distance of 800 metres referred to in the supporting text is generally regarded as a reasonable measure of accessibility to day to day services. It is accepted that the

application of this is a guide and would need to be applied pragmatically in different contexts and situations. A minor amendment to para 5.60 of the Plan to make this clear is therefore proposed.

Proposed minor amendment – Extend the end of para. 5.60 to read as follows:-

Basic day to day services such as a grocery shop, public house, play / community facilities and a primary school should be within a generally accepted easy walking distance of 800 metres in order to be considered sustainable, although the specific local context may mean a higher or lower distance would be a more appropriate guide.

Issue: Policy not restrictive enough

1055, 762 and 86 all consider the policy should specifically refer to development being within easy walking distance. 762 and 86 believe the 800m distance should be embedded in the policy itself whilst 1055 believes it should be 400m in line with their Neighbourhood Plan. In addition, 762 considers the policy should include a proper definition of 'close to' and the 3 dwelling limit in the previous version of the policy re-introduced.

981 and 47 object in principle that the policy would enable development outside the built up confines of a settlement with the latter commenting that this may result in encroachment on AONB or surrounding agricultural land contrary to the NPPF and proposed Local Plan policy SP7.

Response: *As stated above, the application of a walking distance radius to basic services is a guide based on good practice in urban design and sustainability. Reasonable walking distance is widely defined as being within 800m (including for example in Building for Life (2015) and by the Institution of Highways and Transportation, the Design Council and Sports England). Local context will need to be taken into account and therefore embedding a precise walking distance into the policy itself would need to be suitably caveated in any event. On balance, the flexibility enabled by the current drafting is considered to be more appropriate. A 400m walk distance is considered to be too short to be generally applicable although there may be circumstances where a less than 800m walk distance threshold would be appropriate.*

National policy in the NPPF no longer provides for the protection of the countryside per se and the approach to sustainable development in the countryside in para.55 enables new development to take place where it is not isolated. Therefore a policy approach that seeks to restrict development outside the built up confines of settlements in principle would not be sound.

However, there is no national guidance on what constitutes 'isolated' or non-isolated' development and therefore it is impractical for the Local Plan to attempt to be specific about this in geographical or distance terms. No 'one size fits all' definition is likely to be applicable or appropriate. It is preferable for the policy and supporting text to set out some guidance and criteria by which proposals may be judged on a case by case basis. The suggested 3 dwelling limit would be arbitrary and not consistent with national policy and so its re-introduction to the policy is not supported.

Miscellaneous

920 supports the proposed changes but seek revisions to criterion (f) on preserving setting as this is considered to be a ‘conservation area’ test and therefore too onerous for this policy, and the provision of a landscape buffer which should not be a general requirement as it may reduce site area.

1074 refers to para. 5.61 and considers it unlikely that simple topic based policies, applied in isolation to individual applications, will be sufficient to allow cumulative effects to be identified or taken into account as part of development control process.

1187 supports the proposed changes but considers criterion (e) should be amended to reflect the guidance in the NPPF on the impact on heritage assets so that it encompasses a test of harm against public benefit.

665 considers the last sentence of the policy to be unnecessary as it is already covered by the NPPF and policy ENV3.

Response: *The setting (including entrances) to villages can be a fundamental part of their character and individuality, whether designated as a Conservation Area or not. It is reasonable to expect development adjoining settlements to have proper regard to this aspect of character particularly where it is creating a new urban edge to the wider countryside and so no change is proposed to criterion (f) of the policy.*

Criterion (a) of the policy makes specific reference to the ability to absorb new development in combination with any allocated sites or other committed development. It is contended that this addresses the concern over cumulative impacts not being addressed by this policy.

It is reasonable for the advice in the NPPF on the weighing of harm in the development affecting heritage assets to read alongside this policy rather than any attempt to incorporate into the policy itself. In general, it is reasonable to expect the conservation of heritage assets as a matter of policy but to enable material considerations of individual cases to be applied on a case by case basis.

The inclusion of the last sentence in the policy is considered appropriate for completeness to include in this policy.

Support

Reps 1151, 1161, 852, 712, 471 and 95 support the proposed changes.

Response support noted.

MC52 – Policy HOU6 Self and Custom Build

Representations have been received from the following consultees:

349 David Lock Associates (Katie Christou)	962 Lanndia Development Services Limited (Tim Allen) [Duplicates MCLP/449]
353 The Boyd Family	992 LRM Planning Limited (Owen Jones)

449 Peter Brett Associates (Tim Allen)	1167 Judith Ashton Associates (Judith Ashton)
713 Carter Jonas on behalf of The Trustees of the Wheler Foundation (Kieron Gregson)	

Summary of Representations – Main Issues

Issue - Lack of clarity/evidence

713, 992 and 1167 argue that the Policy is not justified as there does not appear to be evidence to support the likely demand for such plots.

1167 states there is no need for Local Authorities to require a proportion of SCB plots on large sites, and evidence should come from SHMA.

Response: *The Self-Build and Custom Housebuilding Act 2015 places a duty on local councils in England to keep and have regard to a register of people who are interested in self-build or custom-build projects in their area. This policy is underpinned by applications to the Ashford Self and Custom Build Register (SCBR). Local Planning Authorities have a duty to give planning permission to enough suitable serviced plots of land to meet the demand for self-build and custom housebuilding in their area. This policy will ensure that the LPA is able to meet its statutory duty in relation to this legislation.*

Issue - Should not preclude smaller sites

349 Policy HOU6 should be amended to not preclude self and custom built development being brought forward on sites of 40 dwellings or fewer, where appropriate and to provide a stronger supportive steer towards self and custom build in general. There would also be merit in considering recently published Planning Policy Guidance on this matter.

Response: *Noted. The Council welcomes applications for self and custom build plots on smaller sites.*

Issue – scope of policy

449, 962 support policy, but believe it could go further. Seek a framework from ABC to facilitate delivery of self & custom build projects on co-located sites. Should be an option for a whole site to be for SCB on sites of 30 units or less, cross-subsidised by contributions in lieu of 5% delivery on larger sites so that infrastructure can be provided. The LPA should establish plots, design code and other parameters on a suitable site at no cost to the landowner to aid certainty.

Response: *Noted. Further liaison will take place with interested parties to evaluate and review how best to deliver Ashford's demand for self and custom build housing.*

Support

353 proposes two sites in Appledore for self and custom build plots.

Response: *Noted. The Council will continue to monitor demand through applications to the Self and Custom Build Register, and welcomes planning applications self and custom build plots.*

MC53 – Policy HOU9 Standalone Annexes

Representation has been received from the following consultee:

1058 Wye with Hinxhill Parish Council (V McLean)	
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Summary of Representations – Main Issues

1058 Representation cites ABC proposed changes only.

Response: *No change required.*

MC54 – Policy HOU12 Residential Space Standards (Internal)

Representation has been received from the following consultee:

993 LRM Planning Limited (Owen Jones)	
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Summary of Representations – Main Issues

Issue - New standards not justified

993 reiterates an in-principle objection to Policy HOU12 submitted previously, stating that there is no evidence to justify “the introduction of new space standards”.

Response: *ABC’s Residential Space and Layout SPD was adopted in 2011 and provided evidence of the need for suitable internal living spaces. The market has delivered these over many years. This transitioned to the government’s Nationally Described Space Standards, introduced in 2015, which although less generous compared with the local standards, continue to be useful in delivering quality homes. No change required.*

MC55 – Homes Suitable for Family Occupation (Deletion)

No representations received.

MC56 – Policy HOU14 – Accessibility Standards

Representations have been received from the following consultees:

519 Rydon Homes Ltd (K Wilcox)	1059 Wye with Hinxhill PC
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Summary of Representations – Main Issues

Issue - Duplication

519 feel that this Policy is an unnecessary duplication of Part M of the building regulations and should therefore be deleted.

Response: *HOU14 relates building regulations to borough specific requirements during the Plan period and is therefore not simply a repeat of Part M of the building regulations. It is considered that the policy 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.*

Issue - minor amendments

1059 support the proposed addition to paragraph 5.100. However, they suggest two additions to the existing para 5.101 in the Policy.

Response: *Suggested amended wording appears to be based on an erroneous reading of the text of the Main Change. The reference to 7.5% relates to the proportion of those on the Housing Register, and not the proportion of homes to be provided at M4 (3b) standard. No change required.*

MC57 - Policy HOU16 Traveller Accommodation

Representations have been received from the following consultees:

747 Elizabeth Buggins	474 Kent Downs AONB Unit
117 Natural England	890 Shadoxhurst Parish Council
37 Paul Buggins	1052 Weald of Kent Protection Society

682 High Halden Parish Council	678 High Halden Parish Council
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Summary of Representations – Main Issues

Issue - Integration of Traveller issues into plan and DPD

747 and 37 The plan should better incorporate gypsy and traveller communities and it should not be done through the provision of a DPD which will take some time and will lead to lost appeals in the meantime. The gypsy and traveller community should not be treated differently from others. 678 regrets that Ashford Borough Council does not have in place a Gypsy and Traveller DPD alongside its current Plan. High Halden has a disproportionately high proportion of the borough's traveller pitches and feels that the DPD is urgently needed to assist in limiting further expansion in the village.

Response: *This consultation concerns the main changes to the Local Plan. The Gypsy and Traveller DPD is a separate matter. Policies within the DPD will be in addition to the Local Plan.*

A call for Gypsy and Traveller sites was carried out in 2013 alongside the general call for sites, through which the council sought to establish a suitable number of Gypsy and Traveller sites for allocation in the Ashford Local Plan. An insufficient number of available and suitable sites were put forward at the time and therefore in response to this, policy HOU16 provides the framework for Gypsy and Traveller applications within Ashford. This will be supplemented by a separate Development Plan Document (DPD). The DPD will focus largely on site allocations and the formulation of the DPD will be based on evidence gathered through a Gypsy and Traveller Accommodation Assessment (GTAA) which is currently underway. Pursuing this through a separate DPD allows Ashford to update its evidence base and respond to recent government changes to National Traveller Policy guidance.

Issue - Clarification of wording

117 requests that the meaning of 'designated area' should be clarified.

Response: *Designated areas are listed in criterion g. no change necessary.*

Issue - Cumulative impact of sites

890 states that the Policy should include means to prevent adverse impact from cumulative impact of traveller pitches and to consider the local population balance in a fair and constructive way as well as taking full account of the true picture of the existing infrastructure. Shadoxhurst has a very overstretched infrastructure which actually cannot cope with the present needs and so requires upgrading before any further development can be considered. This should be added to the policy wording and not the supporting text.

Response: *National guidance 'Planning policy for traveller sites' (DCLG, 2015) Policy B requires that local planning authorities, in producing their Local Plans should relate the*

number of pitches or plots to the circumstances of the specific size and location of the site and the surrounding population's size and density, and to protect local amenity and environment, amongst other matters. In addition, for sites in rural areas, Policy C requires that when assessing the suitability of sites, local planning authorities should ensure that the scale of such sites does not dominate the nearest settled community. All planning applications coming forward for traveller accommodation over the Plan period will be determined in accordance with national and local policies, including assessing the impact that the proposed development would have on its surroundings.

Issue - Definition of traveller

890 This Policy should include requirement for applications to provide evidence a traveller lifestyle.

Response: *The definition of a Gypsy and Traveller for the purposes of planning policy is set out in national planning guidance 'Planning policy for traveller sites' (DCLG, 2015) Annex 1. Criterion d of this policy requires that this definition is met. No change necessary.*

Issue – Windfall policy

890 - The use of a Windfall policy will leave the council open to challenges.

Response: *National guidance 'Planning policy for traveller sites' (DCLG, 2015) Policies B and C require that Local Plans include criteria to guide land supply allocations where there is identified need and, for all traveller accommodation applications, that local planning authorities should ensure that traveller sites are sustainable economically, socially and environmentally. This borough has a long history of delivering accommodation for the traveller community through windfall development, reflective of evidence that travellers in Ashford borough tend to reside on small sites which accommodate immediate or extended family members only. No change necessary.*

Support

474 welcomes the additional wording and insertion of criterion g. 1052 agrees that protection of landscape should be paramount.

Response: *Support noted*

MC58 - Policy HOU17 Safeguarding existing Traveller Sites

Representation has been received from the following consultee:

748 Elizabeth Buggins	
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Summary of Representations – Main Issues

Issue - previous comments not incorporated

748 Previous comments were not incorporated and this has resulted in Gypsy and Traveller issues taking up a significant amount of officer time.

Response: Previous comments related to the need to ensure that only permanent sites are safeguarded under policy HOU17 and the need to ensure better monitoring of Gypsy and Traveller sites. MC58 addressed the wording of the policy to include reference to permanent sites. The second issue relating to monitoring will be addressed comprehensively through the forthcoming Gypsy and Traveller Development Plan Document.

MC59 – Policy EMP2 Loss or redevelopment of Employment Sites and Premises

Representations have been received from the following consultees:

1008 Bilsington Parish Council (P Setterfield)	93 R Jones
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Summary of Representations – Main Issues

Issue- Infrastructure

1008 agree that employment is required in the rural area, however consideration should be given to the nature of the employment and the impact on the environment and infrastructure should be taken into account.

Response: All applications are considered on their own merit and a number of other policies and factors such as environment and infrastructure will also have been considered by the case officer when assessing applications of this nature. It is not appropriate to comment on specific cases during this consultation process.

Support

93 found the main change sound.

Response: Support noted.

MC60 - Policy EMP9

No representations received.

MC61 – Policy EMP10 – Local and Village Centres

Representations have been received from the following consultees:

450	Peter Brett Associates	1060 Wye with Hinxhill PC
964	Lanndia Development Services	

Summary of Representations – Main Issues

Issue - Allocation of site for employment

450 and 964 suggest that the Policy doesn't go far enough to accommodate the potential of rural economies. In the context of Policy S52 in Aldington, the business has been extremely successful and has expanded rapidly. However, a lack of local office infrastructure has prevented them from relocating to a larger space in Aldington. Often rural businesses are configured around a village based workforce where, for instance, parents are able to pick up children from school. To relocate outside of the area would damage this ethos and inevitably the structure of the business. It is important that the Council and the Local Plan do more to facilitate this aspect of local economies.

Response: *The policy EMP10 is specifically for protection of local shopping needs and services, and sites are not allocated for this use. Policy EMP3 is the relevant policy which allows extensions to employment premises in the rural area, and would apply to the site proposal above and in principle encourages and supports extensions of existing employment sites. No allocation is required.*

Issue - Village walkability

1060 believe paragraph 5.206 to be unsound as it defines walking distance as 'within the region of 800m'. This is contrary to the evidence supporting Objective 1 of the Wye Neighbourhood Plan which takes into consideration age, infirmity, safety and absence of footways, or the need for residents to visit multiple destinations on their way home. Paragraph should be amended to read "...reasonable walking distance is defined not only by distance, which is considered to be within the region of 400m"

Response: *Reasonable walking distance is widely defined as being within 800m (including for example in Building for Life (2015) and by the Institution of Highways and Transportation, the Design Council and Sports England). In addition, paragraph 5.206 already makes clear that walkability is defined not only by distance but also by local characteristics such as conditions of footpaths and local gradients. No change necessary.*

Issue - Acknowledgement of parish councils in addition to community groups

1060 feel that the new paragraph included beneath 5.206 is unsound as it does not recognise the central role of town and parish councils that was established in the Localism Act. Would support the proposed addition providing it is amended to read the following: “...This allows town and parish councils and local community groups a fairer chance...” instead of the current reference to ‘local community groups’.

Response: Agree. Minor amendment to second sentence “This allows town and parish councils and local community groups a fairer chance to make a bid to buy the asset on the open market.”

MC62 – Policy EMP11 Tourism

Representations have been received from the following consultees:

1013 Ashford Investor Limited	477 Kent Downs AONB Unit (Katie Miller)
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Summary of Representations – Main Issues

Support 1013 and 477 support the proposed changes to this policy.

Response: Support noted.

MC63 – Section C Transport Introduction

Representations have been received from the following consultees:

98 Stella Marina Harris	768 Jane Struthers
698 Charing Parish Council (Jill Leyland)	1062 Wye with Hinxhill Parish Council (V McLean)

Summary of Representations – Main Issues

Issue - Rail infrastructure

768 asks that more is made of rail infrastructure to encourage modal shift and reduce air pollution.

1062 states that priorities list for stations is not supported by evidence and seeks an additional policy to safeguard land at the Former Oil Depot and Railway Sidings in Wye for off-road parking near Wye station

698 states that this section will not be effective if it does not ensure connectivity between regular and High Speed services, the retention and enhancement of rural services and the installation of a lift for disabled access at Charing Station.

Response: *The priorities for Ashford’s rural stations are taken from Network Rail and Southeastern’s priorities list. ABC will continue to work with Network Rail for station and service improvement in the borough, and encourage modal shift. Improvement of services in general and maintenance of rural services is already included in the additional text. With regard to the requested allocation of land in the village of Wye, paragraph 2.8 of this Plan makes clear that proposals to allocate sites within Neighbourhood Plan Areas of the Borough (where they have been established early on in the preparation of the Local Plan) fall to the Neighbourhood Plan. No change required.*

Miscellaneous 98 requests this chapter is reduced as “this is an inherently masculine domain” which undermines other “feminine” topics.

Response: *The Council considers it both important and necessary to plan for the transport required to support development in the borough to 2030.*

MC64 – TRA2 Strategic Public Parking Facilities

Representation has been received from the following consultee:

1054 Weald of Kent Protection Society (Peta Grant)	
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Summary of Representations – Main Issues

Support 1054 supports the policy, but would also welcome a plan for improved public parking provision in Tenterden.

Response *Noted.*

MC65 – Policy TRA3a Residential Parking Standards

Representations have been received from the following consultees:

14 Nick Lester-Davis	1054 Weald of Kent Protection Society (Peta Grant)
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Summary of Representations – Main Issues

Issue - Increased costs

14 states that requirement for minimum parking standards results in increased commercial costs.

Response: *Noted. Parking facilities are an important and accepted element of residential development and therefore a well-established element of viability decisions.*

Issue - Lower-quality environments

14 states that parking spaces result in lower quality environments, greater land take leading to sprawl, and increased flood risk with hardstanding, particularly in town centres.

Response *This policy does not relate to town centre areas. The integration of parking into well-designed places does not necessarily increase land-take, commercial costs, or indeed hardstanding areas. The plan should be read as a whole, and the requirement for high quality design will ensure that the modern necessity for cars can be integrated into quality places. No change required.*

Support 1054 supports the policy, but requests a plan for public parking provision in Tenterden

Response *Noted.*

MC66 – Policy TRA5 Planning for Pedestrians

Representation has been received from the following consultee:

803 Kent County Council	
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Summary of Representations – Main Issues

Support 803 supports the change however the document's title has been altered which needs to be reflected in the text.

Response: *Noted. Amend second sentence to read “KCC’s Rights of Way Improvement Plan, (currently entitled the Countryside and Coastal Access Improvement Plan).”*

MC67 – Policy TRA6 Cycling

Representation has been received from the following consultee:

804 Kent County Council	
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Summary of Representations – Main Issues

Support 804 supports the change but asks that additional text is added, including the updating of the KCC Plan’s title.

Response: *Noted. This minor text amendment is considered appropriate as it will mirror the wording of 5.272. Amend second sentence to read “KCC recently consulted on its Active Travel Plan- Rights of Way Improvement Plan, (currently entitled the Countryside and Coastal Access Improvement Plan)...”*

MC68 – Policy TRA8 Travel Plans

Representations have been received from the following consultees:

15 Nick Lester-Davis	1068 Aldington and Bonnington Parish Council (P Setterfield)
1006 Bilsington Parish Council (P Setterfield)	

Summary of Representations – Main Issues

Issue - Major development outside the borough

1068 is concerned that the policy does not require consideration to be given to proposed development elsewhere in adjoining parishes where access is not to a main road, and that no consideration has been given to the proposed Otterpool Garden Town.

Response: *Comments noted. The policy will apply to all development in Ashford borough as the Local Plan is intended to be read as a whole. Ashford Borough Council is engaging with Shepway District Council over the emerging plans for a Garden Town focused at Otterpool. These plans are not well advanced, and are not yet part of that district’s planning policy. No changes required.*

Issue - Public Transport and Infrastructure

1006 considers that the delivery of public transport is difficult under the methodology used by S106 agreements. Public transport needs to be in place at the commencement of the development until the end of development. Difficult to enforce this policy in a rural area given the current infrastructure unless the required infrastructure was in place before the

development. Walking and cycling are hazardous on rural roads due to lack of pavements and roads widths.

Response: *Travel Plans, Assessments and Statements are an effective means of ensuring that the transport implications of new developments, including any enhancements to existing infrastructure and public transport linkages for example, are addressed early in the planning of new development. No change required.*

Support

15 supports the main change, but states that it is meaningless in a context of promoting town centre parking solutions and minimum residential parking spaces.

Response: *Noted.*

MC69 – Policy TRA9 HGVs

No representations were received.

MC70 – Policy ENV1

Representations have been received from the following consultees:

1188 Gladman Developments (M Evans)	934 Richard Bartley
806 Kent County Council	892 Shadoxhurst Parish Council (J Batt)
478 Kent Downs AONB Unit (Katie Miller)	118 Natural England (S Hanna)
653 Environment Agency (J Wilson)	

Summary of Representations – Main Issues

Issue – European Sites

1188 The policy states that development which will have an adverse impact on the integrity of European protected sites will not be permitted. The policy goes on in later paragraphs to state that where harm to biodiversity assets cannot be avoided appropriate mitigation will be required. It is presumed that mitigation is also something that can be used to offset any adverse impact to European sites, as well as local sites, but this is not explicitly clear in the policy. In order for the policy to be sound further clarity is required to the potential for mitigation measures with regard to European sites.

Response: *It is considered that the wording of this Policy as drafted accurately reflects the hierarchical approach to the protection of biodiversity assets required by the NPPF and the requirements of the Conservation of Habitats and Species Regulations 2010. No change required.*

Issue – Approach to biodiversity across the borough

934 considers the Local Plan to be unambitious, fragmented and unbalanced in its approach to biodiversity across the borough and unsound as it does not accord with the NPPF paragraph 117 and focuses heavily on urban areas. For example there is no reference to the Great Stour, its significance as a chalk stream and the European protected species that it supports. The Local Plan has nothing to say about AS27, the 410 ha LWS downstream of Ashford's Green Corridor. Instead, the document contains 71 references to the Ashford Green Corridor, and three to urban LWS associated with it, and paragraph 5.307 states that the protection and enhancement of the Green Corridor is a key objective of this Local Plan.

Does not present a complete or balanced summary of the opportunities and threats to biodiversity across the borough. Nor does it offer the strategic and proportionate measures to protect and enhance biodiversity, geological interests and protected species needed to offset the large environmental impacts of edge of town development and population growth. This policy is ineffective and it will not to protect and enhance biodiversity, or provide clear guidance for development proposals that may affect the borough's statutory designated sites and their surrounding land. Suggests that Policy ENV1 can be made sound by adding policy to designate a Nature Improvement Area incorporating Wye and Crundale SAC, Wye and Crundale NNR, and substantial parts of the East Kent Woodlands and Downs and the Mid Kent Greensand and Gault BOAs and Conningbrook Country Park and the Green Corridor.

Response: *The Local Plan plans for biodiversity at a landscape scale across local authority boundaries and therefore complies with paragraph 117 of NPPF. Paragraphs 5.299 and 5.300 and Map 9 in particular address the reality that biodiversity does not fall to be defined by local authority boundaries. Cross boundary biodiversity is the basis of the classification of landscapes into BOAs. Reference to and support for the objectives of the Kent Biodiversity Strategy as they relate to the parts of the 8 Biodiversity Opportunity Areas (BOAs) of the 16 BOAs in Kent which fall within the borough is enshrined within the Plan as a whole, including in Site Policies where appropriate. Opportunities for management, restoration and creation of habitats identified by Biodiversity Opportunity Areas are supported in Policy ENV1.*

The protection of the borough's biodiversity is a Strategic Objective of the Local Plan (Policy SP1). As Policy ENV1 makes clear this includes Local Wildlife Sites. Local Wildlife Sites are listed in the Green Infrastructure inventory set out in Appendix 4 of the Plan. The Great Stour LWS is included. With regard to the apparent criticism of references made to the Ashford Green Corridor, this successful and ongoing initiative has been central to the planning strategy for the Borough since it was adopted in 1994. It is regularly supported at examination and at appeal as an effective and important policy ensuring the linking the expansion of the town of Ashford with its hinterland and one which works to deliver many of the principles of good planning as set out in the NPPF including the promotion of health and wellbeing.

It is considered that the international, national and local sites listed in this representation as requiring further protection are adequately protected by the wording of this Policy. No change required.

Issue – Suggested amendments to wording

806 suggests that the added text in first paragraph of ENV1 is not strong enough and would not encourage the applicants to incorporate enhancements into the site. It is suggested that alternative wording would be “*will be identified and incorporated into the site*”.

892 suggests that ‘Local Biodiversity Opportunity Areas’ and designated ‘Rural Green Corridors’ as identified in Parish Plans be considered in the same way as designated Local Wildlife Sites and Local Nature Reserves in Paragraph 5 of the Policy and that paragraph 7 is altered to require that targets in the Kent Biodiversity Strategy will be “supported *and encouraged*.”

653 there is no mention of non-native or non-native invasive species in the policy. Use of native species of local provenance as a way of maintaining and enhancing biodiversity should be mentioned.

Response: *The sentence to which 806 refers states “Opportunities to incorporate and enhance biodiversity should be identified”. It is therefore not felt necessary to repeat “incorporated”.*

Parish Plans do not form part of the statutory development plan and any designations included within them are therefore not afforded the same weight as the designations listed in Policy ENV1. New Policy ENV3a includes a criterion that proposals shall demonstrate particular regard for “any non-designated, locally-identified, significant landscape features justified in a Parish Plan or equivalent document”.

Safeguarding existing features of nature conservation interest including BAP (Priority) Habitats and existing networks of ecological interest including ancient woodland and hedgerows for example is built into this policy. It is considered that this provides suitable overarching policy, with the use of native species of local provenance being more appropriately dealt with through the imposition of conditions at planning decision stage.

No changes required.

Support 478 and 118 support the proposed new wording to ENV1.

Response: *Support noted.*

MC71 – new supporting paragraphs after 5.313 (Setting of AONBs)

Representations have been received from the following consultees:

Summary of Representations – Main Issues

1087 Canon Woods and Orchard Action Group	479 Kent Downs AONB Unit (Katie Miller)
1089 Hannah Daw	648 Environment Agency (Jennifer Wilson)
667 High Weald AONB Unit (Claire Tester)	430 Sally Cunningham
807 Kent County Council	119 Natural England (Sean Hanna)
1189 Gladman Developments (Mat Evans)	

Issue – Setting of an AONB

1087 states that the setting of an AONB can be far more extensive than land which is immediately adjoining.

1189 objects to the wording ‘Within the setting of the AONBs, priority will be given over other planning considerations to the conservation or enhancements of natural beauty’. It considers that such issues must be considered on a case by case basis and assessed as part of a balancing exercise in determining if development constitutes sustainable development.

Response *The reality that the setting of an AONB is wider than the land immediately it adjoining is already acknowledged in the proposed new text following paragraph 5.313 (MC71) “...in addition to this the settings comprise land adjacent to or within close proximity of the AONB boundary, which is visible from the AONBs and from which the AONBs can be seen. The setting may be wider in certain circumstances, for example when affected by features such as noise and light [...]”. No change required.*

The priority given to the conservation or enhancement of natural beauty reflects the requirements of the Countryside and Rights of Way Act 2000. No change required.

Issue – Saxon Shore parishes landscape protection submission

1089 and 430 asking for a landscape protection policy similar to that which formed part of a representation from the Saxon Shore parishes to be adopted borough wide in order to protect green spaces, rural landscapes, wildlife areas, the unique characteristics of rural villages and protected green belts between settlements and or around the Ashford urban area.

Response *This Plan, which should be read as a whole, contains a range of environmental policies to protect the green spaces, rural landscapes and wildlife areas of the borough. With regard to the unique characteristics of rural villages and protected green areas between settlements around the Ashford urban area, the Council responded to concern expressed at the Regulation 19 Stage (2016) about the growth of urban development principally on the edge of Ashford affecting the individuality of nearby villages, with the addition of new Policy*

SP7 (MC85). This new ‘separation of settlements’ policy is clear that the need to avoid coalescence of settlements should be regarded as an important determinant of whether a proposed development is acceptable or not and to this end states that development that would result in coalescence or the significant erosion of a gap between settlements resulting in the loss of individual identity or character will not be permitted.

With regard to the protection of significant landscape features in rural areas across the borough, new Policy ENV3a includes a criterion that proposals shall demonstrate particular regard for “any non-designated, locally-identified, significant landscape features justified in a Parish Plan or equivalent document”. These policies are considered sufficient to address the matters and protect the aspects of landscape referred to in these representations. No changes required.

Issue – Status of AONBs

667 and 479 (the High Weald and Kent Downs AONB Units) both request that the second sentence should have the word 'often' deleted so it reads "In planning policy terms they have an equivalent status to National Parks". In planning terms, AONBs have equivalent status to National Parks, as conferred in paragraph 115 of the NPPF, therefore the word ‘often’ should be deleted.

Response *Accepted. Minor Modification to remove ‘often’ from second sentence of this new section on Setting of AONB “In planning policy terms they ~~often~~ have an equivalent status to National Parks and are to be given the highest level of landscape protection.”*

Issue – additional wording

119 welcomes the additional section on the ‘setting of AONB’ but requests that the views to and from the scarp slope of the Kent Downs AONB are specifically referenced.

Response: *The priority that should and will be given to the conservation and enhancement of natural beauty including landscape features within the settings of AONBs is clearly set out in the additional text of MC71. It is not considered appropriate or necessary to selectively refer to any particular landscape feature. No change required.*

Support 479, 648, 807 support.

Response *support noted.*

MC72 – Policy ENV3

Representations have been received from the following consultees:

1189 Gladman Developments (Mat Evans)	891 Shadoxhurst Parish Council (J Batt)
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1077 Peter Brett Associates (Tim Allen)	1175 Ashford Borough Council (Councillor Jane Martin)
1083 Smeeth Parish Council (Sue Wood)	459/506 Kent Downs AONB Unit (Katie Miller)
1093 Alice Hocknell	649 Environment Agency (Jennifer Wilson)
1101 Lorenzo Castelletti	931 CPRE Kent (Hilary Moorby)
950 Elizabeth Downey	741 Kingsnorth Parish Council (L Bunn)
669 High Weald AONB Unit (Claire Tester)	1087 Canon Woods and Orchard Action Group

Summary of Representations – Main Issues

Issue – compliance with Section 85 of the Countryside and Rights of Way Act 2000

669 In ENV3b the words 'immediately adjoining' in the second sentence should be replaced by 'affecting' to be consistent with the requirement of Section 85 of the Countryside and Rights of Way Act 2000 for relevant authorities to have regard to the purpose of conserving and enhancing in exercising and performing any functions in relation to "or so as to affect" AONBs. Development outside AONBs can affect them even if it does not adjoin the boundary - for instance if it is visible from the AONB or intrinsically connected ecologically. This is particularly true where the AONB is on higher ground overlooking the lower weald, which is true for both AONBs in this area.

459, 506 supports the provision of a new AONB specific policy and the wording of this. However as proposed there is no reference to the wider setting of the AONB in the policy wording, despite an intention in the background text to give 'priority over other planning considerations to the conservation and enhancement of natural beauty'. Proposals may be sited some distance from the AONB boundary but still have the propensity to impact on the AONB and this needs to be addressed in the policy wording. Section 85 of the Countryside and Rights of Way Act 2000 requires relevant authorities to have regard to the purpose of conserving and enhancing land in an AONB in exercising or performing any functions in relation to, or so as to affect, land in an AONB. The underlying principle of the duty is that the AONB should be conserved and enhanced regardless of where any effect on it arises from. Likewise the requirement for great weight to be given to conserving landscape quality and scenic beauty under paragraph 115 of the NPPF is applicable regardless of whether the development is located within the AONB, or on land outside but so as to affect (i.e. in the setting of) the AONB. The AONB setting issue is now recognised as an important consideration that is supported in both legislation and recent appeal/high court decisions as well as at paragraph 003 Ref ID 8-003-20140306 of the PPG.

Response: Accepted. Amend wording of Policy ENV3b "Other proposals within ~~and~~ immediately adjoining affecting the AONBs [...]"

Issue – wording issues

1189 request that the wording in the criteria of policy ENV3b be changed to conserve and enhance, rather than just enhance. The policy should also reflect the differences of development within an AONB and adjacent to an AONB, where the impacts on the AONB may be considerably different.

1087 As worded, the Policy suggests that the tests concerning development immediately adjoining the AONBs only apply to proposals which are not “major development proposals” (i.e. minor development proposals). This is nonsensical as it would mean that the Policy would not apply to any major development proposals which were located within the setting of the AONBs, even those immediately adjacent to the AONB boundary.

Response: *The wording of new Policy ENV3b already requires that the landscape of the AONBs in the Borough be “conserved and, where appropriate, enhanced or restored [..]”*

The reference to major proposals complies with paragraph 116 of the NPPF. The criteria against which proposals in and affecting AONBs will be determined are clearly set out in this Policy and would also be required to be compliant with the Plan as whole. No changes required.

Issue – Landscape policy approach for villages

1077, 1175, 1093, 950, 1101, 1083 and 891 wish the Council to consider the inclusion of a suitably worded landscape protection policy against which proposals for land use changes and development in the rural areas outside of the AONB will be assessed and which would protect green areas between settlements in and around the Ashford urban area to prevent urban sprawl.

Response *With regard to the protection of significant landscape features in rural areas across the borough, new Policy ENV3a includes a criterion that proposals shall demonstrate particular regard for “any non-designated, locally-identified, significant landscape features justified in a Parish Plan or equivalent document”. In addition the Plan, which should be read as a whole, contains a range of environmental policies to protect the green spaces, rural landscapes and wildlife areas of the borough.*

With regard to the unique characteristics of rural villages and protected green areas between settlements around the Ashford urban area, the Council has responded to concern expressed at the Regulation 19 Stage about the growth of urban development principally on the edge of Ashford affecting the individuality of nearby villages, with the addition of Policy SP7 (MC85). This new ‘separation of settlements’ policy is clear that the need to avoid coalescence of settlements should be regarded as an important determinant of whether a proposed development is acceptable or not and to this end states that development which would result in coalescence or the significant erosion of a gap between settlements resulting in the loss of individual identity or character will not be permitted. These policies are considered sufficient to address the matters and protect the aspects of landscape referred to in these representations. No changes required.

Support 649, 931 and 741 support this proposed main change.

Response Support noted.

MC73 – Policy ENV5 paragraph 5.322

Representation has been received from the following consultee:

808 Kent County Council	
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Summary of Representations – Main Issues

Support 808 supports the change however the document’s title has been altered which needs to be reflected in the text.

Response: Noted. Amend second sentence to read “KCC’s Rights of Way Improvement Plan, (currently entitled the Countryside and Coastal Access Improvement Plan)...”

MC74 – Policy ENV7 Water Efficiency

Representation has been received from the following consultee:

650 Environment Agency (Jennifer Wilson)	
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Summary of Representations – Main Issues

Support 650 continues to strongly support the long-term strategy to reduce water use focused on changing customer behaviour, and, specifically, we welcome ABC’s pursuit of the optional, more stringent, requirements for water efficiency.

Response: Support noted.

MC75 – Policy ENV8 Water Quality, Supply, Treatment

Representations have been received from the following consultees:

651 Environment Agency (Jennifer Wilson)	893 Shadoxhurst Parish Council (J Batt)
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Summary of Representations – Main Issues

Issue - Policy threshold

893 states that the policy should apply to all developments of five houses or more given that several sites of fewer than 10 dwellings are more likely to be delivered in rural settlements (such as Shadoxhurst). These areas often have sewerage infrastructure that is at or near capacity, and are subject to pressure drops in potable water, and little realistic prospect of it being upgraded by way of major development.

Response: *Noted – the Council does not wish to restrict the potential for smaller developments in rural settlements to provide for local needs or incremental growth, but understands the capacity limitations of rural infrastructure. Major development is likely to have the greatest impact on local services, but the Council is content that the policy and supporting text require all development proposals to consider existing capacity and to work with the relevant provider/undertaker. Upgrading of infrastructure for smaller developments can be conditioned through the planning application process if required.*

Issue – Effluent discharge

651 asks that statement is added ensuring development complies with the Environmental Permitting Regulations for foul effluent discharges to surface water or ground. Developments should also include a suitable plan for foul sewage disposal during constructions works – particularly on large scale developments.

Response: *Noted. All development has to comply with environmental regulations. Construction activity is best approached at the planning application determination stage if required.*

MC76 – Policy ENV9 SuDS

Representations have been received from the following consultees:

294 River Stour (Kent) Internal Drainage Board (Peter Dowling)	893 Shadoxhurst Parish Council (J Batt)
320 Ward Member for Isle of Oxney (Michael Burgess)	652 Environment Agency

Summary of Representations – Main Issues

Issue – Maintenance

893 and 652 states that the long term maintenance is essential and should be included in this policy.

Response *This is already covered in criterion J) of Policy ENV9. No change required.*

Issue – SuDS Strategy is required prior to commencement

294 and 320 express concern at proposed change given that, since the main purpose of SuDS is to ensure runoff from developed areas is properly attenuated preventing downstream flood risk, it should therefore be in place and operational prior to development and formulated at an initial stage.

Response *Noted. However, the Council is content that the deleted text is superfluous, and any pre-commencement conditions must be discharged in any eventuality in accordance with national policy and guidance.*

MC77 – Policy ENV10 Renewable Energy

Representation has been received from the following consultee:

480 Kent Downs AONB Unit (Katie Miller)	
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Summary of Representations – Main Issues

Support 480 supports the inclusion of LVIA requirements, and introduction of new paragraphs supporting biomass.

Response *Support Noted.*

MC78 – Policy ENV12 Air Quality

No representations were received.

MC79 – Policy COM1 Meeting Needs of Community

Representations have been received from the following consultees:

1069 Aldington and Bonnington Parish Council	922 CPRE Kent (Ashford)
739 Kingsnorth Parish Council	

Summary of Representations – Main Issues

Issue - Infrastructure Provision and Timing

1069 believes that infrastructure needs to be in place before further development commences. In Aldington's experience, developments have been taken place and, as part of the S106 agreement, the funding for Parish Council projects is made available only when upwards of 75% of the properties have been occupied. In addition, individually small developments do not generate the levels of S106 funding required to enable meaningful infrastructure projects to be completed.

The local plan site allocations for Aldington call for S106 funding for the upkeep of recreation and play facilities. As already stated, Aldington is already well equipped in this respect. The Parish needs meaningful enhancements to infrastructure to improve the community's quality of life.

Response: *Section 106 agreements are negotiated by the Borough Council, with input as appropriate from Parish Councils and infrastructure providers, and developers. The Council has certain specific requirements required under policies which relate to a number of these topics, such as affordable housing, parking standards, open space standards etc, and the open space provision is often covered within policy requirements as a specific criterion. There is some flexibility within this S106 negotiation, and if a PC wishes to request less open space in substitution for an alternative community provision then this can be dealt with by planning and open space officers at that time if there is evidence to support this case.*

S106 money paid for by a specific development proposal must be meeting the needs created by that particular development, and not to resolve other issues present prior to the development taking place. This is set out in the Town and Country Planning Act 1990, and specific regulations must be adhered to which include that they are only used to make a development proposal acceptable in planning terms, that would not otherwise be acceptable.

It is usual practice that section 106 monies are paid at various stages of the build progress. This is to enable to scheme to be viable and be built in a timely manner. If a piece of key infrastructure is required (for example a highway improvement) prior to development being occupied, then this would require evidence to be presented.

With regards to the contributions received, again these must be relative to the size of the development, and therefore larger schemes create larger contributions.

Support

922 and 739 support the proposed Main Change.

Response: *Support noted.*

MC80 – Recreation, Sport, Play and Open Spaces

Representations have been received from the following consultees:

1199 Tenterden Town Football Club (Stuart Saunders)	367 Sport England (Laura Hutson)
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Summary of Representations – Main Issues

Issue: Allocation for playing fields in Tenterden

1199 states that there is poor provision for playing fields in Tenterden and this has been made aware by the recently adopted Playing Pitch Strategy that Ashford has developed in conjunction with Sport England. There is an opportunity to improve Homewood School (Appledore Road) playing fields which accommodates an 11 a-side football pitch. The adjacent field has the ability to be turned into additional pitches to serve mini soccer and adult football. These sites are accessible by road, public transport, foot and bicycle, therefore sustainable.

Response: *The site has not been submitted by the landowner to be allocated for these uses and therefore is not available. The Local Plan would not allocate land for this use unless it was available and required as part of a development proposal or proposed by the recently updated Playing Pitch Strategy which is a supporting document to the Local Plan 2030.*

There is also an alternative option for parishes or community groups that may wish to apply for formal open space designation under the community rights and Localism Act. However, it should be noted that evidence is required that the land has been used a ‘public’ space historically, rather than private space.

Issue - Ashford Playing Pitch Strategy

367 would encourage that this policy references the new Ashford Playing Pitch Strategy. This would be helpful to both applicants and development management colleagues as the PPS makes clear which sites are mentioned as protected for sporting use.

Response *Agreed – minor edit proposed to specifically mention the Playing Pitch Strategy.*

Amend second sentence of paragraph 5.432

These figures are derived from evidence including the emerging Ashford Borough Playing Pitch Strategy, alongside standards set out in the current Green Spaces and Water Environment SPD.

MC81 – Monitoring and Review

Representation has been received from the following consultee:

1190 Gladman Developments (Mat Evans)	
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Summary of Representations – Main Issues

Issue - Review period

1190 argues that a specific review policy should reflect the proposals set out in the Housing White Paper and that it may be necessary to consider additional triggers for a shorter review if monitoring or national policy shifts.

Response: *It is agreed that short term Local Plan reviews may be required, including in circumstances where national guidance is altered. The wording here advises that short term reviews will be undertaken if it is clear from monitoring that key elements of the strategy are not being delivered and complies with national guidance at the time of writing.*

MC82 - Updated Key Diagram - Revised Ashford Urban Area Figure 2 Insert

Representations have been received from the following consultees:

994 LRM Planning Limited	383 Sally Cunningham
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Summary of Representations – Main Issues

Issue - Footprint of Court Lodge and Pound Lane link

994 the built footprint of Court Lodge is indicated on the updated key diagram but the site policy allows for flexibility therefore the key diagram should not be afforded a status where it would predetermine the arrangement of the site. In addition, the key diagram indicates the location of Pound Lane Link Road however there is no policy requiring this or evidence to suggest this is required. This should be deleted.

Response *The insert map is indicative only. With regard to the Pound Lane Link Road this is an integral part of development proposals to the south of the town and is required by Policy S3.*

Issue - Representation of strategic gaps

383 The plan does not do enough to protect the environment. Policy SP7 should be indicated on the plan as a clearly defined area as is the case with Green Belts.

Response: Policy SP7 is not a land use designation and its purpose is not to designate all land around settlements as protected from development, but rather to protect settlements from coalescence. As detailed within the policy, the decision will take into account individual and cumulative effects. The supporting text provides detailed justification and definition for the context and purpose of the policy and the factors which will be taken into consideration, which relate back to the principle of sustainable development.

MC82 relates solely to the Ashford Urban Area where environmental protection measures include the green corridor which is included the Key Diagram.

Issue - Need for comprehensive maps

383 suggests that each parish is given a small map of the developments in their borough as it is difficult to see the broader cumulative effect of the plan.

Response Local plan policies, including site policies, are available online through the Ashford.gov.uk website. Parish Councils are provided with copies of all Local Plan documents.

MC83 – Updated Green Corridor Diagram

Representations have been received from the following consultees:

995 LRM Planning Limited (Owen Jones)	70 Mersham with Sevington Parish Council (Tracey Block)
475 Jennifer Taylor	

Summary of Representations – Main Issues

Issue - Court Lodge

995 the Updated Green Corridor Diagram as it relates to South Ashford is predicated on the built footprint of development at Court Lodge being located on the northern half of the site, with the green infrastructure and corresponding green corridor being located to the south. MC10 provides flexibility for a different footprint for the built development. In this alternative scenario the green corridor would in fact be immediately south of the existing urban area. This would not harm the overall aspiration to extend the green corridor to the south of the town.

Response: The updated diagram only shows the future extension areas as indicative arrows and not exact boundaries. This enables flexibility with the future allocation of the Green Corridor to be determined after completion of the proposed developments in these locations.

The Green Corridor is a connected network of green spaces which are used for a particular function (movement, ecology, flood zone, recreation) and is not an allocation of land to protect areas from development.

Issue - Further areas should be designated

475 contends that all the different areas of development in the Borough should have their own Green Corridor, similar to the area between Kingsnorth village and Park Farm. If this happens, people will get more of an individual sense of belonging to a particular development and hopefully taking a pride in it.

70 is disappointed that, while the new policy SP7 Separation of Settlements is welcomed, the maps depict the land at Highfield Lane (WE15) as a “Potential Future Addition”. Given the encroachment on Mersham of the housing developments at Cheeseman’s Green, Finbury and Waterbrook, the pre-existing U19 site allocation, the lorry park extension, the pending M20 Junction 10A development and the further proposal of the S50 site for 50 housing units at Caldecott there is no credible reason to delay allocating a new green corridor addition at this location within the 2030 plan. Request that an additional allocation is confirmed within the 2030 plan for the area between Highfield Lane and Blind Lane.

Response: *The area between Kingsnorth village and Park Farm was formal ‘green buffer zone’ created by legal agreement to protect the village characteristics when the permission for Park Farm was granted. It is now proposed as a Green Corridor extension area as its functions and uses now (Open Space, pedestrian linkages etc) meet the requirements of the Green Corridor designation. All new developments do have open space and recreation requirements which they must provide within the development itself, and where located on the edge of a settlement, appropriate buffers will be considered, but these areas would need to be established and meet the functions of the Green Corridor before they could be designated as part of this overall network.*

The area around Highfield Lane is identified as an area of future extension, as at present the land is not meeting the functions of the green corridor network, but with the planned developments, outlined in the representation above, it is likely that this area will become land which meets much of the criteria. To designate as Green Corridor now, the exact boundary and use would need to be defined, and as the developments are yet to get permission or commence, it would not be clear where these boundaries could be applied to create a functional movement network.

The new Policy SP7 however, will assist in meeting the requirements sought by the village of Mersham, as along with the Windfall housing policies and landscape protection policies within the Local Plan, it will restrict development proposals which result (Individually and cumulatively) in the merging of settlements and loss of green gaps between settlements.

MC84 – Revised Housing Trajectory

Representations have been received from the following consultees:

Summary of Representations – Main Issues

1182 and 1191 Gladman Developments (Mat Evans)	999 LRM Planning Limited (Owen Jones)
949 Millwood Designer Homes Ltd (Millwood)	996 LRM Planning Limited (Owen Jones)
769 James Ransley	766 Westwell Parish Council (Sue Wood)
895 Shadoxhurst Parish Council (J Batt)	1061 Church Commissioners for England
1168 Judith Ashton Associates	414 Thomas Bates & Son Ltd (Joshua Bates)
355 The Boyd Family	357 The Boyd Family

Issue - Phasing and delivery rate assumptions

1182 states that the evidence in the plan at present is limited to a trajectory without explanation as to such key elements as lead in times and build out rates.

A number of representations raise site specific delivery issues. 949 states that complications have arisen with S10 including contamination issues, that need to be resolved. It can be assumed that should 5 years from commencement of development actually be achieved, this will not be in the year 2021/22. It is much more realistic to assume that the developer, on the provision they can meet the deadlines, will release the dwellings at a much slower rate. The site is in very close proximity at Elwick Road, releasing 100 units to the Ashford housing market at the same time, notwithstanding that this outline application is not yet consented, despite being submitted 2 years ago and facing similar constraints and issues as the Former Powergen Site.

999 and 996 support first completions on S3 in 2020/21. Whilst this still requires the Council to deal expeditiously with a planning application it is a more realistic timescale.

1168 Without clear understanding on the number of developers involved in the delivery of Chilmington Green it is impossible to say with certainty that this site will be delivering in excess of 200dpa year on from 22/23 to 29/30. The delivery rate at S10 seems to be optimistic and the start dates for some of the proposed new allocations seems to be optimistic given said sites have not been the subject of independent examination yet, nor planning applications submitted. There needs to be a contingency built into the commitments to address the issue of non-delivery, the true level of commitments is in our opinion likely to be significantly less than suggested. As a result, and as we also believe the OAHN to be some 85dpa greater than suggested by ABC, ABC need to identify additional strategic sites if they are to meet their housing requirement / provide for any flexibility as required by the NPPF. Without evidence to support the housing trajectory the ALPMC cannot be said to be sound and failure to address this point will also lead to this.

Response: *The housing trajectory delivery rate phasing is based on a number of sources. These include dialogue with the landowners/developers in relation to their plans for development and their assumptions alongside a number of additional factors including current and historic completion rates, market issues, individual site constraints and borough wide infrastructure scheduling (such as Junction 10a). The housing trajectory will be monitored on an annual basis, through the AMR process, and therefore the council does not intend to amend the phasing of sites unless there is evidence to support an amendment (with the exception of minor factual updates to recent permissions and withdrawals).*

Issue - The Delivery of the 5 Year Housing Land Supply

1191 concerned about the ability to demonstrate a 5 year housing land supply.

769 considers that the 5 year land supply should be reduced by 975 dwellings and the Local Plan supply by 2,960 resulting in housing shortfall. Due to capacity constraint associated with the new J10a, there is doubt over the deliverability of the scale of development proposed south of this constraint. The tidal peak flows, a rebalancing of allocations to include housing north of J10a DCO, would produce large counter tidal peak flows. This would represent a more deliverable strategy making the best of existing capacity.

1061 the Local Plan should identify additional safeguarded/allocated housing sites to mitigate periods when the Council cannot demonstrate a five year housing land supply. Land at Cheeseman's Green and Swanton, promoted by the Commissioners, would be appropriate sites. The inclusion of these additional sites would make the Local Plan effective and positively prepared.

Response *These points are dealt with in responses to MC4.*

Issue - Changes following application decisions

895 highlights that the allocation for S36 is 25 in the housing trajectory. However, the current planning application is now 19 and should be lower to allow room for a proper size of village green to be created. Therefore the Revised Trajectory is incorrect. Should the 19 be granted before the Local Plan is properly tested, presumably the 19 will have to become a windfall site tally and the trajectory would have to be further amended.

Response: *Following this consultation period a number of planning applications have been granted. The application for the reduced amount of 19 houses, rather than 25 outlined in the policy, has been permitted. The HT will therefore be updated to reflect this factual update. It will not be included as a 'windfall' but assigned against the draft policy to avoid duplication.*

Issue - Feasibility Assessments

766 S47 is shown as delivering 25 dwellings in 2019/20 and 50 in 2020/21. This document needs to be amended to take account of the further evidence and assessments that need to be carried out to establish the noise and vibration conditions applying to this site from road and train traffic to both north and south of the site. Site S47 is in a strategic transport corridor in the open countryside without any noise screening, which is one reason it is in agricultural land use and not housing. The requirements for construction, noise insulation and viability need to be assessed before this can be deemed deliverable. The need for a vibration assessment arises because trains are passing close by at 300km / hr on an underlying

geology of sand. There also needs to be a complete reworking of the transport access feasibility assessment to take account of the function and characteristics of the A20 as a strategic Kent highway, including as an emergency substitute for the M20 during Operation Stack, as well as a local road. This functionality and requirements may moderate not only the delivery of S47 but also S49.

Response: *this is dealt with in response to MC90.*

Issue - Housing

355 and 357 The trajectory has no housing delivery identified through allocations outside urban sites from 22/23 onward which is only 5 years from the likely adoption date (18/19). Lack of specific reference to sites, dates and build-outs in rural village areas limits the ability to plan for the future of these areas. Does not respond to NPPF and the NPPF 55 requirement to 'promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities'.

Response: *this issue is responded to under MC4.*

Issue - Neighbourhood Plans

414 Neighbourhood Plans are progressing at very slow rates such that sites are being assessed are unlikely to contribute to housing need in the early years of the Local Plan. In some cases the Parish Council response is not only slow but results in a resistance to all growth. The Neighbourhood Plan for Boughton Aluph and Eastwell lags behind the Local Plan for Ashford. Due to the important role that the rural housing market has to play in meeting housing need we object to the proposed housing strategy that fails to identify sufficient sites as 'allocations' for new housing and thereby ensure that the target for housing can realistically be delivered.

Response *The decision to produce a Neighbourhood Plan and its preparation is the responsibility of neighbourhood plan groups. The fundamental strategy for housing development in the borough is one of focusing the majority of development in and around Ashford as the most sustainable form of development where services, jobs and excellent road and public transport links are readily available. In contrast, the rural parts of the borough are, by comparison, relatively poorly served, with Tenterden and a handful of rural service centres providing a limited range of facilities but inevitably requiring travel to access higher order services and facilities and many employment opportunities. The inherent qualities and character that make the rural areas attractive in the first place are also important considerations and whilst national policy is now clear that the countryside should not be protected for its own right, much of the rural area within the borough is designated as AONB or otherwise provides the characteristic landscape setting for the villages that generate the 'Garden of England' image.*

The general thrust of this approach remains sound although this Plan has recognised the need for a limited scale of new development to be able to come forward across the rural areas through a broader range of allocations and a more permissive policy for residential windfall development in accordance with the NPPF. The contention that the Plan fails to identify sufficient sites for new housing in rural areas is not supported.

MC85 – Policy SP7 – Separation of Settlements

Representations have been received from the following consultees:

20 Stephen Penny	25 Hallett
84 Linda Arthur	314 Egerton Parish Council
384 Sally Cunningham	768 Jane Struthers
424 Hothfield Parish Council	418 Thomas Bates & Sons Ltd
923 CPRE Kent (Ashford District)	753 RA Joynson
445 Charlotte Burke	486 Kent Downs AONB Unit
1118 Aviva and DMI Properties Ltd	896 Shadoxhurst Parish Council
767 Westwell Parish Council	696 Boughton Aluph and Eastwell Parish Council
839 Margery Thomas	847 Sandyhurst Lane Residents Association
880 Sharon Swandale	976 Carol Procter
861 Heather Lister	

Summary of Representations – Main Issues

Issue – Policy too restrictive

1118 object to this new emerging policy which seeks to implement a ‘green belt’ style rule on development outside of settlements. There is no green belt designation within Ashford and we do not consider it appropriate to adopt a self-styled version of this. Regardless of this, the policy should not be applied as a ‘blanket cover’ to the whole borough, as this would restrict the growth of Ashford and the development of Sites which are otherwise appropriate in the Urban Area. We consider that this would give rise to conflict between other policies within the development plan, as well as the strategic objectives of the Borough.

Ashford has a requirement to provide further residential and employment uses over the plan period, and the implementation of this policy would likely prevent sites from coming forward and assisting in meeting this need and/or future demand. A number of villages are located within the Ashford Urban Area, an area which is described in emerging policy SP2 as the

most sustainable location for new housing development, and which is close to existing and future services.

418 submit that proposals to extend Eureka Park, that include the longer term use of the adjoining golf club as well as smaller scale proposals that are being considered by Boughton Aluph and Eastwell Parish Council, will contravene this policy.

768 disagree with the separation of settlements policy in the plan. All of the settlements are already separated and so I think this goes against the government who say they are getting rid of unnecessary bureaucracy. I think the council is trying to do too much in this plan and I think that you should let the market decide where it wants to build.

20 Policy SP7 demonstrates yet again the Council's uneven approach to supporting sustainable development and affordable housing, which has resulted in policies that need a raft of others to rectify their shortcomings. The introduction of this policy at the eleventh hour undermines the integrity of the NPPF guidance accepted in MC51, that sustainable development immediately outside or adjoining the confines of a village should merit a presumption in favour of development - by erecting artificial barriers of no proven veracity to sites most likely to meet the sustainability criteria.

The Council offers no evidence that the absorption of a hamlet by the expansion of a village, or the coalescence of two villages, is detrimental to either, or inferior in its provision of sustainable housing, employment or quality of life than two separate villages would be.

Further, the segregational effect inherent in this policy is one of the key drivers of exclusivity and the desire to keep out the poorer sections of the community, which as our housing market clearly demonstrates, leads to premium pricing and undermines the policy of affordability that the Council aims to promote.

Response: *The intention of this policy is not to designate all land around settlements as protected from development, but to protect settlements from coalescence. It is not a land use designation, and each application will be decided on its own merits and the policy given relevant weight based on local circumstance. As detailed within the policy, the decision will take into account individual and cumulative effects. The supporting text provides detailed justification and definition for the context and purpose of the policy and the factors which will be taken into consideration, which relate back to the principle of sustainable development.*

With regards to segregational effects, the council does not agree that this would not be created by the adoption of this policy. Most settlements within the borough will see proportionate growth through allocations and/or windfall development over the plan period. In addition all sites of 10 or more homes are required to provide affordable housing and a mix of dwelling types and sizes in accordance with other policies within the plan. There are also policies for local needs and custom build housing, which together with the mix and affordable requirements will provide a range of housing options across the borough, for all sections of the community. These policies are not undermined by the principle of protecting the character and identity of settlements from coalescence in Policy SP7.

Issue – Policy not effective

896 believes that this policy does not go far enough to properly protect Shadoxhurst. There must be a greater acknowledgement of the importance of avoiding coalescence by stealth which must include proper consideration of the cumulative effects of development in the pipeline, not just applications in isolation.

976, 384 consider that for the policy to be effective, it needs to be much stronger, with more detail and clarity, and an agreed shared understanding of what it actually means. Only then can it instil any confidence that it is more than just an aspirational policy and can be implemented in a meaningful way.

84 the policy should be more positively and proactively worded and looking more specifically at examples. In addition, there is no mention of what area a buffer zone should be. How large a space is required to separate settlements? A buffer zone should be large enough to provide a natural, strategic gap.

976 states that Chilmington Green is not covered by this Local Plan. It has its own rules in the Chilmington Green Area Action Plan (2013). Will it recognise / adopt policy SP7?

Response: *The NPPF states that Local Plans must be prepared with the objective of contributing to the achievement of sustainable development. To this end, they should be consistent the presumption in favour of sustainable development, and therefore constraining specific areas around settlements and restricting development, without detailed landscape evidence of constraint or specific ecological or landscape designations on the land, this would not be in accordance with this principle. Allocated 'buffer' areas would be different in each location and the design and scale of specific development proposals would affect different landscapes and settlements in different ways. Therefore setting specific borough-wide criteria for what constitutes an appropriate 'buffer' would not be justified or effective in plan making terms.*

However, PPG guidance on Natural Environment does state that planning should recognise the intrinsic character and beauty of the countryside and that Local plans should include strategic policies for the conservation and enhancement of the natural environment, including landscape. In order to address this issue, a number of policies are included within the Local Plan which include; ENV3a- Landscape Character and Design, ENV3b – Landscape Character and Design in AONB's and ENV5 – Protecting important rural features, which together will ensure that the design proposals coming forward demonstrate particular regard to the landscape characteristics of the area, and in particular the rural landscape and character. In addition, Policies HOU3a and HOU5 cover the issue of windfall development proposals within and outside settlements, with the latter being restrictive to development in the countryside and requiring a number of criterion to be met such as development sitting sympathetically within the landscape, preservation and enhancement of the nearest settlement and 'appropriately sized' landscaped buffers to the open countryside. The term 'appropriately sized' is flexible enough to allow individual site and location circumstances to be considered and this does not require repetition in SP7.

Policy SP7 compliments these policies and specifically covers the issue of coalescence of settlements, and whether development proposals individually or cumulatively would not cause merging or loss of gaps between them. Taken together, these Local Plan policies create the appropriate level of protection for the countryside, edges of settlements and the

landscape character as directed by the NPPF, whilst allowing sufficient flexibility and a case by case judgement to be applied to development proposals whilst also applying the principles of sustainable development.

Issue – A20 corridor sites conflict

847 believes Policy SP7 will make unsound the current “A20 corridor” proposals, including S47 Land East of Hothfield Mill.

839 argues that this policy is welcome but not effective because policies S47, S48, S49 contravene it and immediately render the policy undeliverable.

314, 861 concerned that this new policy may be undermined by the proposals for the A20 corridor (Policies S47, S48, S49, S50), and or Charing in S28 and S29 where the creation of a series of ribbon development could give the impression of contiguous development that in due course could all too easily become joined up.

Response: The A20 site allocations are not located in areas where they create coalescence between existing settlements. Once developed, Policy SP7 would be applicable to the areas around the new development and the existing areas of Charing and Ashford, and therefore would prevent the coalescence of the areas, rather than encourage it.

Issue – Promotion of Landscape Protection policy

880 - While SP7 is a good starting point it does not go far enough. Several villages have joined together to propose a Landscape Protection Policy, this is a far more proactive policy and the council should adopt it borough wide. The cumulative impact of development and its relationship to the infrastructure and surrounding communities should be considered as a priority.

384 and 753 The current plan and policies, makes little mention of the Landscape Protection Policy that a number of villages have worked on to preserve the rural setting. I would like to see this included in the plan and specifically reflected in this policy. 753 wishes to see Landscape protection policy adopted.

Response *This Plan, which should be read as a whole, contains a range of environmental policies to protect the green spaces, rural landscapes and wildlife areas of the borough. With regard to the unique characteristics of rural villages and protected green areas between settlements around the Ashford urban area, the Council responded to concern expressed at the Regulation 19 Stage (2016) about the growth of urban development principally on the edge of Ashford affecting the individuality of nearby villages, with the addition of new Policy SP7 (MC85). This new ‘separation of settlements’ policy is clear that the need to avoid coalescence of settlements should be regarded as an important determinant of whether a proposed development is acceptable or not and to this end states that development that would result in coalescence or the significant erosion of a gap between settlements resulting in the loss of individual identity or character will not be permitted.*

With regard to the protection of significant landscape features in rural areas across the borough, new Policy ENV3a includes a criterion that proposals shall demonstrate particular regard for “any non-designated, locally-identified, significant landscape features justified in a Parish Plan or equivalent document”. These policies are considered sufficient to address the

matters and protect the aspects of landscape referred to in these representations. No changes required.

Issue – Land designation requests (Green Belt, Green Corridors and Confines)

896 ABC must actively encourage villages and parishes to define their limits and green spaces, demonstrating a delineated buffer in terms of a form of special status and protection within the Local Plan. A 100 metre 'green strip' for example, will not be sufficient in most cases to separate communities, particularly where this encroachment damages the character, visual beauty and defining aspects of the community. Each is different and the pressures and constraints will vary.

896 A key aspect of this policy is to ensure there are green corridors both within and between communities and settlements. A green space on its own can only draw in certain species and in maintaining full biodiversity opportunities it is imperative to ensure a continuation of green areas both through and between settlements. Although this is recognised in the Ashford policies to some extent, Shadoxhurst has lost a vital green corridor to development in 2017 and there was insufficient weight given to the importance of the green corridor and ABC failed to protect this key green space. Green corridors exist in the south of the Parish and connect with SSSI's, the BOA and the protected Forest of Orlestone. We seek to protect these and the other corridors that are likely to be threatened by development. These are defined on the Shadoxhurst Proposals Map. This includes a corridor through to the proposed Discovery Park at Chilmington, and highlights the need for protected corridors into Bromley Green, other parts of Ruckinge and Kingsnorth. Kingsnorth is particularly important due to the considerable development already built and further growth being proposed, again squeezing out all forms of wildlife.

880 Environmental and leisure uses should be planned by the council and land allocated as open spaces to preserve the rural way of life, this is an essential part of what makes the wider Ashford Borough so attractive. Leaving this up to developers is not far thinking enough and green buffers should be included in the 2030 plan. This is a chance for Ashford to lead the way in maintaining a rural urban balance, please do not leave it to developers to shape our landscape.

839 recent boundary changes emphasising edges of rural and urban development should be noted and respected in SP7. SP7 should include the identification of open spaces and green corridors between and within parishes, and give them permanent protected status. 424 agrees that open spaces and green corridors between and within parishes should be identified in the Local Plan and be awarded specific status and be protected from future development in perpetuity.

384 I would like to see a firmer commitment to green buffers or green belts around villages and a firm boundary of where the ashford urban area ends. Most residents in places like Shadoxhurst and Bromley Green are seriously concerned about losing rural village characteristics to encroaching urban developments.

84 To adequately protect Mersham, the land to the east of Cheeseman's Green Lane should also be mentioned as an example of a potential buffer zone in the supporting text

445 at no point does this policy attempt to indicate where the boundaries to 'Ashford' may lie. It will be important to include green buffer zones around urban Ashford, in part for environmental and flood-plain reasons and in part to delineate and protect the surrounding rural villages. A firm commitment to keep urban sprawl in check, at least to 2030, will show that Ashford has looked into the needs of its rural neighbours.

976 If Ashford Borough Council are serious about keeping settlements separate and maintaining their individual identity and character, then we actually need a greenbelt policy which will afford us stronger protection.

896 ask ABC to put in place a process that will lead to applying for a formal designation of a legal and defensible Green Belt around Ashford. This is a challenge that we hope that Ashford Borough Council will rise to and champion. We will certainly contribute to and support. Whilst there is a clear need to serve a housing need, there must be a clear delineation that will help protect vulnerable areas of green space.

Response: *There is no Green Belt designation within the. The NPPF directs that the designation of new green belts should only be made in exceptional circumstances, typically located around large new settlements.*

Masterplanning, both of the urban extension at Chilmington through the Chilmington AAP and of other large scale allocations on the urban edge provide for generous levels of green space and buffers, reflecting Ashford's rural location. In addition, the successful and well established Ashford Green Corridor designation which runs through the main urban area Ashford into the countryside, creates a very similar level of protection. Policy SP7 adds further weight to this position.

Issue – Specific Site Concerns

880– The owner of WE15 is known to have plans to extend their warehouse development, in neighbouring U19, across the agricultural landscape. This is the final open space between Mersham and Ashford. Sevington is encircled by the U19 development, which is completely out of scale in a rural landscape. WE 15 must be protected from any development, just giving a few metres over to leisure use will not mitigate the impact of the warehouses that have already been given outline planning permission, let alone the enormous ones in the un-submitted plans.

84 would like to see mention of an example of a future buffer zone to protect the character and identity of the village of Mersham from encroaching development. There is overwhelming support for WE15, the land between Highfield Lane and Blind Lane, to become a buffer zone and this deserves to be included in the supporting text.

25- I do not agree or support the plans to allow the land (we15) to be built on. We need to keep the protective buffers nor do I think that allowing this change to happen will benefit the local area. The land will be a direct destructive means to Mersham village.

Response: *WE15 is an omission site and a response to this representation is therefore found in the SHELAA Report. The Council is not supporting the inclusion of this new development location in the Local Plan. The Cheesman's Green site is Policy S15 (Finberry*

North West) and the proposals for that area remain. The inclusion of Policy SP7 is designed 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. Any applications in the areas between settlements, such as this, will be required to be in accordance with these policy requirements

Issue- Suggested edit to policy

896, 424, 767 and 923 would like the first sentence in the second paragraph to be amended read to change the word will to ‘may’ which removes assumptions that permission will be granted and adds flexibility also suggest and/or support this proposed amendment.

Response: *The proposed change of the word in the sentence as suggested does not change the context of this whole paragraph and is therefore not required. The paragraph as worded, clearly states that development will be permitted subject to there being no overriding conflicts with other policies and the wider objectives of the plan. Therefore the position is that permission is not guaranteed. The policy is worded positively in accordance with the NPPF and the principle in favour of sustainable development and the context is already flexible due to the ‘subject to’ criteria and the word ‘may’ replacing the word ‘will’ would not alter this position, and in fact would make the whole paragraph more ambiguous in its meaning.*

Support

314, 424, 847, 486, 923, 696, 767, 896 are supportive of the new Policy SP7

Response: *Support noted*

MC86 – Policy HOU18 – Housing Mix

Representations have been received from the following consultees:

48 Catherine Feather	912 Lee Evans Planning (C Foley)
57 Stephen Penny	924 CPRE Kent Ashford District (Hilary Moorby)
85 Paul Buggins	975 Tetlow King Planning Ltd (Elaine Elstone)
742 Kingsnorth Parish Council (L Bunn)	1153 MPD Trust (C/O agent)

Summary of Representations – Main Issues

Issue – density

48 requests policy amended to ensure greater density of multi-storey blocks of flats in Ashford town to avoid building within AONB and rural area.

Response: *Noted.*

Issue – Threshold

57 supports the principle, but proposes increasing the threshold to 15dw to encourage development of smaller sites without affecting viability.

912 states that the threshold is too low and that for smaller developments the required 'evidence' is not in accordance with national policy.

Response: *Comments noted. Threshold appropriate since this is a benchmark for major development in national government policy and guidance. No change required.*

Issue – Lack of evidence

1153 states that the proportionate evidence, as required in this policy, in many cases is not up-to-date, and therefore requests this requirement to be optional.

Response: *Noted – no change required. It is appropriate that housing mix varies by location and, if local village assessments are deemed 'out of date' then the developer may provide any relevant and appropriate information that informs its approach.*

Issue – scope of policy

85 supports the policy, but asks that currently-required housing mix requirements are outlined, and that Gypsy and Traveller pitches are required as part of this policy on larger developments.

Response: *This policy serves to outline mix requirement. The Council will produce a Gypsy and Traveller SPD for delivering the needs of this group. No change required.*

Support

742, 924 and 978 support the policy.

Response: *Support noted.*

MC87 – S11a Former Bombardier Works

Representations have been received from the following consultees:

961 /810 KCC	1122 Network Rail
837 Prescott Business Park	

Summary of Representations – Main Issues

837 the proposed changes to Plan have now separated the former Policy S11 site allocation into two parts, the Leacon Road site (owned by Bretts) and our client's site. We object to this change, which we consider is not consistent with the guidance contained within the NPPF in the context of the requirements for plan-making. As such we consider that this change is unsound.

In order to provide flexibility and greater prospects of developing the former Bombardier and the Leacon Road sites, the most appropriate approach is to deal with both sites together through a single policy which promotes a comprehensive redevelopment. This is consistent with the previous version of the Plan and we see no reason, in planning terms, why this position has changed. This approach, however, should not preclude the two sites being developed separately, but any development should be consistent with an agreed masterplan. Such an approach will ensure that in overall terms, the development potential of the wider site is optimised.

In terms of the former Bombardier site, although the site may be suitable for rail use we do not agree that the site should be 'safeguarded' for such a purpose. Rail development is only one development option and despite some recent interest from Southeastern Railways, the current franchisee, it is clear that there is no certainty that any train operator, Network Rail or the Department for Transport will want to utilise this site for such a use.

In terms of non Class B uses, we note that the emerging Local Plan states in reference to employment land provision that "*the Council has concluded that in broad terms there is sufficient land allocated already within existing adopted Plans to meet the overall land requirements to 2030 and these should be rolled forward as allocations*". The former Bombardier site was not allocated for employment use in the adopted Local Plan and we understand from a recent meeting with the Council that the Borough Council has sufficient employment land at present and the loss of the Bombardier site to non-employment uses would not be a significant issue in quantitative terms. In this respect, we also note that the proposed changes to the Plan allocate additional employment land at Waterbrook. In this context, although the site may come forward for Class B uses (in part at least), the policy should allow for a range of other development opportunities, including other employment generating uses. This may include retail use, given the close proximity of the Matalan site to the west and forthcoming 'gateway' status of the roundabout following the road expansion scheme. Any uses would, however, need to be consistent with the masterplan.

Response *The Council has taken a considered view of the approach to the development of the two sites S11 and S11a. The existing rail head is a key piece of infrastructure for the town and as such the Council considers that it should be retained. The new policy S11a does not preclude commercial development on the remainder of the site outside of the area safeguarded for operational railway use whilst the S11 Leacon Road site is considered to be the most appropriate area of land for residential development.*

Issue - Heritage

810 The site lies on River Terrace Gravels and Alluvium with potential for early prehistoric remains. Significant archaeology could be dealt with through suitable conditions on a planning approval.

Response Noted

Support

961 supports policy.

1122 welcomes that ABC recognise that the site is a highly important part of infrastructure that needs to be maintained for rail purposes. In relation to the proposed allocation of commercial B1-B8 uses within the site, while Network Rail does not object to this, ABC should be aware that the land required for the operational railway is not definitive and that Network Rail's preference is for the land not to be given any alternate use until this is clarified.

Response support noted.

MC88 – S45 Land South of Brockman's Lane

Representations have been received from the following consultees:

811 KCC	641 Environment Agency
1063 Church Commissioners	120 Natural England

Summary of representations:

Issue - Highways and Transportation

811 the adjacent site S14 should solely provide the improvements to the existing signal controlled junction at Finn Farm Road, as they are reliant on this junction to provide access to their site. The policy (b) in relation to potential contribution to junction improvements at Finn Farm Road should therefore be removed from Policy S45.

Response: *The adjacent site at S14 is proposed to be accessed via a new junction from Finn Farm Road and discussions are currently underway concerning how this may be delivered in relation to draft proposals for the S14 site. The Council will liaise with KCC Highways on this issue.*

Issue - Minerals and Waste

811 This is an allocation that will affect recognised economic geology in the Ashford area, as shown on the Kent Minerals and Waste local Plan 2013-30 Ashford Borough- Mineral Safeguarding Areas proposals map. In order for this allocation to be fully evidenced as an acceptable option for the delivery of the area's sustainable growth over the Plan period to 2030, an understanding of the economic geology in this affected site is required. There may be grounds to justify why the mineral safeguarding presumption should be set aside (please refer to the criteria of Policy DM 7 of the Kent Minerals and waste Local Plan 2013-30) on the allocation, which may or may not include prior extraction of the economic geology, though this is as yet un-evidenced due to an absence of minerals assessments.

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. 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 - Heritage

811 The site lies in an area of potential associated with prehistoric and Roman activity found at Park Farm East. A phased programme of archaeological mitigation will be required. Significant archaeology could be dealt with through suitable conditions on a planning approval.

Response: *advice noted.*

Issue - Delivery schedule

1063 support the allocation of Land South of Brockfield Lane, Bridgefield. However, it is suggested that the requirement in the policy and supporting text that the development can only be delivered after the completion of site S14 should be amended. The key considerations for the suitability of the site for development is the delivery of supporting infrastructure and a critical mass of development at S14. The policy and supporting text should be amended to allow the delivery of site S45: "Following the completion of the necessary infrastructure or 75% of the dwellings at S14, whichever is earlier."

Response *The Council will liaise further with interested parties on this matter.*

Issue – river corridor

641 This site is adjacent to the Rucking Dyke, a main river so any development at this site must respect the river corridor through provision of a suitable buffer zone of at least 8m from the top of the river banks. If the increase in capacity put this requirement at risk, then we object to the increase. Rivers form an important wildlife corridors and ecological networks which Section 117 of the NPPF specifies need to be preserved and restored.

Response: noted. Under the terms of the Water Resources Act 1991, and the Land Drainage Byelaws 1981, the prior written consent of the Environment Agency is required for any proposed works or structures, in, under, over or within 8 metres of the top of the bank of a main river. Therefore this repetition is not required in Policy.

Support

120 Natural England supports the wording within Policy S45 to facilitate and contribute to the extension of the Ashford Green Corridor.

811 supports S45 (d)

Response: Support noted.

MC89 – Policy S46 – Chart Road (A28) Ashford

Representation has been received from the following consultee:

812 KCC	
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Summary of Representations – Main Issues

Issue - PROW

PROW Within Policy S46, KCC supports an extension to the existing footways and create a formal pedestrian crossing facility across Chart Road and a pedestrian/cycle access through to Kings Avenue. It is requested that a footpath connection to link Public Footpaths AU98 and AU72 is considered.

Response: Noted. These matters will be addressed at planning application stage.

Issue – Archaeology

812 The site may contain post medieval industrial remains associated with a late 19th century brickworks. Significant archaeology could be dealt with through suitable conditions on a planning approval.

Response: *Noted.*

MC90 – Policy S47 – Land East of Hothfield Mill

Representations have been received from the following consultees:

8 John Mayes	833 Lucy Simmons
22 Lambert & Foster (N Brandreth)	843 David Porter
31 Michael Briest	844 Sandyhurst Lane Residents' Association (D Porter)
121 Natural England (S Hanna)	850 Margery Thomas
141 J Bailey	856 Claire Warren
291 Penny Knatchbull	882/756/709 AC Bartlett
321 R M Partridge	883 E Boughton
358/855 Jolyon Drury	906 Mark Daisey
378 Derek Warner	917 Colin Lester
389 Dean Warren	910 John Ralph
488 Kent Downs AONB Unit (K Miller)	925 CPRE Kent Ashford District (H Moorby)
580 Kent Wildlife Trust (Vanessa Evans)	937 Porchlight (C Williams)
680 EA (J Wilson)	938 Kelie Williams
719 James Ransley	946 Millwood Designer Homes Ltd
723 Sue Wood	988 Celeste Muir
730 Iris Freemantle	1095 Sue Power
756 AC Bartlett	1020 Ian Lloyd
761 Westwell Parish Council (S Wood)	813 KCC
	1124 Network Rail (E Stamp)

Summary of Representations – Main Issues

Issue: Objection to Criterion c)

22 consider the wording of the condition introduces the prospect of negotiation, which could slow or prevent the development from coming forward if one of the landowners is an objector. Closure of the lay-by is within the gift of Kent Highways, any proposals would have to be in liaison with Woodside and therefore this does not need to be a part of the condition. Woodside is outside of the allocation perimeter and is therefore out of the applicants/freeholders control. It cannot be brought in as a condition as there is no guarantee of deliverability.

Response: *The primary vehicular access to this site should be from the A20 which requires highway improvements to accommodate a right turn lane into the new access. In addition, highway improvements may be required with regards to the layby, to ensure appropriate separation from the site access. The Plan indicates that the closure of this lay by and a new access directly from the A20 to serve the property known as Woodside could be provided. The Plan indicates that there may be other options as to how this can be achieved. Consequently, the imposition of c in the policy and the supporting text in the reasoned justification is considered to be a reasonable policy requirement to enable a suitable solution to be delivered.*

Issue: Infrastructure Provision

31, 291, 389, 844, 1095, 906, 730, 883, 723, 937, 856, 1020 suggest that the development will add pressure to schools, shops and GP surgery which are already at capacity. The appraisal for the site states the site is close to Hothfield Primary School despite the fact it has since closed.

358, 761 additional sewerage capacity would be required, along with internal roads and service provision, therefore unlikely site will be delivered within timescale set out in trajectory. In order for the Plan to be sound, service provision needs to be in place before the delivery of the first dwellings. Connections to the nearest sewerage connection point will alter the cost and deliverability.

358, 850, 883 as an isolated development in a rural area adjacent to a high speed through route with no infrastructure in place, it is hard to see how it is sustainable or deliverable in the timescale proposed.

833 water quality will suffer due to an increase in development, with the Stour water now classed as 'poor'. 761 states that there are high pressure water mains running through the north/south of the site will require 12 months notice.

Response: *Whilst the proposed development area is removed from the main built up part of the Ashford urban area, the area is located on major transport corridor linking Ashford town and the village of Charing with good accessibility to a full range of local services and facilities.*

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.

Issue: Traffic, congestion and accidents along the A20

856 there has been a change of access from Westwell Lane to the A20 and it is not easy to understand why, original appraisal reports and comments should be accepted.

856 questions what closures or major roadworks will take place with regards to this development. 988 and 730 note the crossroad section of A20 goes from 70 to 60mph and is particularly dangerous, with accidents occurring frequently.

937 is concerned that the A20 already becomes gridlocked during rush hours.

358, 1095 reiterate that there is a risk of side swipe or shunt collisions at the end of the westbound dual carriageway, whilst 389 has witnessed accidents when traffic turns into Westwell Lane, especially in the winter when there is black ice on the road.

850 turning right out of Westwell Lane is a blindspot. 1020, 850 state that according to CrashMap there have been 12 accidents with 5 serious on the stretch of road from Station Road to Holiday Inn. 761 believes the transport feasibility assessment does not take into consideration the accident history of the road. 1020 mentions that the deceleration length of 55m needs to be increased to 80m in line with the A20 Amey Access Report.

1020, 906, 730 also believe a 'ghost island' would cause problems and be unsafe – traffic lights may be more suitable.

291, 389 mentions that extra traffic will cause problems on rural lanes which have no footpaths or cycle lanes, particularly in light of operation stack. 321 Westwell Lane has been blighted by the M20 and parking of lorries and these additional properties will create rat runs of a once peaceful country lane. 850 the exit from Sandyhurst Lane is a narrow old sunken lane immediately after a bend also in the sunken lane, and the junction with Westwell Lane which itself has partial visibility when turning.

358 the proposed closure of Potters Corner layby is inconsistent with KCC and ABC proposals to return this stretch of road for drivers to make short stops – Policy S47 (b and c) therefore needs revision.

850 mention that the layby used by HGVs is actually a road used by residents. 761 bullet 'c' therefore needs to be replaced by a statement that is more applicable, particularly as closing the lay-by would be inappropriate. 358/882 request serious reconsideration of the proposed access to S47 to resolve the unacceptably close proximity between the end of the dual carriageway and the right turn into the layby, all off a road that is 70mph.

358, 906, 730 and 723 closing the layby at Woodside is unacceptable as it is a traditional access, whilst the proposed change to the bus stop onto the A20 would make it dangerous for users. 856 questions who would have the right of way in the layby – the residents of Woodside or the oncoming traffic.

946 is concerned that access to this development is dependent on the deliverability of third party land.

882, 844, 850 and 756 KCCs access assessment feasibility report does not identify or address how to manage access to public and community facilities other than the access to Woodside and the Hare & Hounds Pub. The Report states that “No solutions are proposed.” In Para 2 it also states that “It is understood that only one site will be selected for construction.” This suggests that in the event of any other sites being selected, the A20 Development Site Access Assessment should be repeated. An access solution needs to be agreed between KCC, residents and business owners before three new accesses on top of the existing six are permitted on this stretch of road. Until an access solution is permitted, these developments should be postponed.

910 mention that the access to the Hare & Hounds is constantly in use and will therefore require sufficient space, a junction at the bottom of the A20 is a safety concern.

378 there should be no vehicular access onto Westwell Lane during construction or when the build is complete. 378 the policy should define 'safe vehicular access to and from the A20'.

950 speed limits should be in place to reduce the speed of cars and allow for safe access in and out of the development.

856 note that the access will be onto a fast flowing part of the A20, with no traffic calming measures proposed – a safety assessment is required.

358 the transport proposals are both incorrect and inadequately researched, whilst the Transport Feasibility Report is not up to date with the latest proposals from Kent Highways for the management of the A20 between Charing and Ashford as an experimental section for overnight lorry parking.

358 MC90 is not deliverable based on the existing traffic evidence provided.

946, 843 feels that traffic assessments are required before it can be assumed that S47 is 'deliverable', whilst 833 believes there is no evidence of any traffic study relating to development along the A20.

850, 761 the site walk was conducted between 11am and 1pm in good weather, whilst the other was late morning on Tuesday 30th May – this is not representative of what road users face during rush hours and bad weather.

Response: *Whilst the A20 is a main highway route into Ashford, the detailed access evidence provided by KCC indicates that a satisfactory access arrangement into and out of the proposed site can be achieved. The Council will however continue to liaise with KCC Highways on these matters. It should also be emphasised that the Local Plan should be read as a whole. Policy TRA8 will apply to this site and will require that Transport Statements or Transport Assessments are submitted as part of any applications for development coming forward here.*

Issue: Operation Stack

761, 730 and 723 the road is frequently used as an emergency alternative to the M20 for Operation Stack, yet this is not mentioned in the policy. 883 when Operation Stack is in place it is nigh on impossible to join the A20. 856 is curious as to how the Council intends to improve the roads to cope with all of these pressures.

Response: *During times of Operation Stack that involves the use of the M20 between junctions 8 and 9, traffic can be diverted onto the A20 with the subsequent increase in traffic volumes along this particular section of the highway. The concerns in respect of Operation Stack are acknowledged but this has been enforced on only a highly exceptional basis and not at all in the last 2 years and so is not a justification for not allocating development here.*

Issue: Public transport provision

906, 833, 719 buses not running regularly will result in an increase in car usage.

946, 850, 719, 730 and 723 consider the site to be unsustainable as future residents will be reliant on private cars for access, whilst there needs to be significant new infrastructure on the A20. 856 questions the lack of public transport along the A20. 833 the cumulative developments at Hothfield/Charing/Lenham and Harrietsham will result in an unsustainable increase in the number of cars.

719 the A20 sites will not be able to deliver sustainable transport options if they are all dealt with in isolation.

Response: *It is acknowledged that new developments will increase use of the private car but there is the potential as indicated in policy TRA 4, to meet the additional demands created by new development to improve and enhance the delivery of bus priority measures, the provision of a new service or the alteration/expansion of an existing service.*

Issue: Junction 10a

358 notes that the site has likely been included to provide short term housing as other larger sites are constrained by Junction 10a. 761, 730, 723 If the authorities built 10a then this would enable more appropriate sites to be delivered, meeting the housing requirement. 937 if Junction 10a is expected to come forward within the next 5 years then there is no reason to include these A20 sites.

Response: *The Plan has to meet an overall housing requirement up to 2030 and that involves the identification of a range of housing sites in a variety of locations. Even if major constraints to development, such as the capacity available at junction 10 were removed, the possible completion rates that could be achieved would mean that there was still a requirement for additional, deliverable housing sites. The sites along the A20 corridor are identified as deliverable and developable sites without any significant constraints.*

Issue: AONB impact

31, 291, 730, 723, 937, 856 concerned that the development will negatively impact the AONB.

358, 389 as a site on the northern side of the A20 it would be a development in the AONB setting and will require mitigation. 719 the sites will be visible from some public viewpoints and will cause harm to the AONB.

719 feels that sites closer to the Ashford urban area and further from the AONB should have been considered more thoroughly before the A20 corridor option was included. 850 an urban corridor within an AONB will set a precedent for the rest of the borough, whilst more people living close to a SSSI will mean more walkers and more erosion.

580, 723 suggest that these new proposals in the north west section of the town will result in urbanisation and need to allow for functional green corridors through from the town centre, along the Greensand and Gault Biodiversity Opportunity Area.

1020 suggests that the application of Policy ENV1 is added as a condition within Policy S47.

378, 488 want the site to be restricted to two storeys. 488 the northern part of the site should be excluded from development as this is most prominent in views from the Kent Downs.

488 suggest that the woodland belt on the western side of the site is extended as suggested in the background evidence to S47 in order to help filter views of the site within the Kent Downs. This needs to be included within the policy to comply with NPPF para 115 and the CROW Act 2000. 488 also want further woodland planting to the northern boundary of the developable area to mitigate impact on the AONB. 488 the reference to the North Downs AONB in the background text to the policy should be amended to give the AONB its correct title – the Kent Downs AONB. 850 wish to see new screening (trees) between Westwell Lane properties and the motorway. 761 reiterate the importance of the TPOs which screen Westwell Lane from the impact of Motorway noise.

937 and 1020 street lights will be required to the areas detriment. 938, 850, 761 these developments will affect the unpolluted night sky (dark skies) and have a huge impact on the mass of local wildlife.

850 and 730 The A20 corridor proposals with the necessary infrastructure of street lights, traffic lights, widening of narrow feeder lanes etc is the urbanisation of a distinctly rural area of small separate settlements and isolated spread-out groupings of buildings adjoining the AONB, and in the context of the draft Heritage Strategy and NPPF are not sound.

Response: *The site adjoins the boundary of the AONB which is formed by the M20 motorway and the Ashford – Maidstone railway line. The fact that a site adjoins the boundary*

does not preclude development. The AONB boundary forms the north eastern boundary of the site and the need to deal with this sensitive area is clearly set out in the policy and supporting text. The map that accompanies the Policy makes clear that the area immediately adjoining the AONB boundary, which is an area of higher ground, is to be kept free from development. The policy indicates that “particular attention needs to be given to the topography of the site [...] the wider countryside and the AONB settings”. Minor amendment proposed to criteria d to require additional woodland planting to assist in the mitigation of the impact of development on the AONB.

d) Provide appropriate landscaping on the eastern built boundary, additional woodland planting to the northern boundary of the developable area and retain and improve existing screening around the site boundaries;

In terms of the urbanisation of the area, there will inevitably be an element of urban intrusion into previously undeveloped areas but these can be mitigated where possible by good design and layout. Policy ENV4 of the draft Plan, along with the Council’s Dark Skies SPD (2014), seeks to restrict the impact of external lighting.

Issue: Biodiversity considerations and open space provision

121 in order to prevent an increase in recreational pressure on the SSSI, Natural England recommends that reference is made within the policy for the provision of high quality green space to provide easily accessible walking routes for residents. 580, 844, 719 also argue that on-site green space is required to reduce pressure on the Hothfield Common however express concerns that this will reduce the development capacity on already constrained sites and result in densification, and on-site green space will not mitigate against the impact on the SSSI. 856 states that the policy falls short in that it doesn’t expand on what the expectations of a socially compliant recreational area should be.

719 refers to the 2016 SA and notes how it was mentioned that ‘the residents would be served by local green space and extra facilities’ but as this is not the case, these A20 sites should be deleted.

358, 850, 843, 761, 730 and 723 raise concerns that the site is greenfield and in agricultural use, but there is no assessment accompanying these proposals for the wildlife sites in the area. 358 The site has nesting skylarks each spring, and is a vital wildlife corridor between the Warren and Hothfield Common, both SSSIs.

389, 580, 1020 Hothfield Common is already at capacity and at risk of losing its biodiversity, whilst pets will be at risk from the busy roads and will require dog walking facilities. 580 notes the development will result in increased recreational pressure, whilst dogs will disturb wildlife and enrich soil in a notably nutrient-poor area. 844 feels that the site should be afforded the same biodiversity protection as is proposed for S34.

850 mentions that the hedge between the two fields proposed should also be protected as it is an integral part of the wildlife corridor. The western hedge on Westwell Lane is also packed with elm and should be identified within the environmental survey. A full assessment is required on the habitat impact of these developments. 730 and 723 states that the hedge that sits between the site and the A20 is an important wildlife corridor.

850 note that the Greensand and Gault Biodiversity Area is at risk from additional traffic run-off and gardening. 1020 the Hothfield Common is identified as an area where the delivery of Kent Biodiversity Strategy targets should be focussed in order to secure the maximum biodiversity benefits. 1095 also feels that the ribbon development will endanger the nature of the sites of special scientific interest.

Response: Policy ENV1 of the draft Plan deals with Biodiversity. Minor amendment to supporting text and additional criterion in Policy to ensure consistency with S48 and S49 with regard to the provision of on-site green space and mitigation of impact on Hothfield Common SSSI.

Add additional paragraph :

Hothfield Common SSSI is situated within close proximity to this site and is already under considerable pressure from recreational use. Any development proposals in this location need to give careful consideration to potential additional recreational use of the common, and contributions towards appropriate mitigation measures will be required. These should include on-site provision of informal open space which meets additional recreation pressures such as dog walking. Development proposals must ensure that any mitigation or enhancement as a result of development reflects the local habitats and species, as outlined in the Biodiversity Opportunity Area (BOA) guidelines for the BOA of Mid Kent Greensand and Gault. Liaison with the Council and Kent Wildlife Trust will be necessary to ensure that appropriate measures are defined and delivered as part of the wider programme for the management of the SSSI.

Add criterion:

- h) Ensure that any indirect impact on the Hothfield Common SSSI is suitably mitigated, including provision of on-site recreation space. Mitigation measures must reflect BOA guidelines and be addressed in consultation with Kent Wildlife Trust;

Issue: Pollution

8 and 389 feels that the development to the land east of Hothfield Mill will cause an unnecessary increase in traffic noise, congestion and pollution in the area. 291 also feel that the extra houses and cars will cause an increase in noise pollution.

358 is concerned that there has been no consideration of the noise and vibration impacts of this site - the other side of the site away from the A20 would also be impacted by severe noise from the M20 motorway which has no sound screening at this location. 358, 925, 844, 850, 843 and 761 the site is bounded to the north by the M20 and High Speed railway so noise impacts should be assessed.

844 suggest the site is unviable without an assessment as it cannot comply with NPPF para 123 and PPG which requires the noise standard for bedrooms to be 30dba and living rooms 35 dba.

580 air quality will suffer due to an increase in the amount of traffic and will ultimately affect heathland flora and fauna in the area.

850 water pollution may occur as a result of pesticides/herbicides, whilst light and noise pollution will disturb resting animals. 833 reiterate this by saying human activity has the potential to pollute the water. 730 and 723 water will runoff the site into the stream.

833 mention that the A20 developments will need to comply with NPPF paras 109, 110 and 120 with regards to minimising soil, air, water and noise pollution.

850 Car emissions will also produce harmful chemicals that will have a subsequent impact on the SSSI environment.

856 Woodside will be affected by noise, light and traffic pollution.

Response: *The assessment of potential pollution issues would take place as part of the assessment of a detailed planning application for the site. In terms of the noise impact of the M20, the area of the site that is immediately adjacent to the motorway is proposed to be kept free from built development. In terms of light pollution, policy ENV4 of the draft Plan, along with the Council's Dark Skies SPD (2014), seeks to restrict the impact of external lighting.*

Air quality is covered by Policy ENV12, and will not permit proposals which result in National Air Quality Objectives being exceeded. No Change required.

Issue: Beechbrook

856 Beechbrook (0.5 miles away) failed to be passed for residential development, and this site has the same flaws. More emphasis should be placed on finding suitable brownfield sites.

Response: *The Beechbrook site is an extensive area of land that is isolated from existing development and in a more prominent location visually. The proposed site at S47 is on the edge of the existing built up urban area and is limited in scale. There are brownfield sites within the urban area, principally within or close to the town centre that have been identified for residential development in this Plan and in some cases are already under construction.*

Issue: Gypsy and travellers issues

358 the partial closure of the layby may generate unsatisfactory opportunistic use of the area, for example by travellers.

Response: *The draft policy and supporting text indicate that the possible closure of the layby should be investigated as part of the consideration of this site for development. The closure of the site, if it could be achieved, would eliminate its use.*

Issue: Local geology and topography

358, 844 and 761 advise that the local geology is sand which results in an increase in vibration in wet conditions. The site is also described as flat which is incorrect, the site slopes to the south and west towards the adjacent Stour tributary, particularly in the areas proposed for development.

358 the EA would need to approve how the site drainage would be handled, as the land drains west to a stream that runs into the Stour.

813 this allocation will affect the economic geology within the Ashford area, and therefore for the site to be fully evidenced, an understanding of the economic geology at the site is required. There may be grounds to justify why the mineral safeguarding should be set aside, which may or may not include prior extraction of the economic geology.

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. 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.*

The Environment Agency and Southern Water will be involved in the consideration of a detailed development proposal or the site.

Issue: Pedestrian/cycling provision

358 and 1020 feel that ribbon development along a busy high speed road is unsustainable and not practical for cycling or walking.

358, 389 Westwell Lane is unsuitable for walking or cycling as it is a rural lane – yet it is stated in the policy that there will be pedestrian/cycle access onto that road. 358 Adapting it for pedestrian and cycle use would require considerable reconfiguration. 850/730 believe Westwell Lane does not possess the capacity to cater for additional pedestrian/cycling use.

856 queries whether there is an intention for a cycle way to be developed at Westwell and Sandyhurst Lanes.

844 believes S47 is unsound as it fails to recognise its obligation to promote and support safe pedestrian and cyclist access.

906, 730, 723 the proposed cycle/pedestrian access into Westwell Lane into Sandyhurst Lane is dangerous, there would be serious mobility issues.

813 support new pedestrian and cycle routes throughout the development and request that a footpath connection to link public footpaths AW372 and AU66 is considered.

378 there should be a safe pedestrian crossing over the A20, sufficient lighting and affordable housing included. 1020 support a crossing for children to catch school busses. 389, 1095 mention that there should be pedestrian zones and crossings.

917 The proposal to include a cycle path in Westwell Lane would need to continue into Sandyhurst Lane otherwise it would become highly dangerous for cyclists and pedestrians to

join that road. 973 in contrast suggests that a route across the site onto Westwell Lane for pedestrians and cyclists obliging them to exit onto Sandyhurst Lane is extremely dangerous as traffic on Sandyhurst Lane often breaks the 30mph limit and the exit from Westwell Lane is on a blind bend.

Response: *Any development on the site would include the creation of a network of cycling and pedestrian routes within the site. The Council is committed to the improvement of cycling and walking routes within the borough and any development here would link into the wider route network that exists at present or which could be created in future.*

Issue: Groundwater protection zones

680 state that the A20 sites are located within Source Protection Zones 3 for drinking water supplies and over Principal Aquifers, sensitive settings from a groundwater protection point of view. Adequate investigation and risk assessment should be carried out to assess the risk to groundwater and surface water and potentially propose appropriate remediation where required. SUDs should demonstrate that discharge will not result in pollution of the water environment.

917 The topographical situation of the site would negatively impact the water table & drainage system in the adjacent area of Westwell Lane and Sandyhurst Lane.

Response: *Comments relating to Source Protection Zone location are noted. Policy ENV8 (Water Quality, Supply and Treatment) will apply to all major development proposals.*

Issue: A20 corridor (Strategic corridors)

882, 844, 850, 843, 761 and 709 argue that developing this site and others along the A20 goes against the principal of containing urban development within the urban envelope, south east of Sandyhurst Lane, as clearly delineated in maps of the Great Ashford Development Framework. The sites are all unsupported by existing draft plan policies and have not been subject to any other rounds of consultation.

882, 844, 843, 709 until the A20 corridor concept is incorporated within the Plan as a policy with geography defined and conditions for development set, no new developments in the area should be considered. 709 as the A20 corridor as a concept is unsound, so is S47.

844, 850 S47 should be reallocated as a site under residential development in the rural settlement policy (HOU4/HOU5) or excluded from the plan.

988 ribbon development also goes against ABCs laudable policy of building sustainable communities with access to a wide range of facilities.

906 are concerned about a concrete corridor being developed from Hythe to Ashford if all the planned developments come forward.

761 implies that the only reason the A20 sites have been proposed is because they have access to the A20, whilst a lack of consideration has been given to how right hand access in and out of the A20 sites will be provided. 761 in other areas, discussions have taken place with the community to establish local criterion and mitigation. 761 suggests that to become sound, there would need to be an SP policy to provide a sustainable rationale for the inclusion

of these A20 sites, whilst the access feasibility assessment needs to be recommissioned to take proper account of the characteristics of the A20. An HOU policy would guide the definition and planning of development that isn't within a settlement.

Response: *The A20 is a major transport route into Ashford and whilst it is acknowledged that there are no local services directly adjoin this site it is a relatively short distance from the town centre and nearby local centres within Eureka Park, Repton Park and Hothfield village. The Plan has to make a range of allocations for residential development that are capable of being delivered and these sites will enable the Council to meet its overall housing requirement. The site does not require the delivery of significant infrastructure and there is no impediment to the site being delivered.*

Issue: Heritage/archaeology

844, 850, 843, 761 and 730 is unsound as it doesn't acknowledge that the site is part of an Area of Archaeological Potential, as identified in the Heritage Strategy. 761 particularly refer to ENV13 and ENV15. 844 suggests there should be another condition added to the policy whereby evidence will be required in order to show that the development will not cause loss or substantial harm to archaeological assets or their setting.

906, 730, 723, 937 feels that nearby Listed Buildings and the Roman Burial Ground have not been taken into consideration. 850 also note that a number of Listed Buildings in close proximity are not mentioned from a protection perspective. 761 the site is immediately adjacent to the Hothfield Mill, and would look over Yonseas House.

850 the Heritage Strategy is only evidence of intent and therefore cannot be treated as evidence. S47-S49 have not been assessed and therefore the importance of sites such as Potters Corner, Yonseas Farm and Hothfield Heathland has not been considered.

937 development should be focussed around rejuvenating disused parts of the town, thus sparing the areas of heritage elsewhere within the borough. 937 concentrate on developing the town and using disused shops – hard to believe that the town cannot be expanded to accommodate some need.

813 the site lies within an area of potential associated with prehistoric and Roman activity to the west at Beechbrook. Hothfield Mill is a post medieval mill complex and includes two designated heritage assets. In addition, Potters Corner is known to be the site of post medieval or earlier pottery production. Remains associated with this industrial activity may survive on site. A phased programme of archaeological mitigation will be required. Significant archaeology could be dealt with through suitable conditions on a planning approval.

Response: *Noted. Policies ENV13 of the draft plan will ensure that heritage assets are given full consideration in the assessment of any development proposals for the site. Policy ENV15 deals with archaeology and will ensure that the issue is dealt with when detailed development proposals are considered.*

Issue: Covenanted land

850, 906, 730, 723 comment that the land is covenanted until 2020 and therefore will not come forward in the next 5 years.

Response: *The Council understands that there are joint landowners who are collaborating to ensure that the land identified in the Local Plan is deliverable in response to the draft Local Plan allocation.*

Issue: Minor wording amendment

813 Text should be amended to Kent County Council Highways and Transportation, rather than Kent Highways.

Response: *Amend criterion c) “with recommendations from ~~Kent Highway Services~~ Kent County Council Highways and Transportation”*

Issue: Contradicting SP7 (Separation of Settlements)

850 The allocation of Policies S47-49 contradict the implementation of the SP7 policy.

Response: *Draft policy SP7 deals with windfall schemes that come forward and does not refer to proposed site allocations. In any event, the council considers that the development of this site would not lead to the coalescence or merging of two separate settlements as indicated in draft SP7.*

Issue: Future considerations/liaison

1124 these developments sit adjacent to Network Rail’s operational railway land and infrastructure, and ABC and potential developers should be aware of Network Rail’s standard guidelines and requirements when developing adjacent sites.

Response: *Noted.*

Issue: Support

141 consider the proposal sound but do not want development to spread to the neighbouring land at Beechbrook, or existing travellers sites to enlarge.

Response: *Support noted.*

MC91– S48 Land Rear of Holiday Inn Hotel

Representations have been received from the following consultees:

1192 Gladman Developments (Mat Evans)	1003 Adrian Goldie
1096 Sue Power	1019 Ian Lloyd
948 Millwood Designer Homes Ltd (Millwood)	983 John Bishop & Associates (Robert Stevenson)
860 Margery Thomas	831 Lucy Simmons

764 Westwell Parish Council (Sue Wood)	718 James Ransley
986 Black Elephant Architecture Design Studio Ltd (Hiren Patel)	862 Claire Warren
884 E Broughton	836 Charing Parish Council (Jill Leyland)
814 KCC (Council)	476 Southern Water (Ms Mayall)
642 Environment Agency (Jennifer Wilson)	926 CPRE Kent Ashford District (Hilary Moorby)
679 Environment Agency (Jennifer Wilson)	433 Jan D’Arcy
422 Hothfield Parish Council (Batt)	951 Nash Court Estates (Nash Court Estates)
391 Dean Warren	903 Tony Hayden
292 Penny Knatchbull	173 David and Elaine Capon
122 Natural England (Sean Hanna)	30 Michael Briest
24 Jarvis New Homes (SE) Ltd (Jarvis)	615 Stephanie Radzik
770 Martin Wyatt	972 Lambert and Foster
1205 Tim Dean (Dean Lewis Estates)	

Summary of Representations – Main Issues

Issue: Traffic and Accidents on the A20

30 The A20 is a busy road, especially if the M20 is closed. Vehicles travelling to Ashford that want to turn into the site will slow the traffic and increase accident risk. The A20 will become a ribbon development given the Tutt Hill and Sandyhurst Lane proposals.

292 Traffic on A20 is dangerous. There are no pedestrian crossings and the speed limit is 60mph. It is difficult to turn into the A20 from any side roads especially during Operation Stack. Extra traffic will cause congestion. The A20 will become suburban not rural and the extra traffic, light and noise pollution will cause more sound pollution.

391 believes a host island is inadequate. The A20 is a major trunk road that is also an emergency road when operation stack is in place. There has not been any traffic calming provisions even on reducing speed limit. The Crematorium holds approximately 20 cremations a day, creating traffic delays.

433- It has been acknowledged how dangerous it is accessing the A20 from Chapel Road. Despite requests the Council are not prepared to reduce the speed limit at this dangerous

intersection, or sweep the shale from the raked element of Chapel Road, or cut back the vegetation on the Heath boundary to improve visibility. There have been deaths and serious accidents here. The street lamps creating an even more hazardous junction.

718 the NPPF requires local planning authorities to support a pattern of development facilitating and the use of sustainable modes of transport. The allocation of the A20 corridor sites would result in over reliance on the use of the private car and would fail to provide enough opportunities for sustainable transport modes. There are only very limited pedestrian accessibility local facilities. The site is located away from Ashford town centre and some limited services are provided in Charing, the majority of services would be accessed in Ashford via the A20, increasing reliance on car travel. Bus services along the A20 are poor with only one bus per hour. The site would not be capable of delivering the kind of infrastructure needed to ensure sustainable transport options are achievable.

764 argues that this site would be a ribbon development along the A20 corridor development. The site is outside of Charing which is unsuitable as it is already under considerable strain. If S49 and S48 were both developed both sides of the A20 would be quadrupled and overwhelm the community. The Transport Access Feasibility Assessment does not take account of accident history of the road or the designation of this section of the A20 as part of Kent Highways network of high-speed trunk roads. The transport evidence needs to be reworked to take account characteristics and function of A20. The slow moving traffic is due to Oakover's tractors moving stocks of young trees, 20 funeral corteges a day from Ashford to Charing Crematorium, GHV movements in and out of the Ardo old store and along this stretch of the A20 and HGVs to and from Lenham storage. It is also used in emergency for Operation Stack. The road has a frost pocket in the hollow by Ardo, and flooding: both regular winter hazards and a cause of accidents. There is a lack of safe crossing for pedestrians (elderly and children). The proposal will add considerable activity to the road where there are many accidents.

831 there has been no consideration of impact on A20 traffic. There is only a 2 hourly bus service between Ashford and Maidstone along the A20 and the site is more than 800 metres from amenities causing an increase in daily private car journeys by an additional 300 cars which is not sustainable.

836 there is no provision for pedestrians crossing roads especially since traffic along the A20 is increasing with new developments.

860 advises there have been at least 5 fatalities on A20 between Potters Corner and Tutt Hill; there are regular serious accidents involving hospitalisation to the west of the service station. A traffic analysis and road safety appraisal for the A20 corridor would take into account traffic generated by all potential developments in the area and increased use of Techpro through the Playing Fields Strategy is needed.

862, 983 The A20 is a fast road, with many accidents. The filling station can be difficult to turn right out of, as this is opposite Beefeater and Premier Inn. The additional housing estate forming an additional junction out of Ram Lane has not been considered with Highways investigations being unsafe. Ram Lane is a single track rural lane with no street lighting. The A20 is an emergency road when operation stack is in place on the M20 between junctions 8 and 9. The additional heavy traffic flow along this road is unjustified and unsafe. The local

surrounding lanes of Ram Lane and Westwell Lane would not sustain extra traffic forming rat runs to avoid traffic congestion. There is heavy HGV traffic flow to business along the A20, with the Cold Store, approximately 0.5 miles away and a proposed business, Varte Terracotta, moving from Ashford into Oakover Nurseries. This will create additional HGV traffic flow. Collectively with the other proposed developments along the A20 corridor, Charing and Hothfield, the A20 will be impassable at times. There has not been a road safety appraisal performed at the optimal time with today's traffic flow, nor a projected risk assessment.

884 The A20 is fast and busy, making it difficult to join from a side road, with all the extra housing. Also when operation stack is in place, it is impossible to join the A20.

903 The A20 is a busy main road especially if Operation Stack is implemented. The road becomes gridlocked, adding more houses will only worsen. The bus service is diabolical so adding more houses will increase traffic. More work needs to be done on Transport Access Feasibility Assessment. The need for traffic from this proposed development would need to be introduced on this high speed section of road.

814 requests that (b) should be amended to 'in the form of a right hand turn lane, to eliminate the current lay by access arrangement...'

986 a primary vehicular access directly from the A20 Ashford Road should be created however the current layby can be retained.

1003 highlights that the A20 is a dangerous road due to speeding drivers. The new proposed layout between Esso Garage at Hothfield and the M20 will therefore turn into Accident Blackspot (70-90mph), resulting in residents not wanting to live there. There are no pedestrian crossings, or any facilities for new resident's safety.

1091 and 1019 object to the impractical and dangerous access to A20. By adding 150 houses and another 300-400 extra cars can only cause further accidents to a stretch already experiencing accidents. There have been 12 accidents with 5 serious from 2012-2016 on the stretch from Station Road to the Holiday Inn. Ghost islands are planned for the access to the site with a deceleration length of 55m. For safety this should be increased to 80m. Pedestrian and cycle access is already very difficult, adding more pressure. There is no street lighting on the A20 which would put children at risk crossing the A20 to catch school buses.

770 if S48 and S49 go ahead, there will be a very significant increase in vehicle movements flowing onto and off the A20 going both ways which will heighten the possibility of road accidents.

173 There is a bus service running every hour along the A20 between Maidstone and Ashford but otherwise cars are the only feasible form of transport to these urban areas or other village centres on this route. Many cars already exceed 60mph limit, putting pedestrians at risk, especially crossing over the road to the Esso garage and Hothfield Common. It is also often difficult with a car to turn right on to the A20 from a side road due to the volume and speed of traffic and cycling or walking along the A20 is a very unpleasant, risky and noisy experience.

Response: *Whilst the A20 is a main highway route into Ashford, the detailed access advice provided by KCC indicates that a satisfactory access arrangement into and out of the proposed site can be achieved. The Council will however continue to liaise with KCC Highways on these matters. It should also be emphasised that the Local Plan should be read as a whole. Policy TRA8 will apply to this site and will require that Transport Statements or Transport Assessments are submitted as part of any applications for development coming forward here. The concerns in respect of Operation Stack are acknowledged but this has been enforced on only a highly exceptional basis and not at all in the last 2 years and so is not a justification for not allocating development here.*

Issue: Infrastructure/ Community

30- New homes will add pressure to school and surgery capacity.

173- The NPPF states that planning policies should 'actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development on locations which are or can be made sustainable'. The Esso garage, Woolpack pub, Premier Inn, Holiday Inn and Yellow Fisherman provide some services, there are no shops or other essential services in Tutt Hill. In contrast, Charing village has far more facilities, including shops, a doctor's surgery, a railway station, churches, a school and library and therefore development there would be more acceptable in terms of sustainability.

292- There are few schools and doctor surgeries as those already have been oversubscribed.

391 and 862 believe the proposals along the A20 corridor (S47 and S49) and Charing developments to be unsustainable. Charing village is a small village comprising of only one GP surgery and small grocery provisions. The village is not adept to facilitate the volumes of proposed increased residents.

422 state the site is far from the village centres of Hothfield and Westwell. Charing is under strain as they have their own Local Plan/Neighbourhood Plan issues to address. In terms of impacts on Hothfield Heathlands, it is already 'at capacity' and this development can only increase the pressure.

476 after assessment there is existing infrastructure on 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 on pipe size and depth.

836 The village is not of scale to support a shop, post office or other amenities. It is not in walking distance of Charing. There would be an additional strain on Charing; parking, school and GP practice. The area has a pub, filling station with a small shop and restaurants and the proposed is for some green space. To be sustainable there needs to be a community hall/hub.

862 There is no local sustainable infrastructure to this Greenfield application.

884 The infrastructure/services is unable to support households. The hospital, GP surgeries and schools find it hard to cope with the amount of patients and children. The uncertainty of whether the housing will be affordable for local people or whether it is for families moving from London to the area.

860 The range of local facilities in Charing is already at capacity and will be under even greater strain due to the proposals. This requires consultation, including the NPPF green approach on traffic in rural areas. There are also unlit dark skies in the area.

926 More work needs to be done on infrastructure. This development would be dependent on facilities in Charing and these need to be reassessed.

948 The A20 would offer a poor environment for future residents due to noise and potential air quality implications. The locality has limited existing shops and an absence of services and facilities (primary schools, GP surgeries). Bus services is of low frequency (less than one per hour) reducing sustainability of the site. There is no nearby settlements within acceptable walking distance. Access to Hothfield would require walking along Cades Road which does not have a footpath.

1091 and 1019 The local infrastructure is insufficient to accommodate an extra 500-600 new residents. No schools, health care; local to developments.

1096 There is no local infrastructure to cope with an increase of housing, schools, shops and surgery facilities losing rural settlements their identity. This would lead to further traffic on a busy and dangerous road especially as there is no speed limit. This has caused many accidents and fatalities. This creates an increased danger for pedestrians since there is no source of lightening as lampposts have been removed causing the visibility to be poor. The proposal of ribbon development will endanger nature of sites of special interest, including Hothfield Common creating a negative impact on the area. The proposal at Junction 10 is unnecessary.

615 the proposed development more than doubles the size of Tutt Hill.

Response *It is accepted that any new development proposals will affect existing services. However, the site is accessible to the local services in Charing and the full range of services and employment opportunities in Ashford within a short journey time, including by a direct and regular bus service. The scale of development proposed is not of a scale that would be out of proportion to the ability of local services to cater for residents here. There is also the potential to deliver some minor additional local infrastructure, such as play space and informal open space as part of the development itself. The points raised in respect of specific service providers such as health and education are addressed elsewhere in this response document but it can be reiterated that service providers, such as 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.*

Where service 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.

Issue: Public Open Space and Biodiversity

122 Given the proximity to the site of Hothfield Common SSSI, the development is an area of high quality, semi-natural greenspace with readily accessible walking routes for residents and the supporting text is amended. It should be consulted on any measures in relation to SSSI in addition to Kent Wildlife Trust.

292 Hothfield Common needs to be protected and there is a chance of light pollution from houses causing distress to wildlife.

391-When the high speed line was built, from the increased noise there was a bund placed to protect the land from local residents. The proposal may require removal of bund and no mitigating references have been listed to protection of proposed. By removing this bund will reduce natural progression of wildlife. Hothfield Common should be protected at all costs as it is the only peat bog in Kent. There should be a safe corridor for bugs, birds to stop in-breeding and increase biodiversity. The proposed housing estate will block this due to noise and pets, killing the wildlife population.

642 The minor watercourse flows through this site. As a wildlife corridor, it should be protected from development with a suitable buffer zone.

718 The A20 sites, due to their isolated location, are not in the proximity of any public open space and would be required to provide such space within any development proposals. This site is located in Hothfield Common SSSI which is under considerable pressure from recreational use. Designs for these sites would need to provide appropriate open space to prevent further recreation impact on the SSSI which could include providing more space than is required. In already constrained sites, this will reduce the development capacity of the sites and will result in the need for densification which due to landscape impact is unlikely to be feasible. When assessing Alternative 4.2 in the original 2016 sustainability appraisal, it was said that it would *'be likely to have a significant positive effect as facilities would be likely to be within close range increasing opportunities for access on foot or cycle. Populations would be well served by a range of existing and new green open spaces'* (p 46). This is clearly not the case with the inclusion of the A20 sites which do not have good access to services and are not well served by existing green spaces. As indicated in separate representations on the sustainability appraisal that accompanies the Ashford Local Plan.

764 The Hothfield Common Heathland reserve and SSSI is under pressure from users. Mitigation would be essential and is likely to require provision of SANG. These biodiversity features would require an assessment and consideration of impacts of access by domestic animals.

860 There is a risk of doing irreparable damage to an SSSI, risking irretrievable losses, to the detriment of the natural heritage of the Borough. The Natural England SSSI citation and management advice for Hothfield Reserve indicate rare habitats and individual species and a need for careful management of a sensitive fragile site. Heathland is one of this country's most threatened habitats. More people living close to Hothfield SSSI means more walkers, taking it beyond its capacity needed to avoid erosion of paths and damage to species and habitats, more predation by domestic cats, more car pollution including NOx leading to increased and deleterious soil fertility, with an increase during Operation Stack or other emergency uses of the A20, the risk of pollution of water on the reserve by run-off,

pesticides and herbicides, more light and noise pollution interrupting natural lifecycles of many species. This policy will cause more loss of wildlife corridors that connect isolated and therefore vulnerable pockets of biodiversity (Wildlife Trusts Living Landscapes). The M20 and high-speed rail line have already curtailed the potential corridor network. The wildlife corridor between The Warren reserve and Hothfield will be weakened. As there is no evidence that further development filling in more gaps along the A20 and Sandyhurst Lane will be prevented, wildlife corridors could be even further reduced and the long-term viability of Hothfield further jeopardized. Strategic parks and green corridors do not in any way compensate for loss of wild green space in the rural areas, including the Hothfield SSSI and other hedges, ditches, minor water courses and broad headlands bounding cultivated land. The enhancement and expansion of green corridors is described in the Green Corridor strategy for Ashford town. Care of rural roadside wildflowers by ABC is already damaging; bee orchids on the verge of the A20 between Ardo and the bridge over the M20 are mown down each year before seed can be set and shed. Bats are known to roost at The Saddlery, Tutt Hill. Kestrels are also seen over the A20 and skylarks over the fields north of Tutt Hill.

862 There are no sustainable recreational facilities to this site. The local Hothfield Common is at capacity to visit now and is at risk. This should be protected to maintain the biodiversity and peat bogs. Development of housing close to this area will put the common in danger for migration of birds, bugs and insects to and from its area.

983 The site is too far from the village to create any integration with Hothfield. Both developments place additional pressure on Hothfield Common Site of Special Scientific Interest to the south. The two sites relate visually to the open countryside, including Hothfield Common rather than the village of Hothfield. The site is completely isolated from Hothfield village and close to the heavily trafficked M20 and the Channel Tunnel Rail link (CTRL) causing noise and air quality issues.

1091, 1019 and 422 The Hothfield Common is a Site of Special Scientific Interest (SSSI) and the ribbon along the A20 is part of the 'Mid Kent Greensand & Gault Biodiversity Opportunity Areas'. In the Kent Biodiversity strategy these are defined as "areas where the delivery of Kent Biodiversity Strategy targets should be focused in order to secure the maximum biodiversity benefits'. The BOA maps also show where the greatest gains can be made from habitat enhancement, restoration and recreation, as these areas offer the best opportunities for establishing large habitat areas and/or networks of wildlife habitats". This site has an important part to play in protecting and enhancing our natural habitat; a role that will be destroyed with housing. Policy ENV1 addresses this situation including 'where harm to biodiversity assets cannot be avoided, appropriate mitigation will be required on land that is suitably established prior to the commencement of the development and that can be managed in perpetuity'. Normally any mitigation measures will be required to be delivered on-site, unless special circumstances dictate that an offsite model is more appropriate. An Environmental Assessment of the site must be undertaken and that the application of Policy ENV1 is added as a condition in Policy S48.

Response: *The site does not lie within the SSSI and most has been intensively used for horticultural purposes as part of the Oakover Nursery business. The proximity of the Hothfield Common SSSI is recognised in the supporting text and Policy S49. It is a policy requirement that any impact on the Hothfield Common SSSI is suitably mitigated including provision of on-site recreation space and it is expected that the developers will work*

alongside the Borough Council and both Natural England and KWT to ensure management of any additional indirect recreational pressures are managed. However, this is also an issue for the growth of Ashford and the proposed increase in housing in the area generally as this will generate more strategic recreational pressures which will need to be managed through a variety of new and existing spaces.

Issue: Water Supply and Drainage

391- A sound assessment would need to be conducted. There are insufficient service provisions and no mention of how facilitated. Along with the additional run off water and sewage facilities. The drains may not be capable of taking all the additional waste being produced.

433- There is no surface water drainage and this development will increase the surface water run off reducing braking distances.

679- The site are located within Source Protection Zones 3 for drinking water supplies and over Principal Aquifers, sensitive settings from groundwater protection. Investigation and risk assessment should be carried out to address any contamination and risk to controlled waters. Any site investigations and risk assessments the applicant should assess the risk to groundwater and surface waters from contamination may be present. Any sustainable drainage design should demonstrate that the discharge will not result in pollution of the water environment.

831- The development site is on a tributary of the Great Stour River. Any increase in human activity along a watercourse has the potential to increase pollution. The spring fed tributary across this site will create a channel for pollution by heavy metals and hydrocarbons from roads plus nutrients from gardens and compost heaps to reach the Great Stour. The water quality in the Upper Stour, west of Ashford, is poor. Exposing the river to an increased risk of pollution will do nothing to improve its water quality.

476- In line with NPPF and NPPG to ensure consistency with other housing allocations, the following criterion has been proposed after 'Development for this site shall'... j) Provide future access to the existing sewerage infrastructure for maintenance and upsizing purposes.

Response : *Comments relating to Source Protection Zone location are noted. Policy ENV8 (Water Quality, Supply and Treatment) will apply to all major development proposals.*

Criterion j) will be inserted as a minor change for consistency with criterion in other site policies within the plan.

Add j) Provide future access to the existing sewerage infrastructure for maintenance and upsizing purposes.

Issue: Kent Downs AONB / Landscape impact

173 The NPPF states that 'the planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes' and 'allocations of

land for development should prefer land of lesser environmental value'. In relation to farmland, 'where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poor quality land in preference to that of high quality' and 'encourage the effective use of land by reusing land that has been previously developed'. This site is on the edge of the Kent Downs AONB whose southern boundary is formed by the railway line. The visual impact of 150 houses in this location will be very evident when seen from the Greensand Way and will put much more pressure on Hothfield Common SSSI with the potential for far more dogs and their owners to use it. This is a unique area of landscape within Kent which would be at risk of unsustainable levels of use, particularly if further development also takes place at the Tutt Hill site (MC92). The land in the site area is currently classified as Class 3 agricultural land which is good to moderate.

718- This site lies within the Kent Downs AONB and has potential to cause harm to the AONB. The NPPF states that 'great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty' (para 115). The 2016 Local Plan draft also states that 'development located outside the AONB but which would have a significant adverse effect on the setting of the AONB will also be resisted'. ABC's Landscape and Visual Appraisal (2017) shows, the sites would be visible from some public viewpoints from the AONB. The proposed allocations have the potential to cause harm to the AONB. Sites in the Borough closer to the Ashford urban area and further from the AONB should have been considered more thoroughly before the A20 Corridor option was progressed as the preferred approach.

860- This site will have a negative impact on local landscape, housing development is not appropriate to character of existing buildings.

Response *The site lies outside the AONB although is close to the AONB boundary but there are already significant physical features, namely the M20 motorway, and the High Speed railway line, that impact environmentally on the area. There is also existing built development in the vicinity including the Holiday Inn hotel, Premier Inn, the large Ardo warehouse at Westwell Leacon and the adjoining settlement of Tutt Hill. Landscape assessment of a detailed proposal for development here will need to pay careful attention to ensuring impact on views from the AONB are mitigated but the scale and density of development that is proposed will enable suitable integration into the rural character of the area. The Council will liaise with the AONB Unit on this issue.*

Issue: Minerals and Waste

814- This allocation will affect economic geology in Ashford. In order for this site to be fully accepted for delivery of sustainable growth, an understanding of economic geology is required. There may be grounds to justify why mineral safeguarding should be set aside.

Response *Noted.*

Issue: Heritage

764 Heritage environment would need to be considered: listed buildings include Britton farm cottage. The proposed site would result in development in the setting of listed buildings and the setting would need to be assessed and design taken into account.

814 The site lies within an area of potential prehistoric and Roman activity known to the east. There are two former medieval complexes, Cowlees and Ram Lane and both sites have redeveloped, remains associated from their use may survive on the site. Archaeological mitigation may be required.

860 Under the NPPF the conservation and contribution of locally listed heritage assets will be a material consideration in planning decisions that directly affect them or their setting. Grade II buildings are nationally important and of special interest. There is risk of irretrievable damage if there is no mitigation. The historical use of Hothfield for low-impact grazing and felling by local residents as common land over centuries is part of the historical richness of this area.

Response Policies ENV13 of the draft plan will ensure that heritage assets are given full consideration in the assessment of any development proposals for the site. Policy ENV15 deals with archaeology and will ensure that the issue is dealt with when detailed development proposals are considered.

Issue: Size

24- The proposed area would need to be reduced in size and capacity to exclude the South Western part of the site. This area is visually part of the wider countryside with no sustainable boundary. Development under construction at Britton Farm by vehicular access being via a 'pinch point, has impact on residential amenity from noise and overlooking.

Response: Disagree. The south western part of the site is visually contained by the natural topography and landscape features that surround it and provides an opportunity for a slightly different character of development to the remainder of the site. It is agreed that development on this site will need to relate well to the new residential development at Britton Farm but access to the allocation will not be from Ram Lane which is a very narrow rural lane.

Issue: General

860 There is no definition of the corridor in terms of type and quantity of permitted development, spatial arrangements/limits or timescales, no supporting policy or protection from future infill of sprawl. There have been no local consultation until now with local communities, businesses or parish councils. There is no creation of an urban corridor in a rural area alongside an AONB or the implications of creating a precedent for environmental sustainability of such corridor. The delivery of Junction 10a on the M20 would remove necessity for this type of development. The A20 corridor proposals with the necessary infrastructure of street lights, traffic lights, widening of very narrow feeder lanes is the urbanisation of a distinctly rural area of small separate settlements and isolated spread-out groupings of buildings adjoining the Kent Downs AONB, and in the context of the draft Heritage Strategy and NPPF is not sound.

983 low-rise housing and extra landscaping makes it inevitable that they will be perceived as separate, free standing housing estates in the countryside. The development on this site would displace existing employment uses.

862-The Oakover Nurseries have in the recent past developed on their agricultural areas, but now it seems they are going for the 'golden egg', considering their own financial gain with this proposal without consideration for the destruction of the local communities and landscape.

Response: *The justification for allocating limited scale development in the A20 corridor between Ashford and Charing is considered in response to other objections but policy SP7 is specifically designed to avoid coalescence of settlements and retain their individual character and that of the surrounding area. It should be noted that new housing development on a much larger scale is proposed along the A20 corridor to the west of the borough at Lenham and other villages such as Harrietsham has also seen recent new housing development on a locally significant scale. What this Plan proposes is on a much more modest scale in keeping with the environmental character of the area.*

Issue - Noise impact

173 The motorway and also the CTRL are very close to this site and the noise that both generate will be detrimental to the well-being of those residents whose houses will be close to the site boundary. The M20 generates constant noise and can be very intrusive. Similarly the CTRL will be very noisy.

Response *The requirement to reflect the potential environmental impact of the M20 motorway is reflected in the supporting text to the policy which indicates that the noise impact must be taken into consideration in design and layout with suitable landscaped buffers and acoustic protection.*

Issue: Site selection method

972 questions how both S48 and S49 can be chosen for allocation yet DW10 is not included.

1192 considers the allocation of this site is not sustainable and runs contrary to the approach taken in the rest of the Plan. The SA score is low and there are preferable sites to allocate closer to existing settlements with a better range of services.

Response: *Omission sites are addressed in Appendix 2 of this Report. The SA process indicates that S48 and S49 are preferable sites to allocate to DW10. The allocation of this site (and S49) is addressed elsewhere in this Response document.*

Issue: Support

814, 1205 support this Policy.

Response: *support noted.*

MC92 – Policy S49 – Land North of Tutt Hill, Westwell

Representations have been received from the following consultees:

1 High Speed 1 Ltd	838 Charing PC (J Leyland)
29 Michael Briest	857 Margery Thomas
123 Natural England (S Hanna)	861 Heather Lister
171 David and Elaine Capon	868 Claire Warren
293 Penny Knatchbull	885 E Boughton
393/153 Juanita Jones	904 Tony Hayden
423 Hothfield Parish Council (Batt)	927 CPRE Kent Ashford District (H Moorby)
432 Dawn Leonard	932/933 Martin Turner
434 Jan D'Arcy	953 Nash Court Estates
489 Kent Downs AONB (K Miller)	955 Jacqui & Adrian Farrin
603 Dean Warren	972 Lambert & Foster (N Brandreth)
615 Stephanie Radzik	973 Joan Richards
621 Nicolas Whitham	984 John Bishop & Associates (R Stevenson)
677 EA (J Wilson)	989 Celeste Muir
706 Tracy Edmonds	1004 Adrian Goldie
716 James Ransley	1021 Ian Lloyd
765 Westwell PC (S Wood)	1097 Sue Power
770 Martin Wyatt	1146 Network Rail (E Stamp)
/815 KCC	1156 Dean Lewis Estates Ltd
832 Lucy Simmons	1192 Gladman Developments

Summary of Representations – Main Issues

Issue: Minor correction regarding boundary

1 "the Ashford – Maidstone railway line forms the north eastern boundary of the site....." this statement is incorrect in fact it is High Speed 1 which forms the north eastern boundary of the site with the Ashford-Maidstone line beyond.

Response: *Agreed – minor amendment to first paragraph of supporting text:*

"The site is bounded by the A20 in the east, the M20 to the north and the Ashford – Maidstone High Speed 1 railway line forms the north eastern boundary of the site."

Issue: Network Rail

1146 the site is located adjacent to railway land operated by HS1 and therefore ABC and potential developers will need to contact them to discuss the proposed development.

Response: *Noted.*

Issue: Infrastructure provision

29,153, 955, 885, 838, 706, 621, 765, 933, 973 and 1097 The development will put pressure on schools, shops and the surgery in Charing which are all already at capacity and will not be able to cope. 838, 904 and 1004 the development cannot be considered 'positively prepared' as it does not possess the infrastructure required. 153 Hothfield School is closed and Charing Surgery is at full capacity. 838 notes that it is mentioned in the IDP that Charing Primary School will expand to a full one form entry but this seems unlikely to be sufficient for all the development proposed. 857 the overall impact on Charing facilities as a result of S49 should be assessed in relation to sustainability and the NPPF green approach to traffic in rural areas.

706 building houses is acceptable only if you have the necessary infrastructure in place to support it.

293, 432 there are no schools, shops or doctors nearby, a rural hamlet (Tutt Hill) will be turned into a village without any infrastructure. 615 is concerned that S49 will double the size of Tutt Hill, and coupled with S48 will result in the whole area becoming a village with a main A road running through. 765 S49 and S48 will quadruple the size of the hamlet and without community facilities and other infrastructure the development will be unsustainable. 171 points out that Tutt Hill doesn't actually possess any day-to-day services when compared with Charing, so development should be considered there where it would be more acceptable in terms of sustainability. 615, 861 does however note that Tutt Hill possesses a small shop and pub, but the nearest school and GP surgery is in Charing and they must be at/nearing capacity. 861 there will be a reliance on cars as people make journeys to access basic services elsewhere.

603, 868 suggests that there is no mention of how services to the site will be provided or how traffic will be mitigated whilst it is implemented. 603 questions if the A20 will have to be closed whilst the road is dug up for gas, electric, phone lines, broadband cabling and mobile phone masts.

927 this proposal would result in the creation of a new village which would require its own community infrastructure and pedestrian crossing of the A20. 838 asks that the Plan plans for a proper, sustainable village with sufficient infrastructure provision and community facilities. 838 also consider that Charing would be an appropriate village centre if relevant services were upgraded.

615 The current water supply and pressure is already insufficient without adding 75 more homes plus 150 at S48. 933 improvements to water provision, sewerage systems, telephone requirements and fibre optic broadband will all be required at the site.

933 the William Harvey is currently struggling to cope with the current number of residents, so with all these developments in mind, an additional or very much enlarged hospital will be necessary.

765 S49 draft policy bullets contain “where possible” caveats against c. and d - these should be deleted because the site could not be sustainable development without them.

Response: *It is accepted that any new development proposals will affect existing services. However, the site is accessible to the local services in Charing and the full range of services and employment opportunities in Ashford within a short journey time, including by a direct and regular bus service. The scale of development proposed is not of a scale that would be out of proportion to the ability of local services to cater for residents here. There is also the potential to deliver some minor additional local infrastructure, such as play space and informal open space as part of the development itself. The points raised in respect of specific service providers such as health and education are addressed elsewhere in this response document but it can be reiterated that service providers, such as 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.*

Where service 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.

Issue: Traffic, congestion and road accidents along the A20

815 Policy S49 (b) should be amended to ‘Provide primary vehicular access from the A20 Ashford Road in the form of a right hand turn lane...’

432, 861 , 1097 congestion is already an issue and will be worsened by the extra cars that will come with this development. 885 the A20 is already a fast and busy road and very often

difficult to join from a side road. 615 reiterates this, whilst also emphasising that any developments would increase danger for pedestrians using the shop in the hamlet or the Common. 838 traffic will become an increasing issue as new developments at Harrietsham, Lenham and now Ashford come forward.

171, 989 the number of cars on the road will greatly increase with the developments, making it far more dangerous.

29 vehicles turning into the site from the A20 having come from Ashford will create an additional risk of accidents as they slow and potentially wait for a chance to turn. 770 both S48 and S49 together will significantly increase traffic flows on either side of the road and result in road accidents.

933 note how the 60mph stretch of road outside this development will require a proper speeding assessment and potentially speed limits. It is likely that with this site and potentially DW36 and DW39 going ahead, there will be an extra 500 vehicle movements a day. This will realistically exceed the capacity of the A20 at this point, particularly at the Drivers Roundabout.

393 points out that on this part of the A20 there have been many serious accidents, whilst there are 11 roads and wide entrances onto the A20 in 0.4 miles between Mercury Windows and The Holiday Inn – with two more proposed. The bend, rise, dip and bridge approach will be even more dangerous with an additional two accesses. 432, 984, 1021 the entrance to S48/S49 has already seen many accidents. 393 in order to make this proposal sound, entrance/exit roads should only be made off of a straight road site where there would be less chance for accidents to happen. 955 mention that there are already 40 exits onto the A20 between Potters Corner and Leda Cottages. 1004 note that this area outside Leda Cottages requires a speed reduction or it will become an accident blackspot. 955 No mention has been made of the proposed Vatre Warehouse development opposite the Holiday Inn. 615 the proposed warehouse within metres of the junction would produce more vehicles including HGVs.

927 The need for traffic from the new village to the A20 would mean that speed limits would need to be introduced. 1004 note that up until now, neither KCC or ABC have been willing to change the speed limit, which suggests that it is only new development and money in their pockets that can change their mind. 603 suggest that there has been no traffic calming measures or change to the road layout put forward and note that there were lately two fatalities on the turn into Tutt Hill, so how much worse will this be with the proposed 75 additional dwellings. 989 to turn right out of Tutt Hill and also to turn right leaving the filling station onto the A20 will be hazardous due to the speed cars travel at. 1004 believe the area outside the Esso garage will become an accident blackspot.

621, 857 the stage one safety assessment of the transport access was based on only one site being selected in this area.

434 Accessing the A20 via Chapel Road is currently dangerous, the lack of surface water drainage results in the road awash with shale. The relevant council also doesn't cut down the vegetation on the Hothfield Heath boundary sufficiently to improve visibility. Death and injury have occurred on this stretch of road, yet the council are intending to increase the volume of traffic.

603 and 868 the cottages on the A20 close to the proposed site already have problems turning into and out of their access road so this development would significantly impact on them. Collectively with S48, to have these housing estates planned with only the A20 for access is dangerous and stupid. When traffic jams start to form on the A20, people will begin to use local lanes such as Westwell Lane as rat runs to escape congestion. Also processions travelling to the crematorium would pose a danger as people are impatient and would attempt to overtake if they could.

171 speeding cars already put pedestrians at risk, especially those crossing from the Esso garage to the Hothfield Common

621 it is extremely difficult to turn right onto the A20 from our home or the Woolpack restaurant that will be either side of the proposed new entry road.

1004 believes housing should be placed far away from the A20, in an area where it will be safe without the constant threat of heavy lorries.

153, 432 and 603 argue that the access assessment produced by Highways is not representative of the real road issues, mainly because they chose to visit the site at 11am. 857 also notes that a site walk on the 26th April 2017 between 11am and 1pm, as well as another walk late morning on the 30th May 2017 is not reflective of the genuine traffic situation. 153 and 857 the Planning Inspector should have access to an assessment which incorporates the traffic data at peak times and includes issues such as Operation Stack. 927 also feels that more work needs to be done on the Transport Access Feasibility assessment as the A20 at this point is a high speed road.

838 ask that the local highway authority demonstrate that the cumulative impacts of development can be satisfactorily accommodated along the A20.

765, 857 The transport access feasibility assessment does not take account of the accident history of the road, or the designation of this section of the A20 as part of the Kent Highways network of highspeed trunk roads through the county – including its relief function for the M20.

765, 770 and 933 the transport evidence needs to take into account that overtaking, blind hollows and bridges make this stretch of this A20 dangerous, whilst tractors moving stocks of young trees ; 20 funeral corteges a day moving from Ashford to Charing Crematorium and HGV movements in and out of the Ardo cold store all contribute to traffic pressures. 765, 857 the road also has a frost pocket in the hollow by Ardo and flooding crossing the stream by the Banyan Stream, both are regular winter hazards and cause accidents. The proposed access to and from the A20 is also close to other access points to the Premier Inn and Beefeater restaurant, and Westwell Lane to the east and the two further business entrances to the west : the Banyan Retreat immediately adjacent and the proposed B8 commercial site for Vatre Terracotta on the same side of the road. Separate proposals are also in progress to manage the HGV overnight parking on the A20 – all of this needs to be taken into account when the transport access assessment is redone.

765 believes assessments of the cumulative impact on sustainability and traffic safety are incomplete and therefore the policy is unsound. 838, 832 argue that a proper assessment of

the cumulative impact of development on traffic growth and the implications does not appear to have been done.

832 raises concerns that it doesn't appear that there is any evidence of a traffic study relating to development along the A20 and therefore the Plan cannot be regarded as 'positively prepared'.

868 a respectable highways safety assessment needs to be conducted in order for appropriate measures to be put in place. 868 additional traffic flow into and out of this proposed development should have a more sustainable and accurate safety assessment to address the challenges, particularly those posed by the heavy HGV flow. 933 therefore considers this Stage 1 Safety Assessment as significantly flawed.

432 'ghost islands' are most definitely not a safe option along the entrance to the proposed S49. 955 believes they are also not the solution to an increase in the number of exits along the A20. 615 ghost islands would not be safe enough for the volume of traffic. 765 states it would be unsafe for vehicles to also be turning left and right east and west into and out of the proposed site with only a ghost island. 765, 933, 973 the transport access feasibility report needs to be redone as right turn road markings (ghost islands) in and out of the sites are insufficient and unsafe for development on this scale. Traffic lights or roundabouts should be considered.

1021 also remarks that the ghost islands planned only have a deceleration length of 55m which is less than standard. This should be increased to 80m according to the A20 Amey Access Report.

Response: *Whilst the A20 is a main highway route into Ashford, the detailed access advice provided by KCC indicates that a satisfactory access arrangement into and out of the proposed site can be achieved. The Council will however continue to liaise with KCC Highways on these matters. It should also be emphasised that the Local Plan should be read as a whole. Policy TRA8 will apply to this site and will require that Transport Statements or Transport Assessments are submitted as part of any applications for development coming forward here.*

Issue: Public transport

29, 432, 621 A bus route will have to be considered on the A20 for those children who need to get to school. 838 more frequent buses during the day and later into the evening are required to offset traffic growth that will occur as a result of these developments. 706, 904, 716 more regular public transport provision is required as the service currently provided is not good enough for all the dwellings proposed in the area. 868 with a lack of services nearby and poor public transport, this site cannot be considered as a suitable locality, particularly as Charing school, shops and GP are unable to cater for these additional people. 171, 153, 615, 832 and 973 there is currently only a very basic bus service running every hour along the A20, which means that cars are the only feasible means of transport.

973 a bus stop moved to the highway from a layby would pose a danger to all road users.

716 reiterates that para 30 of the NPPF requires LPAs to support a pattern of development that facilitates sustainable transport. 716 believes the allocation of the A20 corridor sites

would result in a reliance on the private car and would fail to provide enough opportunities for sustainable transport. This issue will be further exacerbated by the fact that the majority of people residing within this development will travel along the A20 to services in Ashford. 716 allocations S48 and S49 would not be able to provide the infrastructure required to provide sustainable transport options, particularly if dealt with in isolation.

Response: *It is acknowledged that new developments will increase use of the private car but there is the potential as indicated in policy TRA 4, to meet the additional demands created by new development here (and in combination with other allocations to the north-west of Ashford to improve bus services along the A20 corridor through the provision of a new service or the alteration/expansion of an existing service. The site lies within a potential 5 minute journey time by public transport of services in Ashford or Charing and so has significant potential for public transport usage.*

Issue: Parking concerns

838, 765 and 933 parking is already insufficient in Charing and this problem is not addressed within the draft Local Plan despite the additional developments proposed.

Response: *The Local Plan should be read as a whole. Policies TRA3a and TRAb will apply to parking provision on all new developments in the borough.*

Issue: The bund at S49

432, 603, 868, 933 Network Rail built in a bund to protect the residents of Tutt Hill from the noise of the high speed so there is a question over where this land can be built on. 432, 857 This bund is at the rear of S49 and should therefore not be built on. 603, 868 questions whether it would be removed and how that would affect current residents.

Response: *The bund is included within the policy area but criterion (e) of policy S49 requires effective noise attenuation measures to be included as part of any scheme on the site. This would also apply to existing property in the area as any diminution in existing noise mitigation would not be acceptable against this criterion.*

Issue: Lack of street lighting

432 Tutt Hill residents would wish to have street lighting again if this development were to go ahead. 615, 1097, 1021 there is no street lighting in the area which makes it dangerous to travel.

Response: *Noted (This would be primarily an issue for KCC)*

Issue: Operation Stack

432 The A20 from the section of Charing roundabout into Ashford, bears the brunt of the M20 'Stackback', this section becomes gridlocked when 'Stackback' occurs and on this ground these new developments are 'Unsound'.

885 when Operation Stack is in place it's nearly impossible to join the A20.

615 and 770 the A20 is the back up road for the M20 during Operation Stack and this often results in the A20 being totally overloaded resulting in traffic coming to a standstill.

293 It is difficult to turn onto the A20 from the site due to Operation Stack and ribbon development between Charing and Harrietsham. 706 The A20 is becoming busier, already pulling out from Westwell Lane onto the A20 is very dangerous with the speed that vehicles are travelling at, not to mention when Operation Stack is on and then it becomes grid locked.

955, 833 and 904 If Operation Stack is in force then the A20 section from J8 M20 to J9 M20 will be used and a gridlock situation will occur, add this situation to your proposed three development sites in the area and the existing highway will not be able to cope with the outfall.

Response: *During times of Operation Stack that involves the use of the M20 between junctions 8 and 9, traffic can be diverted onto the A20 with the subsequent increase in traffic volumes along this particular section of the highway. The concerns in respect of Operation Stack are acknowledged but this has been enforced on only a highly exceptional basis and not at all in the last 2 years and so is not a justification for not allocating development here.*

Issue: A20 corridor (Strategic corridors)

423 is concerned that ABC will seek to develop the A20 corridor, which will result in the coalescence of Hothfield, Westwell and Charing and subsequently result in a loss of identity for these villages. 765 with particular interest in the coalescence of Hothfield and Charing, this would go against the new SP7 policy that the Council intend to implement. 857 reiterates this point by suggesting that S47-49 contradict SP7. 861 also mention that without any mitigation, the boundary between Hothfield and Westwell will become blurred, contrary to SP7.

423 believe that the A20 corridor developments will not properly address infrastructure needs.

765 there is currently no spatial policy to manage development along this Kent transport artery and it is generally presumed as unsustainable. These A20 policies in tandem with the policies which refer to infill development in villages will result in ribbon development.. 857 goes further and suggests that there is no guidance to define the corridor in terms of type and quantity of permitted development, spatial arrangements or limits or timescales, no supporting policy or protection from future infill or sprawl. 765 to be sound this A20 development requires an SP policy which it currently does not have. There also needs to be a new HOU policy to guide the definition and good planning of the development that is not related to a village settlement – this is absent.

Furthermore, the A20 sites have also not been selected following extensive discussion to establish local knowledge and this inhibits their ability to be sustainable. 857 insufficient consultation about this extension of urban Ashford has taken place and is concerned that the lack of planning that has occurred, particularly with regards to the infrastructure required, will set a precedent for development in other parts of the borough. These proposals are contrary to the long standing recognised boundary of urban Ashford along Sandyhurst Lane, reflected in recent ward and parish boundary changes.

29 and 989 object this development alongside the others planned on the A20 will result in a ribbon development.

Response: *The justification for allocating limited scale development in the A20 corridor between Ashford and Charing is considered in response to other objections but policy SP7 is specifically designed to avoid coalescence of settlements and retain their individual character and that of the surrounding area. It should be noted that new housing development on a much larger scale is proposed along the A20 corridor to the west of the borough at Lenham and other villages such as Harrietsham has also seen recent new housing development on a locally significant scale. What this Plan proposes is on a much more modest scale in keeping with the environmental character of the area.*

The A20 is a major transport route into Ashford and whilst it is acknowledged that there are minimal local services that directly adjoin this site it is a relatively short distance from the full range of employment opportunities and services and facilities in Ashford (e.g especially the local centres within Eureka Park and Repton Park). The Plan has to make a range of allocations for residential development that are capable of being delivered and these sites will enable the Council to meet its overall housing requirement. The site does not require the delivery of significant infrastructure and there is no impediment to the site being delivered.

Issue: Junction 10a

765 and 857 the plan should focus on the delivery of Junction 10a which would allow other sites to be progressed that are ready to be delivered. 1097 there are already adequate proposals for Junction 10a so this allocation seems to be an unnecessary and damaging addition to the Local Plan.

973 it is unfair to look for extra housing because of the government's failure to bring forward Junction 10a, which would have unlocked development already earmarked in that part of Ashford and met housing needs.

171 the Council should be pressing the government for additional funding to complete 10a, which would enable more sustainable sites to come forward to the south of the town instead.

Response: *The large majority of new and committed development in Ashford lies to the south of the town and which will be served by Junctions 10 and 10a of the M20. In contrast, the limited scale of allocations on this site and others in the A20 corridor are very much smaller in scale. The sites along the A20 corridor are identified as deliverable and developable sites without any significant constraints.*

Issue: Impact on the AONB

29, 171, 293 express concerns that the houses will be visible from The Pilgrim's Way and the AONB. 621, 857, 861, 984 fear that the AONB will be seriously impacted by this development. 603 states that the development will be clearly visible from the AONB so it should be protected at all costs. 171 also feel that the site is not NPPF compliant on the grounds of impact on landscape as it is within the setting of an AONB and is good quality land.

489 suggests that the site is within the setting of the AONB, yet this is not acknowledged within the background text or policy wording. Views are partially filtered by the topography and vegetation but in order to comply with para 115 of the NPPF and Section 85 of the CROW Act 2000, the policy wording should require the layout and design of any

development to take account of impact on the adjacent AONB. 716 also refers to para 115 of the NPPF, particularly due to the fact that the site lies within the setting of the AONB and has the potential to cause significant harm. Highlights how ABCs Landscape and Visual Appraisal (2017) shows that the site would be visible from some public viewpoints from the AONB. Suggests that sites further from the borough should have been considered more thoroughly before the A20 Corridor Option was progressed as the preferred approach.

857 to introduce an urban corridor along a main rural road and on the edge of the North Downs AONB is unsound, it is effectively the urbanisation of a distinctly rural area of small separate settlements and isolated spread-out groupings of buildings adjoining the Kent Downs AONB, and in the context of the draft Heritage Strategy and NPPF is not sound. 984 notes that no matter how much mitigation is designed into the proposed developments they will be perceived as separate, isolated, free standing housing estates in the countryside.

393, 973 the AONB attracted people to the area, but this will soon be blighted by these proposals.

123 given the proximity to the AONB, any development would need to be of a high quality and in accordance with the AONB management plan.

Response: *The site lies outside the AONB although is close to the AONB boundary but there are already significant physical features, namely the M20 motorway, and the High Speed railway line, that impact environmentally on the area. There is also existing built development in the vicinity including the Holiday Inn hotel, Premier Inn, the large Ardo warehouse at Westwell Leacon and the adjoining settlement of Tutt Hill. Landscape assessment of a detailed proposal for development here will need to pay careful attention to ensuring impact on views from the AONB are mitigated but the scale and density of development that is proposed will enable suitable integration into the rural character of the area. The Council will liaise with the AONB Unit on this issue.*

Issue: Biodiversity considerations and open space provision

123 as the site lies in close proximity to the Hothfield Common SSSI, Natural England recommends providing high quality, semi-natural green space with readily accessible circular walking routes for residents and it is suggested the policy is amended to suggest this. Natural England should be consulted alongside the Kent Wildlife Trust on any measures in relation to the SSSI.

1021 Hothfield Common is already at capacity.

1097 the ribbon development caused by the allocated A20 sites will endanger the nature of the SSSIs, particularly Hothfield Common. 857 the proposals risk doing irreparable damage to a SSSI to the detriment of the borough and would set a dangerous precedent. There does not appear to have been a sufficient assessment of the cumulative impact S47-49 and S34 will have on the Hothfield Common SSSI and surrounding wildlife corridors. Heathland is now one of the country's most threatened habitats and must be protected, whilst Natural England SSSI citation and management advice for Hothfield Reserve indicate rare habitats and individual species and a need for careful management of a sensitive fragile site. KWT is currently working long-term to restore damaged habitats on the site.

857 the wildlife corridor between The Warren and Hothfield will be weakened by policies S47-49. Bats, Kestrels and Skylarks are within the area and therefore an assessment is required. The protections required in S34 should be extended to S47-49.

765 suggests that policy bullet 'g' contains the words 'suitably mitigated'. This is because the Hothfield Common Heathland reserve and SSSI is already under very great pressure from users including dog walkers/neighbouring cats and this mitigation would be essential and require provision of a SANG (Suitable Alternative Natural Green Space). An appropriate assessment under the Habitats legislation is likely to be required to assess the impact domestic animals will have on the Hothfield Common. SANG provision would need to be practical and realistic and respect the adjacent and existing surrounding uses and characteristics. 857 'SANG' provision is unlikely to reduce the movement of people within environmentally sensitive areas when they are on their doorstep.

171, 615, 857, 933 additional pressure will also be placed upon the Hothfield Common SSSI as more dogs and their owners use it. Hundreds of extra people visiting the Common from the development are inevitable, which will place significant pressure on the SSSI.

716 reiterates that public open space should be provided within the development, as it would alleviate pressure on the Hothfield Common SSSI and prevent further recreational impact. However by providing this space on-site, it would reduce the development capacity and result in densification which due to landscape impact is unlikely to be feasible. Questions the 2016 SA that effectively said that the site would have a positive effect as facilities would be within close range and accessible by foot or cycle. This is clearly not the case as the A20 sites do not have good access to services and are not well served by existing green spaces. Believes that the A20 sites should all be deleted.

423, 1021 the Hothfield Heathlands SSSI falls within the ribbon of Mid Kent Greensand and Gault Biodiversity Opportunity Areas and is therefore regarded as an area that offers the best opportunities for establishing habitat areas and wildlife habitats. These proposals will compromise the SSSIs ability to do this. 423, 1021 ENV1 specifically addresses the situation and should be taken into consideration within the policy.

621 environmental issues such as wildlife and habitat conservation have not been fully addressed. 621 the development will place additional strain on Hothfield Heathlands/Common which is a local Nature Reserve, LWS and SSSI.

423 also raise concerns that ABC will develop the A20 corridor between Charing roundabout and the Drivers' roundabout and in so doing will imperil the 'open spaces' and 'green corridors' that provide clear separation between settlements.

432 these developments would result in unsustainable damage to the Hothfield Common, the only peat site left in Kent.

615 lighting from a housing estate would disturb the bats in the area. There is also a pond on the land that may possibly be home to great crested newts.

973 there is no detailed assessment of impact on the environment.

Response: *The site does not lie within the SSSI but is acknowledged to be in relatively close proximity to it. Criterion (g) of policy S49 recognises the need for suitable mitigation of*

any indirect impacts on the SSSI including provision of on-site recreation space and it is expected that the developers will work alongside the Borough Council and both Natural England and KWT to ensure management of any additional indirect recreational pressures are managed. However, this is also an issue for the growth of Ashford and the proposed increase in housing in the area generally as this will generate more strategic recreational pressures which will need to be managed through a variety of new and existing spaces.

More generally, the site has access to a wide ranging public rights of way access creating excellent opportunities for local walking and informal recreation within the local countryside.

Issue: Topography/geology of the site

815 Affected economic geology: Folkestone Formation Sub Alluvial River Terrace Deposits. An understanding of the economic geology in this affected site is required. There may be grounds to justify why the mineral safeguarding presumption should be set aside (please refer to the criteria of Policy DM 7 of the Kent Minerals and waste Local Plan 2013-30) on the allocation, which may or may not include prior extraction of the economic geology, though this is as yet un-evidenced due to an absence of minerals assessments.

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. 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: Cycling/walking provision

171 cycling or walking along the A20 is a very unpleasant, risky and noisy experience. 1004 states that there is not one mention of pedestrian crossings that will enable residents to cross the A20.

293, 765 there are currently no pedestrian crossings across the A20 for children and the elderly to use. Access onto Tutt Hill for pedestrians and cyclists is dangerous as it is single track and on a blind bend.

432 crossing the A20 is nigh on impossible without appropriate safe crossing sites and the lack of provision in the policy for this should render it 'unsound'. 838 and 1097 safer pedestrian crossings than currently exists are absolutely vital. 933, 1097 and 1021 this is particularly important as children will be going to school and will need safe access to the school buses. 955 the increase in traffic will only heighten the existing danger to the children/pedestrians trying to cross the A20.

603, 868 people using lanes as rat runs once the A20 is jammed would result in them becoming extremely dangerous for pedestrians, cyclists and horse riders. Although the policy states that pedestrian and cycle routes need to be created to link to the wider network, there are currently no pedestrian or cycle networks close to this site, how and where are these going to be created, whilst there is no mention of how recreational facilities will be developed.

706, 857 with the proposed building of S48 and S49 in such close proximity, it will be dangerous for cyclists and pedestrians trying to cross the road to access bus stops or the petrol station.

706 hedges and overgrowth on existing pathways currently make them inaccessible whilst out walking the dog or with a buggy. It is only because the site is currently in the countryside that the condition of pathways is accepted. Pathway provision along the A20 will be important so that surrounding areas can be accessed easily.

861 notes that there is currently no easy pedestrian access to the site from the Hothfield side and this would endanger bus passengers from Ashford or to Charing.

973 the needs of residents with mobility limitations has not been assessed in terms of practicalities and safety.

Response: *Any development on the site would include the creation of a network of cycling and pedestrian routes within the site with linkages to other routes where possible. The Council is committed to the improvement of cycling and walking routes within the borough (Policy TRA6) and any development here would link into the wider route network that exists at present or which could be created in future. It is envisaged that bus stops will be available on both sides of the A20.*

Issue: Groundwater/surface water

677 this site is located within Source Protection Zones 3 for drinking water supplies and over Principal Aquifers. Adequate investigation and risk assessment should be carried out to address any contamination and risks to controlled waters. In completing any site investigations and risk assessments the applicant should assess the risk to groundwater and surface waters from contamination which may be present and where necessary propose appropriate remediation. Any SUDs should demonstrate that the discharge will not result in pollution of the water environment.

603 there has been no mention of how surface water will be dealt with, whilst it is also questioned whether drain surveys have been undertaken.

Response: *Comments relating to Source Protection Zone location are noted. Policy ENV8 (Water Quality, Supply and Treatment) will apply to all major development proposals.*

Issue: Agricultural land

171 land in the site area is classed as Grade 3 which is good to moderate and borders Grade 2 land – such a valuable resource should not be used for new housing. 973 the land is currently cultivated and a greenfield site.

Response: *Noted. This site is agricultural land but lower grade. 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 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: Impact on existing settlements

171 notes that Tutt Hill has its own community, incorporating the dwellings on the Westwell, Chapel and Ram Lanes. At present there are 65 dwellings in the area, so the proposed development will double this and negatively impact the existing settlement, therefore not complying with the NPPF. 861 also note how the proposed development is on a greenfield site and will be totally out of scale for the area.

955 Tutt Hill will be overshadowed by the housing estate and unable to support the traffic and footfall created by the increase in houses.

706 house prices will be blighted in this area, with the extra development effectively destroying the village location as it would simply become another housing estate. 973 suggests a reduction in council tax is expected should the development will go ahead.

765 there seems to be no recognition that if this development goes ahead, that Tutt Hill will effectively be its own village settlement and will require its own community infrastructure and pedestrian crossings to be sustainable.

765, 989 Tutt Hill offers no community facilities or other infrastructure which makes this proposed development unfeasible. Its location means that residents will feel no affinity with Charing, Hothfield, Tutt Hill or Westwell

Response: *These comments are noted and acknowledged. However, the proposed allocation provides an opportunity to consolidate the form of development at Tutt Hill and, as suggested, deliver a limited form of local facility (most likely in combination with site S48). This has the potential to create a stronger identity for the settlement rather than diminish it.*

Issue: Pollution

171, 770, 984 the CTRL and the M20 are in very close proximity to the site, and the noise and air pollution stemming from them will negatively affect residents who live close by. 857 an assessment of the noise is required.

293 there will be an increase in noise and light pollution. 857 this will affect neighbouring wildlife, as well as residents.

706 the increase in the number of dwellings would potentially result in an increase in noise pollution, as the land adjacent to the M20 and high speed rail line was built up specifically to reduce noise for the local residents. Changing this setup could threaten more noise pollution.

832 nearby development exposes current watercourses to an increased risk of pollution (herbicides/pesticides etc). The spring fed tributary through the centre of the site will create a channel for pollution by heavy metals, hydrocarbons from roads and nutrients from gardens and compost heaps to reach the Great Stour. This would not be consistent with paras 109, 110 and 120 of the NPPF which all refer to ensuring pollution is minimised/prevented.

Response: *The detailed assessment of potential pollution issues would take place as part of the assessment of a detailed planning application for the site but there is no reason to assume why development would inevitably have a detrimental effect incapable of mitigation. In terms of the noise impact of the M20, the area of the site that is immediately adjacent to the motorway is proposed to be kept free from built development and the motorway sits in a cutting at the point it passes the site. In terms of light pollution, policy ENV4 of the draft Plan, along with the Council's Dark Skies SPD (2014), seeks to restrict the impact of external lighting but the scale of proposed development is such that only a very limited additional impact might be anticipated in any event.*

Issue: On-site facilities

838 Although the area has a pub, filling station with small shop and restaurants, the only recreational space proposed is green space. To be sustainable there needs to be provision for a community hall or similar hub. The proposal has not appropriately taken into consideration community facilities (NPPF para 28/para 69-70/ para 15) and the draft Plan does not make provision for sufficient infrastructure either at the site or Charing (NPPF paras 156-157).

615 there are no recreational facilities available to young people other than Hothfield Common. 861 feel that this development has been poorly thought out and will offer no new facilities for new residents.

Response: *The scale of development proposed is not sufficient to generate a requirement for a community hall as part of the development. The countryside nearby provides an opportunity for informal recreation or walks and more formal recreation facilities are within easy driving or public transport access in either Charing or Ashford.*

Issue: Impact on existing businesses

621 it will be impossible for us to continue to run our business, Banyan Retreat, as it requires a calm, peaceful and tranquil environment – impossible when the developments planned go ahead and we are surrounded on all three sides. The additional light and noise pollution is a serious issue for us and our business, so we would have no option but to look to ABC to relocate us to a more suitable environment.

765 also note that development would potentially impact on the screening of the Banyan Retreat site and therefore damage the location which is currently used as a meditation and healing centre and feels that local businesses have not been properly consulted and

apprised of the proposals. 857 suggests that the substantial planting around the boundary of the Banyan Retreat should be protected.

984 the development of S48 and S49 would displace the existing businesses and conflict with adopted Policy TRS7 of the TRSDPD.

Response: *The detailed layout of the proposed development would be considered as part of a detailed planning application on the site and in particular the policy requires that the design and layout of the site should take account of the residential amenity of neighbouring occupiers. The supporting text to the policy specifically refers to the substantial planting around the boundary with the Banyan Retreat and that this should be retained as part of any development proposal. It is noted that the Retreat already sits close to the CTRL, M20, A20 and the Ashford - Maidstone railway line and also adjoins a site with permission for commercial storage.*

The relocation of the Oakover Nursery activities from this site (and S48) have been fully discussed and agreed with the Nursery operators.

Issue: Archaeology/heritage

815 Multi-period finds were located as part of the HS1 scheme and similar remains may extend the site. A phased programme of archaeological mitigation will be required and significant archaeology could be dealt with through suitable conditions on a planning approval. 973 archaeology on and near the site, including a nearby Roman burial site has not been mentioned or assessed.

765 the buildings within this development would impact on the Woolpack Inn LB in terms of setting. An assessment is required.

857 the Heritage Strategy suggests that ‘under the NPPF the conservation and contribution of locally listed heritage assets will be a material consideration in planning decisions that directly affect them or their setting.’ With regards to the A20 proposals, their context and mitigation have not been considered – which runs the risk of irretrievable damage occurring if appropriate heritage assessments do not take place. The draft Heritage Strategy is only evidence of intent and therefore cannot be treated as evidence. With monitoring not guaranteed every two years, there is a risk that sensitive or under-documented sites will be vulnerable to development within tight national government timescales before and after approval of the strategy. The draft strategy suggests heritage themes that include Farming and Farmsteads – droving to market, routeways – turnpike, toll cottage, coaching inn, Industry and commerce including rural, all relevant to the A20 corridor proposals. The use of the Hothfield Heathland can be traced back to 1100AD and it is therefore extremely important from a heritage point of view.

861 Of the 33 houses in Tutt Hill, the site is overlooked by 23 of which 7 are listed. 973 impact on historic and listed buildings within the area has not been properly assessed.

Response: *Policies ENV13 of the draft plan will ensure that heritage assets are given full consideration in the assessment of any development proposals for the site. Policy ENV15 deals with archaeology and will ensure that the issue is dealt with when detailed development proposals are considered. It is noted that KCC’s representation raises no*

objection in principle and suggests the matter can be dealt with by suitable conditions on any subsequent grant of planning permission.

Issue: Objection to council’s selection method

603 and 868 implies that these sites have only been selected to create housing numbers without relative care given to local residents, the AONB, the village’s status nor for building on greenfield sites when brownfield sites are available.

868 individual site appraisals are insufficient when considering the ‘bigger picture’.

984 excessive reliance on large sites has led to a serious underperformance in regard to the trajectory. There is also a growing recognition that reliance on large urban extensions has been at the expense of the villages which can come forward in a much shorter timescale. The LPA should be commended for allocating housing at Hothfield but the sites are far too isolated to be sustainable. Visually and environmentally the western edge of the settlement (allotments/former pub car park) is the most conducive to improvement by development. It is suggested that DW34 would be more suitable than the site allocated (S49) and that MC91 and 92 should be deleted and Land South of West Street, Hothfield allocated instead.

972, 953 suggests that if S48 and S49 have been allocated, DW10 should be allocated if the LPA are to be consistent.

1192 considers the allocation of this site is not sustainable and runs contrary to the approach taken in the rest of the Plan. The SA score is low and there are preferable sites to allocate closer to existing settlements with a better range of services.

Response: *The Plan has to meet an overall housing requirement up to 2030 and that involves the identification of a range of housing sites in a variety of locations. An allocation for 40 dwellings has been made in Hothfield village and it is considered that this is an appropriate scale of growth at the village itself. The sites along the A20 corridor are identified as deliverable and developable sites without any significant constraints and add to the variety and choice of housing site available to the market to bring forward. Omission sites are addressed in Appendix 2 of this Report. The SA process indicates that S48 and S49 are preferable sites to allocate to DW10. The allocation of this site (and S48) is addressed elsewhere in this Response document.*

Issue: Affordable/local needs housing

885 are the houses going to be affordable for local people or just catering for people who wish to move to Ashford from London.

868 is concerned there is no mention within the policy whether this site will be affordable or social housing.

Response: *In accordance with draft policy HOU1 there is a requirement to provide 40% of the housing on the site as affordable units.*

Issue: Horses

706 building on the land would be very distressing to the horses that live in the fields between S49 and Westwell Lane as it will disturb the quiet and tranquil nature of the place.

Response: *Noted*

Issue: Support

815 and 1156 support Policy S49 as a ‘sound’ policy.

Response: *support noted.*

MC93 – Policy S50 Land at Caldecott, A20 Smeeth

Representations have been received from the following consultees:

1084 Smeeth Parish Council (Sue Wood)	715 James Ransley
816 KCC (Council)	598 Hurrell
928 CPRE Kent Ashford District (Hilary Moorby)	436 Charlotte Burke
315 Annette Shaftoe	232 Rosemary Selling
165 Barry Lightfoot	1009 Hobs Parker Property Consultants LLP (Jane Scott)
103 Jane Winfield	73 Sue Keeler
56 Angela Williams	46 John David Jamieson

Summary of Representations – Main Issues

Issue - Site Availability - Withdrawn

1009 this site is no longer available for development. Following a recent meeting, the Trustees of the Caldecott Foundation have decided that they no longer wish to pursue a relocation of their operation and shall, instead, continue with a programme that sees them remain onsite.

Response: *Noted. The unavailability of the site for development makes the site allocation undeliverable. The Site policy will therefore be removed from the Local Plan.*

All representations received on the site allocation are responded to for transparency.

Issue – highway safety

816 object due to the isolated location with regard to local amenities, no public transport along this section of the A20 and heavy reliance on the private car. There is also a highway safety concern about increased use of the access directly onto the A20 and increased use of

Smeeth cross-roads as there has been a number of accidents at the private access and Smeeth cross-roads. Consideration will need to be given to Public Footpaths AE409, AE419 and AE416 which run within and adjacent to this proposed site.

46, 56, 103, 165, 436, 715, 928 1084 and 598 also raise concerns about the increase in traffic and vehicle movements on the A20 due to accidents (blackspot), access being directly from/to the A20, which is 60mph speed limit with poor visibility, access from/to the site on to Station road putting extra burden on Smeeth crossroads along with other nearby developments.

92 states that access to the site could be from the A20 and/or from Station Road. Both accesses have constraints and the transport access feasibility access needs more work. 56 and 598 agree that further traffic modelling and access reports are required. 56 believes a speed limit needs to be brought in between Smeeth and The Ridgeway crossroads onto the A20.

315 and 715 state that there are no public footpaths for pedestrian traffic in Station road and allocation of the A20 corridor sites would result in over reliance on the use of the private car. This site does not adjoin an existing settlement and there are only very limited pedestrian accessibility local facilities. Residents of the development will need a pavement on the site side of the A20 to enable them to walk to bus stops opposite Mersham le Hatch or on The Ridgeway.

Response: *Comments relating to access and traffic are noted. It was a requirement of part d) of the policy that highway improvements would have been required in accordance with Kent Highways recommendations and requirements, and that both the A20 and Station Rd points were to be considered. Policies TRA7 and TRA8 would have applied to development of this site also, and therefore a new access of intensification of an access which created a risk of traffic accidents or significant traffic delays would not have been permitted.*

With regards to footpath connections, it is noted that the site is outside of settlement confines, but is a brownfield site close to many local services on a main A road. Policy TRA5 – Planning for pedestrians, is applied to all development proposals and requires information on how safe and accessible pedestrian movement routes will be delivered. KCC would have been consulted on the footpath connections to existing routes at application stages.

Issue – adequacy of local infrastructure

46, 56, 73, 103, 232 raise issues with inadequate capacity of the local infrastructure services including the mains water service as there is regularly experience low pressure, the sewage system, phone/broadband coverage, schools and the local doctor's surgery.

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 to Broadband availability and speeds, Policy EMP6 – promotion of Fibre to the Premises, is a new policy which will be applied to all developments (or over 10 houses in rural areas) and will require connections to be made to fibre broadband service which could improve existing provision in the rural areas.

Affordable housing will be required on all sites delivering 10 or more homes, and therefore redevelopment of this site would meet this threshold and Policy HOU1 would be applied.

Issue - Design & Heritage

103 if the site is used for housing then how the dwellings are laid out with respect to the current properties should be considered; including visual impact, proximity, security (improving boundaries/fences) and noise levels.

73 none of buildings should be higher than the wall in the storage yard facility to look into resident's private garden area. The wall is old and characterful and should not be damaged or built too close to. There is a low fence bordering Caldecott grounds that needs to be considered in terms of security. Consultation needed on that and how close a developer would build to that boundary.

56 Although located on the edge of the village, if more than 50 houses were to be built it would start to alter the rural characteristics of the quiet village life. 46 is concerned that this proposal could possibly be the start of infilling which would result in the eventual amalgamation of the villages of Smeeth and Mersham

816 The site includes the post medieval residence of *The Paddocks*, identifiable on the 1st Edition Ordnance Survey map. The main house still survives, but is not designated, and is surrounded by formal gardens and landscaped grounds. Consideration of the historic character of this complex would be appropriate. Significant archaeology could be dealt with through suitable conditions on a planning approval.

56The main building on the site called 'The Paddocks' is a house of historic importance and part of Smeeth village heritage. It was built in the early 1800s for a local landowner and then owned and extended by a member of the Knatchbull family for about 50 years after the

1850s. The words ‘where possible’ should be deleted from the criterion a) of the policy. This house should be retained and redeveloped and should not be demolished.

Response: *The policy is worded to take account of many of these design features and concerns. Paragraph 5 of the supporting text specifically states that proposals must have regard to the residential amenity of the four neighbouring properties and the school boundary. Paragraph 7 is also specific in the design requirements relating to visual impact of development on the Station Rd side of the site and paragraph 10 notes that the proximity to M20 and A20 will require noise mitigation. These criteria are also policy criterion c and e. However, details of design are dealt with at planning application stages, and other policies within the Local Plan will also be applied such as SP6, promoting High Quality Design, and ENV3a Landscape Character and Design.*

With regards to the potential amalgamation of settlements, Policy SP7 has been included within the Local Plan with the aim of preventing the loss of village character through coalescence.

The policy is clear in the requirement to assess the potential of the retention of the building of local historic importance on the site, but as the building is not listed by Historic England, it cannot be retained by this policy, and only recommended for retention as it has been. Comments relating archaeology potential are noted.

Issue - Minerals

816- Affected economic geology: Sandgate Formation, Hythe Formation. This is an allocation that will affect recognised economic geology in the Ashford area, as shown on the Kent Minerals and Waste local Plan 2013-30 Ashford Borough- Mineral Safeguarding Areas proposals map. In order for this allocation to be fully evidenced as an acceptable option for the delivery of the area’s sustainable growth over the Plan period to 2030, an understanding of the economic geology in this affected site is required. There may be grounds to justify why the mineral safeguarding presumption should be set aside on the allocation, which may or may not include prior extraction of the economic geology, though this is as yet un-evidenced due to an absence of minerals assessments.

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. 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 - Biodiversity and Open Spaces

232- The provision of high quality open space within the development should be taken into consideration, given the lack of access to open space in this location. Native species new planting and the retention of trees and vegetation where possible linking to wildlife corridors within the surrounding countryside. Consideration of a play area within the development of high quality and incorporating natural play elements.

Response: *The policy requires the provision of public open spaces in accordance with the guidance in adopted SPD, this includes informal space and formal areas such as play facilities. The policy also requires an arboriculture and landscape survey to be undertaken and other policies within the plan such as Biodiversity ENV1 would need to be taken into account in design proposals coming forward.*

MC94 and MC95 – Policy S51 Land North of Church View and Policy S52 – Land south of Goldwell Manor Farm, Aldington

(Responses have been combined as many covered issues relevant to both sites, and wider village issues/concerns)

Representations on MC94 have been received from the following consultees:

616 Angela Saunders	745 Terry Ransley
759 Crabtree and Crabtree (Hothfield) Ltd	818 KCC (Council)
1064 Aldington and Bonnington Parish Council (P Setterfield)	1170 ABC Jane Martin
658 Environment Agency (Jennifer Wilson)	344 Jan Wirrmann
360 Simon Foster	340 Erica Gadsby
328 Peter Smith	327 Ruth Guy
147 Daphne Wanstall	110 F Montford
101 Nick Hulme	76 Charles Sell
66 Peter Leonard	60 Caroline Harris
49 Richard Lavender	23 Malcolm Mattocks

Representations on MC95 have been received from the following consultees:

686 Viven Owston	617 Angela Saunders
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750 Tim Bishopp	819 KCC (Council)
1065 Aldington and Bonnington Parish Council (P Setterfield)	1171 ABC Jane Martin
448 Peter Brett Associates (Tim Allen)	521 Susan Pullen
657 Environment Agency (Jennifer Wilson)	957 Lanndia Development Services Limited (Tim Allen) [Duplicate of MCLP/448]
345 Jan Wirrmann	361 Simon Foster
341 Erica Gadsby	330 Peter Snaith
317 Evelyn Rossi	329 Ruth Gay
189 Sergio Lecchini	190 Vera Lecchini
111 F Montford	77 Charles Sell
67 Peter Leonard	

Summary of Representations – Main Issues

Issue – Overall Village Housing Growth

60, 66, 67, 76, 110, 111, 616, 617, 686, 1064, 1065, 1170, 1171 argue too much development, village’s development potential has been reached and this village has taken its share of new homes.

110, 111, 317 state that in 2014 villagers were promised no more development, and village does not need more development. 745 believes that this site should not be included to make up the supposed shortfall in numbers of houses to be built.

23, 1170, 1171 people move to villages for a peaceful way of life/existing residents do not like change. This is eroded by development. The degree and scale of unplanned development over the past 10 years has lacked a sensible and tangible investment in infrastructure.

23, 147, 327-330, 340, 341, 344, 345, 360, 361 development should be delivered in small doses.

110, 111 point out that houses are unaffordable for local people. 49 thinks that a percentage of the housing should be affordable to retain young people in the village.

110, 111 states that NPPG states that councils can make a case for why their SHMA targets are unachievable, and ABC should do this.

1064, 1065 is mindful of the requirements being placed on the Borough Council by central Government on the number of houses to be built. However, while the proposed allocation is a small number (30) in terms of the total required by the Borough as a whole, this is still a large percentage increase for Aldington: a further 6% in terms of housing numbers and population. 70% of parishioners opposed new development, with a 20% response rate, and the Parish Council has been lobbied for some time to allow previous growth “to be absorbed”. Development even of this scale would increase the village substantially.

23 –The schedule of planning should also be agreed at planning approval with agreement on fees. The lost income from rates could be calculated and use this formula for building plot rates to be the fees applied when completion is late. An approach needs to be taken to motivate building companies to keep to target and keep pressure off smaller rural plots.

Response: *Government policy requires local planning authorities to determine their own housing needs based on such assessment of housing need to ensure that general market and affordable housing needs are fully met, as well as taking account of national household and population projections, in preparing its Plan. The SHMA which supports the Local Plan covers Ashford’s housing market area and deals with its specific needs.*

Within the Local Plan, the majority of new site allocations included to meet the boroughs needs are located in and around the Ashford urban area as detailed within Policy SP2 – The strategic Approach to Housing Delivery. However, a certain amount of growth is required in sustainable rural settlements with available and deliverable sites, as outlined by the Sustainability Appraisal which supports the Local Plan 2030.

(See response to MC4 for more detail of the SHMA process, the Strategic approach to housing delivery in SP2 and response to the recent Housing White Paper)

It is noted that Aldington has had a reasonably high level of windfall housing growth in relation to the settlement size in recent years, however, no promise has or can be given that no additional development will be allocated or permitted. This position would not be in accordance with National Policy or the current and emerging Local Plan position which includes the presumption in favour of sustainable development. All sites submitted for consideration in the Local Plan have been assessed using the same criteria, and the suitability of these 2 sites (parts of them) in the SA scoring process makes them suitable for allocation when ABC were required to find additional sites following the increased housing requirement.

As site S52 will deliver up to 20 homes, Policies HOU1 (Affordable Housing) and HOU18 (Range and Mix of Housing) will be applied to the site proposals so 40% of the development will be a mix of affordable housing offer and house types to suit a range of housing needs.

Policy HOU2 allows for the development of local needs housing (this is different to usual affordable housing) where a specific need is identified, on an exception basis. Local need housing comes forward on exception sites in collaboration with Parish Councils, it is not allocated.

Issue - Infrastructure Capacity

60, 66, 67, 76, 77, 110, 111, 147, 189, 190, 327-330, 340, 341, 344, 345, 360, 361, 616, 617, 686, 750, 1064, 1065 point out there is no GP (some propose setting up a transport service), poor Bus service, Busy and narrow roads, parking issues on Roman Road and by school and lack of speed restrictions. 110, 111 state that there are insufficient school places.

60, 76, 686, 750 are concerned that development will result in increased traffic movements. The bus service has been reduced and there are no longer any buses on a weekend. This places serious constraints on elderly and teenage villagers.

189 the village gets gridlocked at certain times of the day. There is no adequate parking in shopping areas or near the school (110, 111, 750 agrees to lack of parking) Along Roman Road, two cars cannot face each other. 66 the main route to the village from the A20 at Smeeth crossroads via Evegat Mill which is an inadequate standard with tight bends, narrow passing points and poor sight lines.

1064, 1065 state that Aldington does not have mains gas, and so LPG or oil must be brought by road and capacity of sewerage network is unknown.

750 there is no mention of water availability within the site policy, the level of which is dropping regionally given housing 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.

With regards to bus provision, this is also addressed by the Local Plan in Policy TRA4 to promote and enhance the bus provision in the borough working alongside KCC and local bus service providers.

Issue – Leisure and Retail in Town Centre

101 states that local infrastructure, including leisure and retail in Ashford Town Centre, and local infrastructure and hospital provision is not sufficient. The cinema is not big enough.

Response: *Within this plan period, Ashford Town Centre will remain the focal point for retail and economic development. The development of a new cinema complex and other retail and leisure facilities at Elwick Place is ongoing.*

Issue - Site suitability and Landscape and Visual Impacts

23 people move to a village for a rural outlook and sacrifice infrastructure benefits available in cities and large housing estates. Development affects the village perception

317 there is concern of ruining the natural beauty view of the church at the village hall and other views in the village. Once development begins there will be noise and sight pollution.

66, 67 argue development on site is “radical and inappropriate”

745, 1064, 1065 sites were excluded from previous draft plan and insufficient justification has been given for their inclusion here. The site is visually intrusive into landscape, would extend the village from its central core, and constitutes ribbon development contrary to the Town and Country Planning Act 1925.

66, 67 Aldington is a designated area of landscape beauty

327, 328, 229, 330, 340, 341, 344, 345, 360, 361 allocations extend village away from its core and will be visually intrusive and difficult to screen from many viewpoints and over long distances.

750 this proposed development will not only extend the village boundary but by doing so will increase the land available for future development that we won't be able to challenge as it will be within the new boundary.

Response: *The settlement of Aldington is not within a nationally designated Landscape area such as AONB, however, the Kent Downs AONB is located in close proximity to the settlement, and the sites are located on the top of the Greensand Ridge. These important landscape features are already detailed within both site policies S51 and S52 and are one of the key factors as to why only the site frontages have been considered suitable for allocation, and not the whole sites. This is explained within the Sustainability Appraisal which supports the Local Plan.*

In addition to the specific site policy criterion relating to the wider landscape settings and topography of the site, Policy ENV3a includes criterion that proposals shall demonstrate particular regard for landscape features, according to their significance and ENV5 – Protecting important rural features, ensures protection of rural characteristics. These policies combined will address the matters and protect the key features of landscape.

The allocation of the sites is in accordance with the current National Policy and statutory legislation, and the style of development proposed is reflective of the current form of development within this part of the village.

Issue – Village Protection Policy and Otterpool

23, 745, 1170, 1171 the Village/Rural Protection Policy should be adopted to protect rural locations.

327-330, 340, 341, 344, 345, 360, 361 contest that these allocations will be contrary to Separation of Settlements policy SP7, and landscape protections are inadequate

101, 110, 111, 750 say the cumulative impact of Otterpool development should be considered.

Response: *The Local Plan, which should be read as a whole, contains a range of environmental policies to protect the green spaces, rural landscapes and wildlife areas of the borough. With regard to the unique characteristics of rural villages and protected green areas between settlements around the Ashford urban area, the Council has responded to concern expressed at the Regulation 19 Stage about the growth of urban development principally on the edge of Ashford affecting the individuality of nearby villages, with the addition of Policy SP7. This new ‘separation of settlements’ policy is clear that the need to avoid coalescence of settlements should be regarded as an important determinant of whether a proposed development is acceptable or not and to this end states that development which would result in coalescence or the significant erosion of a gap between settlements resulting in the loss of individual identity or character will not be permitted. Development at these sites will not result in a convergence of settlements, and is therefore the allocations are not inconsistent with Policy SP7.*

Ashford Borough Council is engaging with Shepway District Council over the emerging plans for a Garden Town focused at Otterpool. These plans are not well advanced, and are not yet part of that district’s planning policy. No changes required.

Issue – Access to sites and Conflict of Policy

448 supports these policies, but proposes that sites could be combined to have a single access to Goldwell Lane and feels the requirement for maintaining views of the church and maintenance of mature hedge are contradictory.

Response: *Due to the different land ownerships of the two sites, it is not viable to propose only one point of access into a joint site proposal as one may not be delivered or result in a ransom strip issue. If the landowners wished to promote a joint scheme which met the other requirements of the policy but had a single access, this would not be opposed by the Council if in agreement with Kent Highways Services. No changes are proposed to the current policy wording.*

With regards to the suggestions relating to the conflict of the hedgerow retention and maintaining views of the church, the Council feel that both are considered to be important criterion for both sites. However, it is made clear in policy criterion a) that the hedgerow should be retained “where possible” and retain gaps in the built frontage of the development, not the hedgerow, to preserve views towards to the church.

Issue – Agricultural Land

76, 110, 111, 147, 327-330, 340, 341, 344, 345, 360, 361, 686 all raise concerns that allocations are on agricultural land, the loss of which is unacceptable, and states that government policy is for farmers to grow more crops.

Response: *It is acknowledged that the sites are Grade 2 agricultural land (which is not the highest grade), however the NPPF does not include an exceptional circumstances test for the use of the 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 poorer quality land in preference to that of higher quality’. The grade of agricultural land is only one of the many factors which is considered and balanced against others in deciding the most suitable sites to allocate for development. Full assessment of all these factors have been carried out through the Sustainability Appraisal. It should also be noted that the majority of the built settlement is also located on Grade 2 land.*

Issue – Dark Skies

147, 317, 521 raise concerns that development will add to noise and light pollution in this “dark sky” area and affect wildlife.

Response: *A suitable condition can be imposed on any permission to mitigate the impact that construction works and associated infrastructure delivery will have on the area.*

The NPPF, Policy ENV4 of this draft Local Plan and the Dark Skies SPD seeks to preserve areas unaffected by light pollution and reduce the amount of light pollution from development in general. Aldington falls within the area of the borough with the lowest levels of light pollution, and development will be subject to the requirements set out in these policies.

Residential development is not a significant generator of noise and the site is set within an area that contains existing residential development and large agricultural structures.

Issue – Affecting local business

521 development on this land would compromise attraction of holiday cottage for rural retreats.

450 and 964 - In the context of Policy S52 in Aldington, business has been extremely successful and has expanded rapidly and Goldwell Manor Farm. However, a lack of local office infrastructure has prevented them from relocating to a larger space in Aldington. Often rural businesses are configured around a village based workforce where, for instance, parents are able to pick up children from school. To relocate outside of the area would damage this ethos and inevitably the structure of the business. It is important that the Council and the Local Plan do more to facilitate this. It is therefore recommended that the remainder of site Policy S52 is reserved for single storey business accommodation, which would only be available for development if a business were expanding from within the local area.

Response: *Policy S52 requires the provision of a landscaped boundaries and requires the retention and enhancement of the PRow. Residential development would not result in noise or cause other amenity impact on nearby holiday lets.*

The policy EMP10 is specifically for protection of local shopping needs and services, and sites are not allocated for this use. Policy EMP3 is the relevant policy which allows extensions to employment premises in the rural area, and would apply to the site proposal above and in principle encourages and supports extensions of existing employment sites. No allocation for this use is required.

Issue – Heritage

521 development would compromise setting of listed Goldwell Manor Farm, and the area of historical importance of the Church and Archbishops Palace

818, 819 the site lies north of the predicted alignment of a roman road and remains associated with the use of this routeway may extend to the site. Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval.

Response: *The supporting text and policies of both sites make clear the local heritage assets importance and contain criterion relating to the retention of views to the church and this area of importance.*

The Listed buildings of Goldwell Farm are separated from the site by the Goldwell Court employment area, and therefore any impact on their setting would be minimal. However, policy ENV13 – Conservation and enhancement of Heritage Assets would apply to all site proposals where relevant. This policy would prevent development proposals where it would cause loss or substantial harm to the significance of heritage assets or their settings. Therefore with the specific policy wording in site policies and the protection of ENV13, no further changes are proposed.

Comments relating to low level Archaeology are noted.

Issue - PROW

818 supports this policy but notes PROW AE474 runs adjacent to sites

Response: *Noted. The PROW is specifically mentioned within the supporting text and policies.*

Issue – Water and contamination

657 sites are located over a Principal Aquifer and adjacent to a historic landfill. Investigation and risk assessment therefore needed to address contamination risks to controlled waters; and sustainable drainage design must demonstrate that discharge will not result in pollution of water environment.

Response: *The Council will be liaising with the Environment Agency on the issues raised in this representation.*

Issue – s106 contributions

1064, 1065 the village does not want contributions towards public open space or play areas, as required by policy, as it is not required. The residents' top-ranking wishes are for 1) an improvement in the bus service; 2) installation of a speed indicator device; and 3) introduction of other traffic-calming measures. However, is concerned that delivery of affordable housing will compromise delivery of village 'wish list'.

46 any 106 contributions should be set against improvements to the village hall, and better transport links with Ashford and Hythe/Folkestone.

Response Section 106 agreements are dealt with at the stage of planning application and decision and are negotiated by the Borough Council, with input from Parish Councils and infrastructure providers, and the developers. The Council has certain specific requirements required under policies which relate to a number of these topics, such as affordable housing, parking standards, open space standards etc, and the open space provision is often covered within policy requirements as a specific criterion. There is some flexibility within this S106 negotiation, and if a PC wishes to request less open space in substitution for an alternative community provision then this can be dealt with by planning and open space officers at that time, if there is evidence to support this case.

S106 money paid for by a specific development proposal must be meeting the needs created by that particular development, and not to resolve other issues present prior to the development taking place. This is set out in the Town and Country Planning Act 1990, and specific regulations must be adhered to which include that they are only used to make a development proposal acceptable in planning terms, that would not otherwise be acceptable.

It is usual practice that section 106 monies are paid at various stages of the build progress. This is to enable the scheme to be viable and be built in a timely manner. If a piece of key infrastructure is required (for example a highway improvement) prior to development being occupied, then this would require evidence to be presented.

With regards to the contributions received, again these must be relative to the size of the development, and therefore larger schemes create larger contributions.

Issue – Minerals and Waste

818 This is an allocation that will affect recognised economic geology in the Ashford area, as shown on the Kent Minerals and Waste local Plan 2013-30 Ashford Borough- Mineral Safeguarding Areas proposals map. In order for this allocation to be fully evidenced as an acceptable option for the delivery of the area's sustainable growth over the Plan period to 2030, an understanding of the economic geology in this affected site is required. There may be grounds to justify why the mineral safeguarding presumption should be set aside (please refer to the criteria of Policy DM 7 of the Kent Minerals and waste Local Plan 2013-30) on the allocation, which may or may not include prior extraction of the economic geology, though this is as yet un-evidenced due to an absence of minerals assessments.

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. 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

49, 448, 759, 818 support policy

759 supports and states that this allocation could be enlarged as it can readily accommodate more development than 10 dwellings within the available site which also includes land with frontage to Roman Road (S51).

Response Support Noted.

MC96 – Policy S53, Brook, Nats Lane

Representations have been received from the following consultees:

655 Donna Fryer	876 Sage
1172 Cllr Jane Martin	820 Kent County Council
511 Theresa Redfern	490 Kent Downs AONB unit
392 Patricia Froude	921 Rachel Dienst
348 N&M Holdstocks	322 Simon Betty
192 Jarrett	174 Stuart Finn
168 Helen Winchester	151 Finn
124 Natural England	82 J Toombs
69 Brook Parish Council	9 Graham Bradley

Summary of Representations – Main Issues

Issue - Location of housing and sustainable development

655 feels that a lack of thought has gone into the location of housing. 876 Feels that Brook is too small to accommodate additional housing and 392 notes that there is no shop, insufficient telephone services, electricity supply, public transport. 9, 1172 and 392 suggest that there is a lack of services in Brook and the development would be three miles from the nearest shop, and 511 feels that the policy is inconsistent with SP1, SP2 and HOU4 on this basis.

69, 168 and 322 feel there is a lack of public transport in the village and poor links to services. 1581 feels that the site does not deliver sustainable development.

Response: *Government policy requires local planning authorities to determine their own housing needs based on such assessment of housing need to ensure that general market and affordable housing needs are fully met, as well as taking account of national household and population projections, in preparing its Plan. The SHMA which supports the Local Plan covers Ashford's housing market area and deals with its specific needs. Within the Local Plan, the majority of new site allocations included to meet the boroughs needs are located in and around the Ashford urban area as detailed within Policy SP2 – The strategic Approach to Housing Delivery. However, a certain amount of growth is required in sustainable rural settlements with available and deliverable sites, as outlined by the Sustainability Appraisal which supports the Local Plan 2030.*

All sites submitted for consideration in the Local Plan have been assessed using the same criteria. The SA scoring defined this site as suitable for allocation when the Council was required to find additional sites following the increased housing requirement.

Policy HOU4 (now deleted and replaced with HOU3a) addresses windfall development in villages and not site allocations made through the local plan. Windfall development is permitted in Brook under Policy HOU3a.

Issue - Design and Impact on setting

876 feels that the proposal for this site does not in any way fit in to the character of the village (Point 5.43 and bullet point a) of Policy HOU3 of ABC's document). The density of housing is too great compared with the rest of the village; the layout would contradict the "ribbon" nature of all existing housing, which runs in single lines along the existing roads; it would lead to houses being built behind existing properties which again is unprecedented in Brook.

9, 151, 168, 174, 192, 322, 392, 976, 490 and 511 suggest that a ten dwelling development in this location would impact on the character of the village by infilling the linear ribbon development. The housing numbers should be reduced to three and should be a linear development to reflect the character of the village. 490 feels that only the front part of the site is developable and that backland development would be incongruous with the settlement pattern. 151 feels that development here would harm the significance of the nearby listed buildings, and cause potential harm to the adjacent SSSI and the nearby SAC.

69, 151, 174, 192, 490 and 322 feel that the nature of the development would impact on the AONB and landscape setting.

Response: *The development proposed on this site lies between two areas of street frontage development on Nats Lane and The Street. Whilst the majority of housing in Brook lies along The Street, the individual buildings are set back by varying degrees, thereby limiting the extent to which the village can be characterised by a specific single building line. The sensitivity of this site, in the Kent Downs AONB, is made clear in the policy and expanded in the supporting text. Criteria a of the policy requires that particular attention should be given to the landscaping of the site and the wider countryside and the AONB setting. Whilst the development would be close to a listed building, criteria c requires that development be laid out to preserve the setting of nearby heritage assets.*

Issue - Housing Mix

655 considers that if 40% of the housing is to be affordable then Brook is the wrong place for them because it's expensive to live here. 921 feels that there should be affordable housing but also the development needs contain bungalows for the elderly.

Response: *Policy HOU1 of the Ashford Local Plan requires that all new developments in the Borough of 10 or more dwellings or sites of more than 0.5ha are required to provide affordable housing. Because of the size and proposed housing numbers the site will require the provision of affordable housing in compliance with HOU1 which will provide affordable housing for the village.*

Issue - Flood risk

392 believes a full flood risk assessment is essential and improved drainage should be provided. 69 and 322 feel that the site is prone to flooding and that drainage needs to be improved.

Response: *Although flood maps indicate a small strip of the site is susceptible to flooding, the development footprint can be laid out to avoid this. Criterion e of the policy requires that a full flood risk assessment is carried out. Any surface water collection on the site can be mitigated through drainage improvements which will need to be provided in line with ENV9 – Sustainable Drainage.*

Issue -Traffic and access

168, 322 and 655 are concerned that the lanes around Brook are too narrow to provide safe access to construction vehicles. 9, 69 and 82 feel that the access to Brook is unsuitable for all vehicles.

392, 976 and 511 feel that the access to ten dwellings could cause access issues contrary to Policy HOU4.

Response: *The local highway authority (KCC) offers no objection to this allocation, and the Council works with other service providers to coordinate a sustainable approach to planning for future service provision.*

Issue - Water and Electricity

655 note that the water pressure in Brook is already too low and this will exacerbate the problem.

69, 322 and 655 – The capacity of the existing network is insufficient and millions would need to be spent improving the system. 392 point out that there are overhead lines across the field.

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.

Issue - Ecology

174 and 322 suggest that the development would cause harm to the adjoining SSSI and its rare adder population. 124 welcomes the recognition of the SSSI but feels that the policy wording could be strengthened.

Response: *The Local Plan should be read as a whole, and the protection of the biodiversity of the national and internationally protected sites is addressed in Policy ENV1.*

Support and Miscellaneous

348 support the development and suggest that ten dwellings could be delivered within five years.

820 advise that there are no known archaeological potential on this site and notes that there is a public byway that runs adjacent to the site.

490 points out that the AONB is the Kent Downs AONB and not the North Downs.

Response: *Noted.*

Amend wording in second paragraph of supporting text to refer correctly to the Kent Downs Area of Outstanding Natural Beauty.

MC97 – Policy S54 – Challock, Land at Clockhouse

Representations have been received from the following consultees:

534 Challock Parish Council	659 Environment Agency
522 Merryl Lawrenson	491 Kent Downs AONB unit
821 KCC	579 The Woodland Trust
372 Christine Bridges	333 GJ and DL Booker

172 Beryl Andrews	254 JRR Nason
125 Natural England	48 Catherine Feather

Summary of Representations – Main Issues

Issue - Housing Mix and location

48 believes that there should be a greater density of houses in urban areas in order that this will prevent development within the AONB and other rural sites.

333, 522 and 534 state that the village has seen approval of many new dwellings and should not be allocated any more and this should not set a precedent. 372 feels that this could impact on social integration in the village. 254 and 172 believe that the houses need to be small and for young and old people not 4-5 bedrooms.

Response: *The Local Plan seeks a balanced approach to the allocation of sites, with the most significant development and allocation of new housing taking place in or on the edge of the Ashford Urban Area. The village of Challock is a sustainable settlement with good links to the retail centre of Ashford which makes it suitable for locating new housing. The village does lie within the AONB which is acknowledged in criterion a) of the Policy.*

Issue – capacity of local infrastructure

372 and 534 state that the roads are narrow and insufficiently wide to deal with additional traffic flows. 333 feels that Challock is poorly served by roads and bus services. 534 is concerned that the schools do not have capacity for additional students and 333 suggests that the GP surgery is over capacity and 534 note that the primary school is at capacity.

Response: *The site is accessed from an A road. Kent Highways support the allocations in this Plan.*

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.

Issue - Village envelope

522 and 534 believe the site lies outside the village envelope and that it should not be allocated.

Response: *The village envelope is a guide for windfall developments and does not prevent the allocation of sites through the local plan process.*

Issue - Air Quality

372 worries that increased traffic will harm air quality.

Response: *There are currently no areas in the Borough where the air quality fails to meet the required standards. Whilst it is unlikely that air quality will deteriorate as a direct result of development in this rural village location, development here, as with all developments coming forward during the lifetime of the Plan, will be required to comply with Policy ENV12 which seeks to ensure that any potential negative impacts on air quality are addressed and ameliorated.*

Issue – Water supply

659 states that the site lies on a Source Protection Zone 3 and that adequate investigation and risk assessment shall be carried out to address contamination.

Response *Noted*

Public rights of way

821 The policy should require improvements to be made to the adjacent public right of way.

Response; *The PROW is outside the control of the landowners of this site and therefore it would not be reasonable to require what would in effect be a Grampian condition within the policy.*

Issue - Heritage

821 Low level archaeology is anticipated but this could be dealt with by condition.

Response: *Noted*

Issue - Impact on AONB

534 – The site is within the AONB and adjacent to ancient woodland. 125 criterion a should be changed so that it states ‘in such a way as to conserve and enhance the character of the AONB’. 48 The revised ABC plan identifies a number of sites for development that are within an AONB. Building on such sites violates ABC Local Plan policy 3.67 which states that AONB should be protected and developments not permitted on them.

Response: Amend criterion a) to read conserve and enhance the character of the AONB. Policy ENV 3b provides guidance for development within the two AONBs in the Borough..

Issue - Trees and hedges

579 – The ancient woodland should be protected by a 50m buffer. 333 states that the policy requires the retention of hedgerow adjacent to Carpet wood but this has already been removed.

Response: Criterion c) of the policy requires that the built footprint of development should be laid out to ensure the protection of the adjacent Carpet Wood ancient woodland. No change required.

Support

491 The site is well contained within the landscape and the development is considered appropriate for the village and its setting.

Response: Support noted.

MC98 – Policy S55 – Charing, Land adjacent to Poppyfields

Representations have been received from the following consultees:

126 Natural England (Sean Hanna)	668 Christine Wickenden
133 Valerie Glass	688 Randall Boenig
166 Simon Lake	692 Carter Jonas on behalf of The Trustees of the Wheler Foundation (Kieron Gregson)
169 Alex Norris	704 Dorothy Burdick
193 Sharon Low	720 Keith Oram
194 Ronald Sorrell	758 Lucy Simmons
215 Terry White	796 David Mortlock
233 Miss Procter	817 Jane Dalton

295 Clive Woodward	822 Kent County Council
296 Wayne Bowring	846 Charing Parish Council (Jill Leyland)
297 Martin Pullen	848 John Duncalfe
343 Cara Mann	849 Isobel Duncalfe
350 Charing Parish Council (Hugh Billot)	859 Jackie Large
369 David Bennett	863 Kevin Yeeles
377 Michael Humphries	867 Mr Alison Rogers
380 Amanda Huggett	870 Valerie Yeeles
382 Jacky Langton	875 Elizabeth Tweed
385 Martin Hill	901 Verona Hutchinson
386 Margaret Hill	905 Christopher Desmond Rundle
388 Mrs Catherine Weaver	915 Adrian and Elizabeth Nash
397 Gavin & Caroline Barr	940 Colin Lowe
428 Wildman	944 Janet Lowe
461 Barry Allen	978 Shirley Solly
482 Southern Water (Ms Mayall)	1046 Weald of Kent Protection Society (Peta Grant)
492 Kent Downs AONB Unit (Katie Miller)	1098 Cynthia Shaw
502 Jacqueline Wills	1107 Martin Pullen
548 Katie Exon	1108 Derry Pickford
560 Chris Blunt	1109 Caroline Philipson
562 Allan Hummerson	1110 Peter Hill
563 Judy Say	1111 Lynda Duffield
568 Ann Blunt	1112 Olive Catton
576 Caddick	1113 SE Norris
586 Kent Wildlife Trust (Vanessa Evans)	1114 Colin Arroll
590 Alison Hedley	1115 Gavin Barr
593 Roger Odd	1125 Network Rail (Elliot Stamp)
600 Jane Exon	1157 Dean Lewis Estates Ltd (Tim Dean)
606 Mr Crookston	1193 Gladman Developments (Mat Evans)

610 Ruth Burns	1201 John and Janet McIntyre
622 Martin Clarke	1202 Ron Lovell
643/656 Environment Agency (Jennifer Wilson)	

Summary of Representations – Main Issues

Issue: justification for allocation

166, 193, 194, 350, 382, 385, 386, 461, 576, 668, 796, suggest that this revised draft Plan is effectively a reaction to the Borough’s failure to maintain and meet a five year supply target rather than from a base of sensible, responsible and locally-needed development.

817 is aware that all local authorities are under pressure to build houses from central government, but this must be resisted in locations that are inappropriate. 166 and 382 argue given the existing allocation for 20 at S28, there is no planning merit in a further 180 houses in S55.

Response: *The Plan has to meet an overall housing requirement up to 2030 and that involves the identification of a range of housing sites in a variety of locations. The A20 is a major transport route into Ashford and this site is a relatively short distance from Charing village centre which has a good range of local services and facilities including a railway station. The Plan has to make a range of allocations for residential development that are capable of being delivered. The site itself does not require the delivery of significant infrastructure and there is no impediment to the site being delivered.*

Issue: AONB impact

133, 193, 194, 297, 343, 350, 380, 382, 385, 386, 388, 428, 461, 502, 548, 562, 576, 593, 606, 622, 668, 704, 758, 796, 817, 846, 863, 867, 870, 875, 978, 1109, 1111, 1112, 1113, 1114 object on the grounds that this plan is unsound as it does not comply with ABC’s own Local Plan guidance on development in the setting of the AONBs or the NPPFs core planning principle that recognises the intrinsic beauty in the countryside. Development here would damage the AONB, and be visible from it resulting in significant impact on it and the Pilgrims Way.

296, 343, 560, 568, 576, 590, 593, 610, 704, 720, 758, 875 highlight that the Local Plan of 2016 states in paragraph 1.60 that “development located outside an AONB but which would have a significant adverse effect on the setting of the AONB will also be resisted.” This is such a development. It is also contrary to paragraph 5.313, and the SA.

492 points out that the site lies within the immediate setting of the Kent Downs AONB. The Ashford Landscape Character Assessment carried out in 2009 places this site within the Charing Farmlands Character Area which is concluded to be of high sensitivity and overall

guidelines include resisting further expansion around Charing and the A20. Clearly the proposed allocation would be against this.

846 the draft Plan implies that the fact that the A20 separates the site from the AONB means it will mitigate the impact to a certain extent in terms of overall visual or landscape impact. This statement fails to acknowledge that the AONB rises up from the A20 and so the presence of the road will have little or no mitigating benefit.

1108 Development on this site, outside the AONB, would be more damaging to it than development within, and would ruin views from Charing Hill. 1112 no thought has been given to the therapeutic value of the countryside to all of us who enjoy its tranquillity and qualities as open space.

Response: *The site is located within the setting of and immediately adjoining the Kent Downs AONB, whose boundary here is formed by the A20. The fact that a site adjoins the boundary does not preclude development. However, it is accepted that the need to minimise the impact of development here on the setting of the AONB, including having regard to views from the North Downs escarpment, should be made more clearly in the supporting text.*

Add additional text to the end of second paragraph of supporting text:

The site is therefore located within the setting of the Kent Downs AONB. In order to minimise any impact on the AONB including views from the North Downs escarpment, development here should be informed by an LVIA and should be designed and laid out in such a way as to take account of the impact on the character and setting of the AONB.

Development here will be required to comply with the policies across the whole Local Plan. On this matter Policies ENV3a and Policy ENV3b for proposals within and affecting the two AONBs in the borough will apply.

The Council will liaise further with the Kent Downs AONB Unit on this issue.

Issue: Inadequate consideration/assessment of visual impact

492 feels that the panoramic photos of this site included in the Preliminary Landscape and Visual Appraisal seriously underplays the extent of the proposed allocation site and therefore query the accuracy of the findings of this report.

492 concerned that the LVIA did not include consideration of land along the frontage of the A20 which is proposed in the allocation.

492 Subject to the retention of these trees agrees with the LVIA in that the site is only partially visible in views from the AONB. Although not assessed in the LVIA, of the opinion that S28 would be more prominent than S55 in the AONB.

Unless appropriate safeguards are included in the policy wording to protect the setting of the AONB, 492 object to the proposed allocation as it is contrary to the NPPF, particularly para 115 as well as Section 85 of the Countryside and Rights of Way Act 2000.

492 disagrees with the statement in the background text that “there are few other features on the site”. As described above, there are a number of large trees both within the grounds of The Swan Hotel as well as within hedgerows that cross through the site.

846 No landscape assessment has been carried out despite the clear impact this site would have on the village setting.

Response: *The Council has undertaken a detailed Landscape and Visual Impact Assessment of the proposed site and this is set out in the Council's evidence base. There are specific requirements within the policy to help to mitigate the impact of the development on the wider landscape.*

Issue: Biodiversity

126 states that for a development of this scale, it would be appropriate to make specific reference to delivering landscape and biodiversity enhancements within the Policy wording.

586 there needs to be further investigation into the chalk springs and streams that run across the site and feed the Great Stour River to ensure that there will be no negative impact on the river, which becomes a LWS just downstream from this point.

606, 643 The presence of the Spring Line and streams across this site needs to be taken into consideration for flood, water quality and habitat reasons. This unique area with rare species needs to be appreciated, and mitigation required.

846 the site appraisal and policy fail to acknowledge the existing landscape features and biodiversity on the site.

388 These fields, the mature trees, hedges & stream sustain a wide variety of wildlife & contributes to its welfare & sustainability. The ecological & environmental impact of this proposed site will devastate the local habitat.

388, 905, 1109, 1112 There is a diverse wildlife and habitats in this area (grassland and woodland), with a wide range of birds, frogs, toads, newts and many other species that may be driven away by such a large development.

Response: *The Local Plan should be read as a whole. Policy ENV1 covers the Plans approach to biodiversity and sets out the criteria which all development in the borough will be required to meet.*

Issue: Impact on village character/Overdevelopment

166, 169, 193, 233, 297, 380, 382, 385, 386, 388, 576, 600, 622, 688, 704, 720, 758, 846, 859, 863, 864, 870, 901, 905, 1109, 1111, 1112, 1115, 1201 this development would be excessive, and would therefore erode or destroy Charing's village character, impacting on infrastructure, visual appeal and resources, and resulting in suburban sprawl and transformation into a town.

296, 343, 397, 560, 563, 568, 606, 758, 905, 1114, 1115, the Local Plan identifies 'minor residential development and infilling on a scale that can be easily integrated' as appropriate for Charing, Hamstreet and Wye. This development does not fit this description and is disproportionate. 193 Seeks gradual and organic development rather than large developments, to better integrate into local community.

169, 193, 461, 622, 688, 758, 846, 901, 1114 Charing has already taken/is already taking its share of development (a projected growth of 22% over the 2011 census baseline). Only

small/infill development should be considered. 846 argues that the Plan is not justified as there is a disproportionate increase in development around the Charing village compared with elsewhere in the borough. The planned sites result in a potential 35% increase in the size of the Charing Ward, essentially growing quicker than the rest of the Borough (32%). This approach is inconsistent with the vision and planning strategy set out in the draft Plan which states that growth should be concentrated at Ashford itself.

Response: *The allocation of the site is in accordance with current National Policy and statutory legislation, and the type of development proposed is reflective of the current form of development within this part of the village.*

Issue: Neighbourhood Plan

846 despite the fact that Charing was preparing a Neighbourhood Plan, ABC did not discuss the site, or alternative sites, properly with either the PC or Neighbourhood Plan Committee. The policy takes no account of the Neighbourhood Plan which is being prepared and how it would have a significant impact. 846 suggest that ABC are not in accordance with para 185 of the NPPF and have not considered para 155 of the NPPF.

133/215/296/870/397/576/590/593 this allocation has totally disregarded the Neighbourhood Plan and the wishes of Charing residents.

233/758 Charing has accepted the need to identify residential development sites within its boundary but sites should be identified and allocated as part of the Localism Strategy. 369/668/758 suggest that Charing could accommodate the housing required across several smaller development sites that could be better integrated.

193, 295,296, 428, 562, 600, 905, 704, 843, 859, 901, 388, 428, 502, 817, 870, 563, 978, 1098, 1110, 1107,1113, 1115, 848, 849, 758 suggests that the results from the Neighbourhood Plan Questionnaire emphasised a preference for smaller sites, not massive ones. 901 these options should be considered before this development goes ahead.

Response: *Discussions were held with the Parish Council following the July 2016 version of the Plan within the context of the need to make additional allocations for residential development in the borough. The Parish Council was advised that as a sustainable rural centre Charing was likely to receive an additional allocation.*

The formal consultation procedures undertaken on the Main Changes consultation were in accordance with legislation and the adopted Statement of Community Involvement (SCI). The PC were formally requested to comment and sent copies of the MC consultation documents at the commencement of the 8 week public consultation period.

At this time, a number of additional documents were published as supporting evidence base. This included the response to representations received in 2016, and the full and an addendum to the Sustainability Appraisal (SA) and SHELAA documents. Both of these documents include site appraisals for all sites which had been considered, including the site in question. The explanation of the increased housing requirements were addressed in the SA and revised Policy SP2 (MC4).

During this time, ABC officers were available for face-to-face discussion at 11 public consultation events held across the borough and by telephone, email and in person at the

Civic Centre (during working hours) during the 8-week consultation period, to assist all persons in understanding the documentation. All the consultation and supporting documents were also available in hard copy at a number of locations (or could be requested by telephone), downloadable online, or commenting was available through the online portal or by email, along with the detailed guidance notes and summary leaflets which provided the direct telephone and email contact details for the Policy team should people have required further assistance in locating them.

Issue: Infrastructure provision

133, 166, 169, 193, 215, 233, 297, 350, 380, 382, 385, 386, 388, 461, 563, 593, 668, 720, 796, 846, 867, 915, 940, 944, 1046, 1107, 1111, 1113, 1114, 1202 the school, surgery and parking, water supply and roads as well as other facilities would be unable to sustain this growth, especially in conjunction with allocation of other sites in the village (S28), resulting in unsafe situations for drivers and pedestrians. Contrary to NPPF paragraph 157.

350, 369 states that the cumulative impact of allocations and development in Charing would be an expansion of the settlement between 10 and 25 percent, without the jobs and infrastructure to support such growth while 758 argues that the plan has not considered the needs of neighbouring villages and therefore cannot be considered to be positively prepared.

133 there is infrequent train provision and this would have to be improved. 295, 940 worry that the village will become a commuter hub, with residents driving to a station where there is insufficient parking. 1108 alternatives to private car use need to be considered, including car pools.

133 states that local schools not large enough and therefore in buses will be used for to transport children to Ashford and Maidstone. This journey will occur twice a day at a time when government is trying to reduce journeys. 377 is curious about which parking studies have been undertaken and how the issues arising from extra residential development (more short trips for shopping/collecting children) will be mitigated.

233, 758 the sewer system locally is known to fail and has already become blocked in several areas, exacerbated by the Poppyfields development.

482 additional local sewage infrastructure would be required to accommodate the proposed development. Pleased to note that this provision has already been included within Policy S55 however there is existing infrastructure on 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. In order to comply with the NPPF and NPPG and ensure consistency with other site allocations in the Ashford Local Plan 2030, the following criteria should be added to Policy S55 after 'Development proposals for this site shall;'

h) 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.

Any site developer will be required to liaise with Southern Water in masterplanning the site, and provision for easement widths for existing infrastructure, and securing future access for maintenance and upsizing, can be addressed via an appropriately worded planning condition on any permission. However, in line with other policies in this local plan, it is agreed that an additional criterion h) as above can be added to the policy as a minor change.

Amend policy to add h) Provide future access to the existing sewerage infrastructure for maintenance and upsizing purposes.

Issue: Road traffic issues/assessment

385 this development will result in at least an additional 500+ vehicle movements a day plus deliveries and other service vehicles.

1112 congestion will arise in the village centre as people will be living further from the village and parking their cars closer to the station. This will consequently be a deterrent for anyone wishing to shop there.

133, 233, 295, 296, 343, 388, 428, 560, 563, 568, 590, 593, 704, 758, 817, 870, 875, 901, 1114 The local road system cannot support the additional housing's traffic, as evidenced by delays on the A20 caused by other developments both in Ashford and Maidstone boroughs. This will be exacerbated by the cumulative effect of permitted and planned developments along the A20, and major road infrastructure will be required to enable people to reach services.

901 The A20 is also used as a relief for the M20 at times so cannot support this development

758 there does not seem to be any evidence of a traffic study relating to the development along the A20 within Ashford's Local Plan Evidence Base.

377 Proposals were refused in Pluckley on the basis of traffic, and until a traffic plan has been produced and approved for the A20, this development (MC98) should not be allowed.

846 it is not clear that there would be a suitable access from the A20 and therefore the Plan is ineffective as it is not proven to be deliverable. 846 the policy requires direct access from the A20 or access through S28. For a development of this scale an access through S28 would be unsuitable and therefore the only option would be through the garden of the Swan restaurant. However this would result in two accesses right next to each other.

166 there has already been at least 5 accidents close to the Poppyfields roundabout and therefore this proposal must be called into doubt.

385, 386, 940 Access is likely to be via the A20 as there is no access via an existing roundabout, and would be “a nightmare”.

133, 461, 848, 849 increased traffic on the A20 will cause further accidents on the junction of the A20 and the Pluckley Road. This junction is subject to at least one accident per year. Driver behaviour on this road is poor.

133 The junction of Charing High Street at the A20 cannot support additional traffic

593, 1202 The creation of another road junction on a short section of busy road between the roundabout and petrol station will create a potential blackspot. Access may not be suitable.

822 an emergency access is required for this site as the proposals provide over a total of 50 dwellings. This could take the form of the pedestrian and cycle access into Poppyfields. A new footway is also required along the southern part of the A20 to connect in with the existing footpath connections at the roundabout junction to the east. A right hand turn is required to cater for the proposed development. The development should provide two new bus stops along the A20 in the vicinity of the site.

822 Criterion (d) should be amended to ‘*Be accessed directly from the A20 in the form of a right hand turn lane.*’

Response: *The proposed development site can be satisfactorily accessed from the A20. There is vehicular access link proposed directly to the adjoin Poppyfields development.*

Policies within the Local Plan deal with issues such as parking (TRA3a), Promotion of the Local Bus network (TRA4) Impact on the road network (TRA7) and Travel Plans (TRA8) arising from new developments.

The Council will continue to liaise with KCC as the highway authority on this matter.

Issue: Pedestrian routes, cycleways and distance to services

193, 233, 382, 385, 386, 563, 668, 796, 848, 849, 867 state that, given that the majority of village services or facilities (open spaces, play areas, etc.) are across the A20 from the proposed site, they are therefore not in easy reach as this road acts as a barrier. It is difficult to cross at present, and further development will make it more so, and there will be no benefit to local services since residents will not be able to access the village. The site is isolated.

193, 233 the application site is outside the village envelope, isolated and less sustainable than other smaller clusters of development that are closer to the village.

846 the policy mentions linking pedestrian and cycling routes to the existing Poppyfield's development but there is no provision for a pavement along the south side of the A20 between the access and existing pavement – the most obvious route for pedestrians.

848 with the plan to open up Poppyfields to pedestrian and bicycle access, would the council be prepared to adopt the roads and public grounds so that the residents do not have to bear the cost of this huge increase in the number of people using these facilities.

668, 846 without easy pedestrian access to the village, people living in these developments will drive to services in Charing where there is no parking, or completely bypass the village altogether. This will result in no economic benefit for the village yet stretch existing services to breaking point. Thus this policy is not positively prepared and is contrary to national policy.

233 all of the paths and roadways on this estate (Poppyfields) are privately owned and therefore cannot be modified by the Highway Authority. This consideration prevents the development from being connected to Charing.

1193 Criterion e) as drafted would create ransom situation, as it requires third party land. Should be amended as follows: (e) In preparing a development framework consideration should be given to securing pedestrian and cycle access through the site into the adjoining Poppyfields development, in the event of a ransom situation and/or 3rd party land being required pedestrian and cycle access will be derived from alternative routes such as the existing PROW to the south of site S55.

Response: *Any development on the site would include the creation of a network of cycling and pedestrian routes within the site. The pedestrian and cycleway will link with the adjoining Poppyfields development. The Council is committed to the improvement of cycling and walking routes within the borough and any development here would link into the wider route network that exists at present or which could be created in future.*

Issue: Impact on the entrance to the village

875 suggests that the 180 houses adjacent to the recent Poppyfields development is too great at the entrance of the village and planners should consider the impact of Harrietsham and the density there before imposing the burden of even more traffic on this busy road.

343, 382, 560, 568, 704, 720, 758, 817, 848, 849, 901, 1111, 1114 a development of this size alongside the petrol station site would have a significant and adverse impact urbanising the entrance to the village, and would destroy the village's rural entrance. The development would be too visually intrusive. 576 the scale and size of the proposed development is too large and would extend the village footprint along the A20 and into the countryside, adjacent to the AONB. 846 The scale, form and location of this development does not reflect the existing built form: it is a significant extension westward of the village.

875 it will result in a ribbon development from Maidstone to Ashford, ruining the 'separateness' of these villages and their individual character. 848, 849 believe that to develop here would set a precedent for further development along the A20 and a subsequent urban corridor to Lenham.

215 this development as well as the other developments along the A20 will have a huge impact on the village (including Lenham and Harrietsham) and result in an urban sprawl.

Response: *The Local Plan should be read as a whole. Policy SP7 seeks to maintain the separation of settlements in the borough. The policy for this site indicates the need to create a clear western edge of the development with substantial boundary planting and this will create a clear edge to the village..*

Issue: Affordability of homes/type of housing

1108 This is the wrong type of home that will further erode the character of Charing. It requires mixed, high density development that includes a school, retail and public space.

758, 944, 1112 Doubts how affordable housing on this site would be, given acute need. Charing requires affordable housing rather than housing for wealthier commuters who are inflating the local housing market.

1108 Proposes a new village is constructed as an alternative to this allocation.

758 ABC has not asked Charing residents what type of housing they want and need, and therefore it is not in line with the NPPF's Core Planning Principles, particularly para 50, which suggests LAs should identify housing that is required according to local demand. There appears no robust evidence that this type of housing or a development of this scale in Charing is needed. Judging from Neighbourhood Plan Questionnaires, it would appear residents would rather the opposite.

Response: *The Plan should be read as a whole. Affordable housing provision is addressed by Policy HOU1 of this Plan.*

Issue: Minor amendments to policy wording

492 The background text to the policy refers to a "mix of dwelling types of two storeys is proposed" however this is not carried through to the policy wording. As per other allocations within the AONB and its setting, the requirement for development to be no greater than two stories in height should be specified in the policy itself.

Response: *Amend final sentence of criterion a. to reference requirement for development to be no greater than two storey in height.*

[.] The development should be comprised of a mix of dwelling types a maximum of two storeys in height, and should take account of the residential amenity of neighbouring occupiers;

Issue: Business/employment opportunities

350 there are no business development opportunities planned for the parish of Charing which implies that the new houses are being planned for commuters. Therefore local residents do not support these developments as they bring little value to the village.

846 there are no draft Local Plan allocations for an employment site in Charing which is reiterated by the Rural Economic Assessment. Without a strategy to positively allocate a site or sites at Charing in the Plan, the large allocation is not positively prepared or sustainable.

166 lack of business and work opportunities must make this site unsustainable. 382/385/386 for such a large increase in residents, new business and employment potential has not been considered. 385/386 this site would be suitable for such a use subject to a proper environmental impact review.

193/875 it is unacceptable for Charing to become a commuter hub. There are seemingly no areas of employment planned so where will the economic growth come from. 875 suggests that they would welcome a small development somewhere in the village for key local workers to live.

796 no proposals have been put forward to increase employment opportunities and promote businesses in the area despite there being an identified need.

461/622 there are no facilities proposed to develop additional businesses to provide local employment for the increase in population.

848 there is a concern that large supermarkets and retail chains will flood into the area because of the development, and therefore pose a threat to local shops within Charing High Street.

Response: *Noted.*

Issue: Pollution

233 speculates that residential developments on the A20 must be increasing air pollution in the local area.

295, 388 the scale of the development will run a high risk of water, air and noise pollution. The existing stream has recently become polluted with scum and algae following the construction of Poppyfields.

1109 this development will result in noise and dust pollution.

Response: *The assessment of potential pollution issues would take place as part of the assessment of a detailed planning application for the site. In terms of light pollution, policy ENV4 of the draft Plan, along with the Council's Dark Skies SPD (2014), seeks to restrict the impact of external lighting.*

Issue: Heritage

822 The site contains several recorded metal (PAS) finds suggesting Roman and later activity, whilst there may be evidence of several ancient trackways converging on Charing. A phased programme of archaeological mitigation will be required. Significant archaeology could be dealt with through suitable conditions on a planning approval

817/1111 there are indications of Roman Ruins at the site.

875 understands the requirement for new homes but urges planners to take into account the heritage of Charing and the historic buildings. Smaller plots would be better than larger sites in this context.

901 the site is of historical importance. 901 realise houses are needed but they should be done in the best possible way to integrate into the village and not destroy it.

385/386 A modern large modern development of this type threatens the nature and character of this historic medieval village which consists of mainly traditional housing and a number of Grade II listed properties in close proximity to the development site.

758 it is believed that part of the site has a Roman Road across it.

Response: *The Local Plan contains a number of policies relating to these matters, ENV13 – Conservation of Heritage Assets and ENV14 – Conservation Areas. These policies combined will address the matters of local heritage asset. Comments relating to Archaeology are noted, and will be dealt with under policy ENV15.*

Issue: Water supply/groundwater protection zone/drainage

133, 193, 295, 296, 297, 350, 369, 382, 385, 386, 461, 560, 563, 568, 590, 593, 600, 610, 622, 704,720, 796, 817, 848, 849, 859, 867, 870,901, 905, 978, 1107, 1108, 1109, 1111, 1112, 1113, 1201, 1114 object on grounds that development here will impact groundwater and pose a risk to a very local water supply. ABC says that developments that interfere with the groundwater will not be permitted but this development goes directly against their own policy ENV8.

656 The site is located within a Source Protection Zone 2 for drinking water supply. Adequate investigation and risk assessment should be carried out to address contamination and risks to controlled waters. Any site investigations and risk assessments should assess the risk to groundwater and surface waters from contamination which may be present and may require remediation. Any sustainable drainage design should demonstrate that the discharge will not result in pollution of the water environment.

846 there is still no evidence to suggest that the constraints of being in a groundwater protection zone and having a number of springs could be satisfactorily dealt with. Unless this issue can be satisfactorily managed, the site would not be deliverable and therefore would be unsound.

1098 suggests that Kent possesses too few areas of good water supply to destroy or pollute any of them. These fields are very important as they contain many streams and supply Charing's drinking water and the Great Stour river. The Borough Council have written that interference with groundwater will not be permitted and have identified this as two groundwater protection zones.

1202 the fields in this area are the last low point left south of the A20 since Poppyfields claimed the two adjacent fields. This area is vital to the movement of ground freshwater and run off from the downs. Last year Hitherfield suffered a water retention problem in the play area for the first time.

758 the site is within two groundwater protection zones and is within the Ashford Water Cycle study, the importance of the stream is raised, particularly from drainage perspective. The properties at the Poppyfields development already have issues with water ingress into buildings, whilst residents complain about waterlogged gardens that aren't fit for purpose. S55 is on even wetter ground so is unsuitable for anything other than as a water catchment

area. A culvert from Poppyfields is showing sedimentation/staining and has been reported to the EA as a pollution incident. The same will happen on the S55 site as the same soil and water conditions exist. The cumulative development of Local Plan housing sites on every tributary of the Upper Stour can only magnify this pollution effect. There is no more groundwater available as the Stour area is over-stressed and over-abstracted. As an increased population results from S55 and other developments, neighbouring A20 villages will not have the benefit of an additional water supply. Interference with the water catchment area at S55 will potentially interfere with the groundwater and reduce the available river water collected through surface water runoff. There is no alternative supply of groundwater in this area so the development of these fields cannot be sustainable and the development of this site cannot be justified.

at the Neighbourhood Plan consultation, there was a discussion about the fields owned by the Wheler Trust, and they were to remain as fields to protect and maintain the water supply. The new development would increase demand for water and simultaneously destroy a water supply used by residents. There is a groundwater protection zone 2C and a groundwater protection zone 4 (Special Interest-) within the vicinity – it is therefore evident that this development should not take place.

Response: *Comments relating to Source Protection Zone location are noted. Policy ENV8 (Water Quality, Supply and Treatment) will apply to all major development proposals. The Council will liaise with the Environment Agency on this issue.*

Issue: Minerals and geology

822 This is an allocation that will affect recognised economic geology in the Ashford area, as shown on the Kent Minerals and Waste local Plan 2013-30 Ashford Borough- Mineral Safeguarding Areas proposals map. In order for this allocation to be fully evidenced, an understanding of the economic geology in this affected site is required. There may be grounds to justify why the mineral safeguarding presumption should be set aside (please refer to the criteria of Policy DM 7 of the Kent Minerals and waste Local Plan 2013-30) on the allocation, which may or may not include prior extraction of the economic geology, though this is as yet un-evidenced due to an absence of minerals assessments.

758 part of the site is on sub alluvial river terrace 3 mineral deposit.

Response: *Sites that are proposed for allocation 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: Better alternative sites

350, 388, 461, 166, 796, 1110 believe development would be more suitable on other sites or in other parts of the borough.

610, 758 Charing residents have identified potential sites where appropriate development could take place, without damaging the water catchment fields, threatening the village's water supply or reducing the water available to the Great Stour river. Sharing the same number of houses around the village would have a much lesser impact on the character, form, attractiveness and heritage aspects of this village and would reduce the urbanisation of the village setting and AONB.

846 believes that the SA concluded that the most sustainable distribution of development was to be on the periphery of the Ashford urban area supported by Tenterden (Alternative 4.2), not Alternative 4.3 which focussed significant development outside of the Ashford urban area at Tenterden, Charing, Wye, Hamstreet and other remaining parishes.

Response: *omission sites are addressed in Appendix 2 of this report.*

Issue: The consultation period

704/863/548/758, 817, 590, 606/1108 915 believe the consultation methodology was unsatisfactory.

Response: *Please see responses to MC1.*

The consultation periods for both the Regulation 19 consultation version of the Local Plan (15 June – 10 August 2016) and the Proposed Main Changes (7 July – 31 August 2017) ran for 8 weeks, two weeks longer than the statutory requirement to take account of these periods overlapping with school holidays. Each period encompassed school term and school holiday time to reflect the fact that those with school age children frequently take summer holidays. Response rates and attendance at the public exhibitions held to discuss the Plan across the borough were high, with council officers in attendance to answer questions and discuss all aspects of the Plan.

Issue: Site boundaries

692 the western boundary to Parcel A is already formed by a natural and established hedgerow, and a key design element of its development would be to retain this boundary through additional planting in order to safeguard the setting of the adjoining countryside. It is therefore a sustainable addition to the village of Charing. The case of Parcel B is slightly different as it would be more visible from the west, in particular from the PROW and the Kent Downs AONB. There is a correlation between the principles of the AONB units previous objection to S28 and Parcel B. The inclusion of Parcel A within S55 is robust and sound, whilst the argument for Parcel B is less clear and sound. If Parcel B is excluded then the total number of units would be reduced to 160 as a significant portion of B would have been lost to substantial boundary planting, whilst there are also a number of ponds/streams on the eastern side.

Response: *The Council notes the natural and established hedgerow that forms the boundary between parcels A and B and indeed the policy requires the retention and enhancement of that boundary. Equally, the Council considers that the most logical boundary for the whole site is that which is indicated on the Policies Map. Critically, this*

takes into account the adjoining site at S28. The development of both sites enables the creation and development of a clear edge to the village on this western edge.

Issue: Future considerations/liaison

1125 these developments sit adjacent to Network Rail's operational railway land and infrastructure, and ABC and potential developers should be aware of Network Rail's standard guidelines and requirements when developing adjacent sites.

846 proper consultation between ABC and the Charing PC/NP Steering Committee should be carried out in future to ensure impact on the village is managed successfully.

Response: *Noted.*

Miscellaneous

492 Reference to the North Downs AONB in the background text to the policy should be amended to give the AONB its correct title – the Kent Downs AONB.

758, 848, 849, 1113 the reasons for refusing the Pluckley Road site (17/00303/AS) are applicable to this proposed site (S55). These include urbanising impact, harm to Landscape Character Area, Impact on AONB and out of scale with village. It will deter tourist visits. Should that site be allowed on appeal concerned with the potential magnitude of development.

233, 1112 Trustees of the Wheler Foundation are understood to be the owners of the site and there are a number of objectives that the Trust Deed set up by Granville Wheeler was meant to fulfil. However the proposed development of the site undermines the objectives of the Wheler Foundation.

576, 758, 1108 Doubt the benefits received from development in the past benefitted the community proportionate to their impacts, that contributions are difficult to obtain from ABC, and have been spent on facilities outside the area (Egerton school).

133, 194, 560, 568, 688 The requirement for developer contributions in criterion f) is too broad, not targeted enough at an identified local need, and therefore it is not easy to see how benefits outweigh drawbacks, or how they would be sufficient to support an increased population.

846 the site extension to the original omission site proposal now extends to open farmland no reference is made to the loss or quality of this farm land (NPPF paras 17 & 112).1201 believes that building should be on brownfield land rather than arable land.

622 there is no provision for travellers on this site, yet there are various illegal sites within a 5 mile radius.

859 revised property growth figures appear strange in light of the unknowns following Brexit.

Response: *Amend reference to the AONB to correct its title.*

The overall housing needs for the borough and distribution of development, is dealt with by strategic Policy SP2 (Please see responses to MC4). At present, Brexit does not alter the borough requirements.

Provision for accommodation for the traveller community is addressed in Policies HOU16 and HOU17 and by two site allocations S43 and S44 of this Plan. Work currently in progress will provide the evidence

Comments concerning the ownership of the site are noted. However this was a site promoted by the owners. Details of the trust are unknown and in any event would not preclude the allocation of this site the owners of the site support this allocation.

Support

822, 1193, 692 and 1157 support this allocation.

Response: support noted.

MC99 – Policy S56 Chilham, Branch Road

Representations have been received from the following consultees:

661 Caroline Jackson	684 Timothy Crouch
823 KCC (Council)	874 Jane Martin
613 Michael Prowse	493 Kent Downs AONB Unit (Katie Miller)
447 Alison Bland	455 Susan & Neil & Paul Jordan
592 Chilham Parish Council (Geoff Dear)	596 Robert White
654 Environment Agency (Jennifer Wilson)	394 J F E Smith
402 David Hayes	403 Dawn Hayes
404 Jody Foulds	518 J Masters
460 Colin Ladley	465 M Adkins
451 Tony Bland	453 Rose Smith
456 Roger Parton	457 Richard Ladley
458 Brenda Ladley	462 Rachel Ladley
467 Rachel Watson	464 Olivia Creaney-Birch
298 John Saunders	299 A Saunders

300 Judith Saunders	301 Ryan Perry
302 Nick Mogford	303 Jane Sargeant
304 Jonathan Purday	306 Sasha Rosen
307 Colin O’Hanrahan	308 Vanessa Purday
313 RW Bell	324 Luke Davies
196 Margaret Olsen	198 Derek Martin
200 Rodney Winch	202 Brian Verlaan
203 Gillian Baylis	205 Richard Neville
209 David & Priscilla Hayward	211 Sylvia Burch
212 Gill Dawes	214 Pauline Morgan
216 GM Smith	217 Claire Gegory
218 Katy Maxted	219 S McNally
220 Richard Goldup	221 Gloria Hamilton
222 Jane Marriott	223 Doug Marriott
224 Geoff Meaden	225 Marilyn Sansom
227 Caroline Cottam	228 Michael Gray
230 Brian Talbot	231 Wendy Williams
234 Alan Marsh	236 Donna Bicker
237 Kirsty Foster	238 Wendy Clover
239 Burke Christine	240 Sue Kendall-Seatter
241 Robert Patten	242 James Fraser
244 Julie Fraser	245 Gloria Williams
246 Linda Sweetland	247 Maureen Reynolds
248 Michael Gavin	249 Peter Frederick Wead
251 June Upchurch	252 Edenden
253 Amys	255 Steve Bicker
256 E.M. Jones	257 Samuel Bell

258 Alastair Baker	259 ME Baker
260 D.S Latta	262 B Busby
263 Howell Tong	264 E.M Blaskett
265 Ann Mary Tong	266 E. Shopland
267 Robert Newsome	268 Hyslop
269 J Konarek	270 Edwin Roording
271 John Kay	272 Wayne O'Shea
273 D Cawdron	274 Becky Shimmin
275 D Gifford	278 PI Mills
280 David Mills	281 Mark Prince
282 Malcolm Fowler	283 Sue Fowler
285 Barry Macey	286 Louise Barton
287 John Harvey	288 P Harvey
289 C Gillmore	470 Jennifer Roording
535 RW Bell	156 Susana Jurado
157 Paul Harford and Harford Lewis White	206 Abbe West
213 John Harvey	132 Mark Hobday
127 Natural England (Sean Hanna)	195 T Valis
199 Theresa Geldard	201 G Burden
208 David Ross	210 Claire Teasdale
197 Francesca Barson	204 Margaret Isobel Goodall
63 Elisabeth Arter	703 Lee Evans Planning (Nathan Anthony)

Summary of Representations – Main Issues

Issue: Roads, Footpaths and Parking

874, 684, 447, 455, 402, 403, 404, 460, 465, 451, 453, 456, 457, 458, 462, 467, 464, 298, 299, 300, 301, 302, 303, 304, 306, 307, 308, 313, 324, 196, 198, 200, 202, 203, 209, 211, 214, 216, 217, 218, 219, 220, 221, 222, 223, 224, 225, 227, 228, 230, 231, 234, 235, 236, 237, 238, 239, 240, 241, 242, 244, 245, 246, 247, 248, 249, 251, 252, 253, 255, 256, 257, 258, 259, 260, 262, 263, 264, 265, 266, 267, 268, 269, 270, 271, 272, 273, 274, 275, 278, 280, 281, 282, 285, 286, 288, 289, 470, 535, 156, 157, 206, 213, 195, 199, 201, 208, 210, 197, 204, 518, 596 – **The proposed access via Branch Road is unsafe for cars and pedestrians.**

Comments include: single track, country lane has no purpose built passing spaces and is used as a “rat run” on weekday mornings, making it hazardous for local traffic; There is no feasible way to create a footpath along its length; walking along this narrow road is sometimes very dangerous; The road is the only means of access by foot or cycle to the Recreation Ground and is used by village children and dog-walkers on a regular basis; A safety “risk assessment” would identify that “additional controls” could not adequately mitigate these risks, meaning no additional traffic or pedestrians should be made to use Branch Road as a means to access this site; It should be a requirement to provide footpath from The Street to all the land. This would no doubt involve acquisition of private land from two to four land-owners, and a CPO may be regarded as very unlikely to be advanced; As there is no other means to access this site, the site is unsuitable and unsustainable.

394 - The adequate sight lines to be provided on this very busy road meaning current hedge would likely have to be removed/replaced. Road used as a cut through by rush hour traffic causing many accidents over the years so visibility would be paramount. Also used regularly by Chilham School children approaching the recreation ground and families and elderly people approaching the surgery on foot with no footpath provided. Currently very few trees present on south border. To provide necessary screening substantial planting to be carried out well within the site as to not interfere with neighbouring property. Existing Harvest House Curtilage. There is no indication of garden space on the plan for the existing large property on the site. One of the main attractions of this property is the views to the south and should be heavily considered.

823 believes it is unlikely that a pedestrian footpath can be accommodated on Branch Road due to its limited width. Traffic calming measures should be appropriate to slow vehicles down to less than 30 mph. Kent County Council is of the opinion that a single width restriction feature would be appropriate at a point south of Arden Grange to reflect the width restriction currently on Branch Road.

493 concerned that the requirement for provision of footpaths and/or traffic calming measures in Branch Road could lead to an urbanising effect on this rural lane. With the exception of the modern development at Felborough Close, Chilham is currently devoid of footpaths and their introduction could be incongruous and out of keeping with this village in the AONB. A reference should be included in this criteria to any highways improvements being carried out in a manner appropriate to the site’s sensitive setting within the AONB and conservation area.

GP Surgery Parking Provision

394 To relocate the parking and avoid the problem of on street parking at least 10 bays would have to be provided at the rear. This is not accounted for.

823 The requirement for parking spaces on site associated with the Doctor's surgery should be based on a parking survey on Branch Road when the Doctor's surgery is open. The provision of a car parking area for the surgery, double yellow lines should be provided as part of this development from the junction with Bagham Road to the site to ensure that the parking area is used.

874 - The Doctors surgery have not been consulted on development.

Response: *The Council notes the concerns from residents relating to Branch Road and the issue of the road being used as a 'rat run' and the risk of accident. The policy requires the provision of footpaths and/or traffic calming measures, and parking for the GP surgery which will reduce on-street parking, therefore the proposals will improve the current traffic issues and concerns here. KCC Highways have been consulted on the proposals and have not raised concerns relating to visibility splays, and have commented on the provision of traffic calming and footpath provision.*

With regards to the detail of traffic calming measures and footpath provision on Branch Road, the Council agrees with the statement from the Kent AONB unit that certain traffic calming features and footpaths can lead to urbanisation of the street, which forms part of the AONB character. KCC Highways have confirmed in their representations (above) that they would recommend a single width restriction only as a traffic calming measure, which would not create an urbanisation in this location. ABC also notes the comments from KCC Highways regarding the lack of potential for footpaths, however believe the policy criterion d) is sufficiently flexible for KCC Highways and other parties to advise on these points at planning application stages, and that policy criterion b) and e) would ensure the conservation and enhancement of the local and AONB character.

Policies TRA7 and TRA8 will be applied to development of this site also, and therefore a new access or intensification of an access which created a risk of traffic accidents or significant traffic delays will not be permitted.

With regards to GP parking provision, the current parking issue was highlighted by residents during local public consultations, however, the Branch Road GP surgery is not open full time (only open 3 mornings and 3 afternoons a week with 1 doctor and 1 nurse available). The surgery at present has only 3 parking spaces on its frontage (which will be retained within the scheme) and the site allocation is proposing a minimum of an additional 5 spaces, creating a total of 8 minimum. This appears to be an appropriate provision based on the surgery opening hours and capacity for appointments.

The consultation on the policy was made in accordance with the SCI, and specific bodies such as the Ashford Clinical Commissioning Group were directly consulted. ABC have received no representations from the surgery requesting additional parking or objecting to the allocation wording. ABC do not believe that a parking survey is required to assess what is considered to be a more than reasonable provision from this small development which will remove current car parking from the narrow road. However, it is agreed that yellow lines may be required to ensure it is utilised correctly. ABC will be liaising further with KCC Highways on this issue.

Issue: Infrastructure

684, 613, 596, 447, 455, 402, 403, 404, 460, 465, 451, 453, 456, 457, 458, 462, 467, 464, 298, 299, 300, 301, 302, 303, 304, 306, 307, 308, 313, 324, 196, 198, 200, 202, 203, 209, 211, 214, 216, 217, 218, 219, 220, 221, 222, 223, 224, 225, 227, 228, 230, 231, 234, 235, 236, 237, 238, 239, 240, 241, 242, 244, 245, 246, 247, 248, 249, 251, 252, 253, 255, 256, 257, 258, 259, 260, 262, 263, 264, 265, 266, 267, 268, 269, 270, 271, 272, 273, 274, 275, 278, 280, 281, 282, 285, 286, 288, 289, 470, 535, 156, 157, 206, 213, 195, 199, 201, 208, 210, 197, 204 - **Chilham lacks key infrastructure to support additional residents.**

Comments include: The GP branch surgery is not accepting new patients. The village school has been oversubscribed for the last 3 years; There is no space to increase the school's capacity and no plans to relocate. The recent development of 40 dwellings within the village has already placed considerable strain. New residents will have to travel long distances to find medical and educational facilities.

518- The surgery building is worn out, not wheelchair friendly and is incapable of providing additional service for the village. The new surgery can adjoin the Sports Hall on Branch Road where there is parking available and parking space sharing would not be a problem since the buildings would be used at different times of the day.

Response: *It is accepted that any new development proposals will affect existing services. Therefore, service providers, including KCC Education, 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, including plans for upgrading or relocation of a provision. 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.

Part of the Sustainability Appraisal site assessment process is an up to date position of GP surgery capacity using the NHS service search website. This was accessed again on 7/11/2017 and reports that the surgery is currently accepting new patients.

Issue: AONB

874, 684, 596, 518, 447, 455, 402, 403, 404, 460, 465, 451, 453, 456, 457, 458, 462, 467, 464, 298, 299, 300, 301, 302, 303, 304, 306, 307, 308, 313, 324, 196, 198, 200, 202, 203, 209, 211, 214, 216, 217, 218, 219, 220, 221, 222, 223, 224, 225, 227, 228, 230, 231, 234, 235, 236, 237, 238, 239, 240, 241, 242, 244, 245, 246, 247, 248, 249, 251, 252, 253, 255, 256, 257, 258, 259, 260, 262, 263, 264, 265, 266, 267, 268, 269, 270, 271, 272, 273, 274, 275, 278, 280, 281, 282, 285, 286, 288, 289, 470, 535, 156, 157, 206, 213, 195, 199, 201, 208, 210, 197, 204 -**The site sits within the Kent Area of Outstanding Natural Beauty.**

Comments include; site forms part of the marvellous view across the Great Stour floodplain from the south. This view would be changed forever if the site is developed; A new residential development will shield the listed buildings which currently make up this view; It is part of the intrinsic character of Chilham.

596 - Policy S56 states that "this site shall the setting of the AONB is preserved and the development is well screened from the wider area." Without mature trees to the south this is impossible. 132 - The open vistas that both exist from the site looking south and from the south looking north towards the site would be destroyed if residential development was allowed. There is a risk causing the degradation to conservation & enhancement of the AONB, countering their obligations under the Countryside and Rights of Way Act 2000. The use of trees to screen the site's southern boundary as mitigation measures to "protect" the open vista looking north from the Great Stour Flood Plain will not be sustainable in the long term. The trees will be removed by residents to open up their properties and gardens to sunshine.

596, 132 Contrary to policies in the Kent Downs AONB Management Plan, in particular SD8; 874 It goes against the NPPF which requires the character and beauty of the Countryside to be protected.

596, 518 Any building on this site would make a severe intrusion in the AONB. Street lighting and light spillage would have a very adverse impact upon the local environment, both in nature and nearby domestic houses. Arguably this is not a "sustainable" development.

132 The development of the site together with the substantial degradation to the local AONB "setting" caused by the addition of 40+ new properties within 400 m of the "site" in the last 2 years and with the possibility of further properties being granted planning permission nearby will cumulatively damage the local AONB and its setting to an unacceptable degree.

127, 493, 874 The proposed allocation site is actually within the Kent Downs AONB, not it's setting as stated within Policy S56. As such the Policy wording and requirements should be amended to omit the word 'setting' in criterion (e).

493 The site is considered to relate to the existing village and development would represent a natural extension to the village. In order for development to conserve and enhance the AONB, additional safeguards/criteria are required in the included in the policy wording, to ensure compliance with paragraph 115 of the NPPF and Section 85 of the Countryside and Rights of Way Act 2000. Given the site's edge of village location and the fact the site lies adjacent to open countryside and in order to minimise impact on views from the east and south-east, any development should be restricted to two stories only. While the requirement for development to enhance the southern boundary is welcomed, this needs to be expanded to specify a requirement for planting along here to include trees to help filter views of the

development from Branch Road and the A28; at the moment views of existing built development of the village from this direction are very much filtered by substantial trees and this should be reflected in any new development.

Response: *The policy and supporting text is clear that the site and whole settlement lies within the Kent Downs AONB and that development proposals must conserve the natural beauty of the Landscape (Para 4 and policy criterion e). It is agreed that the word ‘setting’ can be removed. Minor amendment to criterion e) as follows:*

e) Retain and enhance the hedge and tree boundaries within and around the site, and make enhancements to the southern boundary ensuring the ~~setting of the~~ character of the Kent Downs AONB is preserved conserved and enhanced and the development is well screened from the wider area;

A number of factors have been considered in order to protect the AONB character including the requirement for the retention and enhancement of the hedge and tree boundaries and enhancements to the southern boundary in particular. It is considered that this issue is already specifically covered in paragraph 5 of the supporting text “the current gaps in the tree boundary on the southern edge should be planted to enhance the screening”. However, comments relating to this requirement not being sufficient are noted, and it is accepted that the words ‘additional trees’ could be inserted into this sentence as a minor change for clarity. With regards to new owners removing tree planting on the southern boundary in the future, the site lies wholly within the Conservation Area, and therefore trees cannot be removed without planning consent. Proposed minor amendment to para 5 of supporting text as follows:

As Branch Road is a key rural entrance road to the settlement, the trees and natural features must be retained within the proposal and the current gaps in the tree boundary on the southern edge should be planted with additional trees to enhance the screening and lessen the visibility of the new development from the south, where the site is visible from the busy A28.

With regards to building heights and design of the proposals affecting the character, the supporting text at paragraph 7 states that “given the character and appearance of these surrounding areas, a scheme of 2 storey buildings would be most appropriate here” it also references design taking into account the principles of the Village Design Statement. Policy criterion e) covers the screening point also.

In addition to the specific site policy criterion relating to the AONB and wider area, Policy ENV3b includes criterion that proposals shall demonstrate particular regard for landscape features in the AONB and conserve, enhance and restore, according to their significance and details specific requirements that will also be applied to any future development schemes. It is considered that these policies, taken together, are sufficient in protecting the AONB character and the support of the allocation from the Kent Downs AONB unit is noted.

The NPPF, Policy ENV4 of this draft Local Plan and the Dark Skies SPD seeks to preserve areas unaffected by light pollution and reduce the amount of light pollution from development in general. Whilst the village of Chilham does not fall within close proximity to the area of the

borough with the lowest levels of light pollution, development will nevertheless be subject to the requirements set out in these policies.

The allocation of the site is in accordance with the current National Policy and statutory legislation, and the type of development proposed is reflective of the current form of development within this part of the village.

Issue: Conservation Area & Heritage

684, 447, 455, 402, 403, 404, 460, 465, 451, 453, 456, 457, 458, 462, 467, 464, 298, 299, 300, 301, 302, 303, 304, 306, 307, 308, 313, 324, 196, 198, 200, 202, 203, 209, 211, 214, 216, 217, 218, 219, 220, 221, 222, 223, 224, 225, 227, 228, 230, 231, 234, 235, 236, 237, 238, 239, 240, 241, 242, 244, 245, 246, 247, 248, 249, 251, 252, 253, 255, 256, 257, 258, 259, 260, 262, 263, 264, 265, 266, 267, 268, 269, 270, 271, 272, 273, 274, 275, 278, 280, 281, 282, 285, 286, 288, 289, 470, 535, 156, 157, 206, 213, 195, 199, 201, 208, 210, 197, 204, 596, 613 - **The site sits within the Chilham Conservation area and its boundary adjoins those of 2 x 16th century Grade 2 listed houses.** Comments include: Policy S56 hints at the use of tree screening to conserve the character of the setting. This is not sustainable, the existing will not want their south gardens and facades shaded by trees and will cause significant friction between existing and new residents; Development on this site would have an adverse effect on the open and undeveloped character of this part of the CA; Chilham is widely acknowledged as one of the most picturesque and historical villages in England, and is a popular tourist destination. Development will not complement the surrounding area and is therefore not on an appropriate site.

823 The site lies to the south east of the historic settlement of Chilham. There is evidence of Neolithic activity in this area as well as Roman and later medieval. Multi-period remains may survive on this site. Significant archaeology could be dealt with through suitable conditions on a planning approval.

Response: *It is acknowledged within the supporting text of the policy, paragraph 6, that the village of Chilham is an important heritage asset location and that the site is located within the Conservation Area and adjacent to Listed Buildings.*

Protection of these assets are also specifically referenced in the policy criterion b) along with the importance of taking into account the design principles set out in the Chilham Village Design Statement.

The tree screening requirements are required mainly on the southern boundary of the site, to lessen the impact of the development on the wider area and AONB location and the impact on the amenity of nearby residents of the listed buildings is specifically covered by criterion b).

In addition to this, the Local Plan contains a number of policies relating to these issues and design proposals which will also be applied to this site, these include; ENV5 – Protecting rural features, ENV13 – Conservation of Heritage Assets and ENV14 – Conservation Areas.

These policies combined will address the matters of local heritage asset conservation and protect the key features and character of the village.

Comments relating to Archaeology are noted, and will be dealt with under policy ENV15 – Archaeology.

Issue: Design and layout

394 - The pond in the South West Corner itself and slopes towards this area must be avoided. This is not accounted for. Currently very few trees present on south border. To provide necessary screening substantial planting to be carried out well within the site as to not interfere with neighbouring property. Existing Harvest House Curtilage - There is no indication of garden space on the plan for the existing large property on the site. One of the main attractions of this property is the views to the south and should be heavily considered.

613- The site is overgrown and could be a rich habitat requiring mitigation or relocation. The southern end of the site is located within flood zones 2 and 3.

592 No objection if the proposed development is focussed to the south of the site, to conserve neighbouring occupiers and the setting of the Grade II listed buildings. The site should be delivered to the highest possible design standards. The site should mitigate its impact on local infrastructure and services. The landscaped boundaries are retained and enhanced. There should be consideration given to the provision of housing adapted for older people.

63- Support; Suggested a residential care home, or block of small flats with resident warren with emergency care. This would be for an ageing population with no younger population to care for them.

Response: *Comments related to proposals for older persons house type are noted. However, the plan does not allocate for this use typically, but that would not prevent the site being proposed for such use.*

It will be a private matter for the owners of Harvest House to determine how much curtilage they retain within the new scheme for their property but this is specifically mentioned in paragraph 7 of supporting text. These are matters to be addressed at planning application stages.

The site policy contains detailed guidance relating to tree planting and screening and other design aspects such as the mature hedgerows (see response to AONB above), woodland areas, the local heritage assets and the character of the village, AONB and CA. These are all specifically referenced in the policy criterion and supporting text, along with the importance of taking into account the design principles set out in the Chilham Village Design Statement. In addition to this, the Local Plan contains a number of policies relating to these issues and design proposals which will also be applied, these include; ENV1 - Biodiversity, ENV3b – Landscape Character and Design in the AONBs, ENV5 – Protecting rural features, ENV6 – Flood Risk, ENV13 – Conservation of Heritage Assets and ENV14 – Conservation Areas.

With regards to the pond on site and topography of the land, these issues are again matters for the detailed planning application stages. The site is large enough (at 0.6hectares in size) after retaining land for car parking and Harvest House curtilage, to allow for some constraints without affecting the overall low site density or capacity. However, all policies and issues above will be addressed at application stage referencing the policies listed above.

Issue: Minerals & Water Supply

823 Affected economic geology: Sub Alluvial River Terrace Deposits. This is an allocation that will affect recognised economic geology in the Ashford area, as shown on the Kent Minerals and Waste local Plan 2013-30 Ashford Borough- Mineral Safeguarding Areas proposals map. In order for this allocation to be fully evidenced as an acceptable option for the delivery of the area's sustainable growth over the Plan period to 2030, an understanding of the economic geology in this affected site is required. There may be grounds to justify why the mineral safeguarding presumption should be set aside on the allocation, which may or may not include prior extraction of the economic geology, though this is as yet un-evidenced due to an absence of minerals assessments.

654 Being located within a Source Protection Zone 1 for drinking water supply, over a Principal Aquifer and in close proximity to a historic landfill, this site is therefore in a very sensitive setting from a groundwater protection point of view. Adequate investigation and risk assessment should be carried out to address any contamination and risks to controlled waters. There should be site investigations and risk assessments to assess the risk of groundwater and surface waters from contamination which may be present and where necessary propose appropriate remediation. In addition any sustainable drainage design should demonstrate that the discharge will not result in pollution of the water environment.

Response: *Ashford 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. 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.*

Comments relating to Source Protection Zone location are noted. Policy ENV8 (Water Quality, Supply and Treatment) will apply to all major development proposals.

Issue: Support

63 and 592 Support.

661- It provides much needed additional housing for the area and the plot is well linked to the village with its amenities including the local primary school, the village sports hall and tennis courts, the playground, shop/post office and pubs. It will address the long standing and significant problem of the speed of traffic down rural and narrow Branch Road with appropriate traffic calming or road widening measures. The development will also address the significant and longstanding problem of insufficient parking at Chilham Surgery with its provision of 5 additional car parking spaces. This becomes ever more pertinent with the recent development at the Saw Mill site and increasing use of the local surgery. The development of the site is contained within a framework of gardens within the village and does not extend into the countryside beyond.

703- Support; the site is located within a Conservation Area and AONB. These designations do not preclude development but simply require due consideration is paid to the special character of those areas. The draft policy includes the means to protect the interests of these designations. It is noted that the whole of the village of Chilham is located within the AONB so any development or allocations would be subject to the same protection. Similarly, the majority of the village envelope is a Conservation Area so again special protection is afforded to any sites that would be developed or allocated. The site can offer regular public transport, resolution to street parking, no impact on the setting of the village, wide choice of housing and opportunity to bring new residents to the village.

Response: *Support noted*

MC100 – Policy S57 Hamstreet, Warehorne Road

Representations have been received from the following consultees:

43 Donna Randall	483 Southern Water (Ms Mayall)
44 Mike Fuller	533 Jean Gilbert
54 David White	595 Margaret Allen
62 Orlestone Parish Council (Susan Stiffell)	608 Smith & Garratt (Hugh Garratt)
112 B & C Emanuel	614 Barbara Carroll
128 Natural England (Sean Hanna)	763 Crabtree and Crabtee (Hothfield) Ltd
148 Jennie Mathews	824 Kent County Council
284 Warehorne Parish Council (Maggie Keenan)	879 Emma Haffenden
311 R Bromfield	900 Tim Woodhouse
370 Joan Monsen	919 Valentine Dorothy Showell

396 Mrs Howland	1000 LRM Planning Limited (Owen Jones)
408 Orlestone Parish Council (Susan Stiffell)	1126 Network Rail (Elliot Stamp)

Summary of Representations – Main Issues

Issue – location within village

311 feels that sites on the other side of the village would be better suited for housing that this.608 states that allocation of this site is inappropriate, “stretching the sense of place” of the village, and does not communicate well or safely with the village. Proposes alternate site.

900 states that development should be restricted East of the Wastewater treatment works. 1000 states that this site is less well related to Hamstreet and its services, and will have a greater landscape and visual impact than its promoted site S31.

Response: *Noted. The Council is of the opinion that, following sustainability assessment and other background work, the defined area detailed in this policy is most suitable for development.*

Issue – size of site

879 states that the allocated site is in fact much larger, and that site promoter had publicly displayed larger area previously. This consultation is therefore misleading.

Response: *The boundaries in this site allocation are the boundaries the local planning authority sees as appropriate for development. While the overall land ownership may be greater, the Council is of the opinion that development should be focused only on the allocated area at this time.*

Issue - Character of Hamstreet

43, 44, 54 worry that the allocations in Hamstreet will transform the village into a town, and that the policy is not positively prepared or justified. 62 states that the Parish Council-produced ‘Plan for Hamstreet’ will balance the Borough Council’s requirement for expansion while resolving local concerns for the significant expansion of the settlement. 900 states that little thought has been given as to how the allocations in Hamstreet will speak to each other and integrate with the village.

Response: *Hamstreet is a sustainable village with a range of local services, a GP surgery, a school seeking to expand, a railway station and number of leisure facilities. Allocation of sites for development, therefore, accords with the NPPF’s principles of sustainable development.*

The Parish Council's 'Plan for Hamstreet' is untested and uncosted at this stage. Land required is not necessarily available, and therefore the scheme is not deliverable or developable as required under national guidance for planning policy.

Issue – quality and design

43 states that recent new building has been poor quality and not fit for purpose, with particular issues of dampness. 879 highlights that the design and layout of the new sites is not outlined within the policy, and “would significantly impact the lives of existing residents”

Response: *While construction standards are not part of the planning system, Ashford Borough Council has developed a strong “Quality Monitoring Initiative” which, as outlined in Policy SP6 of this Local Plan, developers are strongly advised to participate in to ensure quality housing that is fit for purpose.*

Issue – infrastructure capacity

43, 44, 595, 879, 900, 919 state that the infrastructure, including GP surgery, school, play areas and storm/waste water drainage systems, is insufficient to cater for this and other developments in Hamstreet.

44 states that the Local Plan to 2030 in general will have a significant effect on the South East region through increased road congestion, pressure on the transport system and pollution.

44, 112 and 370 comments that existing footpaths along Ashford and Warehorne Roads are inadequate, and therefore not legally compliant.

62 proposes that part of the site could be used to provide a large (min. 150 space) car park to service the school, accommodating staff parking and drop-of/pick-up facilities, along with provision of a cross-country running circuit and cycle track, and a play areas for teenagers located well away from housing.

62 states that expansion of the school would be required, but KCC education's views should be sought to avoid oversupply given the creation of new schools at Finberry.

62 requests that a 15 percent levy on the sale price of each dwelling is paid equally between Orlestone and Warehorne Parish Councils, while 900 asks that consultation is held with residents and stakeholders as to how contributions are spent.

112 states that it is unlikely that any improvements in local infrastructure can emerge from development, since developers do not pay while 900 states that the wording of ‘appropriate contribution’ is too vague. 879 states that Hamstreet does not need additional playing fields offered by this site, in conjunction with the other Hamstreet allocation.

Response: *In the production of its Local Plan, ABC works with its statutory partners – including Southern Water, KCC education, the local Clinical Commissioning Group, among others, to deliver the facilities and infrastructure needed to support the Local Plan.*

ABC has a constructive working relationship with developers, and is very successful in collecting and allocating developer contributions for local improvements via s106. It would be

unusual, however, and not legally compliant for an arrangement in which 15 percent of sale prices of houses were paid to Parish Councils.

Issue – existing on-site and neighbouring infrastructure relating to the wastewater treatment works

483 states that, since there is significant infrastructure on site, easement widths between 6-13m are required depending on pipe size and depth. In the context of NPPF paragraph 109, and Policy DM8 of the Kent Minerals and Waste Local Plan which designates this site as a “safeguarded facility” with permanent planning permission for waste management, 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 odour dispersion. Requires developers to undertake an assessment to demonstrate that there would not be a detrimental impact on amenity by reason of odour.

483 requires additional criteria as follows:

k) Provide future access to the existing sewerage infrastructure for maintenance and upsizing purposes.

l) Provide sufficient distance between Hamstreet wastewater treatment works and sensitive land uses, such as housing, to allow adequate odour dispersal on the basis of a noise, vibration and odour study to be undertaken in consultation with Southern Water.

Response: *Criterion b) establishes that development on this site will need to take account of the protection of residential amenity in relation to the WwTW, and therefore makes the proposed criterion l) redundant. Any site developer will be required to liaise with Southern Water in masterplanning the site, and provision for easement widths for existing infrastructure, and securing future access for maintenance and upsizing, can be addressed via an appropriately worded planning condition on any permission. However, in line with other policies in this local plan, it is agreed that criterion k) as written above can be added to the policy as a minor change.*

Amend policy to add k) Provide future access to the existing sewerage infrastructure for maintenance and upsizing purposes.

Issue – road traffic and safety

43 and 112 states that Warehorne Road is a “speedway” at present, with drivers regularly passing at 80mph, and inferring that the situation will deteriorate further with this allocation.

44, 62, 148, 311, 396, 533, 595, 614 and 879 there is considerable peak time congestion at Ashford Road and Warehorne Road – largely as a result of the ‘bottleneck’ caused by parked cars, and exacerbated by farm and gas delivery vehicles - resulting in delays to emergency services and forcing traffic through local roads.

54, 614 and 879 state the proposed site entrance offers a considerable blind spot to Warehorne Road and potential for speeding cars resulting in accident along this congested stretch. This cannot be mitigated without making congestion worse.

62 notes that traffic issues through the village require resolution, and proposes that, given land ownership, connection between Warehorne Road can be constructed through the site, parallel to the A2070 Hamstreet Bypass, and join Ashford Road at the existing field entrance above Stumble Tree. However, this relief road should not be made available for HGVs, or be used as a through road.

62 proposes a 20mph speed limit is initiated on Ashford Road.

533 states that a link road will not resolve local traffic congestion; a new slip road to the A2070 would. However, MCLP/879 notes that there is no mention of the trunk road nor impacts of the development north of the site.

879 states that additional pedestrians and cycles would put “huge pressure and risk on local routes” and advises that the proposed pedestrian and cycle route creates “a dangerous mix of traffic” when it meets Ashford Road between two properties The Gaer and The Spinney.

879 asks how mopeds and motorbikes would be prevented from using the pedestrian/cycle route.

Response: *A traffic management scheme would be required as part of any planning application which, in conjunction with KCC Highways as highway authority and, if relevant, Kent Police who assess appropriate road speeds, could ameliorate current local traffic issues on Warehorne Road.*

Issue – Traffic management scheme

54, 533, 919 proposed traffic management at railway bridge on Warehorne Road will result in increased congestion and will not suffice.

284 following a presentation on how a traffic light system to manage flow of traffic under the railway bridge, Warehorne PC feels that this will be ineffective and will result in more congestion. The PC would prefer a give-way system.

Response: *The policy as written requires in criterion c) that proposals shall consider the need to make improvements to the highway to facilitate safe vehicle and pedestrian movement. The policy simply requires this as part of any planning application. KCC Highways, as highway authority, will advise on the suitability of the proposed measures.*

Issue – impact on the countryside and rural environment

43, 148, 879 – allocation on the site will lead to a loss of “beautiful fields with the rolling green”, including wildlife, on this site, and making this area subject to increased light pollution through street and car lights, and that insufficient mitigation is proposed.

54 and 148 states that allocation of Hamstreet sites will damage the rural environment that local people are used to and have moved to the settlement to enjoy.

128 recommends that consideration of direct and indirect impacts, as well as planning for the avoidance and the full mitigation measures for both SSSIs (Dungeness, Romney Marsh & Rye Bay; Hamstreet Woods) should be included with any planning application for the site.

879 states that the allocation will impact significantly on Stumble Tree Ancient Woodland

900 asks that the developers are required to follow the strictest environmental and safety standards.

Response: *The area of the overall site allocated for housing development is not near to the Stumble Tree Ancient Woodland/Hamstreet Woods, a designation which is any event protected under national planning policy. A requirement of the policy under criterion j) is to carry out an Environmental Assessment Study which will establish the consequences of development on this site – direct and indirect in accordance with European and National legislation. The Local Plan should be read as a whole, and the protection of the biodiversity of the national and internationally protected sites is addressed in Policy ENV1. However, it is accepted that clarification as to the nature and degree of acceptable mitigation is appropriate on those development allocation sites where a significant impact on one or more European Sites is possible. ‘Adequate’ is considered to embody a more appropriate and reasonable level of scrutiny than ‘fully’ and has been accepted for inclusion in the policy wording of other Local Plans. Policy therefore to be amended “...how they can be avoided or adequately mitigated”.*

The Local Plan, which is to be read as a whole, offers complementary policies safeguarding biodiversity, landscape character and light pollution. Development can lead to an enhancement of indicators in all of these spheres.

Issue – flooding

284 feels that insufficient attention has been paid to flooding, with a brook on site [Springbrook Sewer] that may threaten ingress.

Response: *Criterion f) requires that a full flood risk assessment is prepared in consultation with the Environment Agency and submitted as part of a planning application, and that built footprint avoids flood zones. In addition, bearing in mind the Local Plan is to be read as a whole, sustainable drainage policy requires measures to ensure a comprehensive design for surface water disposal and, if necessary, a reduction in runoff rates on site.*

Issue – local amenity

370 says that a suitable access cannot be achieved unless a hedgerow is removed, undermining the visual impact of the area. Proposes a “comprehensive landscape scheme” will have to be rethought.

879 highlights that the policy does not provide for village facilities or any compensation for existing residents, including safeguarding security or privacy.

Response: *As noted in the supporting text, Hamstreet is a large village with a good range of local facilities and there have been a number of new residential developments in recent years that have been completed that have made a contribution to the improvement to local facilities. It is important that this scheme makes an appropriate contribution to the facilities of the village to cater for the additional demand generated. The scale of such a contribution will be negotiated with the Borough Council (in consultation with the two relevant Parish Councils). In this regard criterion g) of the policy as written requires appropriate contributions towards village facilities.*

The definitive access point to the development will be agreed with KCC Highways as highway authority.

Issue – crime production and safety

879 states that as a result of development on this site, “Rear gardens, garages, outbuildings and parked vehicles would be impacted by a loss of privacy as well as introducing a high vulnerability to crime.” In addition the current design of the site would give rise to noise, anti-social behaviour, littering and loitering, and that groups from the development could be attracted to gather in the wider area and cause vandalism and criminal activity. Requests the proposal includes “security statements to prevent crime and anti-social behaviour” and is laid out to Kent Police designs.

900 asks that the safety of existing properties is not compromised by “poorly designed cycle and footpaths.”

Response: *Masterplanning of this site will ensure that the amenity of existing residents is not compromised. This is covered in criterion b). There is no evidence to suggest that allocation of this site would result in vandalism or criminal activity.*

Issue – Heritage

879 advises that the proposed pedestrian/cycle route would disrupt a WWII air raid shelter.

Response: *Noted. The Local Plan should be read as a whole, and policy ENV13 requires consideration of heritage assets on or near sites.*

Issue – Previous planning decisions

879 claims that a previous single dwelling was refused planning permission in the vicinity previously, and questions why a larger number of properties is now proposed.

Response: *Noted – often development on a larger scale provides a different planning context than a single dwelling, requiring different decision making processes.*

Issue – Proximity to rail infrastructure

1126 states that, given the site’s location, reference should be made to Network Rail’s standard guidelines and requirements when developing sites located adjacent to or in close proximity to Network Rail’s land, assets and operational railway infrastructure.

Response: *The location of the proposed allocation site is noted as being close to railway infrastructure, and any applicant/developer will be expected to work with Network Rail to minimise impact on its property following standard guidelines during development.*

Miscellaneous

824 – this site is in a mineral safeguarding zone (Sub Alluvial River Terrace Deposits). Additional evidence required to understand economic geology to justify why mineral safeguarding presumption should be void.

Response: *Sites that are proposed for allocation 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

763 – the allocation is in a highly sustainable location with very good transport links. However, requests clarification as to the extent of investigation required for biodiversity mitigation within that criterion.

Response: *Support noted. The requirements of the EIA process are well established through systematic processes of screening, scoping and report production. Recommendations for mitigation should it be required will emerge from that process.*

824 requests a programme of archaeological investigation/mitigation which could be dealt with through condition. Site is located close to Tidal Flat Deposits and a small stream, favourable to prehistoric and later activity.

Response: *Noted.*

mc101 – S58 – High Halden (A28) Stevenson Brothers

Representations have been received from the following consultees:

942 CALA Homes	935 Hamlin Estates Ltd
714 James Ransley	682 High Halden Parish Council
743 Elizabeth Buggins	825 KCC
726 Bethersden Parish Council	609 Smith and Garratt
644 Environment Agency	161 Sally Sullivan
152 Gardner Crawley	65 Mason Brannan Design Partnership
34 Paul Buggins	

Summary of Representations – Main Issues

Issue - Site Location

34, 609, 726, 714, 935, 942 consider this site to be isolated and poorly served by public transport. The site is unsustainable and not suitable. 161 believes that rural land should not be built on. 726 argues that it is an unwarranted scale of development in a rural location mid-way between the villages of Bethersden and High Halden simply geared towards meeting the 5yr housing supply required by Ashford Borough Council, without any reference to local needs or sustainability. They note that the development would project beyond the existing brownfield land into the open countryside. 685 are concerned that the development would impact on High Halden's ability to retain its own identity.

942 considers that Site WC50 adjacent to the settlement of High Halden is a more sustainable location. 935 suggests land off Church Hill would be a more sustainable location [WC11 and WC74]. 609 proposes the allocation of SS42 as an alternative.

682 – policies S58 and S60 are the more acceptable. However, both risk narrowing the space between High Halden and the adjoining village, thus compromising the separate identity of these settlements.

Response: *The Plan has to meet an overall housing requirement up to 2030 and that involves the identification of a range of housing sites in a variety of locations. This site is identified as deliverable and developable without any significant constraints. The site is partly brownfield land, positioned on the main A28 route between Bethersden and High Halden which provides strong highway links as well as regular bus services to a range of facilities and day to day services at both High Halden, Bethersden and the larger settlements of Tenterden and Ashford beyond. The surrounding area is characterised by clusters of residential buildings, and any development of this site would project no further from the road into the countryside than the nearby development at The Martins. Taking into account these factors, the site is considered a suitable location for development.*

Whilst the sustainability appraisal of the site does offer some negative scoring, this is off-set by the strong highway links to nearby villages and improvements made to the negative appearance of the current site.

Omission sites are dealt with in Appendix 2.

Issue - Relationship to other plans

65 Allocation of this site contradicts the Bethersden Neighbourhood Plan which seeks to contain residential development within the confines of the village.

Response: The site is located within High Halden parish.

Issue - Loss of employment land

34, 65, 152, 726, 682, 942 argue that allocation of this site will result in the loss of rural employment land which should be retained.

Response: *Evidence has been put forward that the existing employment use on the site is no longer fit for purpose and the owners intend to consolidate the use elsewhere and the garage has been vacant for some time, with little prospect of returning to active use. Losing the employment offer in this isolated location will not undermine the Local Plan's overarching strategic aims to deliver suitable and sustainable employment sites from coming forward in the future.*

Furthermore, the change of use of this site needs to be balanced against the benefits of releasing this site for housing. It provides a deliverable opportunity in the borough for a standalone, high quality housing site, provides a different offer to the market in terms of the range of housing sites the market is delivering, is located in an accessible location in terms of proximity to the A28 and a short distance to High Halden, can be delivered early in the local Plan and help achieve the five year land supply position. This builds upon the well established principle of strategic corridor sites to help spread the responsibility of accepting more housing across the borough.

Issue - Level of development in High Halden

161 and 682 have concerns regarding the amount of development taking place in the village which is taking 8.8% of the 1250 units in the main changes.

942 – Does not consider that this site offers the most sustainable and suitable option for new development within the parish. Given it's distance from the centre of High Halden, new housing in this location will have no benefit in terms of social cohesion and will be unable to benefit from public transport provision in High Halden.

Response: *This site is a partly brownfield site outside the village. It is appreciated that it will be reliant upon High Halden for services however connections to High Halden and Bethersden (and the wider borough) are afforded by a regular bus service. The villages of High Halden and Bethersden are sustainable settlements with good ranges of facilities.*

Issue - Highways

34, 65, 726, 682 state the scale of development taking place in and around the village will exacerbate traffic problems on the A28 as it passes through the village. 161 and 743 state that that the A28 is dangerous for pedestrians and cyclists so therefore this site is not suitable.

825 – Two bus stops will need to be provided on the A28

Response: *KCC Highways and Transportation have been consulted and support the proposed allocations in the Plan from a highway capacity perspective. The site is on a bus route and bus stop provision can be required at the detailed planning stage.*

Issue - Public footpaths

825 notes A PROW runs through the site and AT167 adjacent. The policy needs to include mention of these and require that they are retained and enhanced.

Response: Agree. Add criterion to refer to the need to link to existing PROW in any development coming forward on this site.

Amend policy to add: g. Retain and enhance the PROW that runs through the site and provide new pedestrian and cycle routes throughout the development including connections to the existing PROW network.

Issue - Heritage

825 - The site lies opposite a listed building and low level archaeology is anticipated. This could be dealt with through planning conditions.

Response: Noted.

Issue – infrastructure capacity

161, 682 and 685 feel that existing services such as GP's and schools are under pressure and this will exacerbate it. 682 is concerned that the existing sewerage infrastructure is facing issues.

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.

Issue - Scale and housing type

161 argue that the houses should be made available to local residents only. 726, 743 believe that 50 dwellings is out of proportion with the location. Most houses in the area are bungalows therefore two storey dwellings will be out of character.

Response: nearby development at The Martins is two storey, as is the listed building adjacent to the site. The development of this site for two storey dwellings would therefore be in character with the surrounding built form.

Policy HOU2 allows for the development of local needs housing where a specific need is identified, on an exception basis. Local need housing comes forward on exception sites in collaboration with Parish Councils, it is not allocated.

Issue - Ecology

644 mitigation measures should be deployed to protect the ponds on the site.

Response: The value of natural habitats and the potential to preserve and enhance such assets is recognised in the Local Plan. Policy ENV1 states that proposals to conserve and enhance biodiversity will be supported and this policy requires that natural features on the site are retained and enhanced and this is reinforced in the policy which states that existing natural features of the site should be retained and enhanced. Nevertheless it is accepted that this policy should include specific reference to the retention and enhancement of the seasonal ponds on the site. Amend criterion b) as follows:

- b. Include a comprehensive landscaping scheme that seeks to make provision for the retention and enhancement of existing natural features within the site. This should include the retention and integration of the existing on-site ponds. In addition, proposed new landscaping should provide generous soft landscaping along the western edge of the site in order to lessen its visual impact;

Issue - Drainage and sewerage

682 states that the sewage infrastructure and drainage on the site is insufficient.

Response: 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.

It is accepted that any new development proposals will affect existing services. Therefore Water companies and the Environment Agency (drainage and flooding), 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.

Issue - Loss of agricultural land

161 - Green field and agricultural land should not be used for housing, land will be needed after Brexit as we are a rural farming community.

Response: *This site is grade three agricultural land (which is not the highest grade). Paragraph 112 of the NPPF states that ‘where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use poorer quality land in preference to that of higher quality’. The grade of agricultural land is only one of the many factors which is considered and balanced against others in deciding the most suitable sites to allocate for development. Full assessment of all these factors have been carried out through the Sustainability Appraisal.*

MC102 – Policy S59 Mersham, Land at Old Rectory Close

Representations have been received from the following consultees:

71 Mersham with Sevington Parish Council (Tracey Block)	504 Selden
99 Rod Maller	601 Charles McBarnet
150 Lynn Diplock	611 Elizabeth Murphy
425 Chris Jones	645 Environment Agency (Jennifer Wilson)
435 Chris O'Malley	826 Kent County Council
487 Charles McBarnet	854 Gavin Murphy

Summary of Representations – Main Issues

Object – character of the village

99 seeks reduction in numbers to 10. 71, 854 states that allocation of this site does not help much with ABC's housing numbers. 487 states that development would change the character of the village, and that urbanisation and incorporation into Ashford is ever closer with the proposed motorway junction 10a and other allocations in the Local Plan.

Response: *The Local Plan should be read as a whole. The separation of settlements policy SP7 seeks to maintain the individual integrity of settlements.*

Issue – Conservation Area and setting

71, 99, 487 and 854 state that the site should not be developed as it is the only undeveloped parcel within the Mersham Conservation Area, and conserves the character of Grade II listed Glebe Place to which this parcel was attached.

71 and 99 state that the site is outside the village envelope and acts as a buffer between the village and the A20

Response: *The Council is of the opinion that sensitive development on this site could enhance the entrance to the village. The site is within the village of Mersham, forming part of its Conservation Area. This designation does not preclude development, and will ensure that a sensitive and appropriate design and layout are achieved. Criterion a) within the policy addresses this.*

Issue – On-site trees and ecology

71, 99, 150, 487, 611 and 854 seek to safeguard the two mature Turkey oaks (planted circa 1735) on site, favoured by the Queen and “nationally important”, and the row of lime trees at the southern boundary. 611 seeks a TPO for the oaks. 487 states that the root protection area of trees shown on preliminary plans for the site is insufficient.

71, 487, 611 and 854 state that this “ancient wood pasture” is particularly species diverse due to sheep grazing, with rare butterflies, as well as bird, reptile (great crested newt) and plant species.

Response: *The policy as written requires the retention of the mature trees on site, as well as retaining and enhancing connectivity between ponds for biodiversity benefit. Ecological surveys will be required in any planning application.*

Issue – flooding

150 states that the pond area is quite boggy, and hardstanding could increase flood risk.

99 natural drainage on the site needs to be enhanced; not only left as-is, since The Street floods during prolonged rainfall.

Response: *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 – sewerage

71, 99, 150, 611 and 854 states that the existing sewerage system is overloaded and would require significant improvement in case of more housing. 854 states that existing infrastructure is owned by ABC.

Response: *Existing sewer infrastructure is not owned by the borough council. Criterion g requires any new development to liaise with the undertaker to provide a connection at the nearest point of adequate capacity.*

Issue – traffic and roads

50 people walking in the road along Old Rectory Close could be put at risk from increased traffic movements, and motorists ignore 30mph limit through village. 99 and 611 state that the Old Rectory Close/The Street junction is dangerous and, if this site is allocated, traffic management should be improved.

71, 99, 611 and 854 propose a variety of traffic calming techniques and road layout improvements required on The Street to mitigate already speeding traffic. 71, 611 and 854 seek improvements to the junction with the A20/The Street given the increase in traffic movements and its current danger. 611 discusses the types of land ownership to be sought on site, and that any roads constructed should be to adoptable standard.

Response: *Kent County Council as Highway Authority will continue to advise of the requirements for the safe traffic management including access to the site and wider impact of the development on the local road network.*

Issue – noise and pollution

150 states that dwellings will be at risk from noise and pollution from existing M20 motorway.

Response: *Noted. While the village of Mersham is close to the M20 motorway, this does not preclude development. Any specific impacts will be identified and, if relevant, any mitigation can be conditioned at planning applications stage.*

Issue – design

71 and 99 seeks all housing to be to a similar design and standards as those existing in Old Rectory. 150 believes number of dwellings should be reduced, built of recycled materials and “traditional Kentish design”. 611 outlines how the development should provide a density transition throughout the site.

Response: *While the NPPF (paragraph 59) requests local authorities avoid unnecessary prescription in design terms, the site’s location within the Mersham Conservation Area will ensure that the highest quality of design in keeping with the character of this designated area is achieved. The points highlighted above are already covered by criteria a) and b) in the policy as written.*

Issue – on-site parking

99 asks that sufficient parking is provided to serve the proposed dwellings, in double garages separate from living spaces, as well as provision for visitor parking.

Response: *The Local Plan should be read as a whole. Residential parking is covered in Policy TRA3a.*

Object – pedestrian movement

611 and 854 state that the field at present is used for recreation and a pedestrian route to Glebelands. 611 worries that pedestrians crossing the field at present will be rerouted behind the respondent’s house, and that developers should ensure pedestrians should not look into living or bedrooms. 826 states that it is imperative that a safe walking route is provided from the site to Glebelands via the playing field, which should be a formalised tarmac surface. Supports retention of PRow AE669

Response: *Local PRows are to be maintained, and connectivity through the site to the playing field is a policy requirement (see criterion e). Additionally, criterion b) requires the layout to be designed to take account of the residential amenity of existing neighbouring occupiers. Provision of pedestrian routes through the development is required in criterion e.*

It is beyond the gift of a developer to ensure works on third party land (i.e. Recreation field to Glebelands). No change required.

No change required.

Issue – Geology

826 points out that this site is in a mineral safeguarding zone (Sub Alluvial River Terrace Deposits). Additional evidence required to understand economic geology to justify why mineral safeguarding presumption should be void.

Response: *Sites that are proposed for allocation 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 – Archaeology

826 requests a phased programme of archaeological mitigation which could be dealt with through condition.

Response: *Noted.*

MC103 – Policy S60 St Michaels (Tenterden), Land at Pope House Farm

Representations have been received from the following consultees:

1044 John Bishop & Associates (Robert Stevenson)	1090 Hannah Daw
1094 Alice Hocknell	1102 Lorenzo Castelletti
952 Elizabeth Downey	21 Raymond Crawford
618 Smith & Garratt	683 High Halden Parish Council (Susan Wood)
689 Hobbs Parker Property Consultants LLP (Steve Davies)	754 Elizabeth Buggins

827 KCC (Kent County Council)	1106 Scott Properties Limited
1169 Judith Ashton Associates	514 Alan Bates
160 Sally Sullivan	33, 35, 36 Paul Buggins

Summary of Representations – Main Issues

Issue - Housing Need

160 believes that there have been too many houses allocated in High Halden which is over 8% of the Borough's needs. 1169 points out that this site is in the parish of High Halden so should be addressing their needs rather than Tenterden. 160 is of the opinion that greenfield and agricultural land should be used for housing, land will be needed after Brexit. There needs to be a sense of locality for resources within the village.

33, 35, 36 there are concerns whether the proposed site is to reach the housing land supply rather than the appropriateness of the site.

Response: *The overall housing needs for the borough and distribution of development, is dealt with by strategic Policy SP2 (Please see responses to MC4). The local plan proposes the delivery of 14,029 dwellings over the plan period, with the majority of these dwellings planned within the or on the edge of the Ashford urban area (and on Brownfield land where this has been identified as available and suitable). At present, Brexit does not alter the borough requirements.*

Of the total borough need, the Local Plan allocates 135 dwellings within the Parish of High Halden and is a very small portion (less than 1%) of the overall borough requirements. It should also be noted that Pope House Farm, although in the Parish, is not within the settlement of High Halden and is adjoined to the settlement of St. Michaels (Tenterden) where it is most likely residents would use the easily accessible services there, many located within walking distance.

All sites have been assessed through a consistent process, through the SHELAA and Sustainability Appraisal which support the Local Plan.

Issue - Site constraints (Heritage/Gas Main/Landscape/density)

618 This proposed allocation is constrained by landscape factors, proximity to historic buildings, the presence of gas infrastructure, the protection of hedgerows and mature trees and a lack of drainage. These constraints render it less suitable than other available alternative sites, so less deliverable. There is a limit being imposed at such an early stage. There will be commercial difficulty in delivering an affordable element at this density. A further extension into open countryside to the north would not enhance or complete the settlement, it would unbalance it further and would set an uncomfortable precedent for

branching out from settlements into adjacent countryside in an uncontrolled, uncontained manner and despite obvious drawbacks.

1169 argues that development is constrained by high pressure gas main that lies to the north of the area for development. The HSE requires a minimum 9m buffer to such gas mains, but in some cases 50m.

21 This development is sensitively located at the gateway to St Michael's and Tenterden. It is visible across the fields when travelling on the A28 southwards. The wooded view of Dawbourne Wood will be blocked by the houses, and the rural nature of this landscape will become vulnerable to urban sprawl.

827 The site lies north of the known alignment of a Roman road and Roman or later remains may survive on site. Pope House Farm is an 18th century or earlier farm complex and includes a designated historic building. Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval.

33, 35, 36 objects on the grounds that the development will expand the linear developments along the A28 and soon there will be no definition between High Halden and St Michaels. The density of this site is too high and not in keeping with other properties in the location and is very close to the grade II listed property. The development should be of lower density to be in keeping with the surrounding area, along lines of that proposed on S58 and S42 including significant garden space with each dwelling, meeting all affordable home requirements as part of the development.

Response: *This site is considered suitable for the quantum of development proposed, the constraints detailed here are already acknowledged within the policy itself and do not affect the anticipated deliverability of the site which is located adjoining a sustainable settlement with excellent access to local services.*

The indicative built footprint shown on the policies map reflects the gas main constraint and the impact on the landscape that development of the northern area would have, this is detailed in the 4th paragraph of the supporting text.

As the site will deliver 50 homes, Policies HOU1 (Affordable Housing) and HOU18 (Range and Mix of Housing) will be applied to the site proposals so 40% of the development will be a mix of affordable housing offer and house types to suit a range of housing needs.

With regards to the heritage constraints, these are again acknowledged within the supporting text at paragraph 7 and the policy criterion a) where there is a requirement to provide a suitable buffer around this heritage cluster which protects and enhances the character. Due to the current adjoining agricultural barns, it is considered that new development here, and the buffer is likely to enhance the setting of these listed buildings.

The density assumption of around 30dph is considered appropriate for the site, taking into account the constraints detailed above, and the connections to the relatively urban area of St. Michaels. It is correct that the site on the opposing side of the road is allocated for exclusive homes, and this is detailed within that policy, but includes the mature trees protected by TPO and a large pond within the site.

Additional policies within the Plan will also apply to the development of this site, which include: SP7- Separation of Settlements, which will prevent the coalescence of the settlements, ENV3a – Landscape Character and Design, which will ensure proposals take into account the particular landscape characteristics such as topography, trees and woodlands and historic landscape features. ENV13 – Conservation of Heritage Assets and ENV15 – Archaeology will ensure the protection, conservation and enhancement of the listed buildings and ensure the planning application includes an appropriate assessment of archaeological heritage assets.

Issue - Infrastructure capacity

618 states that Tenterden services are under pressure and its roads are congested. It has no rail link.

160 argues that the infrastructure is inadequate such as doctors, primary school, hospital, drainage and traffic. With the A28 access, the roads are already overloaded. When Chilmington Green and TENT1 are finished it will be overcome, causing pollution. Rural traffic which is essential, combines and grain trucks use these roads too.

668 Any further expansion of the population will create problems for the village school to cope. It is already working almost to capacity and its potential for expansion is extremely limited. It is common knowledge that GP and other health facilities are already under pressure. Were all these sites to be delivered residents would have to leave the village to access schools and health facilities, most of these journeys would be by car, which would be unsustainable and contrary to HOU4. High Halden is poorly served by buses: an hourly service on weekdays and no service on Sunday or Bank Holidays; this again means that most journeys from any new settlement would be by car, further increasing pressure on the A28.

1102 Other concerns with this plan are related to infrastructure, services and amenities which are becoming overstretched and none of which have been covered or discussed within the plan itself. A real issue is that many of the new policies such as HOU4 have not required that developers contribute to infrastructure.

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.

Issue - Roads/traffic/PRoW

21 Despite the 40 mph speed limit that section of the A28 is very fast, and traffic entering or leaving the new development will be at risk from fast moving traffic. The junction between the A28 and Heather Drive has a speed limit of 30 mph and has seen many major accidents.

514 The allocation of the addition of 100 new houses will result in many additional traffic movements to supermarkets, schools, surgery etc and worse traffic and parking problems.

827 A right hand turn lane should be provided to serve the site, in order to keep the junction clear for vehicles travelling in a straight ahead direction. A suitable pedestrian refuge island can be provided as part of the right hand turn lane junction.

827 supports Policy S60 (c), as Public Bridleway AT146 runs adjacent to the proposed site but requests that consideration must be given to cycling provision and possible links to the nearby Wealden Cycle Trail.

683 The busy A28 road has significant negative effect on the village. The volume and speed of the traffic, and the increased size of vehicles, has a detrimental effect on the life of the village. Many people are put off walking or cycling around the village due to the narrowness of the road itself and inadequate footpaths. There are traffic islands set along the length of the road through the village centre which means vehicles pass very close to pedestrians. This is very dangerous for older people, wheelchair users or parents with young children. The traffic islands are not safe for crossing the road. There is only one pedestrian crossing along the A28. Any increase in housing in the area will increase traffic passing through the village therefore a decrease in safety for pedestrians or cyclists.

Response: *KCC Highways were consulted in the early stages of plan preparation, and where they have raised concerns, these have been addressed within the specific site policy. KCC do not raise issue with the A28 capacity or visibility splays.*

The comments from KCC above with regards to the right turn lane requirement and pedestrian crossing location are noted and will deal with issue of safety and traffic speed raised by others. The policy already requires the investigation of a pedestrian crossing and connections to local footpaths at criterion c). In addition, the specific reference to the Wealden Cycle route is noted.

As these are new recommendations, further liaison will take place with KCC Highways on this to clarify the policy position of these matters.

Issue - Geology

827 This is an allocation that will affect recognised economic geology in the Ashford area, as shown on the Kent Minerals and Waste local Plan 2013-30 Ashford Borough- Mineral Safeguarding Areas proposals map. In order for this allocation to be fully evidenced as an acceptable option for the delivery of the area's sustainable growth over the Plan period to 2030, an understanding of the economic geology in this affected site is required. There may be grounds to justify why the mineral safeguarding presumption should be set aside on the allocation, which may or may not include prior extraction of the economic geology, though this is as yet un-evidenced due to an absence of minerals assessments.

Response: *Sites that are proposed for allocation 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 - Landscape and Green Space Protection

1102, 1090, 1094, 952, 754 value protecting green spaces, rural landscapes, wildlife areas and the unique characteristics of rural villages. In particular, protected green belts between settlements and or around the Ashford urban area to prevent urban sprawl.

Response: *This Plan, which should be read as a whole, contains a range of environmental policies to protect the green spaces, rural landscapes and wildlife areas of the borough. With regard to the unique characteristics of rural villages and protected green areas between settlements around the Ashford urban area, the Council responded to concern expressed at the Regulation 19 Stage about the growth of urban development principally on the edge of Ashford affecting the individuality of nearby villages, with the addition of new Policy SP7 (MC85). This new 'separation of settlements' policy is clear that the need to avoid coalescence of settlements should be regarded as an important determinant of whether a proposed development is acceptable or not and to this end states that development that would result in coalescence or the significant erosion of a gap between settlements resulting in the loss of individual identity or character will not be permitted. These policies are considered sufficient to address the matters and protect the aspects of landscape referred to in these representations. No changes required.*

Issue -Alternative sites promotion

1169 considers that this site does not benefit from the same level of amenities that the land at Appledore Road/Woodchurch Road does given its proximity to Tenterden. This site is in the parish of High Halden so should be addressing their needs rather than Tenterden.

618 - There are other, more suitable locations for development at scale - including the omission site at Bromley Green, just south of Ashford. By comparison, the omission site at Bromley Green has more scope, is better contained, has fewer constraints and is better connected to transport links and services.

1044 - There are benefits to the village community and to the Borough as a whole in achieving a more balanced spread of deliverable sites for new homes. There are limited opportunities to deliver appropriate housing sites locally given the planning constraints (Area of Outstanding Natural Beauty), the protected blocks of trees and the important open entrance to the settlement to the north of Pope House Lane. The allocation is to the east of the Vicarage in a 'natural' location for new village housing. It lies on the unconstrained edge of the settlement and would round-off development between existing limbs of housing development. It would not create any form of precedent for further development as it is contained by the protected Dawbourne Wood. Satisfactory access onto the A28 can be provided to the south of the vicarage. The development would meet all of the principles of sustainable development and deliver a high degree of connectivity with the existing community. An allocation of 20 houses would assist in sustaining and supporting local services as well as contributing towards meeting housing needs with an array of appropriate sites across the Borough. It should therefore be included as a housing site in the emerging Ashford Local Plan to 2030. This development into open countryside would be harmful to the important entrance to the settlement.

689 -The agricultural land identified in the accompanying plan is submitted for inclusion as part of the enlargement of the Land at Pope House Farm - Allocation Policy S60. It is considered that other allocated sites proposed for inclusion within the Material Changes will not be considered sustainable and may therefore not be taken forward either before or following the examination of the plan. The council needs to consider additional or enlarged allocations to ensure that it has appropriate sites for the provision of housing across the plan period in accordance with the council's Objectively Assessed Need and the requirement to ensure a Five Year Supply of Housing Land is met. The land identified is available for development and would provide a logical extension to the existing allocation utilising the accessibility of the A28 and services found in the immediate vicinity, in what is a highly sustainable location on the edge of Tenterden, which is a main service centre in the borough. It would be expected that as with the existing allocation S60 - MC103, the land put forward would be used both for development and for enhancing the setting of the built and natural environment of the surrounding area through the provision of an indicative development area within the identified area of land.

Response: *Promotion of alternative 'Omission' sites is dealt with in Appendix 2.*

Issue - Gypsy and Traveller DPD

668 -High Halden Parish Council also notes the regrettable position that Ashford Borough Council does not have in place a Gypsy and Traveller DPD alongside its current Plan.

Response: *This issue is dealt with under the response to MC57 on Policy HOU17 – Traveller Accommodation.*

Issue - Support

1106 Support this Policy.

Response: *Noted*

MC104 – Policy S61 Wittersham, Land between Lloyds Green and Jubilee Fields

Representations have been received from the following consultees:

41 Christine Craib	510 Judith Forth
78 Phil Chapman	512 Philip Willcocks
79 Mrs Bullock	515 Carol Holder
80 Harris	516 Jayne Beach
104 Jo Thom	557 Clarion Housing Group (Alex Dean)
106 Stuart Hemsley	577 Gillian Kirk
129 Natural England (Sean Hanna)	584 Gillian Redford
135 Mr & Mrs Lovejoy	588 Michael Avery
139 David Craib	591 Wittersham Parish Council (Yvonne Osborne)
140 Lorraine Wright	599 Valerie Townsend
154 Andrew Hollis	607 Zoe Keen
155 Jennifer Maynard	624 Smith & Garratt (Hugh Garratt)
158 Roger Parker	660 High Weald AONB Unit (Claire Tester)
162 Demy Stevenson	733 Lewis
243 K Evenden	828 Kent County Council
735 Lewis	894 Deborah Clair Bennett
319 Mary Pealy	899 Cleo Lloyd
323 Mary Walton	1001 Adrian Goldie
331 Julian Toogood	1002 Valerie Townsend

332 Mervyn Toogood	1010 Robinson Escott Planning LLP (Neal Thompson)
374 Julian Younger	1024 Miss Waterman
376 Julian Younger	1162 Tim Piper
381 Andrew Hollis	1048 Weald of Kent Protection Society (Peta Grant)
409 Nicholas Hurst	1072 John Jordan
426 George Ford	1092 M Moore
484 Southern Water (Ms Mayall)	1102, 1103 Lorenzo Castelletti [1103 is duplicate of 1102]
509 Nicholas Hurst	908 Patricia Homewood

Summary of Representations – Main Issues

Issue - Roads/Traffic

1162 The previous piecemeal extension of Forge Meads has meant emergency vehicles struggle to pass.

35, 48, 78, 104, 139, 426, 515, 516, 588, 607, 894, 908, 1024, 1094 highlight existing issues with highway safety, congestion, pollution and maintenance locally that will be exacerbated by housing development, including commuting and school runs, leading to an unsustainable village.

106, 516, 584 believe the creation of a new link road between Forge Meads and Lloyds Green would increase highway danger, would require widening of Lloyds Green destroying grassed verges, would become a ‘rat run’ without traffic calming measures, would result in “major congestion” on Forge Meads, and would present a hostile environment for children playing.

78, 243, 409, 509, 515, 516, 585, 599, 894, 1002, 1024 state there is a lack of public transport with infrequent buses that cannot cope with more passengers.

409, 509 - The roads and access to Wittersham would need major improvement before any large scale development is considered.

Response: *The allocation of 40 homes in the period to 2030 corresponds with the community-led plan’s assessment that between 3 and 5 dwellings per year are needed to sustain Wittersham as a vital community. During the construction process, contractors would be expected to show consideration to the village, and any planning permission would be conditioned accordingly.*

The local highway authority (KCC) offers no objection to this allocation, and the Council works with other service providers to coordinate a sustainable approach to planning for future service provision.

Issue - Access

80, 155, 516, 319, 331, 733, 735, 828, 1092, 1162 Access points are undeliverable/ownership needs to be discerned as they pass across ransom strips, third party land, designated open spaces/village green, floor storage features, would require removal of valued landscape features (copse) and the garden areas of existing properties.

104, 155, 162, 331, 332, 510, 512, 599, 607, 1002, 1092 believe access from Lloyds Green to B2082 is hazardous, it adjoins a bend/double bend and therefore visibility is reduced.

79, 332, 1001, 1024 access via Forge Meads is inappropriate as it is over capacity, and other entry roads will be inadequate to carry an increased amount of traffic.

331 there is no consideration in the plan for children, elderly and mobility users.

104 existing parking problems in the village and within these residential areas will be exacerbated.

1001 the access road is inadequate for further development and the village cannot sustain the extra traffic.

Response: *The policy proposes three potential access points, two of which cross ABC-owned land, and therefore access is not a problem. Access will not cross the designated village green. KCC Highways has not raised any objection to the proposed accesses or the proposed connecting road.*

Policy TRA3(a) establishes minimum parking provision on residential development thus ensuring no need for off-site parking.

Policy SP6 of the Local Plan highlights the importance of good design (e.g. through the Building for Life 12 criteria), which focuses on the importance of designing streets for all – including children, the elderly and users of mobility vehicles. More explicitly, planning for older and mobility-restricted people is criterion g in Policy SP1.

Issue – Deliverability, and preference for an alternative site

1092 the alternative site in Poplar Road provides a logical 'rounding-off' of the Settlement opposite the single aspect development at The Meadows and enables provision of access which does not intensify use for existing residents. The site would have a similar capacity at 40 dwellings, which allows for landscape buffers and retention of existing mature specimen trees.

1162 points out this site received permission for 27 homes under reference 04/01857/AS, but this was never implemented.

Response: *Previous permission was granted some time ago, not on this site, but to the south on the land now designated as public open space.*

Alternative sites submitted for consideration have been evaluated for availability, suitability and deliverability in the SHELAA, and for sustainability through the SA process.

Issue - Wittersham is unsustainable and inaccessible

1001 any major development is unsustainable, the children from the new development will have to use buses to Tenterden which cannot sustain traffic.

624 The site is remote from a major centre and transport links and accessed by small roads. Development would not be sustainable as residents are reliant on cars. This would affect the marketability of new homes and delivery of the site especially the affordable housing.

409, 509, 591, 894 Wittersham is unable to sustain the proposed amount of growth in the short term. Wittersham is difficult to reach. The bridges that have access to Wittersham are frequently flooded and impassable. To gain access from Smallhythe the road is very narrow and is sometimes flooded. There is an access from Tenterden to Appledore Road via Ebony, this road is a windy farm road and is unsuitable for normal traffic. The road from Stone is inadequate.

1024 argues that villages are to be protected for farming.

Response: *Wittersham is a recognised settlement with a population of over 1000 people. The amount of growth proposed here, as outlined in Policy SP3, is “of a scale that is consistent with the relevant settlement’s accessibility, infrastructure provision, level of services available, suitability of sites and environmental sensitivity.”*

Through the local plan process, the local planning authority works with the local education authority to forward-plan for education provision relating to allocation sites.

There is no justification in national planning policy to safeguard settlements for a single economic activity (e.g. farming).

Issue – Water supply, surface drainage, sewerage and flooding

332, 584 the entrance from Lloyds Green crosses the pond that has been necessary for storm water drainage. 135 the pond has to be filled in and drainage put in place to prevent further flooding and the present pumping station would not be able to cope.

624 The area is low-lying and therefore has an inadequate drainage. 381 This site is surrounded by wetland and experiences extensive flooding with large areas of woodland.

80, 104, 139, 158, 162, 243, 319, 331, 332, 515, 584, 588, 599, 607, 733, 735, 894, 1001, 1002 raise concerns that water, sewerage and drainage do not meet the existing needs, and therefore cannot for a new development. Sewerage already forces manhole covers to rise up and spill contents in Swan Street when it rains heavily. An upgrade was scheduled by Southern Water to begin in 2015. There have been no improvements in the water system since late 1940s. Forge Meads only has a system with 6" pipe utilised and also has not been improved. The current system is not fit for purpose for the existing properties. In times of high rainfall raw sewage can be seen overflowing down nearby lanes.

607 state that wastewater infrastructure cannot be upgraded without a detrimental impact on the AONB.

484 - The local sewerage infrastructure is insufficient and would require improvement. An easement width of between 6 and 13 metres would be required, depending on pipe size and depth. The easement should be clear of all proposed buildings and substantial tree planting. Accordingly, in line with NPPF and NPPG and to ensure consistency with other housing allocation site policies in the Ashford Local Plan 2030, we propose that the following criteria is added to policy S61 after 'Development proposals for this site shall': h) Provide future access to the existing sewerage infrastructure for maintenance and upsizing purposes.

Response: *The requirements for ensuring continued access to existing sewerage infrastructure for maintenance and upsizing purposes will be added to the policy, in line with other policies in this local plan, to constitute a minor change. The other requirement within the policy for the development to connect to the closest point of adequate capacity working with the service provider will ensure no additional strain on the local network.*

Amend policy to add additional criterion h) Provide future access to the existing sewerage infrastructure for maintenance and upsizing purposes.

The land is not at risk from river or sea flooding, and any surface water collection on the site can be mitigated through drainage improvements which will need to be provided as part of the development. See policy ENV9 – Sustainable Drainage which requires all new developments include appropriate drainage systems.

Issue - parking

243 The parking in this site is unable to cope with the amount of cars. There is traffic in Forge Meads which cannot cope with any more cars from Woodland View and Jubilee Fields plus parked cars in a narrow cul-de-sac. 106 Parking needs to be increased not removed.

1092 there is increasing car ownership, parking and congestion generally in Wittersham

588 There is not enough sufficient parking or adjustments to highways to allow for this.

516 the lane next to the school is narrow with cars parked on both sides which makes the school run more difficult. 515 there are existing parking issues in the village

106, 155, 510, 512, 733, 735 The existing estate roads which serve the development are narrow and already congested with parked cars due to inadequate off-street parking. This would be problematic for the emergency services.

Response: *There is no intention to remove parking. The Local Plan should be read as a whole. Residential parking is covered in Policy TRA3a, which establishes minimum levels of parking to be incorporated into development.*

Issue - Rural nature of the village will be compromised

1102 Green spaces, rural landscapes, wildlife areas and the unique character of the rural village should be protected. Building should be proportionate to size. The green belts between settlements should be protected, including around the Ashford urban area so that urban sprawl is prevented.

588 development, like the expansion of Ashford, will turn the village into an unfriendly place and ruin its rural atmosphere, scenery and character.

584 Before the development has begun the damage to the visual amenity and safety of the residents will have been severely compromised and is therefore not acting in the public interest.

584, 599, 607 Due to additional housing there will be noise and light pollution.

584 This site is in a Dark Skies area of which there are only 1% left in Kent. This defines the countryside and makes it different from towns and cities. That quality needs to be maintained and restored.

Response: *The Local Plan should be read as a whole and, when read in its entirety, provides for sustainable growth in the borough providing much-needed housing and employment space in the public interest. Policy SP7 seeks to maintain the separation of settlements in the borough (although there is no greenbelt designation in the borough). Policy ENV4 and the adopted Dark Skies SPD highlight and respond to the need for protection of this area's intrinsic dark skies, and will ensure that lighting in the development does not compromise this important natural asset. Within this policy itself, the importance of maintaining the amenity of existing residents is required by criterion b.*

Issue – Infrastructure capacity

1102 concerned about infrastructure, services and amenities which are becoming overstretched. This could cause a detrimental effect to the lives of a rural parish.

243, 1002, 599, 1024 state there are no employment opportunities

78, 79, 80, 104, 243, 319, 409, 509, 515, 516, 557, 584, 588, 599, 607, 894, 1024 Local primary (and secondary) schools are over-subscribed and cannot “support an influx of children to the village”. Children in surrounding villages are bussed in; but children in this development would have to be bussed to nearby towns.

78, 80, 104, 243, 319, 409, 509, 515, 584, 588, 599, 607, 1024 point out there is no GP in the village. The doctor's surgery has to cope with additional housing in the village, including new properties in Tenterden. Nearest GPs are in Rye, Tenterden and Northiam, and new development will place further strain.

908 - consider the plan to be unsuitable for Wittersham for the following reasons: 1) Too many dwellings 2) Drainage 3) Bus services 4) Entry and exits for approx. 70-80 cars is dangerous 5) There is room next to the woodland view for 6 more houses, which with the 4 being built at Jubilee and gradual infill will be the right way for Wittersham. 6) No job opportunities locally.

584 Cycle routes are inappropriate for a rural village and this disregards the small rural village status.

1001 The village has insufficient infrastructure and accessibility to accommodate such a mass influx.

733, 735-This site does not have a good level of services and is included because the site are more deliverable to developers as they find houses in these sites to be more profitable. This questions the term 'localism'.

557 also states that the current infrastructure is unable to cope with the development of 40 new dwellings. The development should be limited to 10 dwellings

158- accepts that more housing is need in Wittersham (the Community Led Plan recommends up to 5 per year with the Parish Council refining this to 3 per year) but this proposal is beyond what the village can accommodate.

104 - There is no longer a Police Station in Tenterden.

Response: *This range of comments is noted. The size of this allocation matches the aspirations of the above mentioned community-led plan; and this single allocation does not constitute an 'influx'.*

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.

Issue – AONB and Landscape

41, 78, 80, 139, 158, 162, 243, 319, 323, 374, 376, 409, 426, 509, 515, 516, 584, 588, 607, 624, 733, 735, 899, 1001 State that all major development within the AONB, as a designated landscape area with the highest protection, is contrary to government policy/NPPF.

374, 376, 1048 are concerned that development within the High Weald AONB will start a precedent for development on this untouched land.

154, 332, 510, 512, 577, 591, 1162 this area is within an AONB, as a designated landscape area with the highest protection, and another application for 27 houses at Stocks Road was much more suitable than this site yet was refused planning permission. There may be a better alternative site.

78, 104, 319, 624, 1001, 1024, 1162 The northern boundary of the site is a vast area of combined woodlands (Combe, Church, Rushgreen & Stemps Woods) which is designated Ancient Woodland, a Local Wildlife Site (LWS) and covered by a TPO.

104 states that development of the site would turn the Ancient Woodland into a dumping ground

129 As the site is within the High Weald AONB, any application for this number of houses would need to be of the highest quality and be in accordance with the AONB Management Plan. Recommends that the wording of Policy S61 is amended to ensure consistency with other policies in the Local Plan along the following lines: 'b)...in such a way as to conserve and enhance ~~protect~~ the character and setting of the AONB'.

Response: *Agreed that more standard terminology, relating to the conservation and enhancement rather than protection of the AONB, should be reflected in the policy. Amend criterion b)...in such a way as to conserve and enhance ~~protect~~ the character and setting of the AONB'.*

The sensitivity of this site, in the High Weald AONB, is made clear in the policy and expanded in the supporting text. Development here will have to meet the stringent design and quality tests as per NPPF paragraph 55 and the valorisation of these areas as per paragraph 115. AONBs are landscapes resulting from centuries of human management, and therefore are not untouched, although should be managed sustainably and sensitively.

There is no reason to think that the Ancient Woodland would become a dumping ground as a result of this allocation. Furthermore, the policy ensures a buffer of 50m between the woodland edge and any built development.

Issue - Impact on protected species

899 This proposal fails in conserving the landscape and wildlife habitat and does not take into consideration the lack of local services and infrastructure currently in place.

78, 79, 80, 140, 162, 426, 319, 332, 381, 515, 516, 584, 588, 599, 607, 1001, 1002, 1024 consider there would be a negative impact on wildlife, and in particular in the great crested newts, insects, birds, bats, badgers, foxes, pond life, barn owls, nightingales, Jays, Cuckoos, Woodpeckers, Kestrels, deer, buzzards and hedgehogs, both on site and in surrounding areas.

510, 512 the development of 27 houses at Stocks Road would have been more beneficial providing a wildlife conservation area and better benefit to inhabitants and wildlife.

Response: *The Local Plan should be read as a whole, and Policy ENV1 requires extensive consideration of biodiversity and ecology on or close to allocated sites, in line with Natural England guidance, and requires the incorporation and enhancement of biodiversity in any development. Any development works affecting protected species would have to seek licencing from Natural England.*

Issue - Heritage impact

607-White Cottage and Corner Cottage are Grade 2 Listed Properties adjoining the proposed site and any development will have an adverse effect on homes and the wildlife that use it, including overlooking. 624 development would affect listed buildings and local heritage.

319 there is a strong wish to protect the Conservation Area

828 - The Historic Environmental Records suggests a military crash site may survive on site. Details are not clear but these airplane crash sites are very sensitive and need to be appropriately considered at an early stage. There is evidence of post medieval farming activity in the area and evidence of post medieval land use may survive on site. A phased programme of archaeological mitigation will be required. Pre-determination assessment should be carried out to clarify whether development of any part of the site is possible.

Response: *Noted. We can however find no record on the Historic Environmental Records of a military crash site here. In the event of further evidence coming forward HE guidance is available for dealing with potential Military Crash Sites and would be required to be followed in accordance with the policies of this Plan and paragraph 132 of the NPPF. The Local Plan should be read as a whole, and policy ENV13 requires consideration of heritage assets on or near to the site. The site is some way from the Wittersham Conservation area with Policy ENV14 applying to Conservation Areas.*

Issue - Resident and local amenity

607 Building will overlook White Cottage garden which will result in a major loss of privacy. The views of the field across to the ancient woodland will be destroyed. Loss of a view from a public viewpoint will also have a wider impact on the Lloyds Green and Jubilee Fields neighbourhoods.

515, 588 highlights that this area is popular for dog walkers, The site is home to a pristine countryside and regular footpaths would be affected and the pond with the access proposed for the site along Lloyds Green.

104 The footpaths across the fields are used a lot by walkers.

319 and 584 Such a large development, would cause a loss of green spaces that cannot be replaced. The development would spoil the nature of the visual and recreational amenity available. Large piece of the hedgerow from the ancient woodland and adjoining the entire length of Lloyds Green would be removed, including a pond to build a new road. This would destroy a vital wildlife corridor and spoil the visual amenity.

Response: *The policy as written requires development to take account of the residential amenity of neighbouring occupiers, so the layout of the site will be expected to ensure the maintenance of privacy levels.*

The existing designated Green space and play areas will not be compromised by the development, while the policy requires the formalisation of pedestrian access. It is expected that the development will respect the existing landscape character of the area, while conserving and even promoting biodiversity.

Issue - Geological designation

828 this site is in a mineral safeguarding zone (Sandstone Ashdown Formation and Sub Alluvial River Terrace Deposits). Additional evidence required to understand economic geology to justify why mineral safeguarding presumption should be void.

Response: Sites that are proposed for allocation 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 - Housing

584 The majority of houses are to be sold on the open market, but many houses in Wittersham are not selling, which is proof or a lack of demand. Developers should not be allowed to offer affordable housing as a means of obtaining planning permission in the AONB.

607 The building of affordable housing could constitute an exceptional circumstance for development within the AONB, and this is a local issue. However, the respondent notes that this site would only provide 40% (16) affordable dwellings, but the provision of “16 affordable houses in one single plot at one time would not address the needs of the village since the demand is only for 3-4 dwellings a year rather than at one time.”

1024 Wittersham needs affordable housing for expanding families to expand to stay in the area, but drip-fed consistently over several years.

Response: The Local Plan should be read as a whole. Policy SP2 establishes the strategic approach to housing development, providing a borough-wide target the majority of which is to be met in the Ashford urban area, with the remainder apportioned to rural settlements according to their relative sustainability. Furthermore Policy HOU1 will ensure the delivery of a higher proportion of affordable housing in rural development according to need and viability, ensuring viable and vital communities.

In order to ensure a cohesive, coherent, well-designed and quality development, masterplanning is essential and therefore it is not feasible to deliver only 3-4 affordable dwellings per year in a piecemeal fashion. However, the support for this type of accommodation is noted.

Issue - Developer proposed amendments

1010 proposes amendments to site policy to allocate it for a minimum of 40 dwellings, to remove the requirement for a 50m buffer and for development to be a maximum of two storey.

Response: Site capacity has been assessed indicatively at 40dw, which is reflected in the policy wording. Site masterplanning will inform the final numbers on site. Given the sensitivity of this location, within the High Weald AONB, and close to Ancient Woodland and

Local Wildlife Site designations – all of which are subject to the highest level of protection – the policy wording as written should not be loosened since it is expected that any development on this site should have the highest regard to ecological safeguarding and building design. No changes required.

Support

1072 This is seen as an opportunity to bring opportunity to Wittersham with the introduction of affordable housing to balance the demographic in the village.

Response: *Support noted.*

MC105 – Policy S62 Woodchurch, Land at Appledore Road

Representations have been received from the following consultees:

1152 MPD Trust (c/o Agent)	1015 Woodchurch Parish Council (Rob Woods)
881 John McIntosh	707 James Ransley
829 KCC (Council)	561 Stafford
485 Southern Water (Ms Mayall)	646 Environment Agency (Jennifer Wilson)
50 Maria Amos	4 Gary Hastings

Summary of Representations – Main Issues

Issue - Vehicle Access

1152 - In terms of criteria (d), we note the requirement for a vehicular access from Bridge Close, however the exact location of this access may change depending of visibility splay requirements. We therefore suggest that the arrow is shown as 'indicative' on the site allocation plan and that the wording of criteria (b) is altered slightly to read 'as shown indicatively on the policies map'.

829 An emergency access will also be required onto Appledore Road as Bridge Close already serves over 20 dwellings.

Response: *The Council agrees that the positioning of the access may alter and should be shown as 'indicative' or just as 'Bridge Close' with no arrow in order to be more flexible and*

that an indicative emergency access point on Appledore Road should be shown indicatively in accordance with Kent Highways advice.

Minor change to site map proposed to reflect access as 'indicative'.

Issue - Highways

561 There is a shared access with Bridge Close which is not acceptable because there are already difficulties in exiting into Appledore Road at peak times. There has been a considerable increase in traffic on Appledore Road since the construction of Bridge Close. The access close to 2 blind bends is not suitable to accommodate additional traffic from 30 additional dwellings. There is no continuous pavement to Woodchurch village centre and no pedestrian crossing on the very busy Appledore Road. This is already a hazard for children who live in Bridge Close and an incentive for parents to drive rather than walk their children to school. Parking near the school is already a nightmare and another 30 cars would make the situation much worse.

50 concerned about the amount of traffic and the safety of it, it's not a big opening. It is a big proposal for 30 houses on a relatively small site.

1015 the most obvious risk of pollution and road traffic accidents will be the increase in the number of cars and traffic movements which we would estimate at between 175 and 210 per day - all having to access/exit the site via the current junction at Bridge Close. The egress from Bridge Close is best described as awkward given the deceptive bend in the road which can obscure oncoming vehicles from the east. An additional 200 traffic movements a day will not only transform that junction from awkward to highly dangerous but severely impact on the amenity of the current residents of Bridge Close.

Additionally, there is no continuous footpath planned from the village to this peripheral site. Residents who currently walk with their children to school in the village are forced to compete with an increased volume of traffic. The risk of collisions and serious injury will increase exponentially in the Parish Council's view, with such a large increase in traffic movement in that part of the village.

Response: *KCC Highways have advised that visibility splays are achievable and recommended the main access to be required from Bridge Close. They have since requested a secondary access to be provided on Appledore Rd. The entrance to the site is within the 30mph speed restriction and this is enforced, along with school parking concerns, by Kent Police.*

The policy requires that the development provide footpath connections to the village, so the development proposals can improve the accessibility for existing residents. In addition, other policies within the Local Plan deal with issues such as parking (TRA3a), Planning for pedestrians (TRA5) Impact on the road network arising from new developments (TRA7) and will be applied.

Issue - Infrastructure

881 concerned in relation to the strain on the sewerage system and the ability of the pumping station on Appledore road. The consultation document states that Southern Water need to provide 'additional sewerage infrastructure' but the concern on whether this only refers to the new site not the existing site. Southern Water need to be pressed harder on how 'adequate' the existing infrastructure is and how it will cope with even more additional outflow.

4 believes there is no employment in Woodchurch and the bus service is expensive and unusable. This allocation will destroy the setting, geography and character of the village. There is always traffic and expensive parking. The introduction of 30, 40 and 50 limits cause traffic to go through the country lanes and Woodchurch.

1015 states this site is remote and with limited public transport provision, residents there would be largely dependent on cars, not only for commuting but also to satisfy their educational, leisure and retail needs within the village itself. The cumulative impact on the fragile water and sewerage systems in the village. Southern Water has already indicated that there is insufficient capacity in the sewers to accommodate the 8 homes planned for Front Road, let alone 30 additional homes in Appledore Road. The residents in Appledore Road have been the ones most badly affected by flooding in the past. Expensive infrastructure improvements are likely to be needed to provide new capacity in the network. It is difficult to see how the cost could be recovered without a substantial proportion of the homes being higher-end market homes.

Response: *It is accepted that any new development proposals will affect existing services. Therefore, service providers such as Highways, KCC (Public Transport) & Water companies 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.

In addition, policies within the Local Plan deal with issues such as parking (TRA3a), Promotion of the Local Bus network (TRA4) Impact on the road network (TRA7) and Travel Plans (TRA8) arising from new developments.

Issue - Affordable Housing and Local needs

1015 affordable, low cost or smaller footprint housing is a priority need given the demographic statistics of the village (as defined in the 2011 Census), future demographic

trends, the evidence of the Local Needs waiting list and the trend of the past 10 years which has seen a disproportionate number of large market homes receive piecemeal planning approval.

This has led, by stealth, to a tenure imbalance which Woodchurch residents consider to be detrimental to the future sustainability of the village, its infrastructure and its rural spirit of place.

Most homes built or planned over the last 10 years in Woodchurch have been large residential/market homes. Even with an affordable component of 40% on S62 the tenure imbalance will not be addressed. Moreover, in a typical year prior to 2017, successful planning applications will have accounted for an average of 3 new homes a year, the vast majority of which have been large homes which add to the imbalance.

Response: *The Council has addressed the concerns raised by the Parish Council relating to the local needs and housing mix requirements with the deletion of proposed site for 8 homes, and the inclusion of this site for 30 homes, which will trigger the requirements of the affordable housing and range and mix of homes policies.*

Issue - Impact on residents, Village cohesion and open space

561 The over expansion of Woodchurch House has caused considerable distress to the residents of Bridge Close/Brattle. The project was expanded to a 2 storey 80 bed home, now extending to 100+. This commercial project has affected the cohesion of this part of the village, leaving the residents of Brattle and Bridge Close feeling isolated from the rural setting of the rest of the village. This has been enhanced by the removal of the field connecting the 2 communities to the countryside. The preservation of views and what is left of the quality of the area are important amenities which are being ignored. Residents feel that creating 30 homes on the south of the Appledore Road would exacerbate the feeling of a separate "village" on the edge of the village with no infrastructure. Currently the proposed field is used as a recreation space by young children and teenagers from Bridge Close and has been used by generations of children from Brattle. The residents of Bridge Close were promised a recreational space, but this never materialised and the funds were reallocated.

50 has concerns about keeping the natural beauty of the area we live in. How much disruption will this cause with the building work, noise, traffic and mess and how close the houses will be to the resident's gardens.

1015 disagrees that the S62 footprint is capable of providing 30 homes without appropriate levels of car parking and leisure/community space. The current Bridge Close/ Brattle settlement contains just 2 small grassy areas. Neither have the benefit of children's play equipment or other facilities which means that children have to make the long and potentially dangerous trip to the Village Green to enjoy the amenities there which include a leisure/sports area including play equipment and open air gymnasium. Equally, there are no community buildings or facilities in the current Brattle/Bridge Close settlement.

1015 argues that every land submission received has impacted on our landscape and S62 is no exception. S62 is agricultural land which sits at the south-eastern edge of the village on the edge of Shirley Moor which is classified as a Special Landscape Area. Settlements do

not feature in the landscape characteristics of the moor. This site will complete the creation of a large settlement in excess of 100 homes (including the current Brattle and Bridge Close sites) which will detract from the spirit of place of the moor. Especially given the current Ashford housing trajectory of 13969 homes by 2030 against a target of 13200, cannot see any benefit in building 30 new homes on agricultural land that will impact negatively on the natural surroundings and disrespect the quality and character of the open space and rural vistas in that part of the village. If this development goes ahead, around 40% of its population will live in 2 large settlements, one at the northern tip of the village and one at the southern tip. Both are farthest away from the village's key community, leisure, retail and educational facilities. Community cohesion will be made more difficult if this site is agreed purely in the pursuit of arbitrary Government housing targets. These remote settlements are hard to engage with now and their residents' involvement in community is noticeably lower than those living closer to the village centre. We are reminded that the original land submissions in 2014/15 were put forward primarily because of their close proximity to the village's key facilities and yet, were still rejected as unsuitable space.

This Site S62 is located on the periphery of the village, well beyond any accepted building boundaries and abutting open countryside. It cannot claim to protect or enhance the local environment, including wildlife habitats, trees and woodland in that part of the village. Indeed, it is likely to result in the loss of a small copse. Additionally the proposal would demonstrably harm the amenities enjoyed by local residents in Bridge Close, in particular safe and available parking, valuable green space, privacy and the right to enjoy a quiet and safe residential environment.

Response: *Due to the recent development of this part of the village, it is considered that development of this site is a natural extension to the built form of this area on the southern edge of the settlement, where development already fronts Appledore Rd on the opposite side. Additional mixed residential development here will enhance community cohesion in this location. In addition, the policy requires connections to existing pedestrian routes to be created to the village centre, where there is a large village green, and recreation and play facilities. The land is privately owned and not designated as POS, and therefore this cannot be considered as its current use. The development of 30 homes will trigger the requirement for on-site open space provision, and contributions to the village community facilities.*

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 the settlement. 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 and noise and disruption from construction is dealt with by conditions on the planning decision.

Issue - Biodiversity and River Corridor

881-Declining number of nightingale coming from the copse in the south-east and it is the subject of campaign by the RSPB. The consultation document seems dismissive of the value of the copse and suggests that it could be removed. Within the rural landscape areas such as this copse with tree/shrub cover and undergrowth are ideal breeding grounds for wildlife and should be preserved to promote diversity.

646 This site is beside the Cradlebridge Sewer, so any development at this site must respect the river corridor through provision of a suitable buffer zone of at least 8m from the top of the river banks. If this allocation put this requirement at risk, then we object to the site allocation. Rivers form an important wildlife corridors and ecological networks which Section 117 of the NPPF specifies need to be preserved and restored.

Response: *It appears that the Cradlebridge Sewer is located over 20m away on the opposite side of Appledore Road and therefore already meets the 8m buffer requirement, however, ABC will liaise further with the Environment Agency to clarify this position.*

Issue: Proximity to Woodchurch Wastewater Treatment Works (WTW)

485 The proposed site is within 100m of Woodchurch WTW. The new development must be separated to safeguard the amenity of future occupiers. We would expect an assessment to be undertaken to demonstrate that there would not be a detrimental impact on amenity by reason of odour. Accordingly, in line with NPPF and NPPG and to ensure a sustainable development, we propose that the following criteria is added to policy S62 after 'Development proposals for this site shall':

f) Provide future access to the existing sewerage infrastructure for maintenance and upsizing purposes.

g) Provide sufficient distance between Woodchurch wastewater treatment works and sensitive land uses, such as housing, to allow adequate odour dispersal on the basis of a noise, vibration and odour study to be undertaken in consultation with Southern Water.

Response: *Criterion f) will be inserted as a minor change for consistency with criterion in other site policies within the plan. Minor change proposed.*

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. Policy DM8 of the Kent Waste and Minerals Plan will be applied to the site, and therefore the distances do not require replication in this site policy.

Issue - Flood Risk

707- There is a level of flood risk along Appledore Road. The EA's flood modelling, does not include climate change, demonstrates it is unlikely that safe access and egress can be achieved in accordance with PPG.

Response: *The site itself is not within Flood Zones 2 or 3. Climate change modelling has been undertaken as part of the Strategic Flood Risk Assessment (SFRA). The updated SFRA covers the whole of the Ashford Borough. The purpose of the SFRA is to assess the extent and nature of flood risk and the implications for land use planning. The assessment has been used to locate potential development and infrastructure to areas with the lowest probability of flooding in accordance with the latest guidance, and includes a revised Appendix E which takes account of the climate change projections. The EA have not objected to the content of this SFRA or this specific site allocation proposal on flooding grounds.*

Issue - Cycle route

829- Support criterion C of the policy but cycle provision is not mentioned within Policy S62 and should be considered, as Route LCR011 runs adjacent to the site.

Response: *The Council does not believe it is necessary to include the specific cycle route reference within the policy, as consultation on the details such as these will be undertaken at planning application stages.*

Issue – Overall housing need and Housing Trajectory

1015 the site options presented are a short-term expediency driven by the need to achieve arbitrary targets and not by the current and longer term housing needs as identified by current and future demographic trends. In 2017, following a shift in Government policy, There seems to be no recognition of the impact of this policy shift in the housing trajectory.

Response: *The overall housing requirement for the borough is taken from the Strategic Housing Market Assessment and national population projections which are long term. This evidenced housing needs is reflected in the Local Plan targets for the borough, and dealt with in Strategic Policy SP2. All extant permissions, including barn conversions, are reflected in the windfall housing sections of the Housing Trajectory.*

Issue - Consultation

1015 There has been no meaningful consultation on this site allocation. One informal meeting between Borough Council Officers and a minority of Parish Councillors was convened at short notice at a time to suit the Borough Council. The 4 Councillors that attended had no delegated powers to comment on this Main Change. There has been no consultation with the residents of Bridge Close and the surrounding roads who will be most affected by the Main Change.

The village and Parish Council have not been presented with a sustainability appraisal for this site. There is no evidence that the village needs an additional complement of market

homes on this site when a) demand for such homes can be satisfied by the scale and type of developments approved in other settlements within a short distance of Woodchurch and b) the scale and cost of infrastructure improvements, especially those required by the water and sewerage authorities, will be a major barrier to delivering homes on the site over the next 5 years.

The proposal to include S62 in the Local Plan fails the “positively prepared”, “justified” and “effective” tests of soundness and it stands by its opposition for the reasons identified in Appendix 1.

Response: *ABC officers met with the PC informally to discuss and explain the updated position regarding the boroughs increased housing needs and the potential changes this would have on the Local Plan 2030. No complaint was made at the time of the meeting that not all PC members were available for the meeting and it was not convenient. The purpose of the meeting was for a local plan update and information only to keep the PC informed, before the MC public consultation commenced, of plans which would be of interest to the residents of their Parish. This is not a statutory requirement of consultation, but the Borough Council undertook this as an additional stage to enable PCs to have advance notice. The PC were not being asked for a decision or comments on whether the Proposed Main Changes were supported or objected to, and therefore the members which attended did not require any delegated powers.*

The formal consultation procedures undertaken on the Main Changes consultation were in accordance with legislation and the adopted Statement of Community Involvement (SCI). The PC were formally requested to comment and sent copies of the MC consultation documents at the commencement of the 8 week public consultation period.

At this time, a number of additional documents were published as supporting evidence base. This included the response to representations received in 2016, and the full and an addendum to the Sustainability Appraisal (SA) and SHELAA documents. Both of these documents include site appraisals for all sites which had been considered, including the site in question. The explanation of the increased housing requirements were addressed in the SA and revised Policy SP2 (MC4).

During the consultation period, ABC officers were available for face-to-face discussion at 11 public consultation events held across the borough and by telephone, email and in person at the Civic Centre (during working hours) during the 8-week period, to assist all persons in understanding the documentation. All the consultation and supporting documents were also available in hard copy at a number of locations (or could be requested by telephone), downloadable online, or commenting was available through the online portal or by email, along with the detailed guidance notes and summary leaflets which provided the direct telephone and email contact details for the Policy team should people have required further assistance in locating them.

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.

Issue: Promotion of alternative site – Susan's Hill

1015 support the development of a site on Susan's Hill and invites the Borough Council to discuss this further.

Response: *The only site on Susan's Hill referenced in this representation was submitted during the call for sites in 2014 and was removed from consideration at Stage 2 of the SHELAA assessment process as unsuitable, as it is removed from the built area of the settlement (site ref WS24). No sites in this location have been submitted or re-submitted by landowners as an 'omission' site, through representations on this Local Plan.*

MC106 – Monitoring Framework

Representations have been received from the following consultees:

130 Natural England	830 KCC
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Summary of Representations – Main Issues

Issue – AONB Indicator

130 from Natural England recommends that an indicator in relation to the conservation and enhancement of the AONBs within the Borough is included; this could be the number of landscape enhancement plans approved in accordance with the Management Plan.

Response: *The Council considers that an additional monitoring Indicator which covers Policy ENV3b and the compliance with the relevant AONB management Plan would be*

acceptable. ABC will liaise with NE on the precise wording, baseline and an indication of how the data can be collected and recorded.

Issue – Biodiversity Indicator

130 from Natural England recommends that In addition to the biodiversity indicators proposed, a specific one that is directly relevant to development within the Borough that may provide useful reporting information would be the number of biodiversity/ecological enhancement plans approved by the Council.

Response: *The Council considers that an additional monitoring Indicator which covers Policy ENV1 and biodiversity enhancement plans would be acceptable. ABC will liaise with NE on the precise wording, and an indication of how the data can be collected and recorded.*

Issue – Sustainable Travel Indicator

830 The “Sustainable Travel” transport indicator does not include a target for sustainable transport; the County Council would ask that a target is identified. At the very least, existing routes should be improved and there should be no net loss of pedestrian and cycle routes provision.

Response: *The Council agrees an indicator may be required for this topic policy and therefore proposes to liaise with KCC Highways and Transportation, in order to ascertain that they are able to provide the baseline position of current cycle and pedestrian routes provision in the Borough and provide annual updates which can be used by ABC to monitor the indicator.*

APPENDIX 1 - LATE REPRESENTATIONS

Late representations have been received from the following consultees:

Rep No:	Consultee	Main Change to which Representation relates:
LR/1	Mr and Mrs Bromfield	MC100 (Policy S57 – Hamstreet, Warehorne Rd) / MC35 (Policy S31, Hamstreet, St Marys close)
LR/2	Tom Williams	MC95 (Policy S52 – Aldington, Land south of Goldwell Manor farm)
LR/3	Alex Williams	MC48 (Policy HOU1 – Affordable Housing)
LR/4	John and Elona Griggs	MC96 (Policy S53, Brook)
LR/5	Nathalie Stival	MC100 (Policy S57 – Hamstreet, Warehorne Rd)

LR/6	Nathalie Stival	MC11 (Policy S4, Land north of Steeds lane and Magpie Hall Rd)
LR/7	Nathalie Stival	MC25 (Policy S19, Conningbrook)
LR/8	R.E Rowe	MC96 (Policy S53, Brook)
LR/9	Mary P. Wyatt	MC96 (Policy S53, Brook)
LR/10	Trudie McNamara and Philip Judge	MC50 /MC51 (Windfall Housing policies)

Letters have been sent to each of these consultees advising them that comments received after the expiry of the consultation period deadline of midnight on 31st August 2017 cannot be accepted. The Council has therefore not responded to the points raised by these representations (which may in any event be issues that have already arisen in and been addressed in response to other representations received within the consultation period). They are merely noted here in the Council's responses document and will be available for viewing by the appointed Inspector.

One anonymous Representation was received (MCLP/250). The Council's Guidance Notes on the Representation Form make clear that anonymous submissions cannot be accepted and therefore this representation was not considered.

APPENDIX 2 – 'OMISSION' SITE REPRESENTATIONS

A number of representations received during the Main Changes consultation are referencing the promotion of an alternative or additional site to be considered for allocation within the Local Plan. This document does not respond to those representations in detail as many of these sites have been considered previously, either following initial submission during the 2013/14 Call for sites or as 'Omission' sites presented during the 2016 Regulation 19 consultation and the Council have already undertaken assessments which can be located within the Strategic Housing Land Availability Assessment (SHELAA) 2017, and if not removed in SHELAA, the Sustainability Appraisal (SA) site assessment section.

However, there were also new sites submitted which had not undergone assessment or appraisal as part of the Local Plan process. Where this is the case, these sites have now been assessed and are included in a revision to the SHELAA, and SA where necessary (Nov 2017 updates).

Site assessments contained within the SHELAA and/or SA are the Councils response to all site representations.

Details of all Omission sites received during this consultation as representations can be located within the tables below, along with information about the site assessment stages undertaken. Those which were submitted during the 2016 Reg 19 consultation are cross referenced with their previous representation number for information.

(Please note that all ‘Omission’ sites presented through representations in 2016 are listed in Appendix A of the Regulation 19 Consultation Statement (published July 2017) document, and also remain as outstanding representations to the Local Plan 2030 even if not re-submitted)

New Site Submissions

SHELAA Assessment has been undertaken on all newly promoted sites. SA assessments have been undertaken for those that remained in survey following SHELAA. Please see SHELAA and SA updates documents (Nov 2017) within the Local Plan Examination Library for full site sheets.

REP NUMBER	SHELAA SITE REF & NAME	SHELAA ASSESSMENT RESULT	SA ASSESSMENT UNDERTAKEN?
MCLP/276	ST14 – Joey’s Wood, Hythe Road	Filtered at Part 1 - Protected by TPO	No
MCLP/869	GCS16 – Land adj to Toke Farm, A28	Filtered at Part 2 - Within CG boundary but at present is isolated	No
MCLP/1147	CG2 – Land at Bartlett Lane, Chilmington Green	Filtered at Part 2 - Adjacent to CG boundary but at present is isolated	No
MCLP/92	DN35 – North Court Farm, Old Wives Lees	Filtered at Part 2 - limited access to services and landscape/countryside impact	No
MCLP/1176	WS75 – Criol Land farm, Shadoxhurst	Filtered at Part 2- limited access to services and landscape/countryside impact	No
MCLP/91	DW43 – Land rear of Wheel Inn PH – Westwell	Filtered at Part 1 - Too Small	No
MCLP/959	CH36 – Faversham Rd, Charing Hill	Filtered at Part 2- Ancient woodland and LWS proximity & distance from the village services.	No
MCLP/81	WE56 – Red Barn Farm, Mersham	Filtered at Part 2- Isolated	No
MCLP/97	WS76 – Land adj to The Park, Bromley Green	Filtered at Part 2- Isolated	No
MCLP/74	WS72- ‘Elite’, Hornash Lane, Shadoxhurst	Filtered at Part 2- Isolated & Ancient Woodland	No
MCLP/342	WY23 – Brabourne Rd, Wye	Filtered at Part 2- Kent Downs AONB, proximity to heritage assets and sites of	No

Appendix K – Part 3 Consultation Statement (Response to Main Changes Representations)

		national and international ecological importance, and its lack of a clear relationship with existing settlement	
MCLP/500	DN34 – Pilgrim’s Lane, Chilham	Filtered at Part 2- Isolated	No
MCLP/746	WS5 – Whiteholm, Hamstreet Road, Shadoxhurst	Filtered at Part 2- Isolated	No
MCLP/279	WC94 – Beult Farm, Bethersden	Filtered at Part 2- Isolated	No
MCLP/1200	GCS17 – Court Reed Farm, Sandy Lane, Great Chart	Filtered at Part 2- Isolated	No
MCLP/194	BD20a – North Street, Biddenden	Remain in Survey for SA	Yes
MCLP/146	WS73 – Woodchurch Rd, Shadoxhurst	Remain in Survey for SA	Yes
MCLP/907,911	SS62 – Church Road, Smeeth	Remain in Survey for SA	Yes
MCLP/1129	CH37 – Parson’s Mead, Charing	Remain in Survey for SA	Yes
MCLP/91	SS61 – Plough Inn, Brabourne Lees	Remain in Survey for SA	Yes
MCLP/1176	WS74 – Findon Stables, Shadoxhurst	Remain in Survey for SA	Yes
MCLP/1099	WN24 – Stone Hill Rd/New Rd, Egerton	Remain in Survey for SA	Yes
MCLP/59,107	DW42 – Rear of Mill House, Challock	Remain in Survey for SA	Yes
MCLP/175/176 /177/178/179/ 180/181	SS60 – Calleywell Lane, Aldington	Remain in Survey for SA	Yes
MCLP/91	WC95 – Red Lion PH, Charing Heath	Remain in Survey for SA	Yes

Previous Site Submissions – Re-submitted

These sites were either; promoted in call for sites 2013 (or informally after) and had gone through site assessment process during plan preparation and results of these are already included within Local Plan evidence base; and/or were submitted during 2016 consultation as ‘omission’ sites. All sites will have a sheet within the SHELAA 16/17 document, and those which reached SA stage, will have an SA assessment sheet (indicated below).

REP NUMBER	2016 REP NO	SHELAA SITE REF & NAME	SA ASSESSMENT UNDERTAKEN?
MCLP/851, 852, 945, 946, 948, 949	1831	BAE1- Lenacre Hall Farm, 393 Sandyhurst Lane	No
MCLP/346	2495	BAE2- Sandpit, Sandyhurst Lane	No
MCLP/410, 414,	2072	BAE4- Land at Rook Toll, Boughton Lees.	No
MCLP/969, 941	2236	BD40 - Former Railway Station, Biddenden	No
MCLP/379, 954	1795	DN1- Land between Cobbs Hill and Long Hill, Old Wives Lees	Yes – See Erratum August 2016
MCLP/853	n/a	DN11- Bagham Rd, Chilham	No
MCLP/356	2251	DN3- Chilham Service Station	No
MCLP/951, 953, 983, 984, 971, 972	n/a	DW10 – Land adj to Tutt Hill Farm, Westwell	No
MCLP/357	2111	IO22b- Land at Quillet Fields, Appledore	No
MCLP/52, 1092	n/a	IO5- Land at Lloyds Farm, Wittersham	Yes – See Appendix 4 of May 2016 SA
MCLP/1158, 1159, 1161, 1162, 1163	n/a	IO6 – Land north of Stocks Rd, Wittersham	Yes – See Appendix 4 of May 2016 SA
MCLP/1196	n/a	KE4 – Canterbury Rd, Kennington	Yes – See Appendix 3 of May 2016 SA
MCLP/714,715 and others	2178	NW1- Lees Farm. Willesborough	Yes – See Appendix 3 of May 2016 SA
MCLP 918/1022	1844	NW2- 10A Blackwall Road	Yes- See Appendix 4 of May 2016 SA
MCLP/1195	n/a	CH30- Land South of Maidstone Road, Charing	No
MCLP/19	387	RTW1- Copfield Farm, Rolvenden	No
MCLP/1091	n/a	SS29 – Land rear of Fortescue Place, Smeeth	Yes – See Appendix 3 of May 2016 SA

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MCLP/608, 609, 618, 624, 625	2623	SS42 - 2 parcels of Land at southeast corner crossroads Hamstreet road and Bromley Green Road Intersect, Ruckinge	No
MCLP/1197	2704	SS57- Brabourne Lees - land between Canterbury road and Lees Road	No
MCLP/1165, 1166, 1167, 1168, 1169	2454	TS3- Land at Appledore Road/Woodchurch Road	Yes - See Appendix 4 of May 2016 SA
MCLP/1085	2569	TS7- Hope Grove Farm, Tenterden TSRTW2	Yes - See Appendix 3 of May 2016 SA
MCLP/760	n/a	WC14- Land NE of Smarden Road, Pluckley	Yes – See Appendix 3 of May 2016 SA
MCLP/942, 943	n/a	WC50 – Land east of Ransley Farm, High Halden	No
MCLP/935	2223	WC74- Land East of St Mary's Church, High Halden	No
MCLP/1044	2057	WC85- St Michaels Vicarage	No
MCLP/858	1886	WE10- Land at south Stour Apiary/Munday Farm House, Cheesemans green	No
MCLP/1119	1815	WE15- Sevington Park, Land east of Highfield Lane, Mersham	Yes - See Appendix 3 of May 2016 SA
MCLP/1178	2260	WE4- Finn Farm, Kingsnorth	Yes - See Appendix 3 of May 2016 SA
MCLP/1120	1737	WE44- Batts Farm, Rear of Sevington Church	Yes – See July 2017 Addendum
MCLP/136	320	WE52- Bower Farm, Mersham	Yes - See July 2017 Addendum
MCLP/517, 520	n/a	WN3 – Mill Lane, Smarden	Yes – See Appendix 4 of May 2016 SA
MCLP/ 136	326	WN5- Land adjacent to Long Meadow, Smarden	Yes – See SA May 2016
MCLP/1100	n/a	WS1 – Wyevale Garden Centre, Hamstreet	Yes – See Appendix 3 of May 2016 SA

Appendix K – Part 3 Consultation Statement (Response to Main Changes Representations)

MCLP/371	n/a	WS34- Capel Road, Orlestone	No
MCLP/10	824	WS4- Briars Church Hill	Yes – See July 2017 Addendum
MCLP/1128	n/a	WY2a- Luckley Field, Wye (POLICY WYE2)	No

Ashford Borough Council

Appendix L of Consultation Statement

Main Issues arising from Local Plan Regulation 19 and Main Changes consultations

December 2017



Main Issues arising from Ashford Local Plan 2030 Regulation 19 consultation 2016

1. Summary

- 1.1 The Ashford Borough Local Plan 2030 Regulation 19 version was published in June 2016. A period of 8 weeks was made available for comments, running from the 15th June to 10th August 2016.
- 1.2 This short report presents a summary of the main issues raised by the representations in compliance with Regulation 22 (1) (c) (iii) of The Town and Country Planning (Local Planning) (England) Regulations 2012.
- 1.3 During the consultation period **2,866 representations** were received from **621** individuals, statutory consultees, agencies and organisations. Of these, 2,392 or 83% considered the Plan to be unsound, while 475 or 17% found it to be sound.
- 1.4 Over half of all representations (**1,490**) were made to Site Policy S2 Land North East of Willesborough Road, Kennington.
- 1.5 74% of all representations received concerned the 44 Site Policies in the Plan. 496 or 17.5% were made on the Topic Policies (Housing, Employment, Transport, Environment, Community and Implementation) with 1% received on both the Introduction and Appendices.

2. Main Issues

Issues raised in representations that were considered to go to the heart of the soundness of the Plan are listed below:

Housing

- **OAN too low:** A number of representations were received expressing concern that the OAN used in the Plan is too low, that the Plan therefore fails to significantly boost housing numbers and that the SHMA is not sufficiently up to date. In addition it was argued that recent under-delivery should be reflected in phasing and the approach to market signals adjustment.
- **Supply of housing land:** Approach is considered unjustified and ineffective. Inability to demonstrate a five year HLS. Concern about reliance on larger sites.

- **Policy HOU1 Affordable Housing:** Insufficient planned provision of affordable housing, therefore non-compliance of the Plan with paragraph 47 of the Framework.
- **Distribution of housing allocations:** too much reliance on Ashford town, balance of development allocations between Ashford Town and the rest of the borough disproportionate.
- **Approach to windfall development:** inconsistency between policies SP2 and HOU3, 4, 5. Despite reliance on windfalls for delivery of housing, the development management approach in housing policies is too restrictive, not NPPF compliant in terms of sustainability.
- **Approach to provision of gypsy and traveller sites:** too much reliance on windfalls (Policy HOU16) to deliver identified need.
- **Housing Mix:** Plan does not adequately address need for a range of dwelling types, particularly in rural areas including smaller and mid-market homes and bungalows.
- **Policy HOU13:** does not comply with national policy.

Site Policies

Representations were received on all 44 site allocations proposed in the Plan. Those considered to raise significant issues are listed below:

- **S2 Kennington:** significant numbers of objections (more than half of all representations received to the Plan as a whole) to the allocation of this site on grounds of loss of Grade 1 agricultural land, lack of appropriate road infrastructure and impact on SRN, impact on the Kent Downs AONB and biodiversity, inadequate capacity of wastewater infrastructure, concerns about the safety and future of the at-grade pedestrian crossings over the railway line, concerns over noise, air quality and odour. Need for new school included in allocation questioned.
- **S11 Leacon Road:** objection to loss of this railworks site which has a signalled rail connection to the mainline, given a continued need for stabling facilities to maintain, service and clean rolling stock and its potential for future employment opportunities.
- **S20 Eureka Park:** objections to loss of business park land to housing, impact on road network, impact on rural and open character of this part of the town.
- **S31 land north of St Marys Close, Hamstreet:** objections received on grounds of harmful impact on road safety, landscape including neighbouring Ancient Woodland and SSSI, character of the village and the deliverability of additional school facilities.

- **S39 and S40 Lower Road and Front Road, Woodchurch:** Objections to allocation of two small sites in village of Woodchurch on the grounds that such an approach will not deliver a mix of housing or affordable housing for the village.
- **S44 Watery Lane, Westwell:** objections to the allocation of this site on grounds of detrimental impact on the Kent Downs AONB, harm to the health and wellbeing of future residents having regard in particular to noise and pollution and unsustainable location in terms of access to essential services and facilities.
- **Infrastructure capacity:** many representations across all site allocations expressed concern about lack of or deficiencies in existing infrastructure provision, including local road networks, GP surgeries, primary and secondary schools, sewerage infrastructure and rural broadband.

Employment Issues

- **Policy EMP9:** wording is not NPPF compliant.

Transport

- **Policy TRA2:** no realistic prospect of implementation of Park and Ride schemes as the evidence in the Ashford Parking Review does not support it.
- **Policy TRA9:** objection to use of outdated standards.

Environment issues

- **Rural landscape protection policy:** Many representations were received promoting an additional specific policy protecting and creating strategic green belts, gaps or buffers between villages particularly on the fringes of Ashford including a location specific landscape protection policy for the Saxon Shore parishes.
- **Policy ENV1:** object to omission of reference to the Dungeness Romney Marsh and Rye Bay SPA and to need for HRA screening within the wording of Policy ENV1.
- **Policy ENV3:** policy does not provide sufficient protection to the AONBs. Not compliant with paragraph 123 of the Framework in the matter of tranquillity. Also fails to require appropriate regard to the conservation and enhancement of the setting of the AONBs.

Main Issues arising from proposed Main Changes consultation 2017

3. Summary

- 3.1 A series of proposed Main Changes to the Ashford Borough Local Plan 2030 was published in July 2017. A period of 8 weeks was made available for comments, running from the 7th July to 31st August 2017.
- 3.2 This short report presents a summary of the main issues raised by the representations to these Main Changes in compliance with Regulation 22 (1) (c) (iii) of The Town and Country Planning (Local Planning) (England) Regulations 2012.
- 3.3 During the consultation period **1,178 representations** were received from **611** individuals, statutory consultees, agencies and organisations. Of these representations, 898, or 76%, considered the Plan to be unsound, while 279, or 24%, found it to be sound.
- 3.4 The largest share of representations were made in response to the new sites included in the proposed Main Changes. These are additional to the sites allocated in the Regulation 19 Local Plan, and were required to ensure a land supply which met the then recently increased updated OAN. The 16 new sites proposed¹ received 541 representations (46% of all received at this stage of the Plan preparation).
- 3.5 Less than half the previous level of response to Topic Policies was received, with 227 representations or 19% made on the Main Changes to the Topic Policies (Housing, Employment, Transport, Environment and Community²). A similar number (223 or 19%) commented on changes to the original 44 Site Policies. 5% of representations made to the Main Changes comprised promotions of alternative / omission sites. Finally, 2% of representations received were to main changes to the Introduction and 1% to the Appendices.

¹ One site (S50 Land at Caldecott, Smeeth) was subsequently removed in the minor amendments prior to submission following advice from the agent that the site was no longer available.

² No changes were made to Implementation policies

4. Main Issues

Housing

- **Scale of Housing Requirement:** The scale of housing that the Plan seeks to provide for should be increased. Number of reasons cited including failure to properly address the needs of other local authorities and London, greater account of market signals and affordability issues needed, need to accommodate higher levels of economic growth, and contingency level is not high enough.
- **Distribution of allocations between Ashford and the rural areas:** disagreement that the distribution of development is the most appropriate strategy for meeting the Plan's development needs. Concern received that the strategy places too great a reliance on larger sites in Ashford and, conversely, that the quantum of development allocations in rural areas is too high. Levels of development proposed in the villages of High Halden, Aldington, Hamstreet and Old Wives Lees received specific attention as being considered inappropriately high by many respondents.
- **Affordable Housing:** The threshold, as set out in Policy HOU1, is argued to be inconsistent with national policy. Concern over level of shortfall in the Plan's affordable housing provision when compared against the SHMA figure. Objection to lack of inclusion of a lower threshold in AONBs where developments tend to be smaller and house prices higher. Proposed tenure split is unjustifiably arbitrary and not flexible enough.
- **Approach to Windfalls:** significant levels of objection to the inclusion of Old Wives Lees as a settlement capable of accommodating residential windfall development.
- **Traveller accommodation:** the Plan should better incorporate the gypsy and traveller community. Objection to reliance on windfall policy for the delivery of sites for gypsy and traveller accommodation.

Site Allocations

- **A20 corridor allocations:** significant levels of objections to S55, on the grounds of detrimental impact on the Kent Downs AONB and on entrance to the village, of harm to groundwater protection zones, sustainability, highways access and failings in process including disregard for the preparation of Charing Neighbourhood Plan and failure to appropriately engage with the Parish Council.

Similar issues raised in objections received to Sites S47, S48 and S49 including detrimental impact on the Kent Downs AONB, harm to groundwater protection zones, highway safety and the failure of the allocations to accord with the principles of sustainability. In addition, development along the A20 argued to be contrary to the principle of containing the majority of development within the urban envelope. Additionally, in the case of these sites, concern raised about the potential for harm to the Hothfield SSSI through increased recreational pressure.

- **S45 land south of Brockman's Lane:** Objection to access arrangements, relationship with S14 and reliance on existing signal controlled junction over the railway line.
- **S56 Branch Road, Chilham:** this site received the highest number of objections to a site (10% of all representations received to the Main Changes as a whole) predominantly on the issues of impact on the Chilham Conservation Area and the Kent Downs AONB, concerns over highway safety for both cars and pedestrians and the current lack of infrastructure in Chilham.
- **S61 Wittersham:** high levels of concern expressed on highway issues and potential for harm to the character of the village and the High Weald AONB.
- **S2 Kennington:** large numbers of objections to this allocation continue on the grounds of impact on the Kent Downs AONB, loss of Grade 1 agricultural land and traffic generation.

Environmental Issues

- **Rural landscape protection policy:** multiple requests were received for the adoption of a borough wide policy protecting green spaces between settlements, rural landscapes, villages and significant landscape features, encompassing buffer zones and green belts.
- **Air Quality at European Sites:** Natural England requested that further consideration of air quality impacts to designated sites be provided in the Habitat Regulation Assessment.

General

- **Infrastructure capacity:** many representations were received contesting that existing infrastructure provision, including GP surgeries, primary and secondary schools, sewerage infrastructure and rural broadband is insufficient to cater for the additional demand arising from the levels of development proposed in this Plan. In addition, concern expressed at the lack of evidence that the impact of the planned new town of Otterpool Park in adjoining Shepway District has been taken into account in the preparation of the Plan.
- **Relationship with Neighbourhood Plans:** The Council's position that all policies of the Local Plan should be considered "strategic" for the purposes of paragraph 184 of the Framework is questioned, particularly in the case of site specific policies.
- **Monitoring Indicators:** requests for additional monitoring indicators in relation to the conservation and enhancement of the two AONBs in the borough, biodiversity/ ecological enhancement plans and the provision of pedestrian and cycle routes were received.