

Examination Of Ashford Local Plan 2030

Oral Examination Issue 15, 16 and 17 General Questions

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Representor Number - 652

Introduction

1. I have answered this section in relation to Tenterden.
2. In my opinion the plan has been positively prepared, is justified, effective and consistent with national policy, though some of the policies should be strengthened.

Topic Policies – General Questions

i) Does the Local Plan, when taken as a whole, include a strategy and policies designed to ensure that the development and use of land contribute to the mitigation of, and adaptation to, climate change?

3. See comments to COM2 below. Without a green lung plan for Tenterden, there will be **NO** environment protect such as mitigation to traffic pollutants. Once green lungs are build on, they are gone forever.

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 another ways of expressing the Council's intended approach within these policies?

Policy TRA3 (a) - Parking Standards for Residential Development.

4. These parking standards should also be applicable to windfall development. A large percentage of the homes in Tenterden only have on street parking. If windfalls can ignore off street parking, traffic congestion will become much worse which is already is already impossible to resolve in the broader context of Tenterden.
5. My only other comment is that all development proposals must have adequate off street parking, as Tenterden suffers badly from on street parking causing congestion and gridlock. Both parking and traffic congestion are not a solvable constraint in Tenterden, so everything must be done to increase off street parking.

Policy ENV9 Sustainable Drainage

6. The actual wording of the ENV9 policy is fine with one exception. It does not recognise that there are geological fault lines with natural springs that must be taken into account when considering the practicality of any Suds proposal. Tenterden is renowned for natural springs, which does cause serious surface water issues.

Policy COM2 Open Spaces

7. The borough has a formal open space strategy for Ashford town, whereas Tenterden today does not. It is long overdue that Tenterden has its own open space strategy that is adhered to by all.
8. Research by Fields in Trust has suggested parks and green spaces generate health benefits that would cost more than £34 bn if they did not exist.
9. Parks and green spaces minister Rishi Sunak Green says "spaces can improve overall health for all, including the young, isolated and the vulnerable".
10. Without this open space / green lung plan, it puts Tenterden at an immediate disadvantage when speculative developers apply for an application, or go to appeal to build on a greenfield site. This involves a lot of time and effort to be devoted by organisations such as CPRE and the Weald of Kent Protection Society. In the meantime, we are at serious risk of continuing to lose valuable, irreplaceable green space whilst we do not have an overall open space / green lung strategy.
11. There has to be a yin and yang - one for future housing development sites, the other for open / green space. These are not opposite plans but complementary, interconnected, and interdependent plans in the real world.
12. There has to be a balance that directs housing development in sustainable locations that central government would specify as the right locations.
13. It is obvious to numerous residents that Tenterden needs a hub and spoke approach to a network of green lungs. The recreation ground being the centre, radiates out with the conservation area and then to designated landscape sites such as Limes Land adjoining the countryside, which has its own wildlife and biodiversity designations.
14. Green lungs are so critical for towns such as Tenterden where available land is being built on. With the development of Tent 1, plus Tilden Gill, natural local spaces are being absorbed into the built up area.
15. With the increase of traffic that will be generated by Tent 1 and Tilden Gill, it is of greater importance to preserve existing green lungs and in particular corridors between communities for health and recreational reasons. Trees are very efficient at removing gaseous pollutant particle emissions from cars.
16. Improving air quality is a known priority for central government. Planned green lungs is one effective method as a positive action.
17. Limes Land is perfect to be designated as a local green space and the start of an overall open space designation.
18. A number of the following physical attributes (though not exclusive) should be used to identify open spaces between settlements and communities to support the well being of the town and the definition of character and separation of settlements within the town:
 - i. The land lies between communities
 - ii. Identity of which would be lost by coalescence
 - iii. Prevent an urban sprawl.
 - iv. The land is predominantly undeveloped
 - v. The land is predominantly open
 - vi. The land has clearly defined boundaries
 - vii. The land includes public footpaths or roads which provide a transition from one settlement/ community to another
 - viii. Ecological merit, landscape significance or heritage value
 - ix. Adjacent to countryside

iii) Does the Local Plan, when taken as a whole, adequately promote the health and well-being of the community?

19. Once there is an open space / green lung / green corridor plan for Tenterden, then the local plan will adequately promote and protect the health and well being of the community, together with the protection of rich biodiversity.

End of Submission