

Here are my written submissions for the Local Plan Examination.

RN/137

Parts of the Local Plan are unsound:

**Issues 1, 3, 4**

**NPPF para 150**

‘Local plans are key to delivering sustainable development that reflects the vision and aspirations of local communities’

The vision and aspiration of Shadoxhurst Parish Council and the majority of village residents is that Shadoxhurst should remain a rural village, with its own separate identity and unique rural characteristics, including the retention of our dark skies. (As shown in the village survey and the Village Forum workshops).

Nowhere, to my knowledge, have residents of Ashford Borough, including Shadoxhurst, asked for their area to become an area of growth. Neither, to my knowledge, have we ever been asked if this is what we choose, nor have we been told that this is what we’re going to have imposed on us.

This is inconsistent with para 150 of the NPPF. The vision and aspirations of our village have been largely ignored.

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**Issue 1**

**NPPF para 155**

**‘Early and meaningful engagement and collaboration with neighbourhoods’**

Despite a clear and agreed village vision, there has been no collaboration with our planning authority. At a meeting requested with planners on 25/1/17, some residents and I expressed concerns about an omission site development included in the draft local plan. We explained that we had a village vision that we were wanting to develop, a longer term view that would be sustainable and beneficial for the village, but this involved maintaining a rural village identity and having some green spaces left, not becoming a dormitory suburb of Ashford. Planners seemed interested in this idea, and said for the future this would be something they would like to work with us on. Nevertheless this has never happened, yet whilst they did not collaborate with us, they did with the developer, re-designing the site and producing drawings. Planning permission was then granted before the local plan process could even be completed.

This lack of collaboration appears inconsistent with NPPF 155, have the relevant procedural requirements been met?

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**Issue 2**

**NPPF para 151**

**‘Local plans must be prepared with the objective of contributing to the achievement of sustainable development.’**

I can find no clear definition of what you mean by ‘sustainable development’ in the NPPF – so it is very difficult for people to interpret it.

Ashford LPA uses a ‘sustainability matrix’ when assessing potential sites for development. It is unclear how the matrix was created and whether there was any meaningful consultation about it with stakeholders.

In an effort to meet ever increasing housing targets the LPA has kept its sustainability criteria but now reduced the threshold. Surely something is either sustainable, or it is not. How can this be justified?

### **Issue 3**

#### **Policy HOU3a – residential windfall within settlements**

**Residential development & infilling of a scale that can be satisfactorily integrated into the existing settlement will be acceptable within the built-up confines of (Shadoxhurst)**

#### **5.39 ‘The scale & quantity of housing development proposed should not be out of proportion to the size of the settlement concerned and the level of services present’**

There is a lack of clarity – what does ‘satisfactorily integrated’ mean? is it talking about infrastructure, number of people & social cohesion, loss of the natural environment? Or what? Just reading this does not explain what the scale and quantity might be, and more importantly over what time frame, and how cumulative developments will be taken into account. Villagers do not know what to expect from this, so not a clear or effective policy at all.

#### **Policy HOU 5 – residential windfall in the countryside**

**‘Residential development adjoining or close to the existing built up confines...’**

No definition of ‘close’. This is a big problem for Shadoxhurst village, so close to Chilmington Green urban expansion. This may also conflict with SP7 which our village supports because we do not want to become part of Ashford urban area. HOU 5 is not clear or effective.

### **Issue 4 & issue 5**

#### **NPPF para 154**

**‘Local plans should be aspirational but realistic’**

For many years Ashford Borough Council has been unable to deliver its housing targets. Despite granting planning permissions, if market conditions aren’t right, developers won’t build. The council was complimented by inspector P W Clark for managing to achieve housing growth twice that of the surrounding areas during the recession – but it was still not enough. This resulted in government penalties being imposed (20% buffer) making it even harder for the targets to be achievable. This evidence alone should be enough to raise doubts as to whether or not the targets are realistic, especially as the housing numbers have now been increased.

In particular, with BREXIT just around the corner, **no one** has been able to say for certain how this will affect the housing market, is it realistic to expect that a Local Plan will be flexible enough to deal with unknown major changes caused by this unprecedented event?

How can such high housing targets be justified? To make the Plan sound, housing targets should be reduced from the outset. At present it appears inconsistent with NPPF 154.

### **EN4 16) iv**

Large parts of Shadoxhurst are intrinsically dark. In a village survey the majority of residents wanted to keep dark skies, it is important for our wildlife and part of our unique rural characteristics. Please include us in the dark skies area that already surrounds us on 3 sides.

### **Issue 10**

Policy SP7 – separation of settlements. This is a very important policy, but needs to be strengthened to be effective.

Shadoxhurst wants to remain a rural village and not be part of a homogenous dormitory suburb of Greater Ashford. Policy SP7 is unlikely to be effective in its present form, with no clear definition of what it even is. A mini green belt policy is needed to be truly meaningful. By keeping our village identity, and the sense of belonging that goes with this, we can continue to foster a real sense of community through our clubs and support networks. There are also tourism businesses within the village that thrive because of the existing nature of the settlement ( e.g. Green farm; Eversleigh Holiday Lodges etc).

Thank you for taking the time to read this.

Carol Procter