

Introduction

1. The local plan is sound and has been positively prepared and consistent with national policy.
2. However, improvements could and should be made for the environment and well being of the community.

Topic Policies – General Questions

ii) Policies TRA3a, ENV2, ENV3a, ENV3b, ENV4, ENV9, COM2 and COM3 and a number of individual site policies refer to various SPDs, other Council strategies, or documents prepared by other organisations. As these are not part of the development plan and are subject to change without examination, is requiring compliance with them justified and consistent with legal and national policy requirements? If not, are there other ways of expressing the Council's intended approach within these policies?

Policy ENV2 The Ashford Green Corridor

3. Please see comments under COM2 as these policies are interrelated.
4. Loss of biodiversity, habitat and protected species are often considered as collateral damage by house builders. These consequences, in my opinion, are never given enough weight.
5. Ashford is striving to get a balance of open space and house building. This is evident with the Ashford Green Corridor made up of parks, recreation grounds and other green spaces alongside the rivers that flow through Ashford.
6. As the green corridor is a core element of Ashford's Green Infrastructure, Tenterden must also be given the same offering that provides multi-functional uses for the wellbeing and health to the local community.
7. A Tenterden Green Corridor would greatly enhance and make a positive contribution to the overall environment, biodiversity value and visual amenity.
8. Now that the local plan has proposed the allocated development sites in Tenterden, it is possible to propose sites that logically would give the greatest environmental benefit to the town.
9. Section 40 of the Natural Environment and Rural Communities Act 2006, places a duty on all public authorities in England and Wales to have regard, in the exercise of their functions, to the purpose of conserving biodiversity.
10. Central government's Biodiversity 2020 strategy highlights the need to halt overall biodiversity loss by 2020 and sets ambitious goals
11. The National Planning Practice Guidance states: "One of the core principles in the NPPF is that planning should recognise biodiversity plus the intrinsic character and beauty of the countryside. This includes designated landscapes but also the wider countryside. The guidance supports the policy as to how landscape should be taken into account in plan-making and decision-taking".
12. The National Planning Policy Framework of 2012 introduced local Green Space designation.
13. Paragraph 76 of the NPPF states "local communities through local and neighbourhood plans should be able to identify, for special protection, green areas of particular importance to them".
14. A unique site has been identified within Tenterden that meets the paragraph 76 to 78 criteria of the NPPF as a Local green Space. This site is known as Limes Land, a western corner between Appledore Road and Woodchurch Road in Tenterden.
15. Limes Land was designated as "Landscape Character Area" in 2009 and is also designated as a natural / semi natural green space under Ashford's open space strategy. The land has a coherent

pattern of elements with few distracting features. It is visually unified with good culture integrity and strong ecological integrity. The landscape is undulating with strong sense of enclosure provided by mixed woodlands and hedgerows.

16. Limes Land is self-contained (and not a tract of land) with clearly defined boundaries, is proportionate in size to the community it serves and holds special significance. Each of these, I will expand further.
17. Previous planning inspectors over the last 20 years have said Limes Land is a critical local green lung and corridor and should be protected.
18. CPRE have recently visited the site and confirmed the rich and distinct biodiversity that should be protected and are supportive of it being designated as a local green space.
19. The site meets two specific audits (and evidence can be provided on request):
 - i. NPPF paragraph 77 criteria
 - ii. Ashford's own "open space" benchmark which evaluates sites by economic, social and environmental criteria
20. It is a designated "landscape character" corridor from the "conservation area" to the west, adjoins "AONB" to the East, plus the designated "wildlife site" and "biodiverse opportunity site" to the North.
21. It cannot be overstated the land is indispensable to the social fabric of the community. It provides for leisure activity and is a place of safety.
22. It directly serves the immediate community of Appledore Road, Shrubcote, Woodchurch Road, Eastgate, Kingswood and eventually Tilden Gill once development is complete.
23. A network of watercourses feed five large natural ponds, two smaller ponds with a spine of trees subdividing the land into numerous distinct sections.
24. The land is an important and undisturbed sanctuary that has not been cultivated for hundreds of years and is now dominated with a rich biodiversity of flora and fauna. In fact, many protected birds that are on the RSPB red list can be found here. Plus many other species such as the GCN and slowworm. Where possible they have been logged with the Kent Reptile and Amphibian Group. All rely on the undisturbed mature and varied trees and shrubs, plus watercourses and ponds to provide food and shelter.
25. The vantage point on top of the ridge has unparalleled and exceptional views. The public have an unimpeded line of sight across the countryside to St Mildred's church to the West and across to the village of Woodchurch and beyond to Folkestone 20 miles in the distance.
26. It is a tranquil and traditional view of open space and reflects the area's heritage.
27. It has significant historic significance. On the southern side is "Gallows Green" where many hangings took place and was considered a major event in the area. To the north east on the ridge is the location of a past Saxon Fort outlining human activity of probably archaeological significance.
28. ENV2 policy should be split into two. ENV2a for Ashford and ENV2b for Tenterden.
29. ENV2b should say as a minimum Tenterden Green corridor should include designated Landscape Character Areas, Wildlife Sites and Biodiverse Opportunity Sites.
30. ENV2b in addition should say a comprehensive study would be undertaken to identify other sites that should be included to provide permanent formal and informal leisure and wellbeing activities.

Policy COM2 Open Spaces Strategy

31. Please see comments under ENV2 as these policies are interrelated.
32. Tenterden is in desperate need of a local / green space strategy that provides a positive contribution to social, environmental, public health, well-being and quality of life.
33. Ashford has also identified a serious shortfall of open space in Tenterden, this needs to be confronted head on.
34. Support the creation of a strategic network of open spaces required for Tenterden, such as green corridors, create new open space and promote improvement to existing spaces. It should therefore include the following categories: Community gardens; recreational facilities; creation

- of green lung corridors; link different areas of landscape designation such as natural / semi natural spaces, conservation area, landscape character area, wildlife, biodiversity; amenity green spaces; accessible countryside via footpaths and bridleways
35. There is a great risk of "sleep walking" into urbanising the rural area. Without designed green corridor and open spaces, the separation of communities with Tenterden will disappear. Green lungs, open countryside and amenity land is essential between established settlements / communities. Preserving green space is indispensable with protecting the distinct characteristics and attractiveness of each community within the town, as well as the wellbeing of the public.
36. As well as a local plan for housing development, there has to be a harmonizing plan for open spaces so they both coexist as one. This balance of scales can then direct housing development in economic, social and environmental sustainable locations. Central government would specify as the right locations, principally collocation of jobs with housing together with robust infrastructure.
37. I would ask you to take note of paragraph 17, 61, 114, 156 and others in the NPPF to create a balance between housing and green corridors / open spaces.
38. A comprehensive policy framework for the protection, enhancement, accessibility and use of existing natural / semi-natural green space spaces would create the following benefits:
- i. **Prevention against Coalescence.** Preserves the loss of distinct character of Tenterden's settlements / communities by providing open spaces between them, ideally using a hub and spoke approach of community greenways, 'green lungs' and landscape buffers.
 - ii. **Stepping Stones.** Sites become local green spaces, corridors, green lungs, and stepping-stones from one habitat to another.
 - iii. **Quality of Life.** Supports regeneration and improving quality of life for communities by providing visually attractive green spaces next to where people live.
 - iv. **Biodiversity.** Enhances the quality and diversity of the environment. Provides environmental infrastructure to protect and improve biodiversity, tackling deficiencies in access to nature protect and promote trees, woodland, and geodiversity. Improve access to the countryside and the quality of the landscape through the protecting and enhancing levels of biodiversity and ecological habitats for flora and fauna.
 - v. **Social Inclusion.** Improves the life of local communities, promote civic pride through social inclusion, and promotes physical exercise health and well-being. Provides opportunities to people of all ages for informal recreation, or to walk along paths and bridleways. In particular, to protect, create and enhance all types of open space in their area to ensure that children have safe access to good quality, well-designed, secure and stimulating formal and informal recreation provision.
 - vi. **Needs of the people.** Green space network that meets the needs of local people, now and in the future. To realise the value of open space and green infrastructure as a visual amenity (with and without public access) so people enjoy having open space near to them and provide an outlook as a positive element in the landscape.
 - vii. **Community Identity.** Maintains the visual amenity and increasing the attractiveness of a locality to create a sense of civic local identity and enhance the physical character of the town, so shaping existing and future development.
 - viii. **Community Participation.** Creates a framework for voluntary and community groups to participate in green space provision and management.
 - ix. **Tourism.** Protects the historical, cultural and archaeological heritage, thus boosting the economic potential of tourism, leisure and cultural activities.
 - x. **Climate Change.** Green lungs are ideal sinks for collecting NO² pollution and help mitigate climate change
39. A successful strategy should be part of the local plan that contributes to the development of the borough for existing and future generations. It is complementary to the housing development plan and should be executed as one cohesive plan.