

Ashford local plan



Submission Version
December 2017



ASHFORD

Planning our future **together**

ASHFORD LOCAL PLAN 2030

SUBMISSION VERSION (DEC 2017)

This submission version of the Local Plan 2030 is a composite version of the Regulation 19 (June 2016 Publication version) and ‘Main changes’ to Regulation 19 (July 2017) documents.

This version also contains additional Minor Amendments made following the ‘Main Changes’ consultation, which are detailed in the separately published ‘Schedule of minor amendments’ for ease of reference.

Please note that paragraph numbering is consistent with the 2016 version of the plan, and any subsequent inserted paragraphs are shown in italics with temporary references. These will be standardised following adoption.

Where policy references have been amended or deleted following Regulation 19 consultation stages, these are detailed within the Schedule of Policies (Chapter 1)

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CHAPTER 2 - INTRODUCTION

- 2.1 This Local Plan establishes a policy and delivery framework that provides clear and firm guidance to ensure that the Council's aims for the Borough are achieved where they relate to issues of planning and land use. It covers the period between 2011 to 2030. The policies included within this Plan are consistent with the Council's Corporate Strategy, the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (PPG) and in being so go to the heart of what sustainable development is and how good place making can be achieved. They also form the strategic context within which any neighbourhood plan should operate.
- 2.2 This Local Plan covers the whole borough, except for the area covered by the Chilmington Green Area Action Plan, as shown on the Policies Map (See Chapter 7). Development proposals coming forward within the area covered by this Local Plan will be expected to adhere to the policies set out, as once adopted they will carry significant planning weight when it comes to the determination of planning applications. The Local Plan 2030 should be read and interpreted as a whole.
- 2.3 To be clear, this Local Plan supersedes the following:
- the saved policies within the Ashford Borough Local Plan 2000
 - Ashford Core Strategy 2008
 - Ashford Town Centre Area Action Plan 2010
 - The Tenterden and Rural Sites Development Plan Document 2010
 - The Urban Sites and Infrastructure Development Plan Document 2012
- 2.4 Once adopted, the Council's statutory development plan will consist of this Local Plan, the Chilmington Green Area Action Plan (2013) and any adopted neighbourhood plans. The Kent Minerals and Waste Local Plan 2013-2030 also applies.

Duty to co-operate

- 2.5 In preparing this Local Plan, the Council has sought to fully co-operate with neighbouring authorities and other relevant bodies to ensure that strategic cross-boundary issues have been addressed and that the Plan is deliverable. The approach to the 'duty' is set out in more detail in the 'Duty to Co-operate' Statement which forms part of the evidence base for this Local Plan. This process has been assisted through a memorandum of understanding between ourselves and all of the East Kent districts (Thanet, Dover, Shepway and Canterbury) which has meant that any cross-boundary strategic issues have been dealt with in an open and transparent way. This has assisted not only the formulation of this Local Plan but also the evolution of each of the district's respective Local Plans. Given the Borough's central location within Kent, the Council's West Kent neighbours have also been thoroughly consulted at key stages of plan preparation to ensure the 'duty' has been adhered to fully.

Consultation

- 2.6 Significant engagement and consultation has been carried out in the development of this Plan and its supporting evidence. This has included engagement with key stakeholders and public sector partners, responsible for delivering a range of services and infrastructure. The Plan has

also been subject to extensive public consultation, from the 'Plan it' exercises in 2013 to formal consultation throughout its evolution, including with Ward Members and Parish Councils on potential site allocations. Where appropriate, comments from the public have directly helped and shaped the contents of this plan and it should be viewed as a document that has had significant public input into its evolution.

Policies Map

- 2.7 This Local Plan is supported by an interactive online Policies Map which applies the relevant policies to the applicable spatial area within the borough. This includes showing the extent of the Borough's two Areas of Outstanding Natural Beauty (AONBs), its many ecological conservation and open space areas and proposed development site allocations. Details can be found in Chapter 7. This interactive map will be updated after the adoption of the Local Plan to ensure that it remains up to date (for example if new areas of open space are designated after adoption).

Neighbourhood Plans

- 2.8 This Local Plan sets out the strategic context within which any Neighbourhood Plan will operate. They must comply with national policy, with EU obligations and human rights requirements and with the strategic policies of the local development plan. For the purposes of neighbourhood planning, all policies within this local plan are considered strategic, not just those within the strategic policies section.
- 2.8.1 As of mid-2017, the Borough has seven designated neighbourhood areas at Wye with Hinxhill, Rolvenden, Bethersden, Boughton Aluph and Eastwell, Pluckley, Hothfield, Charing and Egerton. The Neighbourhood Plans for these are at various stages in their evolution, with Wye with Hinxhill and Pluckley now adopted. Where Neighbourhood Plan Areas had been established early on in the preparation of this Local Plan, proposals to allocate sites within these areas fall to the neighbourhood plan, where they are non-strategic in nature. Rolvenden is committed to allocating land for 40 dwellings and this is therefore included within the Housing Trajectory. Hothfield, Charing and Egerton are more recent designations and it has therefore been necessary for the Local Plan to consider and make site allocations within those parishes, where appropriate. That should not exclude those parishes from considering additional proposals for addressing the equivalent (or greater) amount of development through their Neighbourhood Plans.
- 2.9 The Borough Council intends to work closely with those parishes producing Neighbourhood Plans to ensure that such Plans are consistent with both government planning policy and all policies contained within this Local Plan in order that they may pass the 'basic conditions' test that Neighbourhood Plans are subject to at their examination stage.

Key Evidence

- 2.10 The Local Plan 2030 has been influenced by a range of evidence which are background documents to the Plan itself. A full list of the evidence base is included at Appendix 2. The key evidence that supports this Plan is summarised below:

The Corporate Plan (2015)

2.11 This document sets out the Council's vision for the Borough up to 2020 and how the Council intends to realise that vision. It established the following 4 priorities:

Priority 1: Enterprising Ashford: economic investment and growth: To promote growth and achieve greater economic prosperity for Ashford borough. We will work to secure inward investment to create a wide range of jobs carried out by a highly skilled workforce.

Priority 2: Living Ashford: quality housing and homes for all: To secure quality homes across the borough, catering for a range of ages, tenures and need, in well planned and attractive new places.

Priority 3: Active and creative Ashford: healthy choices through physical, cultural and leisure engagement: To provide or enable a range of quality leisure and cultural activities where people can make healthy and affordable lifestyle choices and enjoy assets that create attractive, desirable and active communities.

Priority 4: Attractive Ashford: countryside and townscape, tourism and heritage: To achieve an environment that creates higher standards of public space design, alongside improved standards of presentation of key green spaces. To safeguard and conserve our local heritage and areas of outstanding landscape quality to ensure the very best attractive environment with thriving and vibrant town centres

Sustainability Appraisal and Strategic Environment Assessment (SA/SEA)

2.11.1 An appraisal of the economic, environmental and social impacts of the Local Plan, prepared from the outset of the preparation of the process. The approach and policies listed in this Local Plan have been appraised to ensure that they accord with the principles and objectives identified within the sustainability appraisal, which includes SA addendums published alongside the Proposed Main Changes and Submission versions in 2017. This has included assessment of options in terms of the levels of development proposed, the strategic distribution of development and specific site allocations. The Environmental Report demonstrates that the approach set out in this Plan is the most sustainable options, when considered against the reasonable alternatives.

Habitats Regulations Assessment 2017 (HRA)

2.11.2 This Plan has been subject to a Habitats Regulations Assessment which has examined all the policies of this Plan in order to ascertain whether they are likely to have a significant, adverse, effect on the integrity of European Sites, protected under international law for their wildlife and/or landscape importance, both within, and in vicinity of, the Borough. This is an updated version of the Habitat Regulations Assessment 2016 and is published alongside the Submission version (2017).

Strategic Employment Options Report 2012 (SEOR)

- 2.12 This SEOR considers and sets out a number of potential scenarios for economic growth in Ashford Borough to 2030. It forms the evidence base that informs the setting of the jobs target within this Plan.

Strategic Housing Market Assessment 2014, 2015 and 2017 (SHMA)

- 2.13 The purpose of the SHMA is to develop a robust understanding of housing market dynamics, to provide an assessment of future needs for both market and affordable housing and the housing requirements of different groups within the population. The SHMA covers Ashford's Housing Market Area (HMA) and deals with the specific needs of the Ashford HMA. It provides a 'policy-off' assessment of future housing requirements, considering housing need and demand and also provides specific evidence and analysis of need and demand of different sizes of homes. In 2016, the Department for Communities and Local Government (CLG) published new 2014-based household projections which created the need for an update to the SHMA, which was undertaken and published in 2017.

Strategic Housing and Employment Availability Assessment (SHELAA)

- 2.14 The SHELAA identifies and assesses the potential availability of land for new development in Ashford. It assesses the individual and combined potential capacity of sites that are considered to be deliverable or developable for housing and economic development over the plan period. This results in the identification of a future supply of land in the borough that may be suitable and available for development. The SHELAA is updated annually.

Employment Land Review 2016 (ELR)

- 2.15 The ELR assesses the Borough's employment sites with regard to their suitability and market attractiveness and their development potential and capacity. It analyses the current provision of employment land and sites in the Borough and potential sites which have been considered for allocation.

Whole Plan Viability

- 2.16 In line with the requirements of the NPPF, this Local Plan is supported by whole plan viability evidence which has tested the policies which have a direct and additional 'cost' to the development industry to ensure that the policy framework set out - at the macro level - can be delivered in a viable way and can achieve a reasonable return. In doing so, the strategic policies and approach as set out in this Local Plan can be considered viable within a whole plan viability context and therefore promotes a 'sound' planning approach.
- 2.17 This evidence has explored a range of factors and layers of evidence including, the level of S106 contributions the Council has historically collected, and which are likely to be collected in the future, the additional and assumed costs to the industry arising from new policy areas, the scale and type of infrastructure needed to support and mitigate new development and the land values and returns to the industry in various spatial areas within the Borough.
- 2.18 The outputs of this work has clearly shaped the policies in this Plan, in particular the affordable housing policy.

Infrastructure Delivery Plan (IDP) (2016)

- 2.19 This iterative document sets out the infrastructure that is required to be delivered to support the planned development up to 2030. It has been informed by discussion with key providers and identifies (where known) how and when this infrastructure might be delivered and to what extent new development is directly reliant on its delivery as a means of prioritising the required infrastructure. The IDP has been updated to reflect the Proposed Main Changes 2017.

Working in partnership

- 2.20 The Council accepts that partnership working and co-operation is essential to deliver the vision and the future aspirations set out above. The following lists out the key arrangements that are in place to promote joint working:

South East Local Enterprise Partnership (SELEP)

- 2.21 The SELEP is the key body determining strategic economic priorities and investments for the area which includes East Sussex, Essex, Kent, Medway, Southend and Thurrock. The Borough has already benefited from significant funding for projects through the SELEP Growth Plan and Local Growth Fund, including major contributions towards Junction 10a, Chart Road and Ashford College.

Ashford Strategic Delivery Board

- 2.22 Set up to support the delivery of (initially) eight priority projects which are seen as crucial to the future economic growth and prosperity of the Borough. The board comprises of Ashford Borough Council and other key public sector partners including Kent County Council, the Homes and Communities Agency, Skills Funding Agency, Arts Council England, the Highways Agency and Ashford College. The local Member of Parliament is also a Board member and the Board has a good track record in helping to get projects delivered and funded.

Kent County Council

- 2.23 The Borough and County Council have already achieved a lot by working together on projects over recent years. This approach is reflected in the 'Delivery Deal' signed by both Council - a formally agreed statement of the Council's shared commitment to work together in key areas. This is the first such agreement in Kent. A District Deal board oversees delivery of the agreed projects. .
- 2.24 The Delivery Deal provides the framework to focus on the delivery of the 'big 8' projects as well the coordinated delivery of range of services including economic development, housing, strategic planning, the environment, property and asset management, highways, transport and wastes and culture, town centre management and health and wellbeing.

Ashford Health and Wellbeing Board

- 2.25 A sub-committee of the Kent Health and Wellbeing Board. The aim of the board is to improve the health and wellbeing of Ashford's residents through joined up commissioning

across the National Health Service, social care, borough council, public health and other bodies relevant to the health and wellbeing sector

Formal Review of the Local Plan

- 2.26 This Local Plan is intended to be formally reviewed, to ensure that the wider policy position is suitably up to date and the development envisaged - and supporting infrastructure - has been delivered. It is intended that the review will be adopted by 2025. This period of time provides the right balance between providing enough time to allow the policy framework to be implemented by the market and to give them certainty, with the inevitable need to respond to change as time goes by. However, should circumstances dictate, such as significant undersupply of housing delivery or the non-delivery of key infrastructure (namely Junction 10a) then an earlier formal review will be undertaken.
- 2.27 This will ensure that the Council can provide a suitable policy base to deal with the circumstances as needed in a plan led way - a key requirement of the NPPF.

CHAPTER 3 - STRATEGIC POLICIES

Vision and Strategic Objectives

- 3.1 National planning policy is very clear that there is a presumption in favour of sustainable development. Finding what is sustainable development relies on a careful balance between economic, social and environmental factors and the National Planning Policy Framework gives guidance how to achieve this. It also makes it clear that Local Plans are the key to delivering sustainable development in a way that reflects the vision and aspirations of local communities.
- 3.2 This approach lies at the heart of this local plan. The Plan seeks to achieve each of the economic, social and environmental dimensions of sustainable development in a way which avoids significant adverse impacts by mitigation or compensatory measures.
- 3.3 The plan sets out the spatial implications of economic, social and environmental change and identifies opportunities for development. It has been based on early and meaningful engagement and collaboration with local communities and a range of other stakeholders. The plan aims to reflect a collective vision and a set of agreed priorities for the sustainable development of the Borough, including those contained in any neighbourhood plans.
- 3.4 The plan is positive, realistic and is focused on delivery.

The Vision

- 3.5 The following sets out the vision for Ashford Borough in 2030.

3.6 Ashford Borough will meet its housing and employment needs, and take account of the needs of investors, through the provision of new high quality development forming attractive places, with the necessary supporting infrastructure and services, and in sustainable and accessible locations that take account of the Borough's environmental constraints.

3.7 The town of Ashford will continue to be the main focus for development with the regeneration of the town centre and areas where there are existing environmental and social issues and the creation of attractive and vibrant new communities on the periphery of the town.

3.8 A regenerated Ashford Town Centre will expand significantly its leisure, cultural, educational and residential offer. A new Commercial office Quarter next to the railway station will be a major economic impetus for the area, helping to substantially increase employment, trigger more spending in the town centre economy, and improve wage rates and skills levels. The town centre's heritage will be conserved and enhanced alongside quality new public realm reflecting the various different character areas.

3.9 Tenterden will continue to serve the south western part of the Borough as a principal rural service centre with a strong offer of shops and services, conserving and enhancing its historic centre and accommodating development of a suitable scale, design and character.

3.10 The other rural service centres of Charing, Hamstreet and Wye will remain important providers of local 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. Development within all the rural settlements must conserve and enhance the historic centres and heritage and natural assets.

3.11 The identity and attractive character of the Borough's rural area, with its range of attractive settlements, wealth of heritage assets and its expansive countryside, including the Kent Downs AONB to the north and the High Weald AONB to the south, will be conserved and enhanced.

3.12 The Boroughs green spaces will be protected and enhanced to serve expanding populations including two new strategic parks at Ashford and the promotion of sporting and recreational hubs in accessible locations; the retention of flood storage areas; reinforcement of wildlife corridors and an improved cycle network to foster healthier lifestyles for residents and workers.

3.13 A positive approach to adapting to, and mitigating against the effects of, climate change will be secured by promoting sustainable transport, sustainable energy technologies, and encouraging sustainable building design; avoiding development in areas at greatest risk of flooding; protecting and enhancing green networks; carefully considering the location, layouts and design of new housing; promoting sustainable drainage and challenging water efficiency standards.

3.14 In order to deliver the vision, a number of strategic objectives have been developed, as set out in Policy SP1 below.

Policy SP1 - Strategic Objectives

To deliver the Vision, a number of strategic objectives have been identified. They form the basis of this Local Plan's policy framework, as well as providing the core principles that planning applications are expected to adhere to.

- a) To focus development at accessible and sustainable locations which utilise existing infrastructure, facilities and services wherever possible and makes best use of suitable brownfield opportunities**
- b) To conserve and enhance the Borough's natural environment including designated and undesignated landscapes and biodiversity and promote a connected green infrastructure network that plays a role in managing flood risk, delivers net gains in biodiversity and improves access to nature;**
- c) To conserve and enhance designated and non-designated heritage assets and the relationship between them and their settings in a way that promotes distinctive places, proportionate to their significance. Place-based heritage will be a key principle underpinning design and spatial form of development;**
- d) To create the highest quality design which is sustainable, accessible, safe and promotes a positive sense of place through the design of the built form, the relationship of buildings with each other and the spaces around them, and which responds to the prevailing character of the area;**
- e) To ensure development is supported by the necessary social, community, physical and e-technology infrastructure, facilities and services with any necessary improvements brought forward in a co-ordinated and timely manner;**
- f) To promote access to a wide choice of easy to use forms of sustainable transport modes, including bus, train, cycling and walking to encourage as much non-car based travel as possible and to promote healthier lifestyles;**
- g) To provide a mix of housing types and sizes to meet the changing housing needs of the Borough's population, including affordable homes, self build and custom build properties, specialist housing for older and disabled people, accommodation to meet the needs of the Traveller community, spacious, quality family housing and for newly forming and downsizing households;**
- h) To provide a range of employment opportunities to respond to the needs of business, support the growing population and attract inward investment; and**
- i) To ensure new development is resilient to, and mitigates against the effects of climate change by reducing vulnerability to flooding, promoting development that minimises natural resource and energy use, reduces pollution and incorporates sustainable construction practices, including water efficiency measures.**

Strategic Development Requirements:

3.15 Strategic Development Requirements

- 3.15.1 The starting point for the approach is the National Planning Policy Framework (NPPF) and the guidance contained within the national Planning Practice Guidance (PPG). At its core, the NPPF sets out that there is a presumption in favour of sustainable development.
- 3.15.2 Although paragraph 14 of the NPPF defines what this means in overall terms, there are a number of references throughout the NPPF and PPG, which taken together are relevant to how this ambition is achieved. These include social, economic and environmental factors; access to infrastructure and services (or the ability to suitably provide such provision); ensuring that development can be delivered and is viable and ensuring that development is phased in an appropriate way.
- 3.15.3 The role of this Local Plan is to provide a policy framework that reflects all of these factors – effectively setting out what sustainable development is within the context of the borough. This includes specifically planning to meet the objectively assessed housing needs of the borough with flexibility. These considerations have been applied as a series of layers and have been informed by the evidence base that supports the Plan.

3.16 Objectively Assessed Housing Need

- 3.16.1 The NPPF and the supporting PPG set out that local planning authorities are required to identify their own objectively assessed housing need (OAN). It stipulates that a Strategic Housing Market Assessment (SHMA) should be the primary vehicle by which to determine the OAN figure.
- 3.16.2 In 2014, the Council commissioned consultants who prepared an NPPF compliant SHMA. This work was updated in 2015 and more recently in 2017 to take account of new and more up to date demographic projection data – an approach that is consistent with PPG.
- 3.16.2 The SHMA identifies the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period to meet household and population projections, taking into account migration and demographic changes and addressing the need for all types of housing, including affordable housing. It identifies that:
- Ashford has a relatively contained housing market area that largely reflects the borough boundary,
 - a total of 14,934 dwellings are needed between 2011-2030 to cater for the 2014 sub-national population projections,
 - around 45% - 50% should be affordable housing.

3.17 Market signals

- 3.17.1 The National Planning Practice Guidance sets out that upward adjustments should be made to housing need figures where affordability is an issue – as is the case in Ashford. There is no nationally identified standard as to what this uplift figure should be. The 2017 SHMA takes this into account and suggests that a 5% uplift is appropriate for Ashford based on an assessment of market signals, affordability, past delivery rates and likely future delivery

rates. This equates to an OAN of 15,675 dwellings being identified between 2011 and 2030, equating to 825 dwellings per annum.

3.18 Economic considerations

- 3.18.1 Another key consideration in the formation of the OAN is the relationship between housing and job creation. In 2012, the Council commissioned economic forecasting work to establish the likely growth in job numbers over the Plan period and the sectors most likely to experience expansion of employment opportunities in the local area. The forecasting reflected both macro-economic factors and more localised issues. It identified four potential economic scenarios for the borough, ranging from a ‘downside risks’ scenario at the lower end to an ‘enhanced performance’ scenario at the top end.
- 3.18.2 The initial assessment that a ‘downside risks’ scenario was most likely (reflecting a reduced rate of job growth in the borough over the Plan period) has since been reassessed by the Council based on the national economic recovery towards modest but sustained economic growth. As a consequence, a job creation rate based on a ‘baseline’ trajectory (i.e. a continuation of job creation in the borough at rates that are largely pre-recession) was considered to be the most robust and realistic scenario. The 2017 SHMA OAN figure reflects a housing target beyond that needed to fulfil this economic ambition.

3.19 Finalising a Housing Target for the Local Plan

- 3.19.1 The NPPF and supporting PPG establishes that a range of factors need to be taken into account to determine the eventual housing target for the area, to be identified through a Local Plan. The text below explains how the housing target for this Local Plan has been established.

3.20 Future proofing

- 3.20.1 The SHMA outcomes set out above already take account of some future in-migration flows to Ashford from London. However, advice received from the Council’s consultants suggests that demographic modelling for additional migration flows from the capital, of 34 dwellings per annum, could also be applied from 2017.
- 3.20.2 This reflects the current prediction by the Greater London Authority that out-migration from London will return to pre-recessionary levels soon and therefore districts with accessible links to London such as Ashford should plan for this rebalancing back to what were ‘normal circumstances’. This is considered a sound aspiration for this Plan given Ashford’s HS1 links to London.
- 3.20.3 These additional dwellings do not form part of the OAN figure. They are also not seeking to meet any unmet need from London. However, the Council considers that it is a sound planning approach to add these additional 442 dwellings to the overall housing target for the Local Plan.

3.21 Duty to Co-operate

- 3.21.1 As mentioned elsewhere, the Council has fully engaged neighbouring Districts in the preparation of this Plan, recognising the proposed housing development strategies in the emerging Local Plans in those districts. In particular, the proposed Plans in Canterbury and Maidstone Districts, where there are very minor geographical housing market overlaps with Ashford borough, are intending to meet, at least, their respective OAN housing requirements.

At the time of publishing this Local Plan, no other District has an outstanding request to this Council to assist meeting any unmet housing need in their area.

3.21.2 Therefore, there is no need for the housing target in this Plan to be adjusted to reflect an unmet housing need from either within the Housing Market Area or beyond.

3.22 Viability and deliverability

3.22.1 Although viability and deliverability are linked to aspects of social, environmental, economic and other relevant considerations (such as infrastructure provision), the NPPF makes it very clear that these are significant considerations in their own right. This includes a reasonable assessment of market conditions – both at a macro-scale and of the local housing market, including land and sales values in different parts of the borough and for varying forms of residential development, plus analysis of how different types of sites may be able to come forward for development.

3.22.2 The policies and strategic site allocations within this Local Plan have been assessed within the context of whole plan viability to ensure that they do not place an undue burden on developers and therefore can realistically be delivered. Flexibility is also applied within the policy framework through a policy approach which gives schemes the optimum opportunity to still come forward where viability can be independently verified as a constraint to development occurring.

3.22.3 In reaching an appropriate housing target for the Plan, the viability evidence supporting the Plan is clear that seeking to meet the proportion of the OAN figure that the SHMA indicates is ‘affordable housing need’ would not be viable as a policy requirement and would render residential development in the borough undeliverable.

3.22.4 In order to fully meet the affordable housing requirements identified in the SHMA through site allocations would necessitate an increase in the housing target of over 6,000 dwellings. In turn, this would require housing delivery hugely in excess of any annual level of housing completions the market has ever achieved in the borough. This is not a realistic or deliverable scenario, notwithstanding the significant environmental implications of this scale of growth over such a relatively short period of time.

3.23 Constraints and Context

3.23.1 The PPG sets out that an understanding of the strategic constraints and context of an area is relevant to the setting of an individual LPA’s housing target in a Local Plan.

3.23.2 Ashford’s previous role as a regional Growth Area in the now revoked South East Plan was predicated on extensive improvement of the town’s infrastructure, most notably in strategic highway capacity. Key infrastructure has been delivered in recent times (e.g. the upgrade to M20 junction 9 and Drovers roundabout). However, there remain critical constraints to strategic growth in the short term at both M20 Junction 10 and along the A28 corridor to the west of the town that directly impacts upon the scale of development that can be safely accommodated on the strategic highway network.

3.23.3 There are clear proposals to bring forward schemes to alleviate these constraints (see Infrastructure chapter) but the ability to bring forward some developments in Ashford in the short term is affected. Therefore, in the short to medium term, there are limitations to the

scale and rate of development that can be delivered in and around Ashford – the Borough’s principal town and most sustainable location. This clearly influences the Council’s strategy for development in this Plan in terms of the phasing of housing delivery – this is covered in more detail below.

3.23.4 Crucially, these constraints do not mean that the overall housing target established for this Local Plan cannot be met over the Plan period, merely that there is a need to properly phase development over the early years of the Plan (see section below).

3.23.5 In environmental terms, the Borough enjoys a wide range of environmental ‘assets’ that contribute greatly to its overall character and attractiveness. Two Areas of Outstanding Natural Beauty are complemented by large areas of unspoilt countryside which, although without a formal landscape designation, are rightly valued in their own right. Watercourses across the Borough provide examples of rich areas for biodiversity whilst also providing natural areas for flooding along their lengths.

3.23.6 Natural environmental assets are complemented by the quality of the built environment with a number of attractive settlements, hamlets and farmsteads contributing to the overall character of the area. In addition, 43 Conservation Areas, over 3,000 Listed Buildings and numerous other heritage assets help to create the Borough’s rich character.

3.23.7 All of these environmental factors have been taken into account when determining the housing target and strategy for growth in this Local Plan.

3.24 Identifying a housing buffer

3.24.1 In preparing this Local Plan, the Council has liaised with landowners, developers and house-builders on a number of key sites within the Borough to ascertain their intentions on likely housing delivery rates on those sites. This is reflected in the housing trajectory Appendix 5 which supports this Local Plan.

3.24.2 However, these intentions relate to current market conditions and these can fluctuate over the plan period. Given this, the Local Plan identifies a supply of housing land that is additional to that needed to deliver the housing target set out below. Identifying a ‘buffer’ provides choice and competition for the market across the whole plan period, whilst remaining within the wider umbrella of sustainable development as a whole.

3.24.3 The housing buffer helps to provide greater certainty that the overall housing target can be delivered. It does not relate to meeting any wider unmet need, nor should it be considered part of the Council’s OAN figure. It sits outside of this figure and as such should not be used as the figure on which to base any future 5 year housing land supply calculations.

3.25 Housing Windfalls

3.25.1 Paragraph 48 of the NPPF allows unidentified windfall sites to be taken into account based on the Strategic Housing and Employment Land Availability Assessment (SHELAA), historic windfall delivery rates and future expected trends.

3.25.2 With regards to the SHELAA, over 700 sites were assessed following a ‘call for sites’ exercise in 2014, with over 200 sites progressing to the final stage of assessment.

3.25.3 Completions data over the last 10 years show a strong and consistent rate of windfall housing delivery with an average of 167 dwellings completed each year. It is highly likely that this consistent rate of delivery will continue and indeed may well be exceeded. There are a number of reasons for this:

- the various extensions to permitted development rights via the prior approval process to allow conversions on various property types to residential use;
- the NPPF’s presumption in favour of sustainable development; and
- the Local Plan’s proposed windfall development policy which is more permissive than the equivalent policy in previous Local Plans.

3.25.4 Based on these factors it is assumed that an additional 950 units will be delivered from windfall sites between 2021 and 2030, at an annual rate of 100 dwellings per year, well below the historic trends for windfall completions. This is in addition to the 749 housing windfalls that currently have planning permission.

3.25.5 Within the context of the issues discussed above, the Sustainability Appraisal of the Plan has tested different levels of housing growth to assist in the determination of a housing target. This evidence shows that the full housing need of the Borough can be met through a housing target (plus a reasonable buffer) figure that is at an overall level that can still be considered sustainable within the context of social, environmental and economic factors.

3.26 The Housing Target

3.26.1 Based on the factors above, an overall Housing Target for the Borough of 16,120 dwellings to be delivered between 2011 and 2030 has been established. Factoring in completions since 2011, this figure is reduced to 12,943 between 2017 and 2030. The overall breakdown of this figure can be viewed under table 1 below.

Table 1 – The overall housing profile

Objectively Assessed Need	15,675
Future Proofing	442
The Housing Target (2011-2030)	16,120
Delivered since 2011	3,177
Residual Requirement	12,943
Extant commitments (previously allocated sites – some with permission)	3,001
Extant windfalls*	749
Chilmington Green	2,500
Future Windfalls	950
Proposed Allocations**	6,749
TOTAL	13,949
Contingency buffer	1,006

**Those not started have been reduced by 25% to account for potential non-delivery*

***Including re-allocated sites without permission and assumed contribution from Neighbourhood Plans.*

3.27 Distribution of Housing Development

- 3.27.1 Historically, larger scale residential development in the Borough has been targeted towards the town of Ashford. All recent iterations of previous Local Plans, County Structure Plans and the South East Regional Plan gave clear and distinctive spatial guidance that focused growth towards Ashford and its immediate surroundings whilst applying a policy of limited growth to Tenterden and the main villages in the borough.
- 3.27.2 In some instances, such as the Core Strategy 2008, there have been separate and distinctive housing growth targets for Ashford and the 'rest of borough' respectively. This recognised both Ashford town's role as an economic hub in the wider south east region and the Borough, as well as the need to protect the more sensitive nature of the rural area.
- 3.27.3 The abolition of regional planning and the introduction of the NPPF and PPG changes the higher level context fundamentally. There is no longer a higher level plan that pre-determines the amount of development each part of the Borough should deliver. However, it is clear that, in principle, the strategic spatial objectives of the previous approach are sound in planning terms and represent a policy approach that clearly resonates with the NPPF and its desire to deliver sustainable development.
- 3.27.4 Various growth model scenarios have been tested through the sustainability appraisal. This evidence shows that:-
- an appropriate balance of housing distribution is needed. Focusing most development towards Ashford and its periphery with proportionate development elsewhere provides the maximum benefits in terms of the social, environmental and economic factors;
 - moving away from the broad distribution strategy identified below can quickly lead to unsustainable development, imbalanced communities and harm to the environment;
 - the countryside is not a sustainable location for large scale development, unless certain exceptional criteria or circumstances apply which make it so within the context of the NPPF (e.g. garden cities or villages).
- 3.27.5 With the above in mind – and taking into account a number of the considerations listed in the section above relating to overall housing numbers - the following distribution of housing development is proposed.

3.28 Development at Ashford

- 3.28.1 As the Borough's principal settlement, Ashford represents the most sustainable location within the Borough and therefore where most development should be located. Ashford is home to about half of the Borough's population and where a large proportion of local jobs are located and plans for future economic growth concentrated. There are a wide and full range of local services available within the town centre and the various neighbourhoods that make up the wider urban area and the town caters for its own residents' needs and those living in a wider rural hinterland. The town has expanded very significantly in recent years and plays an important role in the sub-regional economy of East Kent.

- 3.28.2 Ashford has always been a well-connected town in Kent with rail connections in 5 directions but since 2009, its prime location on the HS1 rail link to London St Pancras has resulted in a step-change in reducing journey times to the capital via the major new growth locations at Ebbsfleet and Stratford. The town straddles the M20 motorway with two junctions providing quick access to the national motorway network and London or to the coastal towns, and also to the Continent via Dover and the Channel Tunnel. The Eurostar rail service provides direct international rail connections from Ashford International station to Paris, Brussels and other Continental destinations. Connectivity within the town via the regular bus services and extensive pedestrian and cycleway network is also a major attribute for new development to benefit from and contribute towards.
- 3.28.3 Aside from a limited number of development opportunities in the Town Centre (Policy SP5 of this Plan), the existing urban area of Ashford provides relatively few opportunities for development on a significant scale. The major available brownfield sites in the town have been identified for redevelopment in the existing development plans, and many have planning permission or are under construction. Existing green open spaces within the urban area play important recreational and environmental roles in those neighbourhoods and so would not be suitable for allocation unless there were exceptional and specific local circumstances. Therefore, the existing urban area cannot play a major role (town centre apart) in accommodating new development outside those existing sites and allocations which may be brought forward.
- 3.28.4 The principal opportunities for new growth lie on the edge of the existing built up area of Ashford through carefully managed and planned growth. Here, although a number of well established environmental constraints exist in the form of the Kent Downs AONB and the floodplains of the Great and East Stour rivers, there are locations adjoining the town that could accommodate new development without undermining the wider environmental objectives of this Plan.
- 3.28.5 As such, a realistic scale of development on the periphery of Ashford has been identified through the allocation of a number of sites which have the ability to be well integrated with the existing town and / or committed schemes. This approach has been influenced by a number of important factors, including the implementation of the Chilmington development across the Plan period, the availability of additional motorway junction capacity that is due to be created by the construction of the proposed M20 Junction 10a and the need to ensure a consistent supply of available housing sites to cater for different elements of the market.
- 3.28.6 It is considered that a strategy that relied too heavily on a small number of very large sites, such as Chilmington Green, to achieve the Borough's development targets would not be sufficiently flexible and instead a more balanced approach that seeks to distribute new development across more locations is preferred. This distribution also takes account of the presence of existing strategic infrastructure and services and the ability to deliver new facilities as part of new sites that can come forward in the short to medium term. Similarly, a strategy that focuses on a larger number of small sites around Ashford would fail to deliver the critical mass and a comprehensive approach to master planning and the delivery of services that larger sites can achieve.

3.29 The Strategic Road Corridors

- 3.29.1 The NPPF is clear in its desire to promote housing development which has good access to services and facilities, does not require significant infrastructure to deliver it and can be delivered early.
- 3.29.2 With this in mind, the Local Plan – following an assessment of the main road corridors which enter Ashford and the ability to maximise the use of the public transport services to Ashford this presents - identifies a few appropriately scaled housing sites near to Ashford along the A20. These sites have excellent access to the main local road network and are sites that do not adversely impact on the local landscape in a way that outweighs the benefits. Suitably scaled and designed housing development here would be consistent with the prevailing character of the built form along this part of the A20.
- 3.29.3 As part of the evolution of the Plan, the Council have confirmation from the landowners that these sites can come forward in the early years of the plan, on account of them being relatively unconstrained and by virtue of requiring little in the way of new infrastructure provision.
- 3.29.4 Providing potential development sites along this corridor introduces an additional offer to the market in terms of the types of land being promoted for development within the Borough, complementing the sites in the Town Centre, those within and adjoining the urban area and the sites on the periphery of rural settlements. Providing this variety is seen as a way of giving choice to house builders and broadening the scope of housing opportunities in the Borough.

3.30 Development at Tenterden

- 3.30.1 Although only about one-tenth the size of Ashford, Tenterden is the second largest settlement in the borough and its only other town. It plays a main rural service centre role for much of the south-western part of the borough. It is an attractive, historic town which is relatively well served by shops and services and is an important tourist destination which contributes greatly to the rural economy of the Borough.
- 3.30.2 Development at Tenterden is constrained by the High Weald AONB which surrounds it on three sides and a high quality, well-preserved Conservation Area in its heart that gives Tenterden its distinctive character. Traditionally, Tenterden has been the focus of relatively small-scale ‘organic’ growth which has been usually more on a village-type scale than the scale of allocations at Ashford. However, the Core Strategy identified increased levels of development for Tenterden and the Tenterden & Rural Sites DPD allocated a significant development area to the south of the town centre (TENT1) for which the first phase is under construction.
- 3.30.3 The high quality of Tenterden’s landscape setting and its intrinsic historic character are factors that suggest that new development in the town should be limited, phased and very carefully planned. Therefore, no more major new development is planned in Tenterden itself, apart from the completion of the master planned southern extension to the town and the permitted extension to housing at Tilden Gill Road on the Shrubcote estate. Combined, these

can fulfil the town's development needs over the Plan period without adversely affecting the character of the town.

3.31 Development at villages

- 3.31.1 The Borough is home to a wide range of smaller rural settlements which play a key part in establishing its overall character. Many lie in attractive and /or designated landscape settings and contain areas of historic value. Some fulfil a local service centre role and have a range of key local facilities such as a primary school or a post office or shop that helps to meet everyday needs.
- 3.31.2 The government's policy for development in rural settlements has changed since the advent of the NPPF and its supporting Planning Practice Guidance. Now, the ability of development in one village to support services in a nearby village could be considered sustainable.
- 3.31.3 In line with this approach, the Local Plan proposes an allocation strategy that has been assessed against a broad range of issues, promoting suitable sites that can provide a range of housing opportunities across the Borough. This approach gives considerable weight to more 'local' factors and takes account of recent rates of development in different villages whilst encouraging the small-scale evolution of some smaller settlements which might otherwise stagnate. Overall, the strategy seeks to direct new development towards the most sustainable villages where services are more extensive and well established and public transport connectivity is greatest, consistent with the thrust of the NPPF.
- 3.31.4 In making Local Plan development allocations, the Council is also cognisant of several emerging Neighbourhood Plans being promoted by Parish Councils. The Council has worked closely with these parishes to ensure that their plans are consistent with the proposed strategy for development set out in this Local Plan and has encouraged them to include an appropriate scale of local development allocations in their respective Plans. The current scale of these allocations is included in the Housing Trajectory at Appendix 5.

3.32 Development in the wider countryside

- 3.32.1 One of the NPPF's core planning principles is to recognise the intrinsic character and beauty of the countryside, although it is clear that this should not be interpreted as applying a blanket restriction on new development. Isolated new homes should be resisted, unless proposals meet the particular exception tests set out in the NPPF, but there may be scope for the potential re-use of suitable brownfield sites and there is a need to consider potential economic or tourist related development that will benefit the wider rural economy of the borough. In fact, the attractiveness of the Borough's countryside is an important aspect of the economic potential of the Borough, especially of the rural economy, and a significant income generator for the Borough as well as providing a fundamental part of the character that makes Ashford a pleasant place to live and work.
- 3.32.2 Therefore, except for a handful of very minor site allocations dealing with gypsy and traveller accommodation and the desire to deliver some 'exclusive' homes within the Borough, the Council does not propose to allocate residential development sites in the wider countryside away from existing villages as such locations will be usually be more environmentally sensitive and less sustainable in respect of access to services and reasonable road or rail

access. Instead, development in the countryside should be controlled through appropriate topic-related policies which are set out elsewhere in this Plan.

3.32.3 There are two Areas of Outstanding Natural Beauty (AONBs) in the Borough – the Kent Downs and High Weald. These are statutory designations of national importance where the conservation of the natural beauty of the landscape and countryside is the primary objective. The Council has a statutory duty to protect the character of the AONBs and major developments will not be permitted in AONBs unless there are exceptional circumstances where a need is proven, no other sites or alternative provision are available and any detrimental impact on the landscape and environment can be moderated. Also, development located outside an AONB but which would have a significant adverse effect on the setting of the AONB will also be resisted.

3.33 Phasing and Delivery

3.33.1 The final strand relating to the promotion of sustainable development within the Borough is its phasing and delivery.

3.33.2 The NPPF is clear in its desire to ‘significantly boost’ housing supply, within the context of meeting Objectively Assessed Housing needs, alongside setting out a requirement for authorities to maintain at least a 5 year housing land supply.

3.33.3 The NPPF is clear in its overall desire to deliver development that is sustainable and sets out that the economic, social and environmental planning roles need to work together in order to achieve this ambition. The Planning and Compulsory Purchase Act 2004 (section 39 (2)) also states that Local Plans must be drawn up with the objective of contributing to the achievement of sustainable development.

3.33.4 The phasing and delivery strategy for this Local Plan is explored below and has been informed by various layers of evidence. It should be read in conjunction with the distribution strategy above and the housing trajectory that supports this Plan, see Appendix 5.

3.34 The Borough’s profile

3.34.1 Ashford Borough contains two distinct areas that exhibit clear and differing characteristics in planning terms. Ashford is clearly the most sustainable location within the Borough and therefore the most suitable location at which to deliver the majority of new housing growth. In comparison, the Borough’s rural area is much more sensitive and too much housing growth would quickly lead to an unsustainable model of housing development overall.

3.34.2 These characteristics are clearly evidenced in the accompanying Sustainability Appraisal to this Plan and are reflected in the Plan’s distribution strategy which identifies new housing land allocations to deliver around 5,139 dwellings in and around Ashford and 1,610 dwellings in the rural parts of the Borough.

3.34.3 Any significant divergence from this broad approach, i.e. transferring major housing growth from Ashford to the rural parts of the Borough should be avoided. Doing so would result to an unsustainable model of development by:

- being poorly served by sustainable modes of transport, leading to significantly more trips being made by private car,

- not making best use of infrastructure that has been delivered or is about to be delivered at Ashford, including HS1 and strategic road improvements,
- being more removed from the local jobs market which is focused at Ashford,
- being located near to services and facilities that may only meet local needs, as opposed the range of key services and facilities at Ashford,
- running contrary to the roles and character of different areas by shifting the focus away from where growth and change has previously been planned – and where substantial infrastructure investment has been targeted - to providing a step change of housing levels in the rural area, areas which have incrementally and organically grown steadily over time,
- damaging the intrinsic beauty and character of the countryside,
- damaging the nature and character of the rural settlements with a scale and pace of housing that is not proportionate,
- undermining the sound planning aspirations for Ashford and the benefits to be delivered through increased housing growth in a way that provides sufficient critical mass to deliver new strategic facilities for the town, including two strategic parks and the wider services and facilities present which benefit the wider borough.

3.35 The urban housing market

- 3.35.1 Accepting that Ashford and its periphery is the most sustainable location on which to target significant levels of housing growth in the Borough, the realistic ability of the market to deliver this growth must be considered.
- 3.35.2 Recently, housing completion rates in and around Ashford have not come forward as originally envisaged, despite full and up to date Local Plan coverage over many years. This is mainly due to the wider macro-economic downturn that affected the general housing market from 2008 and restrictions on the capacity of the strategic road network, in particular until Junction 10a is in place. Other factors, including site-specific issues, viability concerns and market confidence in the Town Centre due to lower land values were also relevant.
- 3.35.3 However, many of these issues have, or are now being, overcome. Market confidence is returning and - as of May 2017 - many key brownfield sites in the town centre have planning permission and some are under construction. Others are in advanced discussions with the council. Also, the major urban extension at Chilmington Green is now under construction.
- 3.35.4 It is clear that the recent constraining factors to housing delivery at Ashford are beginning to subside. However, it is accepted that housing completion rates may not increase rapidly as it will take time for the market to continue to improve. A number of key sites are also still constrained until such time Junction 10a is in place (due to be completed in mid 2020).
- 3.35.5 The phasing strategy in this Local Plan is cognisant of this position in that it predicts a lower level of housing delivery rates in and around Ashford in the early years of the Plan (pre Junction 10a) with a steady increase around in the early 2020s. This is considered to be a realistic and deliverable scenario and is consistent with developer's and house-builder's known assumptions and intentions.

3.35.6 Basing a strategy on an immediate major step change in the delivery of housing in the early years of the plan, far in excess of what has been delivered, on average, annually in the past, would be inappropriate and unrealistic. There is little doubt that the urban area will be able to achieve the increase in housing numbers that is required, but it will take time to fulfil this ambition and therefore needs to be given every opportunity to succeed.

3.36 The rural housing market

3.36.1 The rural housing market in the Borough has been and continues to be strong. Market evidence points strongly towards a healthy demand for new residential development in the rural parts of the Borough as supported by market viability evidence that underpins this Plan. The 2008 housing delivery target for the rural area, as set out in the Core Strategy, has been delivered, in effect, some 5 years early.

3.36.2 The phasing strategy in this Local Plan recognises this position in that it reasonably assumes the majority of rural housing allocations will be delivered in the early years of the Plan, mostly within the first 5 years. There are no significant infrastructure constraints to restrict these new dwellings from coming forward and none are of such a scale that individually - or cumulatively – would warrant a settlement specific phasing approach to mitigate their impact.

3.36.3 Frontloading a number of rural housing allocations in this way also helps ensure that the annualised housing supply numbers for the wider Borough in the early years of the plan are maintained at a reasonable level prior to the resolution of the market and infrastructure constraints on delivery in the short term at Ashford.

3.37 Rectifying the housing shortfall since 2011

3.37.1 As of April 2017, the Borough has a housing delivery shortfall of around 1,770 dwellings which demonstrates that, except for 2015/16, housing completion rates in the Borough have not kept pace with the annual requirement for new housing indicated by the updated SHMA.

3.37.2 However, the Local Plan provides the opportunity to address this position and determine a robust and sustainable approach to rectify this shortfall - one which reflects local circumstances and character.

3.37.3 As referred to above, it is questionable how realistic it is to rely on the Ashford urban housing market to achieve a short term step change in housing delivery needed to meet the housing shortfall in the early years of the Plan. It is also doubtful that the industry will be able to deliver such an increase in housing completions in such a short space of time. This would require securing a local workforce, building materials and immediate financing arrangements at a time when the local market is still recovering and remains in competition with other areas in the south east.

3.37.4 The only alternative option therefore would be to require the rural area to rectify the housing shortfall, entirely on its own. Such an approach would lead to over 2,000 additional new dwellings in the rural area, significantly more than has been planned through this Local Plan and evidenced as being sustainable through the sustainability appraisal.

3.37.5 Section 3.34 (the Borough's Profile section above) of this Plan demonstrates why such an approach is not appropriate or sustainable. The Strategic Housing and Employment Land Availability Assessment (SHELAA) shows that there is very little scope to deliver new

housing growth within the confines of rural settlements. Therefore, significant amounts – way above what is already being allocated – of greenfield land would need to be released in a way that would fundamentally harm the countryside and the attractive character of the rural area.

- 3.37.6 As the Plan identifies more land for residential development than is needed to meet the Plan's overall housing target, and adopts a pragmatic and realistic approach to housing delivery in Ashford, there is no justification for allocating significantly more land in the less sustainable locations which would seriously affect the Borough's character. The housing trajectory (Appendix 5) of this Plan indicates that major sites in Ashford are likely to come forward in the early part of the 2020s as strategic infrastructure constraints are resolved and the local housing market broadens in response to the connectivity of the town via HS1 and the M20. This should mean the current shortfall in delivery since 2011 has been fully rectified by the mid 2020s, well before the end of the Plan period without the need to resort to further unsustainable short-term releases of land in the Borough's villages and countryside.
- 3.37.7 However, to achieve this outcome it is necessary for the strategy to assume that the shortfall is technically addressed over the whole of the remainder of the Plan period – commonly referred to as the 'Liverpool' approach - in order for the Council to be able to demonstrate a deliverable 5 year housing land supply in the short term. This approach ensures the integrity of the Council's strategy for addressing the shortfall in a sustainable way can be properly maintained and that unrealistic annualised levels of housing completions are not required from the start of the Plan, merely as a means of meeting an existing shortfall that can be better and more sustainably phased and located elsewhere in the Borough over the Plan period.

3.38 Dealing with any future housing shortfall

- 3.38.1 The scale of allocations proposed in this Plan should ensure that there will be no significant housing shortfall in the future. However, in the event of a housing shortfall being identified in the future, the following considerations will be applied.
- 3.38.2 Although this Local Plan does not propose separate policy based housing targets for different parts of the Borough, unlike in some previous Plans, it is clear that there are very different policy priorities for Ashford and its periphery which focuses on managing and sustaining growth, in comparison to the rural area which focuses on managing small scale change in a way that protects the Borough's attractive rural character. This is reflected in the overall scale of new dwellings proposed for each planning area (see policy SP2 below).
- 3.38.3 These respective priorities should be used as a guide by the developer and decision maker as to the way in which the Local Plan approach should be applied; namely that there should not be significant substitutions of housing numbers away from Ashford and its periphery to the rural parts of the Borough.
- 3.38.4 It is not the case that each planning area should maintain its own five-year housing supply, as this will continue to be calculated on a Borough basis. However, if a Borough housing shortfall in supply occurs as a result of significant non-delivery within Ashford and its periphery, the variances in policy emphasis between the two planning areas will need to be weighed accordingly, alongside the need to improve housing land supply and meet housing needs.

3.38.5 Housing numbers across the Borough will be monitored annually. If a significant housing shortfall against the Local Plan target becomes apparent, and housing trends suggest that this will not be a short term issue, the Council will seek to implement the review of the Local Plan earlier than expected (currently expected to be adopted in 2025) as a means of ensuring that a plan-led solution can be delivered to rectify the situation.

Policy SP2 – The Strategic Approach to Housing Delivery

A total housing target of 12,950 net additional dwellings applies for the Borough between 2017 and 2030. In order to achieve this target, additional housing sites are proposed to provide choice and competition in the market up to 2030.

The housing target will be met through a combination of committed schemes, site allocations and suitable windfall proposals.

The majority of new housing development will be at Ashford and its periphery, as the most sustainable location within the Borough based on its range of services and facilities, access to places of employment, access to public transport hubs and the variety of social and community infrastructure available. With this in mind, in addition to existing commitments, new land allocations to deliver 5,139 dwellings are proposed.

Development in the rural areas will be of a scale that is consistent with the relevant settlement's accessibility, infrastructure provision, level of services available, suitability of sites and environmental sensitivity. With this in mind, in addition to existing commitments, new land allocations to deliver 1,620 dwellings are proposed.

Windfall housing development will be permitted where it is consistent with the spatial strategy outlined above and is consistent with other policies of this Local Plan, in order to ensure that sustainable development is delivered.

The Economy and Employment Development

Current position

- 3.81 With the growth of the town over the last few decades, the Borough's economy has grown, stimulated by critical drivers such as the introduction of International and domestic services on High Speed 1, transforming Ashford's location and connectivity. Enhancements to key road infrastructure such as junctions 9 and 10 on the M20 have enabled employment land to continue to come forward in developments such as Orbital Business Park and Eureka Business Park. With the growth in population within the town, expansion of the retail and leisure offer has also delivered new jobs to the area with the introduction and now planned expansion of the Designer Outlet Village, the extension to County Square, the development of the offer at Eureka Leisure Park, and the introduction of brands such as Waitrose and John Lewis.
- 3.82 Ashford has traditionally had a very high employment rate within the area with lots of residents in employment (80%+), but the challenge has been improving the low average earnings levels, and bringing more highly skilled employment to the area. Average gross weekly wages have increased in the last 5 years above the local and regional averages, with increases of 5.7% from £479.10 in 2009 to £506.30 in 2014 for residents in Ashford borough. This is a stronger growth rate than Kent at 4.5% and the wider South East region at 5.6%. This shows positive progress for this continued challenge in improving the local productivity and prosperity of the labour market.

The Key Drivers for Growth in the Borough

- 3.83 The aspiration is for Ashford Borough to play a key role in terms of economic development in Kent, and this is built around its strategic location, excellent transport links, competitive costs, and the quality of lifestyle for residents and employees.
- 3.84 **Location** - The key driver for employment growth within the Ashford Borough is the impact of the introduction of HS1 and the critical investment in transport infrastructure. Ashford's business advantage is its location, as demonstrated through the results of the last Locate in Kent Perception Survey, which highlighted Ashford as Kent's number 1 business location.
- 3.85 **HS1** -The impact of a 38 minute journey time to London, Kings Cross / St Pancras will result in companies moving operations out of London to Ashford, but will also result in Kent companies locating to Ashford to take advantage of its central location within Kent and proximity to London.
- 3.86 **International Links** - Ashford is also the UK's International town, with direct train services to France's three largest cities, Paris, Lyon and Marseille, as well as to Brussels, Lille, Avignon and Disneyland Paris. With the tax and labour force advantages that the UK provides, Ashford continues to see the relocation of French companies into the area providing jobs and investment.
- 3.87 **Highly Competitive** – With commercial property costs up to 73% lower than central London, Ashford provides a real alternative for companies who want to do business within the capital, but without the continually rising costs.

- 3.88 **The importance of Place Making** – A key challenge over the next 15 years for Ashford will be the importance of developing the town into a memorable and sought-after location. Ashford already has many recognised benefits, but it's town centre and external image make the attraction of investment a continual challenge. The importance of quality place making through good design and streetscape will continue to be important in changing this image and attracting more employment and wealth to the area.
- 3.89 **Broadband infrastructure** – potential for strong broadband infrastructure available in parts of the Borough to attract investment, and support development of digital/ new media sectors will be critical in delivering greater productivity and prosperity within the local economy.
- 3.90 **Rural Enterprise** - Although the majority of employment growth will be centred around the Ashford Urban area, rural economy opportunities for development of rural enterprise, capitalising on quality of life and accessibility, and including the tourism economy, will ensure an enterprising and dynamic borough with a choice of employment locations and a choice in the price of accommodation.

Economic forecasting

- 3.91 The NPPF requires the Council to use evidence to define the full, objectively assessed needs for both business and housing in their areas and then seek to ensure that their Local Plans meet the needs identified.
- 3.92 In terms of business development the Council commissioned GL Hearn to carry out a Strategic Employment Options Report (SEOR) that developed a number of scenarios for economic growth in Ashford borough to 2030 that would be used to set a jobs target to be included within this Local Plan. There were four potential economic scenarios for the borough ranging from a 'downside risks' scenario at the lower end to an 'enhanced performance' scenario at the top end. This work was prepared in 2012 when economic conditions in the UK were significantly worse than they are now.
- 3.93 At the time, GL Hearn were suggesting that the 'downside risks' jobs scenario had the greatest probability of playing out based primarily on the macro-economic risks to the wider global economy creating weaker prospects for growth over a longer period of time. This was predicted to result in job growth of 9,200 (16%) between 2011-30.
- 3.94 In general, the forecasts made in the SEOR enable a range of eventualities to be covered and, given the current predictions for economic growth in the UK from the OBR and other institutions, some of the more negative aspects of the forecasts need to be reconsidered in choosing an appropriate employment target for the Local Plan.
- 3.95 The other economic scenarios considered in the report were a 'baseline' trajectory based on previous performance of both the macro-economic factors and local factors and two 'enhanced' scenarios based on a significant uplift in local performance and productivity. Both of the 'enhanced' scenarios would rely on strong growth in the office-based sectors and to a lesser degree, the industrial sector. These remain aspirations for Ashford and steps towards the creation of the Commercial Quarter are now well under way. However, the creation of a strong and vibrant office market will take some time and the allocation of an over supply of land in the early years, especially outside of the town centre, may be counterproductive in building on the solid foundations of a station-based new office market. The 2012 report

focused strongly on those aspects of the Ashford economy that have performed well and those where there is scope for improvement given the assets the borough has. This enables the council to focus land allocations towards the strongest sectors and put in place appropriate policies to protect existing active employment sites where possible.

- 3.96 As part of the GL Hearn commission there was an assessment of the current business sector strengths and the nationally forecast changes to employment by sector through to 2030. The sectors where the forecasts for the next 10 years show growth in jobs in Ashford include business services, professional services, computing services, hotels and catering, construction, retailing and education and health. Sectors that are likely to see lower employment growth due to macro-economic impacts or sectoral changes such as the automation of processes are manufacturing and public administration
- 3.97 It would seem prudent to set an employment target that is aspirational but also realistic in terms of its delivery over the next few years. The ‘downside risks’ scenario from the 2012 report now appears to be too pessimistic in terms of the macro-economic position in particular and a more appropriate response for the Local Plan would now be a jobs target based on the ‘baseline’ scenario of 12,600 new jobs over the Plan period.
- 3.98 The SEOR then derived a forecast of future employment land requirements based on the anticipated performance of the economy. Based on a jobs target of 12,600 jobs there is a requirement for 70.9 hectares of land for B class uses over the period from 2010 – 2030.
- 3.99 Since the GL Hearn forecasts for the 20 year period 2010 to 2030, and a target of 12,600 jobs for the Borough, survey figures have been published providing an updated position to 2014. 1,500 jobs have been created within the Ashford Borough between 2010-2014, during a difficult national and global economic period. This 3% growth during this period is above the 2.4% average growth for Kent, but below the 3.3% growth within the South East and 5.2% national growth. This leaves a job target of 11,100 between 2014 - 2030.
- 3.100 An additional GL Hearn commission in 2016 to undertake an Employment Land Review: Site Assessment provides an up-dated employment land requirement for 2015-2030 of 66 hectares based on the baseline scenario from the 2012 SEOR report.

Spatial Approach

- 3.101 As the main town within the borough and with the strategic transport links, it is proposed that growth in employment again is concentrated within and around Ashford town, and that due to its sustainable location, infrastructure and with its role as the heart of the town, that development is concentrated within the town centre on brownfield sites as the principal priority for the Local Plan.
- 3.102 The other primary locations for business demand for sites within the area are those with excellent access to the motorway network to support their operational needs. Industrial and Distribution companies have a specific need for good access to motorway junctions, to minimise the time for supplies to be delivered to and from the site. This also limits the impact on other areas of the town through additional traffic and congestion. For businesses requiring office space, as well as the locations in town centres, some companies will require a location that enables car bound access to clients across the County.

- 3.103 The challenge, spatially, and in the number of development sites within the Local Plan, will be to ensure that there is a choice of locations across the borough to support different business needs, and to support competition and choice within the market place. Both choice and the delivery of speculative employment space will stimulate relocations into the area. The allocation of sites needs to provide some flexibility for the market to adapt to changes in the economy, whilst providing a structure within which the aspirations of the plan can be achieved.
- 3.104 There are 4 key strategic sites for employment in Ashford – the Commercial Quarter, Waterbrook, Sevington and Eureka Park – but other employment areas also provide a range of alternatives options for business development.
- 3.105 **The Commercial Quarter** – This is the new main business sector of the town intended to stimulate investment opportunities in new large scale office space based around a high quality environment with a location close to the domestic and international railway stations. The site is proposed for up to 55,000 square metres of new office floorspace
- 3.106 **Eureka Park** - This large office based business park close to junction 9 provides a key strategic location with easy access to the motorway network and the rest of Kent. Previous planning permissions for B1 floorspace have delivered a number of phases of development. This is a substantial greenfield site with excellent connectivity to the M20 at junction 9 and the potential remains for primarily office development with the area being seen as different to the offer in the Commercial Quarter with lower density development in a landscaped setting. There is also the opportunity in this location to support more flexibility to deliver a smaller secondary element of other employment uses such as light industrial around the cleaner pharmaceutical, medical and health sectors, as well as space for uses such as private hospitals. The role of Eureka Park is also proposed to evolve with the introduction of higher quality residential development on an extended site to sit alongside the employment development
- 3.107 **Sevington** – this site was identified in the Core Strategy and subsequently the Urban Sites and Infrastructure DPD as a strategic employment site to provide for a range of employment types and uses but with the opportunity to cater for some of the larger scale employment uses that are less suited to higher density, mixed use environments.
- 3.108 Outline planning permission has been given (subject to a s.106) for a development of this sort at Sevington. Approximately 157,000 sq m of floorspace is proposed in total. Within this figure there is flexibility for up to 140,000 sq m Class B8 (storage and distribution) use; up to 23,500 sq m of B1a/B1c Business (of which a maximum of 20,000 sq m of B1a); up to 15,000 sq m of B2 (general industry); up to 250 sq m of A1 (retail shops) and 5,500 sq m to accommodate the relocation of Kent Wool Growers from the town centre.
- 3.109 A masterplan has been produced showing how the quantum of development can be accommodated on the site whilst limiting the impact on the setting of Sevington church and the wider area. The masterplan includes substantial strategic planting to help reduce the impact of the large buildings proposed – this will be complemented by the planting proposed as part of the junction 10A scheme. This planting will obviously need to mature to deliver the full benefits – long term arrangements will be needed to make sure these areas are managed and protected, including the potential use of group Tree Preservation Orders.

- 3.110 It is likely that the phased development of this site will take some years to be completed. The planning permission given sets thresholds beyond which development cannot proceed before improved highways access arrangements are in place.
- 3.111 **Waterbrook** – this site is identified for mixed use development but to date only limited development has taken place on the site which currently accommodates the Ashford Truck stop and lies adjacent to the aggregates recycling facility and railhead. The adjacent Orbital Business park is nearing completion and there will be a requirement for similar types of provision with smaller industrial, distribution, office and other sui generis uses within the area to fulfil requirements that do not fit comfortably within the primary roles of Commercial Quarter, Eureka Park or Sevington.

Rural employment

- 3.112 Rural Ashford accounts for around a quarter of all jobs in the Borough, a proportion that has remained largely constant over the last 10 years or so. In the rural area workforce jobs have increased by around 14% between 2003 and 2012 – in absolute terms this represents an increase of approximately 1600 jobs.
- 3.113 In employment terms, rural Ashford's largest sectors in 2012 were business and retail, largely echoing the pattern of employment across the Borough as a whole. The social care, construction and wholesale sectors also accounted for significant shares of employment. The tourism sector also makes a significant contribution to the rural economy.
- 3.114 It is clear that the rural area plays an important part in the economic prospects of the borough and this will continue into the future.

Overall requirements

- 3.115 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 that these should be rolled forward as allocations in this Local Plan. The range and type of site has been identified as an issue and there are new allocations identified at Leacon Road/Victoria Way and additional commercial land identified to be brought forward at the Waterbrook site.
- 3.116 In the rural area, a new allocation is specifically proposed at Tenterden at the Pickhill Industrial Estate, but there has been a limited selection of other possible sites submitted for consideration. There is currently substantial small scale employment provision in the rural area and hence the approach is to support appropriate, small scale expansion of existing sites, subject to necessary planning policy criteria (see policy EMP3).

Policy SP3 - Strategic Approach to Economic Development

Job growth and economic prosperity will be supported in order to enable the achievement of a sustainable economy with the intention to deliver 66 hectares of new employment land and a total of 11,100 jobs in the Borough between 2014 - 30. This will be achieved by the following measures:-

- a) **The promotion and development of the employment locations identified within this Local Plan;**
- b) **The appropriate retention of the existing industrial/commercial/business land, premises and estates;**
- c) **The maximisation of town centre employment opportunities in accordance with the strategic approach to the town centre set out in this Local Plan;**
- d) **Taking a positive approach that reflects a presumption in favour of sustainable economic development;**
- e) **Promoting appropriate rural employment opportunities in sustainable locations**
- f) **Improving skills in the workforce**

Retail and Commercial Leisure Development Needs

- 3.117 Retail and leisure development plays an important role in the economy of Ashford Borough, and it is expected that these sectors will continue to contribute to the local economy over the plan period. This type of development is particularly important in supporting and developing a vital and viable Ashford town centre.
- 3.118 National Planning Policy requires local planning authorities to plan to meet the needs of main town centre uses in full, adopting a 'town centre' first approach.
- 3.119 The Local Plan should allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres.
- 3.120 The Retail and Leisure Needs Assessment 2015 (RLNA), provides an up to date assessment of the quantitative and qualitative need for new retail (comparison and convenience goods) and commercial leisure floorspace in Ashford Borough, up to 2030.
- 3.121 Tables 2 and 3 below outline the quantitative need for comparison and convenience retail development.

Table 2 - Convenience Retail Need 2015 to 2030 for Ashford Borough

	2020	2025	2030
Ashford Town Centre (m² net)	106	200	289
Tenterden Town Centre (m² net)	-455	-196	50
Local/Village Centres (m² net)	119	225	324
Rest of the Borough (m² net)	-2,085	-774	464
TOTAL BOROUGH (m² net)	-2,315	-544	1,127

3.122 The evidence shows there is limited quantitative need for new convenience floorspace over the Plan period across the Borough. However, there is currently an imbalance of convenience retail expenditure to out of centre stores, particularly in the Ashford urban area, which is influenced by a lack of foodstore provision in Ashford Town Centre. The RLNA therefore considered a potential scenario where ‘claw back’ of expenditure was achieved from out of centre food stores. This increases the forecast need for Ashford Town Centre to 751m² by 2025 and 1,084 m² by 2030. Alternatively, this provides the potential to support a deep discount foodstore of up to 1,673 m² by 2025 or 2,413 m² by 2030.

Table 3 - Comparison Retail Need 2015 to 2030 for Ashford Borough¹

	2020	2025	2030
Ashford Town Centre (m² net)	-714	4,017	9,170
Tenterden Town Centre (m² net)	9	541	1,122
Local/Village Centres (m² net)	93	259	440
Rest of the Borough (m² net)	-3,107	771	5,032
TOTAL BOROUGH (m² net)	-3,719	5,588	15,764

3.123 In the short term, there is limited quantitative need for comparison retail development, when taking into account the re-use of existing vacant prime retail floorspace.

3.124 With regard to commercial leisure development, the leisure needs assessment identified the potential to support new cinema screens in the Borough, new food and drink beverage outlets (A3 to A5), and new gym facilities.

Meeting the need for Retail and Leisure Development

3.125 In accordance with National Planning Policy it is important that new retail and leisure development is focused at Ashford Town Centre first, to help to maintain and strengthen its role in the network and hierarchy of centres. The ‘Rest of the Borough’ retail need identified above should therefore be planned for within Ashford Town Centre.

3.126 Since the RLNA was completed, planning permission has been granted for a six-screen cinema, hotel, restaurants and cafes, at Elwick Place, adjoining the primary shopping area. Permission has also been granted for an extension to the Designer Outlet, which provides additional comparison floorspace and restaurants and café uses.

3.127 These committed developments provide for the need for comparison retail up to at least 2025, and cinema, restaurant and café development, for the whole plan period, in Ashford Town Centre. Given the uncertainty regarding retail forecasts beyond this time, it is not considered appropriate to allocate additional sites to accommodate the remaining need for the last few years of the plan period. In any event, there are sites within the Ashford Town Centre Policy Area, as set out in Policy SP5 which provide opportunities for development.

¹ Based upon constant market share and taking into account re-use of vacant prime retail floorspace in Ashford Town Centre

3.128 With regard to the provision of convenience retail need, since the RLNA was completed, planning permission has been granted for 1,750sqm of A1 convenience retail within the Ashford Town Centre Policy Area, for an Aldi supermarket. This permission provides for the need for convenience retail within the town centre, under the ‘claw back’ scenario, until at least 2025. In terms of the need for the remainder of the plan period, in order to maintain flexibility, it is not considered appropriate to allocate a specific site. The need is only required if it is possible to further re-distribute the market share to improve Ashford’s convenience provision, therefore the delivery of such a proposal will be very much market driven and there is also significant uncertainty regarding retail forecasts beyond this time. It is considered that a flexible approach should therefore be maintained to enable any further proposals to come forward within the Town Centre Policy area, as set out in Policy SP5 . Proposals will be required to demonstrate that they accord with Policy EMP9 (Sequential and Impact Assessments) and proposals for convenience provision out of town will be strongly resisted through that policy.

Policy SP4 - Delivery of Retail and Leisure Needs

The need for retail and leisure development for Ashford Town will be met within the Ashford Town Centre Policy Area as defined in Policy SP5; through the delivery of existing commitments, development proposals in the pipeline, and site redevelopment opportunities.

The need for retail development in Tenterden and the local/village centres will be met through small scale development and changes of use within and adjoining the existing centres.

Delivering a Sustainable Town Centre

- 3.130 Ashford town centre (as defined in the Topic Policy Detailed Map: SP5 Ashford Town Centre) is the key focus for shopping and services in the borough and will play an increasingly important role at the heart of the Borough’s economy. The town centre is the most accessible location in the Borough and, with an attractive historic core, is a pleasant place to visit. It is an important shopping centre, especially for people living in the urban area, but it competes with centres such as Canterbury, Maidstone and Bluewater. Many Borough residents living outside the town visit less frequently and do their ‘comparison’ shopping (clothes and one-off purchases) elsewhere. The town centre needs to respond to this diversion of ‘spending power’ by strengthening its role and its own special offer and identity.
- 3.131 With fast rail access not just to and from London but also to the continent, the town centre is well placed to cater for a growing office market. In addition, the availability of substantial space in the form of vacant or underused brownfield sites near to the stations present opportunities for development and change that is unique when compared to other south east of England locations.

- 3.132 However current market confidence remains cautious with ‘pioneer investors’ inevitably carrying higher initial risk. This position is reflected in the viability evidence that supports this Local Plan which shows that schemes are highly sensitive to change and can become unviable very quickly. The Local Plan responds to these sensitivities by adopting a flexible policy approach that is not overly prescriptive and the level of requirements sought from development here.
- 3.133 That said, Ashford town centre is very much on the cusp of a major transition with an emerging office market and growing market interest in investment in other sectors such as leisure, buy to rent apartment schemes. This is reflected in recent planning applications and current ongoing discussions with developers around a number of schemes on important sites within the town centre. It is therefore crucial that the Local Plan's emergence does not undermine these discussions or current interest.
- 3.134 Where these schemes are expected to contribute to the Borough's overall housing numbers, the sites are referred to in the housing trajectory that supports this Plan (Appendix 5). For the non residential development requirements the contributions from these schemes are reflected in Policy SP3 and SP4 of this Local Plan.

Vision

- 3.135 A thriving town centre is crucial for the people who use it day to day but also, more generally, to make it a more attractive destination for residents of the wider area and for tourists. The more people that use the town centre the more successful it will be. As town centres change in response to the internet and the changing retail market, so the town centre needs reshaping to provide not just for essential daily needs, but also to create a mix of more quirky, varied and specialist shopping and entertainment opportunities. This will attract people in from a wider area, over a longer part of the day and evening.
- 3.136 The strongest town centres have an ‘all day economy’ – busy lunchtimes as a large local workforce takes a break and lively evenings after work and as people come back to the town centre for specific attractions such as the cinema and to eat and drink. Healthy town centres also tend to have a significant resident population which helps the place feel active at all times and brings more spending to town centre businesses.
- 3.137 So the Council’s vision is of a town centre that offers a wide and entertaining mix of activity throughout the day and evening; with a strengthening ‘leisure shopping’ offer including a growing mix of interesting, independent retailers; and a fast growing resident and working population that brings more activity and spending power to the town.
- 3.138 Helping to drive delivery of that vision Ashford also has a unique opportunity. High speed rail services give access to and from London in 38 minutes and this, coupled with the potential for an expanding range of rail services to the continent, places Ashford town centre in a very special position. Combining the three key factors of fast travel times, relatively low average house prices and the quality of life offered in the area, Ashford is now in a very competitive position in south east England to attract inward investment and jobs growth.
- 3.139 The supply of readily available land in the town centre for growth – especially in the area between the stations and the shopping core is the final, critical ingredient. The town has the opportunity to move from a relatively small provincial office market to a centre of much

higher ranking by creating a high quality business centre, as an integral part of a stronger town centre.

- 3.140 In short, the town centre will be a key motor for Ashford's growth in the coming years. Jobs in the new Commercial Quarter will tend to be at higher skill levels and provide opportunities both for the local workforce and for some of those people currently commuting who would like to work closer to home. As this town centre office sector grows, a range of secondary services will be needed to support new office businesses – many sectors of the Ashford economy will benefit. More jobs in the town centre will bring more spending power for the day and evening economy and help to drive a better range of opportunities to eat and drink, shop and enjoy leisure time.
- 3.141 There are several very important themes that will guide the Council's approach as the town centre evolves.
- 3.142 **Quality place-making:** The Council is wedded to delivering quality places, spaces and buildings for people to enjoy in the town centre. The attractive medieval core of the existing centre, including over 100 listed buildings and the Conservation Area, needs protecting but alongside this a harmonious blend of new development is needed with bustling streets and attractive public spaces. By continuing to demand high design standards this not only brings pleasure to town centre users but it helps to encourage investor confidence in the town and the emerging Commercial Quarter office market and will help to attract further investment.
- 3.143 Design quality means not just the way a building looks but the contribution the scheme makes as a whole – how it animates the street by including active uses on ground floors; how the spaces around the buildings work and link into the wider townscape; and how special care is taken to create character at key junctions, corner plots and focal points in important views. The Council will continue to use its independent Design Panel to help assess the all round quality of town centre schemes.
- 3.144 **A vibrant town centre:** National Planning Policy requires local planning authorities to plan to meet the needs of main town centre uses in full, adopting a 'town centre' first approach to the provision of new shopping and leisure development. A Retail and Leisure Needs Assessment (2015) has been carried out which shows that the quantitative need for new retail floorspace in the town centre over the plan period is low. The Study found an imbalance between town centre and out of town food shopping and identifies the potential for additional food shopping space in the town centre to help address this.
- 3.145 Shoppers today are tending towards more varied 'leisure shopping' in good quality environments with a range of other activities – eating, drinking, entertainments - on offer. Strong town centre management is key to success and this includes the Council's direct influence as landlord of the Park Mall shopping centre.
- 3.146 Ashford, like strong town centres elsewhere, needs to complement traditional strong Saturday retail trading with an 'all day economy' – busy lunchtimes as a large local workforce takes a break, and lively evenings after work and as people come back to the town centre for specific attractions such as the proposed cinema and to eat and drink.

- 3.147 ***A place to live in:*** The town centre’s resident population is growing rapidly. This growth is likely to continue as people are attracted by competitive prices, an improving town centre with an easy walk to the stations and quick access to London. There are sites available which can provide for significant residential development. One residential market that may emerge strongly is institutionally funded apartments in the private rented sector. This sort of development would help to increase the range of housing choices available; it can be built to generous space standards but at a relatively high density typical of a town centre; and will therefore lead to a substantial increase in town centre residents.
- 3.148 More residents brings more support for the shops, services and entertainments provided in the town centre and helps to animate the town day and evening. Coupled with the growing number of office jobs in the Commercial Quarter and the student numbers at Ashford College this will create a significant and sustained impetus for town centre regeneration.
- 3.149 ***A place to work:*** The Commercial Quarter has the space to create an important new office centre in south east England. It sits alongside the stations and occupiers will benefit from the high speed domestic and international train services. The area can meet the demands of an emerging office market within an overall masterplan designed to create a fine new place, characterised by excellent quality treatment of the public realm. As a major landowner the Council is well placed both to drive delivery in this area and to set and achieve high design and place-making standards.
- 3.150 A range of supporting services will be needed as this Quarter grows - these will include specialist financial, IT, marketing and legal services as well as catering, buildings maintenance and office supplies. This will benefit town centre businesses as well as firms in the wider Ashford economy.
- 3.151 ***Local skills to match opportunities:*** As the office sector expands a growing workforce with a wider range of skills will be needed providing excellent career opportunities for local people. The construction of Ashford College in the heart of the town centre, offering increased choice for local students in both further and higher education, is a crucial component of the wider economic development of the Borough as a whole. The Council will continue to work with the Hadlow Group both to help shape the curriculum to meet emerging needs and to expand the presence in the town.
- 3.152 ***Movement and parking:*** A careful balance needs to be struck between providing town centre parking to serve the retail, leisure and commercial facilities on offer balanced with an awareness that there is finite road capacity in the town centre. Successful towns attract traffic and as the economy strengthens this issue will become more important. In the early years a relatively high level of parking provision is likely to be sought by investors to help attract tenants – especially for new offices. As the market strengthens parking on site to support future schemes may need to be provided at a lower ratio to make sure that the available road space is managed effectively, including making enough provision for shoppers and residents needs.
- 3.153 Much has been achieved to make the town a pleasant place for people on foot, including the pedestrianised centre, the Elwick Road shared space and other street improvements (e.g. to West Street). As a result it is easier for pedestrians to walk to the town centre and to enjoy it once there. The Council will continue this approach by making sure that developments in the

town centre play their part to improve the pedestrian environment and the attractiveness of the town centre as a whole.

- 3.154 **A deliverable strategy:** The opportunities in the town centre are considerable and there is growing market interest. Evidence indicates, however, that many schemes remain only marginally viable and the comparatively high build costs needed to deliver a quality product are not yet reflected in returns from development. Pioneer investments in relatively untested sectors of the Ashford town centre market – e.g. new town centre offices; private rented apartments; leisure projects – may therefore be unable to support the full range of normal developer contributions set out elsewhere in this Plan. Where this is the case, viability assessments will be needed to test these issues with a realistic approach being taken that reflects the risks investors are taking and the need to help stimulate investor confidence. Once confidence has been created further investments are likely to flow that will benefit the town centre and Borough as a whole.
- 3.155 Experience of viability assessment in the town centre shows that residential schemes are, as yet, generally unable to meet the range of developer contributions to infrastructure that is needed, including affordable housing. The Council has a track record of working with developers to minimise these costs to avoid inhibiting regeneration in the town centre, in line with the National Planning Policy Framework. Private rented sector apartment schemes will bring a new product to the choice of homes on offer in the town, help broaden the market and are supported by national planning policy. In the light of this, the Council recognises that it may be inappropriate to meet the policy requirement for affordable housing on town centre housing sites where viability is an issue, as set out in policy HOU1.
- 3.156 As the Council is a major landowner in the town centre – including the Park Mall shopping centre; Vicarage Lane car park and a substantial part of the Commercial Quarter – it is able to help deliver well planned and high quality development. Over the duration of the Plan this can make a huge contribution to the regeneration of the town centre.
- 3.157 The Town Centre policy below picks up these themes – it is supported by a specific site policy for the Commercial Quarter (see site policy S1). The general policy approach is deliberately flexible to accommodate a range of potential uses in the town centre that help to meet the vision and approach set out above. In an emerging market a degree of pragmatism is essential to be able to respond to changing market demands. National planning policy supports a market-aware approach of this sort.

Policy SP5 - Ashford Town Centre

Proposals coming forward in Ashford town centre (as shown on the policies map), will be supported in principle where they help to deliver the vision set out above and where they promote high quality design that is appropriate to their location. A range of principal uses may be acceptable including retail, offices, leisure, residential and hotel. Other complementary uses may include, voluntary and community uses and health facilities. Proposals in the town centre will need to comply with sequential test requirements set out in policy EMP9 .

Proposals will be assessed against the following criteria:

- a) All schemes will need to demonstrate a quality of design that makes a significant contribution to improving the character of the town centre. This includes not just the buildings proposed but the spaces around them and links to the wider public realm. Mixed use developments are encouraged and street frontages of buildings should include active uses that help bring a sense of vitality to the street scene. New development proposals on major and/ or prominent sites will be expected to have been subject to public exhibition/ consultation and be subject to review by the independent Ashford Design Panel**
- b) Residential development in the town centre is encouraged, for example, making use of space above shops but the opportunity also exists to provide a range of types of home, including the potential for serviced private rented apartment schemes.**
- c) Further expansion of further and higher education facilities at the Kent College complex will be supported subject to design and other site-specific considerations.**
- d) A balanced approach to office parking needs will be taken in order to help stimulate early investment in the town centre, whilst considering long term impacts on road capacity and the needs of shoppers, residents and other users. As the market strengthens and further developments come forward this approach is likely to be subject to formal review.**
- e) Where a development proposal comes forward that clearly demonstrates it would meet the vision and design quality set for the town centre but is of marginal viability, the Council (taking specialist advice) will explore a flexible approach to seek to reduce the costs of contributions to infrastructure and affordable housing, provided the resulting proposal does not create a serious and unacceptable level of impact.**

Promoting High Quality Design

Design Quality

- 3.158 Delivering development that is of high design quality and is sustainable is a key Council priority. The National Planning Policy Framework is unequivocal in the ‘great importance’ the Government attaches to design as ‘a key aspect of sustainable development...indivisible from good planning’ (para 56 NPPF). The Framework requires ‘robust and comprehensive policies’ (para 58) in local plans – this chapter sets these out.
- 3.159 The need for good design applies in all areas of the Borough, whether in a sensitive village or countryside setting; on the periphery of Ashford or within the town area. Given the scale of development that needs to be planned for in the Borough – especially in and around Ashford town - it is crucial that high quality design and place-making sits at the top of the Council’s agenda. To be successful it is critical that as strong a consensus as possible is built with local communities affected by development. For over a decade the Council has worked in this way and has received national awards reflecting the best practice it has set.

The design process

- 3.160 Design issues start to emerge even before the draft local plan stage when potential site allocations are discussed with local people and site promoters before becoming site policies in the Plan. To build community involvement from the outset and work with local people to drive design quality the Council may use a variety of tools – such as public exhibitions/surgeries and collaborative design workshops. The actual combination of tools used will depend on the scale and nature of the site in question. The package of supporting guidance includes National design guidance such as ‘The Manual for Streets’; the Urban Design Compendium and Sport England’s ‘Active Design’; local design guidance, including adopted neighbourhood plans, the Kent Design Guide, development briefs and Supplementary Planning Documents and, in the rural areas, Village Design Statements.
- 3.161 The ‘Building for Life’ toolkit is a useful tool for the Council and local people to use to explore design options and then to help assess housing proposals. As the most strategic local plan site allocations come forward, the Council will set up design workshops, funded by the developer, to bring representatives of the local community to work together with developers, their designers and service providers. This is established best-practice in line with NPPF advice (para 66). These workshops help to build a masterplan based on key principles of place-making and are a well established part of the planning process in the Borough that helps to provide a clear basis for planning applications. By building a consensus with the community and other stakeholders they create greater certainty for investors with the cost savings that implies.
- 3.162 There is a long established and independent Ashford Design Panel that the Council uses to test emerging proposals and to allow those promoting development to explain their design approach. The expert second opinion the Panel provides is invaluable and the conclusions it reaches are used to help inform officers’ assessments of proposals and the Planning Committee in making decisions. Larger developments, or those of smaller scale but on a prominent site, are referred to the Panel at the applicants’ expense. This happens relatively early in the design process to help shape good quality proposals and avoid wasting time and

money on poorly designed schemes. This reflects the advice in the NPPF (para 62) that local authorities should have such arrangements in place.

- 3.163 Design and Access statements are required with most types of planning application. They should demonstrate how the Council's key design principles, set out below, and those in Neighbourhood Plans have been taken into account and reflected in project design. The findings of any public involvement in exhibitions or design workshops should be summarised with an explanation showing where they have influenced the design.
- 3.164 If good design is undermined during the construction process then any amount of good design on paper can be undone. Large construction projects are complex with many players – sub-contractors, service providers, etc – and it is not surprising that genuine mistakes can happen. Sometimes the problems are compounded by poor workmanship; the use of the wrong materials; or not following the agreed plans.
- 3.165 Creating great places demands an attention to detail and care in construction. The Council has had too many examples of poor delivery on site which lets down residents and undermines the quality of place aspired to in Ashford. As a result a 'Quality Monitoring Initiative' has been set up which involves specialist officers working with site managers to regularly check that schemes are being delivered correctly. Spotting any issues early will reduce the risk of repetitive mistakes being made and the costs of putting things right. Developers are encouraged to work with the Council in this way to the mutual benefit of all parties.

Key Design Qualities

- 3.166 **Character, Distinctiveness and Sense of Place:** The Borough is made up of many different places, each with their own distinctive characteristics of development form, landscape and surrounding space, both historic and new. All development proposals need to reflect their local context, particularly where this has a special character or features of interest, whether built or natural.
- 3.167 Where the built environment is of decent quality, new proposals should be sensitive in terms of scale, height, layout and massing to the surrounding buildings. Where the surrounding development is fragmented or of poor quality, development proposals will be expected to help repair the urban fabric and generate distinctiveness, with good quality architecture and careful treatment of the space around the building. Public art has a key role to play in helping to add to local character and people's enjoyment of places.
- 3.168 In areas of significant new development very careful attention needs to be given to creating new places with their own sense of character and place. Larger developments may need to be broken down into separate areas with their own character but within an overall masterplan linking the parts together. Part of this involves working with existing character, for example, retaining historic reference points to help create a sense of local identity and distinctiveness. Masterplans and development briefs which are prepared to support site policies have a key role to play in helping shape a sense of place and supporting planning applications, infrastructure planning and delivery.
- 3.169 More generally, where historic features exist - including listed buildings, conservation areas, ancient roads, green lanes and byways and sites of archaeological interest – these must be

respected by new development and, where appropriate, carefully integrated with new development.

- 3.170 **Ease of Movement:** Places should be designed so that they are easy to use on foot but also successfully cater for cars and other vehicles. Major developments – whether in town centres or peripheral new housing areas – need a network of inter-connected routes that tie them into the surrounding area. This offers pedestrians and cyclists more choices of route and these people help to animate places. Likewise new housing areas based on linked routes perform better than extensive cul-de-sac systems.
- 3.171 Equally new developments need to be designed with the needs of vehicle users in mind and parking. Sufficient spaces are needed to avoid inappropriate parking and these need to be well designed so that they are used by residents. Often visitor parking is best accommodated on-street with the street designed to provide clear parking spaces but also having sufficient width to allow this without causing congestion.
- 3.172 **Legibility:** Places should have a clarity of form and layout that create identity and help people understand them. This can be achieved through street layout and variation in density in particular – the centre of places often being marked by an increase in the density and height. Other important tools include the placing of more interesting, ‘landmark’ buildings at the end of vistas and views, on corners and intersections or incorporating natural features like mature trees and ponds. Legibility (and sense of place) is undermined by unthinking repetition, blandness in design and a lack of reference to context.
- 3.173 **Mixed Use and Diversity:** All successful centres – whether in town, village or new housing area - rely on a mix of uses, activities and variety and choice of property types. In Ashford town active uses on ground floor frontages of the main streets is needed helps to bring life to the centre. In a similar way within new housing areas a grouping of local shops, live-work units and community facilities can help create a successful centre. Building-in flexibility is important – space reserved for future facilities and buildings designed to be capable of residential or shop/ office use on the ground floor are good examples.
- 3.174 **Public safety and crime:** Section 17 of the Crime and Disorder Act 1998 places a duty on councils to do all they reasonably can to reduce crime and disorder locally and improve people’s quality of life as a result. This can be achieved through appropriately designed development that should be based on a clear distinction between public and private spaces. New buildings and/or landscape should create continuity of form and enclosure to the street, and allow overlooking and natural surveillance of the street or open space. This clarity in design thinking will help create a safe environment by reducing the potential for anti-social behaviour and crime.
- 3.175 **Quality of Public Spaces and their future management:** The quality of public spaces does much to define the overall quality of the place. It depends on a number of elements which need to be carefully taken into account at the design stage - accessibility, degree of enclosure, size, the quality of materials and street furniture, lighting, planting, orientation, public art, how well it is overlooked and the uses in and surrounding the space.
- 3.176 The pattern of public spaces and how well they are linked together is crucial in an urban setting but also in new developments. The functions of the space need to be understood and reflected in masterplanning and detailed design.

- 3.177 The quality of the public realm depends on how well it is maintained. Too often private management arrangements put in place by developers have not been robust and residents have suffered as a result. Properly funded, long-term management and maintenance arrangements are needed to make sure that the quality of place is protected in future. The basis for such arrangements will need to be clear when planning applications are made – the Council firmly believes that these schemes work best where there is a strong degree of resident involvement.
- 3.178 **Flexibility and Liveability:** Refurbishment, conversion and extension are usually more sustainable and energy efficient than demolition and new build. With an ageing population the adaptability of homes is more important than ever. New homes should be designed with sufficient space to provide a good quality of life for residents – both issues are now dealt with in the Building Regulations. The Council’s local guidance complements this national framework – for example, dealing with external space in gardens and balconies, and external storage (for bins etc).
- 3.179 Major new developments also need to have some adaptability built in for example in new local centres, land may need to be reserved to help provide for future needs as they emerge; and the ground floor design and ceiling height of buildings at key locations can be designed to accommodate a range of future uses.
- 3.180 Communications infrastructure needs to be able to cope with today’s demands and likely future demands in mind. The normal expectation will be that new development includes ducting and fibre optic cabling to the home unless there are technical issues that prevent this or abnormal costs.
- 3.181 Developments should be adaptable and designed to reduce vulnerability to the effects of climate change. This may involve a range of features – for example, on site sustainable drainage to help deal with intense rainfall events, and tree planting on the northern sides of streets and in public spaces to provide shade in summer and reduce ‘heat island’ effects. Practice will inevitably change and further guidance will be produced when needed.
- 3.182 **Richness in detail:** Attention to detail is an essential part of design quality. Visual richness requires quality in design, materials and workmanship. In larger buildings, the design of the facades will need to be broken down to ensure that they have a human scale, avoid the repetitive use of the same visual elements and are visually interesting. Details such as window design, recessed and projecting features, surface treatment and transition between materials need as much attention as any other aspect of design.
- 3.183 There is clearly a role for high quality traditional designs in an area with a strong historic character but quality modern buildings will introduce variety and interest into the townscape and present a good opportunity to add examples of the architecture and styles of our own period into the landscape.
- 3.184 **Efficient use of natural resources:** Buildings and landscapes should be designed to make efficient use of natural resources during construction, operation and maintenance. This will contribute to climate change mitigation and adaptation, and reduce the ecological footprint of Ashford’s growth. The Council will actively encourage the design of new buildings that minimise the need for energy and water consumption, use renewable energy

sources, provide for sustainable drainage, support water re-use and incorporate facilities to recycling of waste and resources. Sunlight and energy efficiency should be considered as an integral part of the layout through passive solar design and natural ventilation systems. Developments should also consider whole-life performance and costs. Ashford Borough is a largely rural area and includes an area which is one of the least polluted by artificial light in south-east England. Protecting the rural parts of the Borough – and particularly the Dark Sky area – will help to protect the character of the countryside and reduce wasted energy use (see policy ENV4).

Policy SP6 - Promoting High Quality Design

Development proposals must be of high quality design and demonstrate a careful consideration of and a positive response to each of the following design criteria:

- a) **Character, Distinctiveness and Sense of Place**
- b) **Ease of Movement**
- c) **Legibility**
- d) **Mixed use and Diversity**
- e) **Public safety and crime**
- f) **Quality of Public Spaces and their future management**
- g) **Flexibility and Liveability**
- h) **Richness in Detail**
- i) **Efficient use of Natural Resources**

Development proposals should show how they have responded positively to the design policy and guidance, including national and local design guidance, relevant Neighbourhood Plans, Village Design Statements and site specific development briefs.

Developers are strongly encouraged to participate in the Council's 'Quality Monitoring Initiative' which works to make sure that the approach agreed to design quality when planning permission is given is delivered on site.

Separation of Settlements

- 3.185 The separate and distinctive identity of individual settlements forms part of the particular character of much of the borough, helps to define communities and is an important feature in maintaining the quality and attractiveness of the borough for residents and visitors alike.
- 3.186 As Ashford town in particular has grown in recent years, some of the open space between the edge of the town and the closest surrounding villages has been eroded. In some locations, such as at Park Farm, specific features such as the buffer zone with Kingsnorth village have been implemented. But as pressure for additional growth to the south of Ashford continues (which is reflected in the proposed allocations in this Local Plan), the need for such protective features is likely to increase with more settlements potentially affected.
- 3.187 The Council is concerned that unplanned erosion of countryside between built up areas would have a serious and significant adverse impact on the character and individual identity of villages through loss of their setting or, more seriously, through coalescence. This could occur in a variety of locations across the borough, for example by the large scale expansion of villages to encompass nearby hamlets; through progressive ‘ribbon’ or linear development along roads that joins up settlements, or through the expansion of Ashford itself.
- 3.186 In judging whether a proposal would adversely affect the individuality and character of a settlement, the distance between settlements is only one factor to consider. The topography of the area can create visual separation even if gaps between settlements are relatively narrow. Existing woodland and other natural features may also contribute to visual and functional separation but artificial or managed landscaped buffers are unlikely to be a suitable substitute where a gap is narrow. The historic integrity of the settlement and its setting will also be a significant factor in assessing proposals that would otherwise coalesce or join together settlements.
- 3.187 Coalescence can occur not just as a result of further residential or commercial development but also as a result of other minor development related to activities such as agriculture, recreation or the keeping of horses. Proposals for development in areas at risk of coalescence will be considered with particular regard to siting, design, external appearance and the cumulative effect of any changes taking place.
- 3.188 Sporting or recreational uses that utilise open spaces between settlements may help to provide a functional open gap between settlements that helps to retain their individual character and identity. In these circumstances, proposals for such uses may be acceptable provided that any associated built development is minimised in number and scale, located appropriately and designed to a high standard without undermining the principal aim of the policy.

Policy SP7 - Separation of Settlements

Proposals for built development on non-allocated sites outside the built up confines of settlements shall be permitted only where its impact, individually or cumulatively, would not result in the coalescence or merging of two (or more) separate settlements, or the significant erosion of a gap between settlements resulting in the loss of individual identity or character.

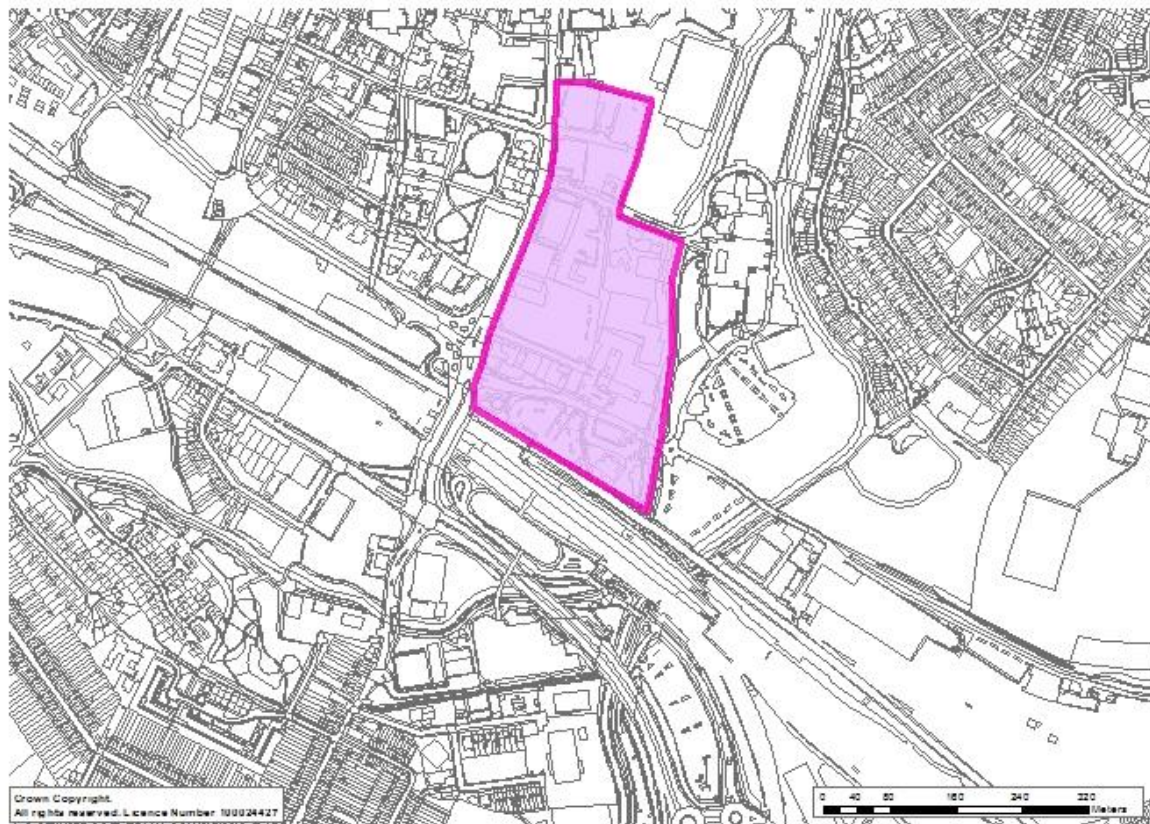
Proposals for outdoor sports and recreational uses will be permitted subject to there being no overriding conflict with other policies and the wider objectives of the Plan. Any related built development should be kept to the minimum necessary to enable the functioning of the associated use, be sensitively located and of a high quality design.

CHAPTER 4 - SITE POLICIES

- 4.1 This section of the Local Plan deals with a set of detailed site specific policies.
- 4.2 These site policies set out a range of criteria that development of the site must adhere to and the policy should be read in conjunction with the reasoned justification that precedes it. There are number of other relevant policies set out in this Plan that will apply to all sites, as well as those specific criteria set out in the site policy, which have not been repeated in the site policies. These include, but are not limited to, the following:
- Affordable housing requirements (policy HOU1),
 - Providing a range and mix of dwelling types and sizes (HOU18),
 - Sustainable Drainage Systems (policy ENV9),
 - Parking Standards (policies TRA3 (a) and (b),
 - Improvements to bus services (policy TRA4),
 - The protection of the integrity of European Sites and enhancement of biodiversity (ENV1),
 - Sewerage and draining provision (policy ENV8),
 - Delivery of community provision and facilities (policy COM1),
 - Delivery of sports, recreation and play space (policy COM2),
 - Delivery of needed infrastructure (policy IMP1).
- 4.3 The Local Plan should be read as a whole, but in the event of any conflict between a site specific policy and a generic policy, the site specific policy should take precedence.

Ashford Urban Area

Commercial Quarter



- 4.4 This area, adjacent to the stations, will become the dynamic new main business sector of the town – a new office quarter complemented with smaller scale residential, retail and space for eating and drinking. The area plays a key part in delivering the wider vision for the town centre and, for this reason, a specific site policy is needed.
- 4.5 Throughout the area the emphasis will be on creating a network of routes and space and a very high quality public realm – each phase of development making its contribution to this. This network should be animated by local amenities such as small shops, cafes or bars and public art. A central public space within the Quarter will enable a local focal point to be created. This will help set a standard that will give added confidence to future investors and help bring forward further growth. An approved ‘Design Framework’ provides the basis for this development – this may well require updating to reflect market trends as these change over the relatively long period it will take to complete all phases of the Commercial Quarter.
- 4.6 Different parts of the site have different roles to play. In the Dover Place area, there is potential to reuse heritage buildings and create new flexible space to house smaller office users – for example, IT and media businesses and small workshop space office suites as well as supporting retail and venues for food and drink. This is the entrance to the area from the stations and needs to take advantage of the inherent character of some of the buildings that remain to provide an appealing and welcoming with a lively mix of uses, with existing buildings and new ones working in an interesting juxtaposition. The benchmark for the

quality of public realm expected throughout the area has already been set in the works carried out in this area.

- 4.7 The riverside frontage of the site is well suited to a residential-led mix of uses providing riverside access and direct pedestrian access over a new bridge to the South Park and Stour Centre. The listed Whist House should be restored as part of the development of this part of the site either to its former residential use or a suitable alternative use.
- 4.8 The first phase office development is likely on the area of the existing car park and at least two further phases can be accommodated on land controlled by the Borough Council. As the development progresses, Royal Mail - who currently remain on the site - have previously indicated they will seek to relocate, creating space for a further series of phased developments. The Design Framework provides an indicative phasing and car parking strategy as development takes place.
- 4.9 The northern part of the site also includes existing offices and Ashford Bowling, alongside a public car park owned by the Council. This land is not required to come forward to deliver the level of development envisaged in the policy below but are suitable locations for office development and are well placed to respond if the Commercial Quarter develops as proposed. The car park is considered a suitable location for a future Multi Storey Car Park, utilising its accessibility to the Town Centre and existing access onto Station Road. Should this come forward, the possibility of providing an additional access onto Tannery Lane should be considered as part of the proposal to help with traffic movements in this area. Proposals coming forward on the northern part of the site will need to demonstrate how they will complement the delivery of what is envisaged on the remaining parts of the Commercial Quarter.
- 4.10 Unlike many parts of the town centre where a predominant, historic scale of 3-4 storeys exists, there is the opportunity for larger scale development blocks here. The topography of the Quarter slopes away from the town centre so that taller buildings are less prominent and, of course, International House is an existing landmark feature. It is not proposed to replicate the height of International House - development fronting Station Road should average 5-6 storeys. There may be scope for building(s) of 7-8 storeys closer to the centre of the Quarter and International House but this would depend on a clear design rationale being agreed for the site as a whole and this would need to be tested through detailed modelling. On the riverside, 2-4 storeys is likely to be the appropriate range.
- 4.11 Non-residential development in the Commercial Quarter will be required to provide proportionate contributions towards the delivery of strategic parking provision in the town, such as the delivery of a Town Centre Multi Storey Car Park and or a Park and Ride site outside the Town Centre area.

Policy S1 - Commercial Quarter

The Commercial Quarter is proposed to become an important new office based district playing a key role in creating jobs for the town centre and growing the wider economy of the Borough. The site has the potential to deliver up to 55,000 sq m of new office floorspace.

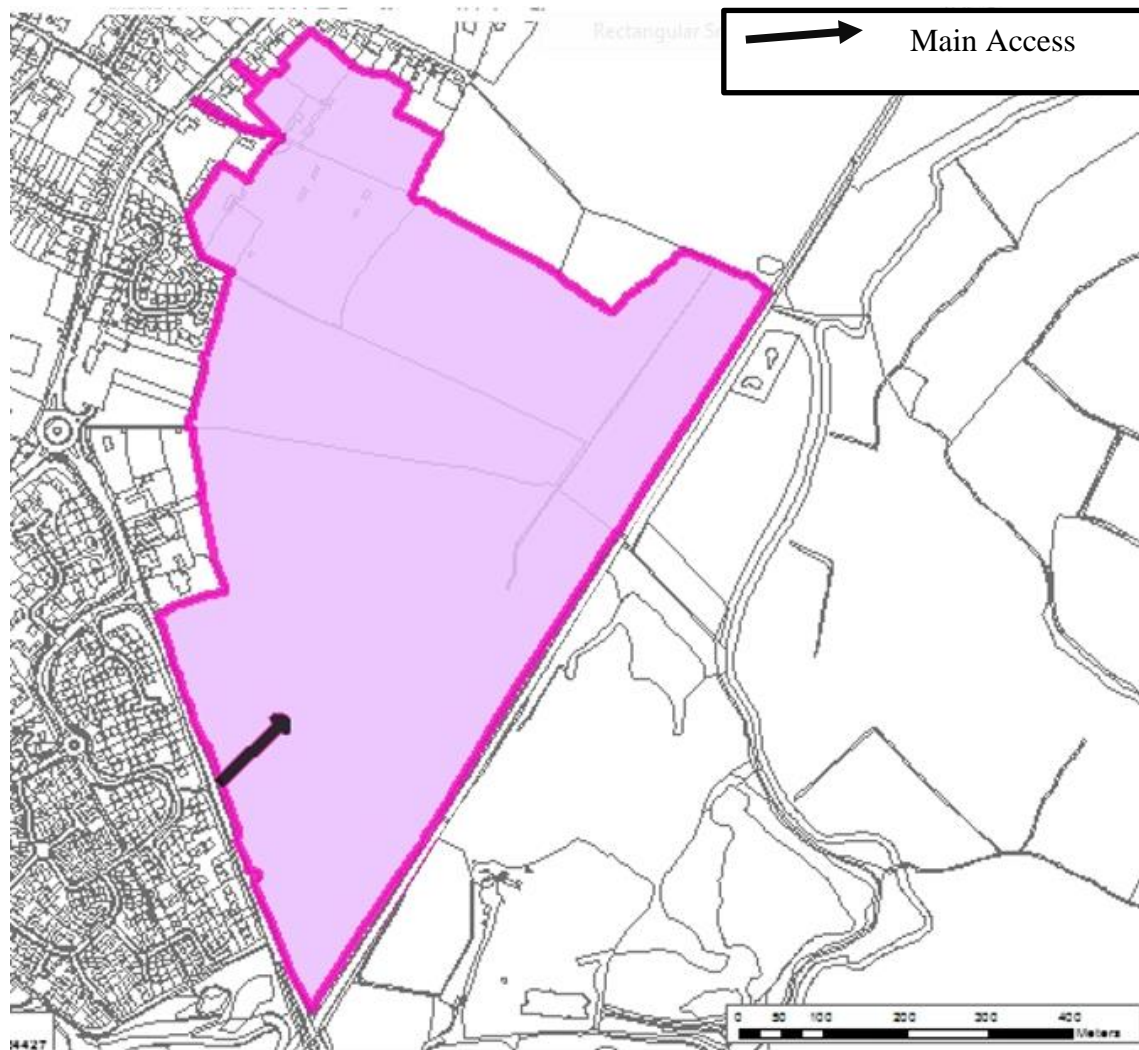
In addition to offices, other secondary uses such as residential apartments, small scale retail and/ or leisure uses and a hotel would also be appropriate in this Quarter, providing they complement the wider objective to deliver the substantial commercial space envisaged here. The site also has the potential to deliver residential apartments. To the northern part of the site, a multi storey car park is envisaged to come forward.

The Quarter should be delivered in phases and this needs to be guided by a ‘Design Framework’ which may need revising as the Quarter is developed. The quality of the public realm linking the component parts of the Quarter and more widely to the stations and shopping heart of the town centre needs to be of an especially high quality and each phase will need to be designed and delivered with this in mind. Active uses will be needed to help animate key routes and important focal points at junctions.

Development in this Quarter should generally be an average of 5-6 storeys above ground level although slightly taller buildings may be appropriate towards the heart of the site. The riverside frontage should generally not exceed 4 storeys.

Non-residential development in the Commercial Quarter will be required to provide proportionate contributions towards the delivery of strategic parking provision in the town, such as the delivery of a Town Centre Multi-Storey Car Park and / or a Park and Ride site outside the Town Centre area.

Land North-East of Willesborough Road, Kennington



- 4.12 The site is located on the north-eastern edge of the built up area of Ashford. It is bounded to the west by Willesborough Road, and the residential development of Little Burton Farm. To the east is the Ashford to Canterbury railway line, with Conningbrook Country Park and Julie Rose Stadium over the railway line. Residential development is proposed (part of which has planning permission) on the Conningbrook site, and will run from Willesborough Road, along half of the site's eastern boundary, on the other side of the railway line. Linear residential development along Canterbury Road forms the north-western boundary of the site. To the north and east lies further agricultural land.
- 4.13 The site is best and most versatile agricultural land (approximately 60% being Grade 1) predominantly in arable use, with a small area of the northern corner of the site, being a separate smallholding not in active use. This part of the site contains redundant agricultural buildings. The site is slightly undulating and slopes downwards from south-west to north-east, towards the railway line and the open countryside to the north.

- 4.14 The site is located on the edge of the existing urban area, and half of its boundaries are currently adjacent to residential development. Once the Conningbrook site has been developed, the site would form a wedge of open land between residential developments on three of its sides. The site is located close to existing services, and in particular there is an opportunity for the Conningbrook Country Park and Julie Rose Stadium to become a hub for local facilities, adjacent to the site.
- 4.15 The site is proposed as one of the strategic housing allocations in this Plan, and is considered appropriate for residential development in line with the strategy for the distribution of housing as outlined in Policy SP2 . The boundary of the site has been informed by the characteristics of the existing built form, in particular the extent of residential development along Canterbury Road, and to minimise the extent to which the development extends into open countryside.
- 4.16 The site, which is approximately 40 ha in size, is allocated for primarily residential development with an indicative capacity of 700 dwellings, although a final site capacity should be determined following a detailed and inclusive site masterplanning exercise that should inform any planning applications for development on the site. The site should also include a serviced area of land sufficient for the provision of a Two Form Entry Primary School (currently 2.05 hectares).
- 4.17 Development of the site will need to pay particular regard to the topography of the site, and its relationship with the surrounding built development. The design and layout of the site must take into account the residential amenity of the occupiers of existing residential properties along Canterbury Road, Willesborough Road, Canon Woods Way and Orchard Lane.
- 4.17.1 The Kent Downs AONB lies approximately 1km to the north of the site. In order to minimise any impact on views from the AONB a Landscape and Visual Impact Assessment should be carried out to inform details of structural and internal landscaping and building heights within the proposed development.
- 4.18 The existing tree/hedge lines along the boundaries of the site shall all be maintained and improved other than along Willesborough Road where there may be some loss in order to provide the necessary vehicular accesses to the site. The provision along the railway line should provide a suitable visual and acoustic barrier.
- 4.19 The landowner of the northern corner of the site has indicated an interest in delivering self-build properties on that area of the site. In accordance with policy HOU6 the development will be required to deliver a minimum of 5% of the dwellings as self-build, and this area of the site is considered to be suitable to provide for this requirement.
- 4.20 The primary vehicular access to the site should be provided from the Willesborough Road. The exact location and form of the access shall be determined following an assessment of the traffic generation onto the Willesborough Road. A secondary/emergency vehicular access to the site should also be provided, and the most appropriate location for this will need to be considered in liaison with the Local Highways Authority.
- 4.21 There are also two potential minor access points to the site from Canterbury Road, however they are relatively narrow and located between residential properties and the Croft Hotel, and

it may not be possible to obtain the necessary visibility splays. These accesses are therefore only likely to be suitable for very limited levels of traffic, however they may be considered for the secondary/emergency access. Development proposals for the site must therefore include a detailed assessment as to the suitability of any access onto Canterbury Road, in liaison with the Local Highways Authority.

- 4.22 The transport modelling carried out in support of the Local Plan has demonstrated there will be an impact of the proposal upon the wider transport network. A Full Transport Assessment will be required to be submitted in support of a planning application for development of this site. This should consider the impact of the proposal on the wider road network, and make recommendations to improve capacity at existing junctions where necessary and possible. Funding for an extension of existing bus services in the area should be part of a package of measures designed to ameliorate the impact of additional traffic.
- 4.23 The combination of this proposal and the development permitted and proposed in Policy S19 at Conningbrook means that there will be additional traffic at M20 Junction 10. Consequently, no occupations of the residential development on this site may take place prior to the completion of Junction 10a, in accordance with Policy TRA1.
- 4.24 There are two public rights of way running east-west across the site. One provides an at-grade pedestrian crossing over the railway line into the Conningbrook Country Park. The other diverts north to meet a further public right of way which runs just beyond and along the northern boundary of the site, and provides a further at-grade pedestrian crossing over the railway line. Given the proposed scale of development here, combined with that at Conningbrook means that considerable additional use of the at-grade crossings could be expected. Network Rail has advised that due to the increased risk, the existing at-grade crossings will need to be closed at the time of the development. The Council's preferred solution would be to provide a new pedestrian / cycleway bridge over the railway in order to provide safer access into the Country Park from the site and wider area. Therefore, proposals for the development of the site must fully investigate the potential for it to deliver a new single bridge crossing over the railway line, with the intention of retaining the PRoWs as far as possible. In addition, the proposals for the site must also include cycleways and pedestrian routes that link Willesborough Road and Canterbury Road through the site.
- 4.25 Part of the site, along the eastern boundary with the railway line is located within Flood Zone 2. In line with the National Planning Policy Framework, it is unlikely that residential development on this part of the site would be considered acceptable but a full flood risk assessment will need to be carried out in consultation with the Environment Agency. In the event that this area cannot be used for residential development, it should be utilised for publically accessible open space.
- 4.26 Development of this site presents an opportunity to incorporate a sustainable drainage system that will contribute to managing surface water for the benefit of flood risk, water quality, biodiversity and amenity. A drainage strategy will be required to show how the impact of the development will be reduced through site design and SUDS techniques.
- 4.27 Southern Water's assessment has revealed that additional sewerage infrastructure would be required to serve the proposed development. The development will therefore be required to make a connection to the nearest point of adequate capacity in the sewerage network. Early liaison should take place with the service provider in this regard.

- 4.27.1 There is existing sewerage infrastructure on the site that needs to be taken into account when designing the proposed development. An easement width of between 6 and 13 metres would be required depending upon the pipe size and depth. This easement should be clear of all proposed buildings and substantial tree planting.
- 4.27.2 Southern Water has advised that there are pumping stations on the boundary of the site that need to be taken into account so that the proposed design safeguards the amenity of future occupiers of the proposed development. The developer should liaise with Southern Water to ensure this can be taken into account when designing the layout of the proposed development.
- 4.28 The northern corner of the site contains features that have the potential to support protected species and biodiversity. Further detailed investigation will be required to determine whether the site does support protected species and biodiversity, and proposals should include any mitigation necessary in order to minimise any impact upon nature conservation.
- 4.29 Part of the site is located adjacent to the railway line. It is likely due to the location of the flood plain, that only a limited number of properties will be located directly adjacent to the railway line. However, the development proposals will need to demonstrate how they have been laid out and designed in order to minimise the impact from noise and vibration on the amenity of future residents of the development. A noise and vibration assessment will be required to be submitted in support of the planning application for the development.
- 4.30 The former Orchard Lane Landfill site is located on the northern boundary of the site, and there is evidence of soil contamination on parts of the site. Detailed proposals for development here will need to investigate this and ensure that any land contamination is appropriately dealt with prior to development taking place.
- 4.31 Kent County Council (KCC) is currently searching for a site for a 2FE primary school within the Willesborough and/or Kennington area in order to meet the need for primary school places. This site provides a suitable location for the provision of a primary school to meet this need. This development will be required to provide the land for the school, and make a proportionate S106 financial contribution towards primary school places to meet the needs for primary school places generated from this development.
- 4.32 Due to the current pressures with regard to primary school places it is envisaged that the primary school will be delivered in the initial stages of the development and this could be achieved prior to the completion of M20 Junction 10a. Liaison will be required with KCC to ensure the school can be delivered in a timely manner and to agree the details for doing this.

Policy S2 - Land north-east of Willesborough Road, Kennington

Land to the north-east of Willesborough Road, Kennington, is proposed for residential development with an indicative capacity of 700 dwellings. A serviced area of land shall be provided within the site for the development of a two form entry primary school. Development proposals for the site shall be designed and implemented in accordance with an agreed masterplan for the general layout and delivery of development and related infrastructure on the site. The masterplan shall be developed taking into account the following:

- a) The topography of the site and residential amenity of neighbouring occupiers of the site.**
- b) A full flood risk assessment that has been prepared in consultation with the Environment Agency.**
- c) Primary access to the site shall be provided from Willesborough Road, with the location of a secondary/emergency access to be determined following further investigation into the feasibility of access onto the Canterbury Road, in liaison with the Local Highways Authority.**
- d) 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. 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 into the country park.**
- e) The existing trees and hedgerows along the boundaries to Willesborough Road, the railway line, and the northern countryside shall be retained and enhanced, except to provide suitable access.**
- f) Proposals for ecological mitigation and enhancement measures are to be provided on the site informed by a habitat survey.**
- g) The location of the primary school site shall be determined following liaison with Kent County Council, and the site should be made available in the initial stage of developing the wider site.**
- h) Provision of an extension to the Green Corridor, allotments and areas of informal open space to meet the needs of the development.**
- i) The need to minimise the impact of noise and vibration from the railway line on the amenity of future occupiers of the development, informed by a noise and vibration assessment.**
- j) Consider the impact upon views from the Kent Downs AONB, informed by a landscape and visual impact assessment, to determine appropriate structural and internal landscaping and building heights.**

In addition, the development shall:

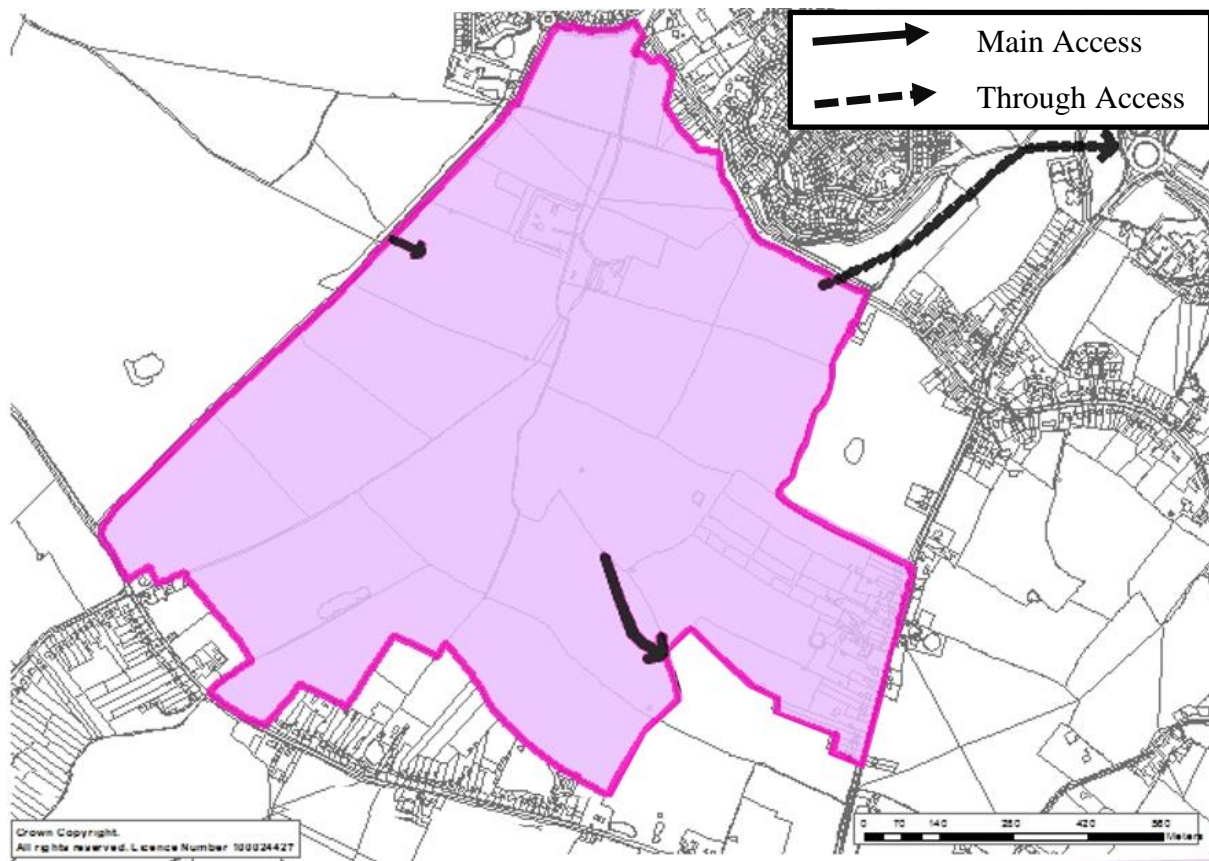
- i. Make improvements to the local road network, where necessary and achievable, informed by a Transport Assessment carried out in liaison with KCC Highways and Transportation.**
- ii. Provide a proportionate financial contribution to the delivery of Highway England's scheme for a new M20 Junction 10a.**
- iii. Provide a financial contribution to the extension of existing bus services in the area to serve the development.**

Cont...

- iv. **Provide a proportionate contribution towards primary education to contribute towards the delivery of the primary school on site.**
- v. **Ensure that any land contamination issues are satisfactorily resolved or mitigated.**
- vi. **Provide a connection to the nearest point of adequate capacity in the sewerage network, in collaboration with the service provider; and provide future access to the existing sewerage infrastructure for maintenance and upsizing purposes’.**

No occupation of the residential element of the development shall take place until the proposed M20 Junction 10a is complete, in accordance with Policy TRA1.

Court Lodge



Please see Chapter 7 for detailed area map

- 4.33 The site lies to the south of Pound Lane, east of Long Length and north of Magpie Hall Road. It is largely flat, arable and grazing land which lies partly within the floodplain of the Whitewater Dyke which passes through the site. It lies immediately to the south of the existing built-up extent of Ashford (Knights Park).
- 4.34 The site is proposed for residential development with an indicative capacity of 950 dwellings, although a final site capacity should be determined following a detailed and inclusive site masterplanning exercise that should inform any planning application for development on the site. A detailed Flood Risk Assessment will be required to support any planning application to ensure the latest flood modelling advice and information can be taken into account in the detailed layout for the site. As part of this remodelling, opportunities to improve channel flow in the Dyke should be taken to provide potential flood benefits on-site and downstream. The design of Sustainable Drainage Systems (SuDS) on the site will also need to ensure that drainage measures contribute to ensuring that existing properties near to the site are not adversely affected by the development.
- 4.35 The masterplan will also need to demonstrate how any remodelling of the floodplain and the delivery of SuDS form part of a wider landscape strategy for the site that seeks to utilise the higher ground to the eastern boundary as part of a broader buffer area to the properties that front Ashford Road as well as landscaping within the built up areas to create attractive public realm and natural shading.

- 4.35.1 The built footprint of the development should be established through further discussions with the Environment Agency with the objective of consolidating development on the northern half of the site if possible as this will enable closer links to the existing residential development to the north and providing publically accessible space through an extension to the Discovery Park being formed west of Long Length. If this proves not to be possible, an alternative layout may be considered that keeps the existing floodplain area free from built development but with a more dispersed development footprint. In either circumstance, suitable areas for public open space and ecological mitigation will need to be provided.
- 4.36 To provide a focal point for the community, the development shall also include a ‘local centre’ for the provision of day to day retail services of up to 450 sq.m. This will also need to include land for the provision of a new 2FE primary school to serve the local area, which the developer will be expected to fund in part, and up to 350 sq.m. of serviced local employment (B1) space. A Community building should also be provided at the local centre which is designed so that its space may be used on a flexible basis by different community groups. The precise scale and specification of this building should be determined in association with the Borough and Parish Councils and other local stakeholder groups. The provision of the services and facilities at the local centre will need to be phased in accordance with the masterplan for the development of the site taking account of the availability and capacity of nearby facilities.
- 4.37 The Local Centre will also need to be sited at the confluence of the main vehicular links through the development. This will, initially, include a route from the north via Pound Lane or Merino Way and a route from the west via Long Length. This latter route will also form part of a new ‘strategic’ route through the development to Pound Lane where it will meet a proposed new single-carriageway link road to the east of Knights Park linking with the A2070 junction at Park Farm (Forestall Meadow). It is expected that the development will help to fund the delivery of this new link road. In addition, the layout shall also provide for the delivery of a route to the south-east as far as the site boundary to deliver a connection to the proposed development allocation at north of Steeds Lane and Magpie Hall Road (see policy S4).
- 4.38 The route of the Roman Road that passes through the site should be utilised to create a strategic pedestrian route through the development area that also accesses the Local Centre directly. Further pedestrian links east to the site boundary should be provided to enable connectivity to Kingsnorth village and the green buffer planned to the south of Kingsnorth as part of a wider pedestrian route corridor from Discovery Park to the west.
- 4.39 Within the built footprint of the development, proposals should be brought forward for a variety of areas with different characters based on a varied set of design parameters and residential densities. Each character area should be defined by a legible street hierarchy that encourages connectivity and activity and takes account of its surroundings and context as well as its purpose in the wider development area. For example, it is expected that the area around the Local Centre would be characterised by relatively higher density development with a more ‘urban’ feel and include a mixture of apartments and houses. By contrast, the southern periphery of the built footprint overlooking the open space and parkland should have a lower residential density characterised by more detached properties in larger plots. A detailed design ‘model’ for each character area should be set out in the masterplan for the development and used to inform final dwelling capacities and layouts for specific phases. This should include mean and maximum net residential densities for each area.

- 4.40 This exercise will also need to show how the affordable housing elements of the scheme should be integrated. In accordance with policy HOU1, 30% of the final site capacity will need to be provided as affordable housing. These units should be distributed across different phases of the development.
- 4.41 The development shall also be expected to contribute towards the provision of sports and recreational facilities off-site based on Sport England's Facilities Planning Model. An equipped play space should be provided close to the local centre and opportunities for more informal play should be provided within the publically accessible open space in the southern half of the site. The development also provides an opportunity for new community allotments to be provided. These should be located in an accessible location with suitable parking facilities.
- 4.42 Given the scale of publically accessible space and ecological reserve areas to be created on the southern half of the site, it is important that there are suitable long term management arrangements in place. Development proposals for this site should include a management plan for these areas that will need to be funded for a period to be agreed with the Council.
- 4.43 The masterplan for the site will establish a minimum of 4 phases for the development. The initial phases shall include the delivery of the enabling works to the floodplain and the establishment of the ecological reserve areas to allow translocation of protected species. 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.

Policy S3 - Court Lodge

Land at Court Lodge Farm is proposed for residential development with an indicative capacity of 950 dwellings and a Local Centre, incorporating a new 2FE primary school, a set of local retail and employment space and a new community building. The development shall also provide a major new area of publically accessible open space that will form an extension to the planned strategic Discovery Park land that lies to the west of the site.

Development proposals for this site shall be designed and implemented in accordance with an agreed masterplan for the general layout and delivery of development and related infrastructure on the site. The masterplan shall include details of the following elements:-

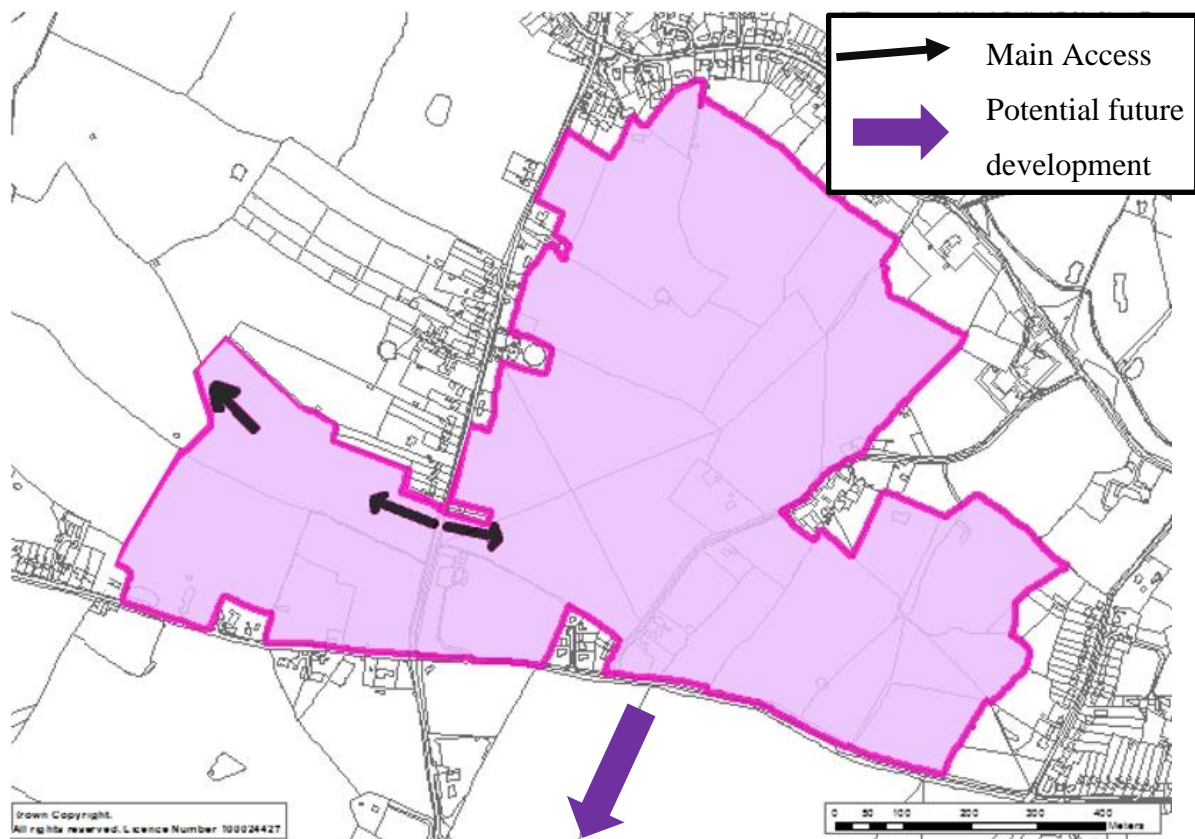
- a) Flood mitigation - being informed by a full flood risk assessment prepared in consultation with the Environment Agency, including levels and features to be introduced to manage flow along the Whitewater Dyke corridor.**
- b) Drainage - The layout and treatment of surface water drainage through the use of SuDS should be provided as an integral part of the landscape design and open space strategy along with acceptable maintenance arrangements and, west of Ashford Road, be compatible with drainage proposals serving adjacent development. The development should provide a connection to the nearest point of adequate capacity in the sewerage network, in collaboration with the service provider and provide future access to the existing sewerage infrastructure for maintenance and upsizing purposes.**
- c) Ecology – full details of ecological mitigation measures to be provided on the site and proposals for their implementation and future maintenance.**
- d) Landscaping and public open space – details showing where strategic areas of landscaping and open space provision on the site, including any allotments, will be established.**
- e) The ‘Local Centre’ – a detailed block layout showing how residential and non-residential uses will relate to each other, including details of the arrangement of the public realm, equipped play space and any public parking facilities.**
- f) Design and Layout principles – a series of principles that set out the prevailing scale and form of the urban environment to be created in different parts or phases of the development. This will include the mean net residential densities and maximum storey heights in any phase as well as road hierarchies, streetscape treatments and building to street width ratios.**
- g) Vehicular, pedestrian and cycleway access both at the edge and within the site – in conjunction with the road hierarchies to be set out above, details of linkages and connections to be provided throughout the built and open parts of the site, including the utilisation of the route of the former Roman Road.**
- h) Phasing – details of the proposed phasing of built development and infrastructure, including any necessary mitigation works either on or off site.**

cont.....

In addition, the development shall also:-

- i. Provide affordable housing in accordance with Policy HOU1 and provide a mix of dwelling types and sizes in accordance with Policy HOU18.**
- ii. Provide primary vehicular access from Long Length to Pound Lane via the Local Centre to enable connection to the Pound Lane Link Road to the north. Vehicular access to the south –eastern boundary of the site shall also be provided as part of any proposals for the development of the site. Any other links to local roads will be determined as part of the masterplan to be agreed.**
- iii. Provide a proportionate financial contribution to the delivery of the Pound Lane Link Road and the delivery of Highway England’s scheme for a new M20 Junction 10a.**

Land north of Steeds Lane and Magpie Hall Road



Please see Chapter 7 for detailed area map

- 4.44 This site lies to the north of the Steeds Lane/ Magpie Hall Road axis and either side of the Ashford Road. The site is in predominantly agricultural use with scattered homes and clusters of houses with a more linear pattern of development along Ashford Road adjoining the site. The predominant character is one of gently undulating farmland rising towards the north of the site to a small ridge from which there are good views of the surrounding countryside. To the north of the site there are more trees reflecting a stronger field pattern and sense of enclosure. This area is an important part of the wider setting of Kingsnorth village Conservation Area. To the south, the more formal landscape of the cricket field and the cluster of homes at the southern end of Bond Lane contrast with the mainly agricultural land around on both sides of the Ashford Road.
- 4.45 The main highway framework is the crossing of the north/ south Ashford Road and the east / west Steeds Lane/ Magpie Hall Road whilst towards the eastern side of the site, Bond Lane is a pleasant meandering rural lane.
- 4.46 This site is proposed for residential development with an indicative capacity of 400 dwellings, although a final site capacity should be determined following a detailed and comprehensive site masterplanning exercise that should inform any planning permission for development on the site. 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. There is potential for residential

development in three distinct parts of the site. The land north of the cricket ground forms the principal area of new development but smaller, secondary areas west of Ashford Road and east of Bond Lane can also contribute to the creation of a new settlement which has different and varied characters as part of it and which are part of a wider vision for how the area in general can be brought forward in a sustainable, high quality way.

- 4.47 The importance of avoiding coalescence in this area is emphasised elsewhere and so the northern extent of built development here needs to be carefully controlled. Development should sit below the ridge line that lies south of Kingsnorth village, with the ridge and the space between it and the village itself forming a strategic open buffer to protect the setting of Kingsnorth and create a sense of separation from the new development. The protection and enhancement of existing landscaping in this area is a key policy objective here and should be reflected in landscaping proposals for the development of the site.
- 4.48 In the area north of the cricket ground, the opportunity exists for a mix of residential densities but within an overall mean net density of around 20 dph. This should reflect a rural, village style character that would be appropriate in this location whilst allowing for some pockets of slightly higher density commensurate with many village layouts.
- 4.49 To the east of Bond Lane the setting is more rural and a significant and well defined gap of open countryside is needed between the area proposed for development and the community at Stumble Lane to avoid the areas coalescing. The Ancient Woodland at Isaac Wood forms a natural and visual boundary to the site and it will be important that there is a significant landscaped and open buffer between the woodland and the built footprint here. Consequently, low density homes in large plots are appropriate in the range 10 – 12 net dph.
- 4.50 To the north of the properties in Magpie Hall Road, the land is ecologically sensitive and forms part of the drainage areas from the higher land to the north, so development potential here is more limited. This land also directly links to the areas proposed for ecological and drainage mitigation associated with the neighbouring Court Lodge Farm site and the wider extension of Discovery Park (policy S3). Therefore, development is proposed north of the watercourse that passes through this area, to be accessed from a new road which will include provisions for buses, pedestrians and cyclists, that will eventually link through to the proposed Local Centre at Court Lodge. Development will help to animate this route and should wrap around the contours avoiding the higher ground to the north. Development here should also be at relatively low residential densities reflecting the characteristics of existing properties on Ashford Road and Magpie Hall Road.
- 4.51 Given the size and varying nature of different parts of the site and the need for great care in designing the relationship with neighbouring uses and countryside, the masterplan for the site needs to define the precise developable areas of the site and these will form the basis for setting actual net residential densities. Initially, masterplanning will need to establish a reasonable relationship between each area of new development and existing homes – for example, by sensitively designing and locating public open spaces and surface water drainage areas. More widely, the masterplanning will establish the detailed form of the place and the way its layout relates to the cricket ground at its heart. A comprehensive masterplan will help to build confidence for existing residents about those areas that will be developed and those that will be protected for the long term.

- 4.52 A landscape strategy will be needed as a key part of the masterplan. It will set out where public space and play areas will be provided; where landscape buffers are to be created, their scale and the planting proposals therein; the location of sustainable drainage features; areas of protected habitat; footpath links to the wider area and a viable, long term management plan for all these areas.
- 4.53 There are several listed buildings close to the boundary of the site (two on Ashford Road, two on Magpie Hall Road and two on Bond Lane). Their settings need to be preserved. There may be also be archaeological constraints on the site and therefore, a historic landscape survey and assessment will be needed.
- 4.54 The primary vehicle accesses to the site should be from Ashford Road. Traffic management measures put in place as part of this development at points north and south of the development area to mark the entrance to this enlarged community to control speeds and improve the environment of the main thoroughfare should be considered. This will enable junctions onto the Ashford Road to be of a less intrusive scale and design. The highway access created to serve development to the north of Magpie Hall Road will need to be designed to serve as the start of a road linking to the adjoining proposed Court Lodge development area. Land will need to be reserved and funding made available to complete the construction of this road to the site boundary. This will help to improve the road network in the area and spread traffic movements around the south of the town.
- 4.55 Similarly a package of traffic management measures will be needed on the more minor roads – Magpie Hall Road; Steeds Lane and Bond Lane – to help manage and limit traffic flows to levels that are appropriate given their rural nature and lack of pavements/ lighting, etc. Within the development itself, a network of routes should be established to inform a less urban character commensurate with the generally lower density and village-style form of development.
- 4.56 Provision of sports and leisure facilities will be required to meet the community needs arising from the development. This could be met in part through improvements to the existing cricket club and its facilities.
- 4.57 Public rights of way cross the site linking to Kingsnorth village to the north and the wider countryside to the south-east and west. A network of footpaths and cycleways is needed within the site and linking to the wider area, including links in an east-west direction to the Court Lodge site. Similarly, the layout of roads within the site should take account of the potential opportunities for future bus services to create connections with Court Lodge and Chilmington to the west and the Town Centre and Station to the north.
- 4.58 The scale of development allocated here in this Plan will not support local shopping on its own but the passing trade along Ashford Road provides an opportunity for a local convenience shop to serve new and existing residents. The detailed location and access arrangements for a suitable site fronting the Ashford Road will be established at the masterplanning stage. Similarly, the present scale of development would not support the provision of a new primary school as part of this allocation but proportionate contributions will be required.
- 4.59 Given the location, number of units proposed and size of the site, 30% of the dwellings shall be provided as affordable housing, in accordance with Policy HOU1.

4.60 In allocating this site, it is acknowledged that a more sustainable form of development that would sustain its own services and facilities may be achieved by a greater scale and extent of development in the future. The land south of Steeds Lane presents an opportunity to extend this allocation in the future so that a new Local Centre to complement that to be created at Court Lodge Farm may be formed and a more self-sufficient scale of development achieved with a more distinctive identity and character of place created. The masterplan for the site required by this policy should also acknowledge the potential future expansion of this area, particularly in establishing potential connectivity and the treatment of the boundary with Steeds Lane. The potential of the area south of Steeds Lane should be considered as part of the formal review of this Local Plan.

4.60.1 Careful consideration will need to be given to the impact of the proposed development on the parcel of Ancient Woodland (Isaacs Wood) within the boundary of the site on its eastern side. This could include the development of an appropriate management and access strategy, but will always involve its conservation and enhancement as part of the overall design of the area.

Policy S4 - Land north of Steeds Lane and Magpie Hall Road

Land north of Steeds Lane and Magpie Hall Road is proposed for residential development, with an indicative capacity of 400 dwellings. Development proposals for this site shall be in designed and implemented in accordance with an agreed masterplan for the general layout and delivery of development and related infrastructure on the site. The masterplan shall include details of the following elements:-

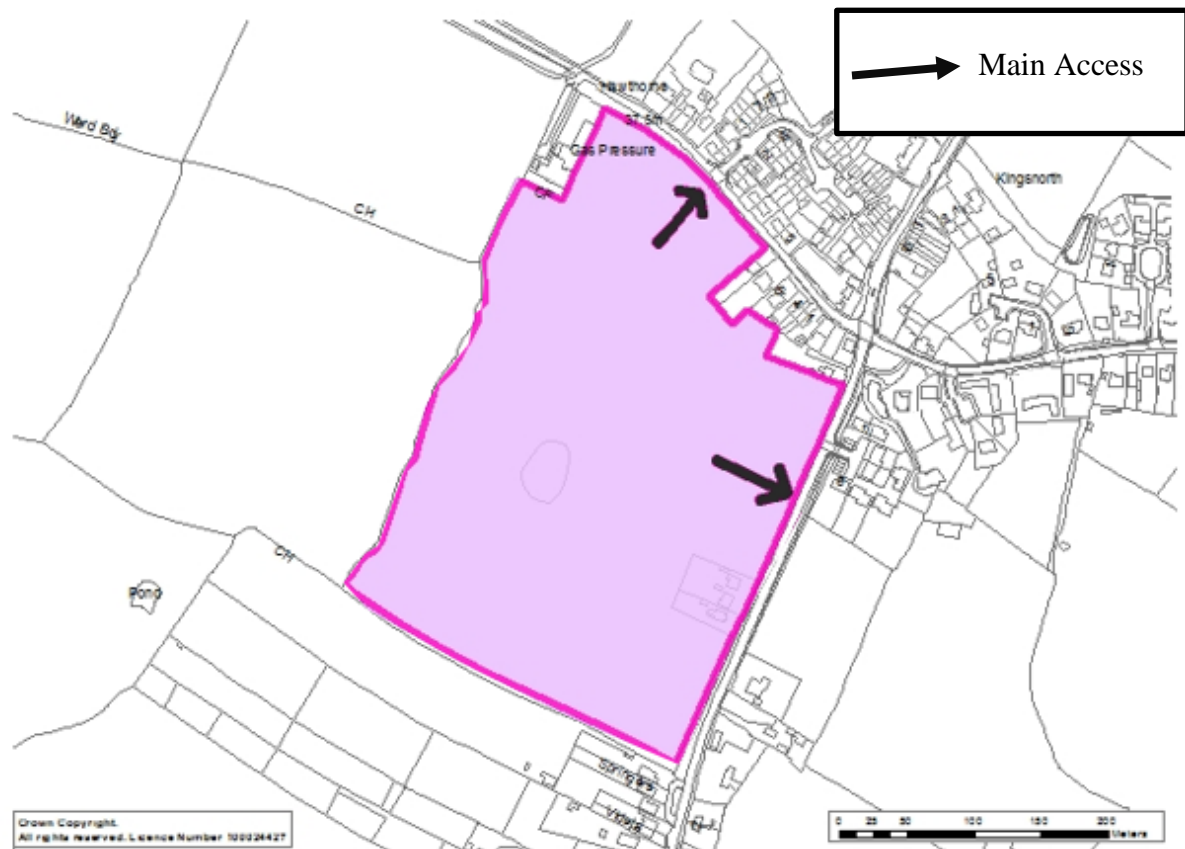
- a) **Design and layout principles – a series of models or codes that set out the prevailing scale and form of the urban environment to be created in each of the three separate areas of the site (north of the cricket ground; east of Bond Lane and west of Ashford Road). This will include the mean net residential densities to be created in each area as well as road hierarchies, streetscape treatments and building height to street width ratios.**
- b) **Highway access proposals – details of junction arrangements on Ashford Road, Steeds Lane and Bond Lane.**
- c) **Traffic management – details of any traffic / speed management measures proposed on any adopted highway within the site.**
- d) **Ecology – Appropriate species and habitat surveys will be carried out, details of which will inform ecological mitigation measures to be provided on the site and proposals for their future implementation, maintenance and monitoring. Particular attention to the conservation and enhancement of Isaacs Wood (Ancient woodland) will be required.**

- e) **Landscaping and open space** – details showing where strategic areas of landscaping and open space will be provided, including the retention of a significant open buffer area between the northern extent of the built part of the development and Kingsnorth village as shown on the policies map; and between the eastern extent of the built part of the development and the site boundary.
- f) **Drainage** – the layout and treatment of surface water drainage through the use of SuDS should be provided as an integral part of the landscape design and open space strategy along with acceptable maintenance arrangements and, west of Ashford Road, be compatible with drainage proposals serving the proposed Court Lodge development. The development should provide a connection to the nearest point of adequate capacity in the sewerage network, in collaboration with the service provider and provide future access to the existing sewerage infrastructure for maintenance and upsizing purposes.
- g) **Pedestrian / cycleway routes** - provide a network of pedestrian and cycle routes throughout the development with connections to existing rural routes and public rights of way and to the new development at Court Lodge.
- h) **Community facilities** – Public open space and suitably equipped play areas needed to serve the development, taking the opportunity to create a sense of the heart of the community being based around the cricket field at the main traffic corridor – Ashford Road. A local convenience store should be located here in a way that can take advantage of passing trade. A specific set of projects related to the scale of needs arising from the development will be identified in consultation with the local community and the cricket club.

In addition, the development shall also:-

- i. **Provide a proportionate financial contribution to the delivery of Highway England's scheme for a new Junction 10a.**
- ii. **Provide a link road from the Ashford Road to the boundary with the adjoining Court Lodge Farm development.**

Land South of Pound Lane



Please see Chapter 7 for detailed area map

- 4.61 This site lies to the south of Pound Lane and west of Ashford Road. It is flat, arable land that provides part of the setting of the village of Kingsnorth, which lies to the north and east. The site also adjoins the proposed Court Lodge Farm site allocation to the west (see policy S3).
- 4.62 The land rises gradually from north to south towards a shallow ridge that runs west – east either side of Ashford Road. Development of the site will need to take account of the strategic context provided by the nearby Court Lodge Farm and Steeds Lane/Magpie Hall Road proposed allocations and, in particular, the key objective of avoiding coalescence of development areas. 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. To this end, the southern part of the site should remain free from development so that it may form part of a broader swathe of open space that runs south of Kingsnorth (to the east) to the extension to the Discovery Park (to the west) and provides for the physical separation of Kingsnorth village from new developments to the south. This area should be publically accessible with pedestrian and cycleway links created across it that will form part of a wider pedestrian / cycleway network linking Discovery Park in the west to the land south of Kingsnorth village in the east. A landscaping strategy for the site should reflect this requirement and the need to provide some visual separation from the adjoining proposed development at Court Lodge Farm.

- 4.63 The principal access to the site should be gained from Ashford Road with a secondary access to Pound Lane. The potential for vehicular access directly west to the proposed Court Lodge site should not be prejudiced in any proposed layout on this site, and pedestrian and cycleway links should be provided to the site boundary to achieve connectivity to the proposed Court Lodge Local Centre in due course. The potential for signalling the Pound Lane / Church Hill / Ashford Road crossroads and closing the western arm to vehicles should be investigated once the link from Ashford Road to Pound Lane has been delivered.
- 4.64 The Whitewater Dyke flows close to the northern boundary of the site and a full Flood Risk Assessment will need to be undertaken to inform a detailed layout for development on the site. Similarly, given the topography of the site, proposals for sustainable drainage systems will need to form part of the layout on the site to ensure that runoff conditions are at least no worse than in an undeveloped state.
- 4.65 It is important that the amenities of the residents of the handful of existing properties on the southern side of Pound Lane are protected in the layout and orientation of any new development. This should mean that there is adequate separation and screening provided as part of any development on this site.
- 4.66 The proximity of the site to Kingsnorth village, the Park Farm District Centre and the proposed Court Lodge Farm Local Centre means that it would not be necessary for this site to accommodate additional new local recreational, educational or community facilities. However, proportionate financial contributions to deliver, improve, extend or refurbish existing or planned facilities as appropriate will be sought to mitigate the additional demands generated by development here. Informal and publically accessible open space should be provided as part of the undeveloped land at the southern end of the site.
- 4.67 It will be important for development here to pay regard to the nature of nearby existing and planned housing in terms of establishing an appropriate scale and density. To the north of Pound Lane, Riverside Close accommodates a series of mainly terraced properties whilst the nature of the properties on Pound Lane itself and along Ashford Road tends to be mainly detached or semi-detached. In accordance with policy HOU1, 30% of the dwellings on this site shall be provided as affordable housing and there should be a mix of dwelling types and sizes to reflect the nature of the surrounding area.

Policy S5 - Land South of Pound Lane

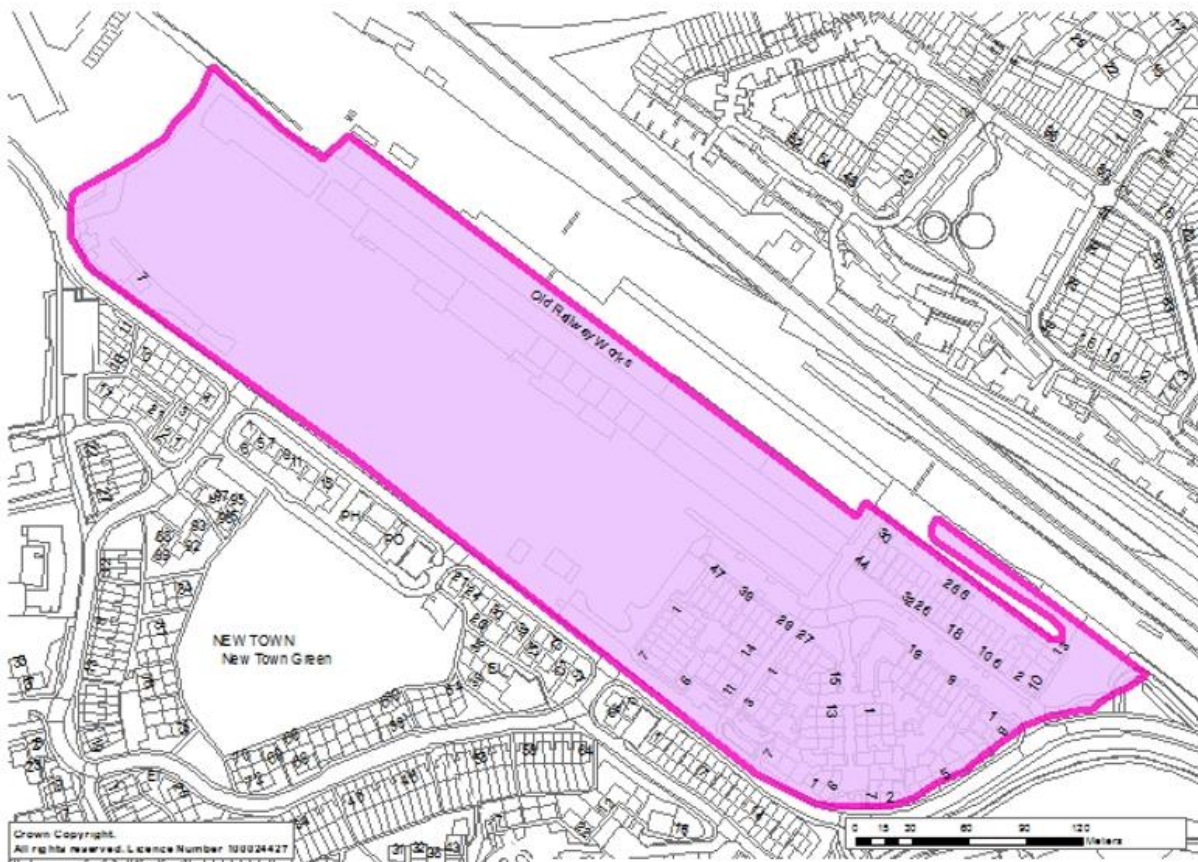
Land south of Pound Lane is proposed for residential development. The capacity of the site will be determined following a comprehensive masterplan exercise, but is proposed with an indicative capacity of 150 dwellings. Development proposals for this site shall:-

- a) Retain the southern part of the site free from built development, with the creation of pedestrian and cycleway links across the land from Ashford Road to the western site boundary.**
- b) Provide primary vehicular access from Ashford Road and a secondary access to Pound Lane. Proposals shall also enable the ability to provide a vehicular connection to the boundary with the adjoining Court Lodge Farm development.**
- c) In addition to the pedestrian and cycleway connection in (b) above, provide a network of pedestrian and cycleway links through the built part of the site including a connection to the site boundary with the adjoining Court Lodge development.**
- d) Provide a landscaping plan for the site, to be agreed by the Borough Council, to create a significant visual break with the adjoin Court Lodge development and to screening to the houses and gardens of any adjoining residential properties.**
- e) Be subject to a full Flood Risk Assessment, to be agreed by the Environment Agency and the Borough Council. The layout and treatment of surface water drainage will need to ensure that there is no adverse flooding or drainage effects to any neighbouring properties.**

In addition the development shall also:

- i. Provide a proportionate financial contribution to the delivery of Highway England's scheme for a new Junction 10A.**

Former Newtown Works



- 4.68 The former Newtown railway works site lies between Newtown Road and the main railway domestic and high speed railway lines. The site is one of the largest available areas of brownfield land in the Borough. The site contains six listed buildings which together form a very important heritage asset and a reminder of Ashford's historical importance as a centre of railway engineering. Part of the site has recently been developed for housing with over 100 new homes.
- 4.69 Suitable proposals for the site include residential, tourism uses, workshop and office employment space, and small scale specialist retail uses.
- 4.70 The listed railway sheds are the dominant feature in a very linear form along most of the length of the site – they provide some noise protection from the maintenance works and operational railway running along the north east boundary of the site but are a very important local heritage asset reflecting the town's railway heritage.
- 4.71 The site is closely linked to the adjoining former Klondyke Works (Policy S7) and together both sites have substantial undeveloped areas with the potential to accommodate suitable development that will both regenerate this area but also be an attractive place to visit for a much wider public. Given these opportunities, and the relationship between the site and the communities and other uses surrounding it, development should be planned comprehensively and proposals need to be based on an agreed masterplan for the whole site. This will also determine how the development is phased.

- 4.72 Vehicle access is available from either end of the Newtown Works site with the Listed clock tower and gatehouse providing much interest and character at the western access opposite the Klondyke site, whilst at the eastern end of the site, the new housing development helps to frame the entrance point. Detailed junction design will need to protect the settings of the listed gatehouse and clock tower, reduce related signage and safety barriers to the minimum and be able to handle the substantial pedestrian movements that are likely to arise in future.
- 4.73 Whilst the primary access will be from the western end of Newtown Road, additional traffic generated by the development will aggravate the situation on Crowbridge Road where there is a narrow, humped back bridge. The masterplan for the site will need to include proposals for signalisation here to tackle this.
- 4.74 A network of cycle and pedestrian routes is needed to show how the planned development on the site links to surrounding areas and helps to reverse the current, relatively isolated nature of the sites.
- 4.75 There is a strong opportunity to take advantage of the many visitors to the Designer Outlet Centre and the proximity of the domestic and international railway stations to attract people to this area to enjoy the railway heritage and help to make a mix of potential uses viable. In turn this will help to secure a long term future for the important listed buildings on the site which are a key part of Ashford's heritage.
- 4.76 The residential capacity of the site will be influenced by the eventual mix of uses and the type of homes built and so this policy only suggests an indicative capacity of about 450 homes to be provided on the site (including the 108 already constructed). Substantial employment floorspace is likely to be created within the existing listed buildings – especially the main locomotive shed. Convenience retailing to support the residential development on the site should be limited to no more than 450 sq.m. of any retail space created and any other retail units should be specialist and small scale in nature and demonstrated to not have a significant impact on the vitality and viability of the Town Centre.
- 4.77 The policy approach to the mix and combination of uses needs to be relatively flexible to help create the opportunity for a viable scheme to come forward that will fund the re-use and repair of the listed buildings and make good use of this substantial brownfield asset. There are, however, some key constraints that need to shape emerging schemes.
- 4.78 Before full development of the site can take place, off-site highway improvements are needed to provide additional capacity at the A2070 Orbital Park junction and a clear commitment to the delivery timetable for the new Junction 10a on the M20. The threshold set for the quantity of development that can be occupied on the site as a whole before these improvements are committed is based on the historic, 'fall back' position from previous uses on the Newtown and Klondyke sites. The relatively close proximity to the stations and town centre and the bus service through the area provide the opportunity to reduce the car based trip rate arising from the development of the area.

While it is expected that the delivery of improvements to the strategic road network will greatly enhance the ability of sites to come forward at pace, there will still be a need to ensure that traffic movements resulting from development proposals are sustainably managed. Therefore, where traffic generation to and from the site is expected to exceed that of previous

lawful uses, a Transport Statement/Transport Assessment should be provided in accordance with Policy TRA8.

- 4.79 Residents in the area have long been concerned about pressures arising for on-street parking from visitors and those working in the area. A comprehensive approach is needed that links any major development proposals on these sites to the provision of appropriate parking controls (for example, through a controlled parking zone) and a package of traffic management measures.
- 4.80 A comprehensive development proposal for the area will need to bring together land use proposals with traffic planning and parking issues and deal with the re-use of the historic buildings. The layout of the development should derive from an historical analysis of the site and create fine quality public spaces as the setting for both the linear form of the main listed sheds, and more intimate spaces around the other smaller listed buildings and the western entrance to the site. This should also determine the best route for through-traffic in the area – whether along Newtown Road or through the site itself – and for public transport access.
- 4.81 The heritage of the area needs to be reflected strongly in emerging proposals and special care given to the sensitive restoration and re-use of the remaining listed buildings, including the huge main locomotive shed. There may be scope for innovative but high quality design interventions to help enable re-use – for example, within the main shed. The masterplan will need to show how phased development of the site will enable the restoration, conversion and reuse of the listed buildings and ‘trigger points’ will be set to link the delivery of new build development to this phased strategy for recovering the historic assets.
- 4.82 The scale of new buildings should be carefully related to the scale of the listed buildings – both the imposing main shed and the smaller ancillary buildings. A scale of 4-6 storeys will be appropriate over much of the site with key corners and landmark locations within the site having special prominence. Building frontages and uses along the busiest parts of the public realm should be 'active' to add interest and vitality.
- 4.83 The site was levelled for their former railway use resulting in a significant change in levels where the land rises to the Newtown Road boundary. This has the effect of reinforcing a sense of separation between the site and Newtown itself, the railway village that once supported its workers. Residential development on the Newtown Road frontage should face the street and be designed to help integrate it with the existing residential area at Newtown – including respecting the predominantly 2-3 storey scale.
- 4.84 Three dimensional modelling will be required so the impact of new building can be tested and the scheme designed to create views of the listed buildings. Given the important heritage assets in the area and the likely demand for high levels of public access, the design of the public realm is especially important - for example, development proposals should include details of the design of outdoor lighting and street furniture, signage, bus shelters, public art and landscaping. The site designs will need to incorporate good public transport facilities, cycleways and pedestrian routes that link to the train station, Designer Outlet Centre and the Town Centre and also clear plans to meet the car parking needs of residents and visitors.
- 4.85 The impact on trees and biodiversity must be assessed prior to any development. There are a number of mature trees on the southern boundary along Newtown Road. A clear strategy will

need to be agreed for retention of important trees and replacement new planting where appropriate.

- 4.86 Details of a scheme to deal with contamination of land and/or groundwater must be submitted and approved for each phase of development and a programme of building recording to ensure that the historic buildings are properly examined and recorded. Archaeological field evaluation works must also be carried out on the site, along with any subsequent mitigation measures, before development commences. Capacity in the local sewerage system is insufficient to service the proposed development. It will be necessary to upgrade the existing local sewerage infrastructure before development can connect into it. It is also important that existing sewerage infrastructure which crosses the site is protected and future access secured for the purposes of maintenance and upsizing. Liaison with the relevant infrastructure company at the time is recommended.
- 4.87 Affordable housing will need to be provided in line with policy HOU1, subject to the viability of the overall package of proposals, recognising the considerable investment required in providing long term protection for the listed buildings. Starter homes will be an important element of any affordable provision. The affordable homes already created on site as part of the completed phase of development can be counted towards the future requirement arising on the site.
- 4.87.1 Southern Water's assessment has revealed that additional sewerage infrastructure would be required to serve the proposed development. The development will therefore be required to make a connection to the nearest point of adequate capacity in the sewerage network. Early liaison should take place with the service provider in this regard.

Policy S6 - Former Newtown Works

The site of the former Newtown Railway Works is proposed for a mixed use neighbourhood based around the regeneration of the area through the restoration of the range of listed railway buildings to create an attractive new place to live and work and for visitors to enjoy.

Suitable proposals for the area include residential, tourism uses, workshop and office employment space, and specialist, small-scale retail uses of a type that would not seriously impact on the town centre.

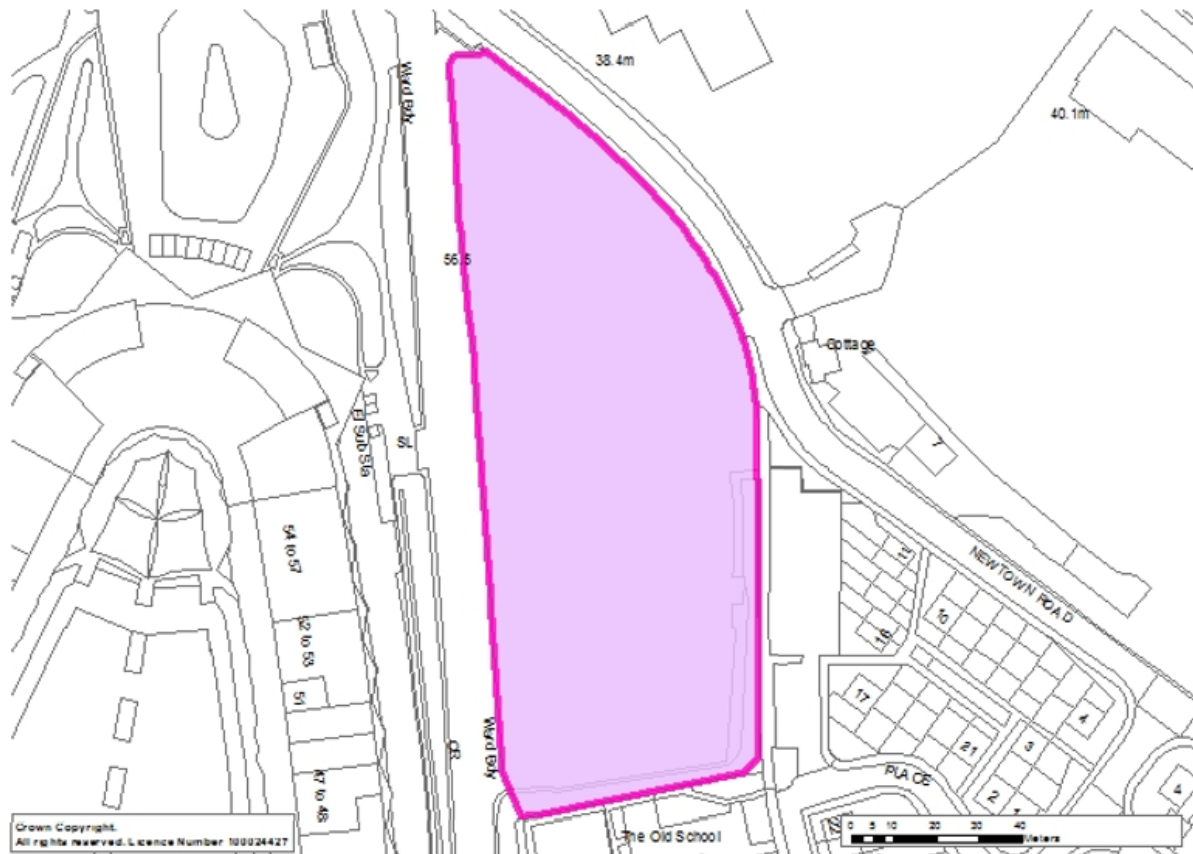
A comprehensive masterplan / development brief for the site and the adjoining Klondyke works should be prepared to inform the precise scale and mix of development here but it should include a new mixed use neighbourhood with at least 350 additional homes and a substantial area of commercial floorspace.

Development proposals for this site shall be in accordance with the agreed masterplan / development brief and:-

- a) ensure the restoration and re-use of the listed buildings on the site;**
- b) provide a sensitively design access to the site from Newtown Road taking account of the listed buildings affected;**
- c) be based on a parking strategy that provides adequate public and on-street parking to best meet the needs of residents and visitors;**
- d) fund the signalisation of the Crowbridge Road bridge, and traffic management works required as a result of the development;**
- e) accord with a detailed agreed phasing schedule that will include the timing of the redevelopment of the listed buildings on the site;**
- f) deliver excellent and comprehensively planned public realm as part of the development, including a detailed range of materials, proposals for outdoor lighting and street furniture, signage, bus shelters, public art and landscaping;**
- g) provide new pedestrian routes and cycleways throughout the development and convenient links to existing routes to areas around the site and local services and the town centre;**
- h) retain important trees and be based on a site-wide landscaping plan;**
- i) provide details that deal with contamination of land and/or groundwater, building recording and archaeology.**
- j) provide a connection to the nearest point of adequate capacity in the sewerage network, in collaboration with the service provider.**
- k) provide an adequate gap between the wastewater pumping station and development to allow odour dispersal and help prevent an unacceptable impact from vibration. Provide future access to the existing sewerage infrastructure for maintenance and upsizing purposes.**

Only development that would generate no more traffic than would have been generated by the equivalent of the previous lawful uses of the site, shall be built and occupied in advance of the granting of a Development Consent order for the construction of the proposed M20 Junction 10a and until additional capacity has been provided at the Orbital Park A2070 junction.

Former Klondyke Works



- 4.88 This former railway works site is located on Newtown Road close to the residential area of Newtown and the McArthur Glen Designer Outlet Centre lies on the other side of the Ashford to Hastings railway line to the west.
- 4.89 The site is closely linked to the adjoining former Newtown Works and together both sites have substantial undeveloped areas with the potential to accommodate suitable development that will both regenerate this area but also be an attractive place to visit for a much wider public. Given these opportunities, and the relationship between the site and the communities and other uses surrounding it, development should be planned comprehensively and proposals need to be based on an agreed masterplan for both sites. This will also determine how the development is phased.
- 4.90 There is a strong opportunity to take advantage of the many visitors to the Designer Outlet Centre and the proximity of the domestic and international railway station to attract people to this area to enjoy the railway heritage and help to make a mix of potential uses viable.
- 4.91 Planning permission has been granted for the Ashford International Model Railway Centre and associated parking on the site, which will be a significant visitor attraction for the Borough. If circumstances in the future were to change then an appropriate alternative use could be for a suitable residential development on the site.
- 4.92 In terms of the possible residential development of the site, the location of the site makes it suitable for a relatively high density development. A building scale of 3-4 storeys is

appropriate but both the scale and positioning of buildings at the southern end of the site will need to respect the domestic nature of the surrounding houses and converted school.

- 4.93 Whilst the primary access will be from the western end of Newtown Road, additional traffic generated by the development will aggravate the situation on Crowbridge Road where there is a narrow, humped back bridge. The masterplan for the site will need to include proposals for signalisation here to tackle this.
- 4.94 On the site there is a marked level change to the south which adds to the strength of containment of the site from the residential area to the south. The site borders the Hastings railway line and beyond that the Designer Outlet Centre which has planning permission for a significant extension up to Newtown Road.
- 4.95 Before full development of the site can take place, off-site highway improvements are needed to provide additional capacity at the A2070 Orbital Park junction and a clear commitment to the delivery timetable for the new Junction 10a on the M20. The threshold set for the quantity of development that can be occupied on the site as a whole before these improvements are committed is based on the historic, 'fall back' position from previous uses on the Newtown and Klondyke sites. The relatively close proximity to the stations and town centre and the bus service through the area provide the opportunity to reduce the car based trip rate arising from the development of the area.
- 4.95.1 While it is expected that the delivery of improvements to the strategic road network will greatly enhance the ability of sites to come forward at pace, there will still be a need to ensure that traffic movements resulting from development proposals are sustainably managed. Therefore, where traffic generation to and from the site is expected to exceed that of previous lawful uses, a Transport Statement/Transport Assessment should be provided in accordance with Policy TRA8.
- 4.96 Residents in the area have long been concerned about pressures arising for on-street parking from visitors and those working in the area. A comprehensive approach is needed that links any major development proposals on the sites to the provision of appropriate parking controls and a package of traffic management measures.
- 4.97 Given the important heritage assets in the area and the likely demand for high levels of public access, the design of the public realm is especially important - for example, development proposals should include details of the design of outdoor lighting and street furniture, signage, bus shelters, public art and landscaping. The site designs will need to incorporate good public transport facilities, cycleways and pedestrian routes that link to the train station, Designer Outlet Centre and the Town Centre and also clear plans to meet the car parking needs of residents and visitors.
- 4.98 The impact on trees and biodiversity must be assessed prior to any development. There are a number of mature trees on the southern edges of the site and a clear strategy will need to be agreed for retention of important trees and replacement new planting where appropriate.
- 4.99 Details of a scheme to deal with contamination of land and/or groundwater must be submitted and approved for each phase of development and a programme of building recording to ensure that the historic buildings are properly examined and recorded. Archaeological field evaluation works must also be carried out on the site, along with any subsequent mitigation

measures, before development commences. Capacity in the local sewerage system is insufficient to service the proposed development. It will be necessary to upgrade the existing local sewerage infrastructure before development can connect into it. It is also important that existing sewerage infrastructure which crosses the site is protected and future access secured for the purposes of maintenance and upsizing. Liaison with the relevant infrastructure company at the time is recommended.

Policy S7 - Former Klondyke Works

The site of the former Klondyke Railway Works is proposed for a tourism/visitor attraction use such as the Ashford International Model Railway Centre. A suitable alternative use would be for residential development.

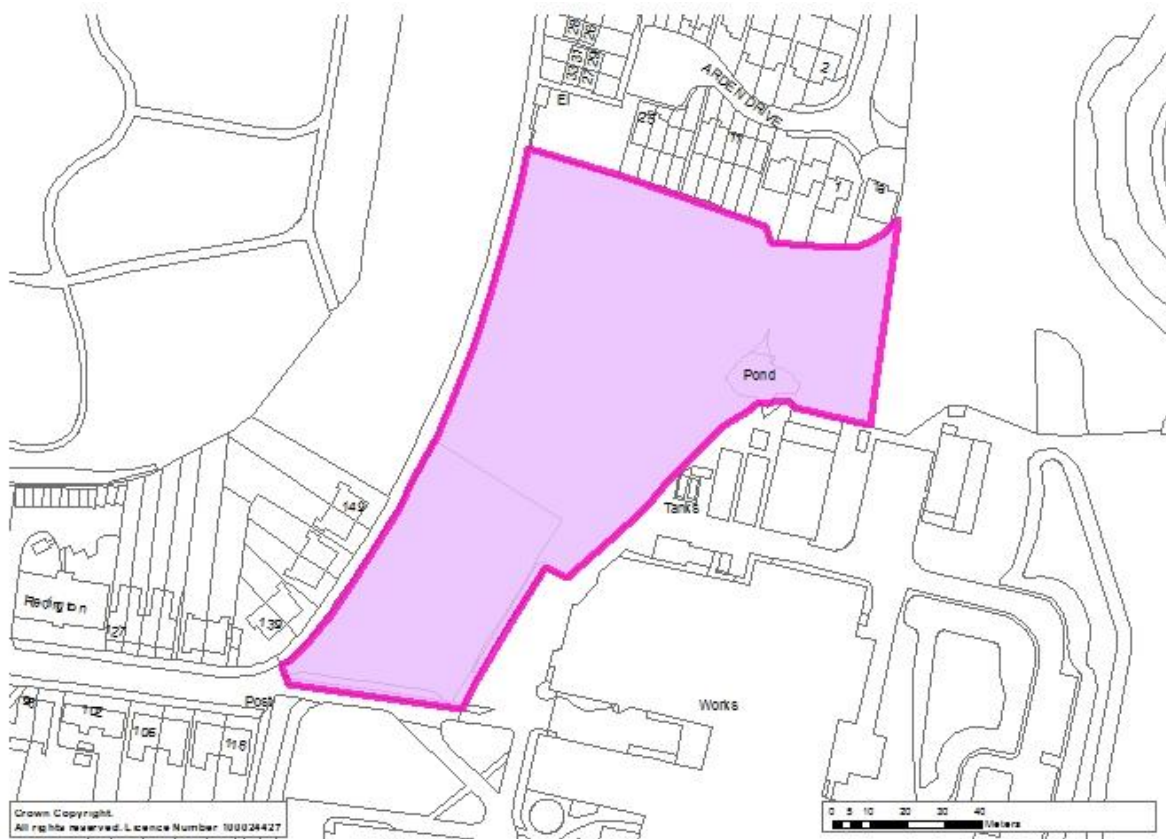
A comprehensive masterplan / development brief for the site and the adjoining Newtown Works site should be prepared.

Development proposals for this site shall be in accordance with the agreed masterplan / development brief and:-

- a) **provide a sensitively design access to the sites from Newtown Road;**
- b) **be based on a parking strategy that provides adequate public and on-street parking to best meet the needs of residents and visitors;**
- c) **fund the signalisation of the Crowbridge Road bridge, and traffic management works required as a result of the development;**
- d) **deliver excellent and comprehensively planned public realm as part of the development, including a detailed range of materials, proposals for outdoor lighting and street furniture, signage, bus shelters, public art and landscaping;**
- e) **provide new pedestrian routes and cycleways and convenient links to existing routes to areas around the site and local services and the town centre;**
- f) **retain important trees and be based on a site-wide landscaping plan;**
- g) **provide details that deal with contamination of land and/or groundwater, building recording and archaeology.**

Only development that would generate no more traffic than would have been generated by the equivalent of the previous lawful uses of the site, shall be built and occupied in advance of the granting of a Development Consent order for the construction of the proposed M20 Junction 10a and until additional capacity has been provided at the Orbital Park A2070 junction.

Lower Queen's Road



- 4.100 The site is at the eastern end of Lower Queens Road and adjacent to the Invicta Press works to the south. Existing residential development lies to the north and the site adjoins the green corridor to the east. The northern half of the site is currently unmanaged woodland, with the southern part currently forming the Invicta Press car park.
- 4.101 Residential development will be acceptable on this site for up to 40 dwellings. Alternatively, this site could form the first phase of a wider redevelopment scheme with the potential to create an attractive residential riverside environment close to the town centre in tandem with the redevelopment of the adjacent Mace lane industrial estate to the south.
- 4.102 The primary access to this site should be from Lower Queens Road but if there is redevelopment of the wider area, in excess of the 40 units, there will be a requirement for the provision of a primary access onto Mace Lane and at this point the potential to restrict access into the whole site from Lower Queens Road, including full closure, should be thoroughly investigated.
- 4.103 The area has an attractive setting next to the green corridor but any development will need to demonstrate how it would make a positive contribution to the setting and appearance of the green corridor through innovative design and layout. Development must be of an appropriate scale and reflect existing development in the area ranging between 2 – 3 storeys in height.
- 4.104 Given the location, size and number of units envisaged for the site, 30% of the dwellings shall be provided as affordable housing in accordance with Policy HOU1.

- 4.105 An existing sewer runs beneath the site and any layout of development will need to ensure that the existing sewerage infrastructure on site is protected and future access secured for the purposes of maintenance and upsizing. Liaison with the relevant infrastructure company at the time is recommended.
- 4.106 Access to open space and recreational facilities will need to be improved by linking development on the site to the wider network of existing pedestrian/cycle paths surrounding the site. New pedestrian/cycleway routes that improve accessibility into and through the Green corridor to the east shall be provided.

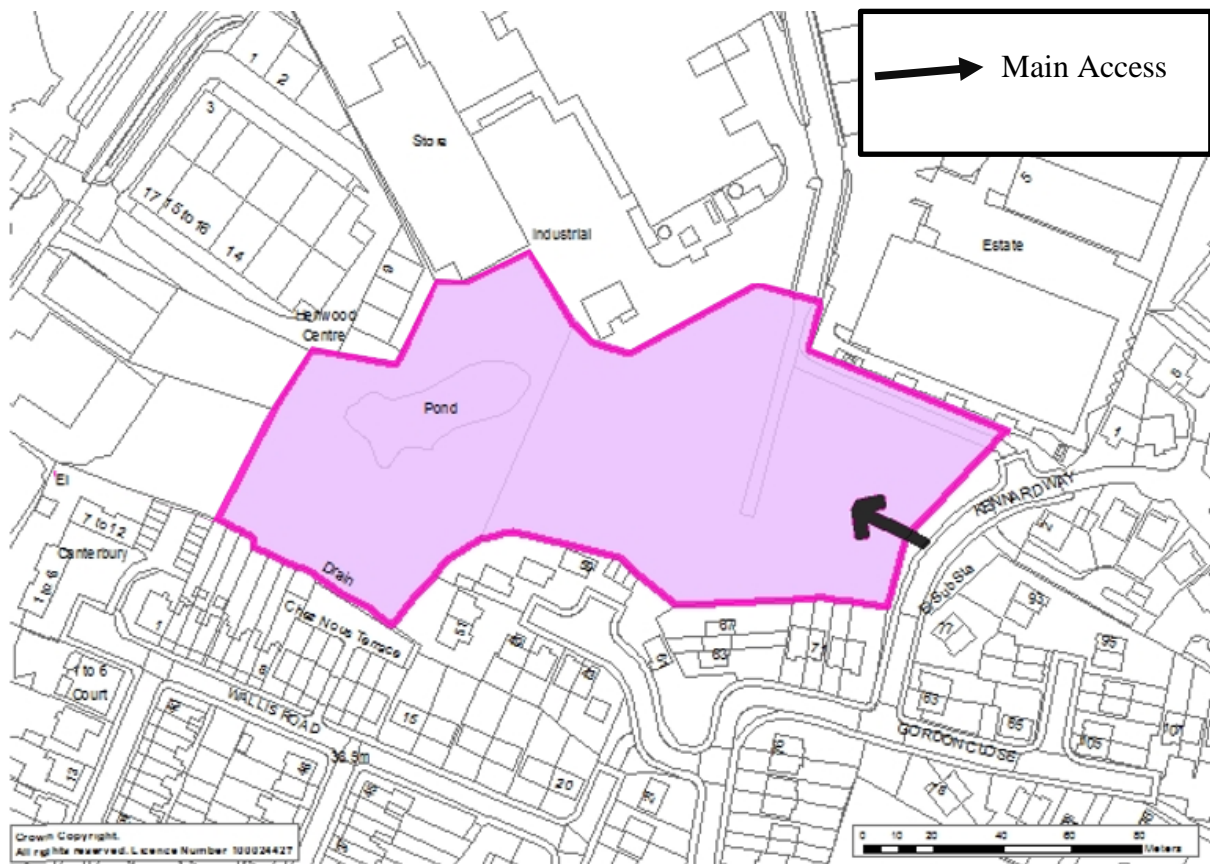
Policy S8 - Lower Queens Road

Land at the end of Lower Queens Road is proposed for residential use (up to 40 units).

Development proposals for the site shall:

- a) **Provide the primary vehicular access to the site from Lower Queens Road;**
- b) **Ensure the built form and layout respects the setting of the green corridor;**
- c) **Ensure the development is of an appropriate scale ranging between 2-3 storeys in height;**
- d) **Provide links to existing pedestrian/cycle paths surrounding the site, including improving accessibility into and through the green corridor to the east of the site;**
- e) **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.**

Kennard Way, Henwood



- 4.107 This site is located on the north eastern edge of Ashford Town Centre, at the end of a cul-de-sac accessed off Hythe Road. It is situated between a residential area to the south and east and Henwood Industrial estate to the north and west. It has previously been designated as part of a wider Henwood employment allocation originally in the Local Plan 2000 and more recently in the Urban Sites DPD 2012. The site obtained outline permission in 2008 for employment use (now expired) which was not completed. Due to the unviable employment allocation, the site is now considered suitable for residential development, which also reflects its close proximity to the recently developed residential areas in Gordon Close and Kennard Way.
- 4.108 The site is currently comprises rough scrubland, with a pond and some mature vegetation in the western part. The adjacent Industrial estate comprises of a mix of warehouses, office blocks and open storage areas. The residential areas to the south and east are mainly two-storey terraced and semi-detached houses. The site currently contains two access points, one from the Industrial Estate in the north and one from Kennard Way, which is a private road, unadopted by the Highways Authority. The site has good access to local services due to the edge of town location.
- 4.109 Residential development is suitable on the eastern side of the site which provides a developable residential area of approximately 0.45ha. This could accommodate around 25 dwellings depending on house size, layout and design. To be in keeping with the existing residential areas, dwellings should be 2 storey and front the road where possible, with the potential for higher storeys in northern parts of the site, where it adjoins the Industrial buildings. The design and layout, particularly the relationship between the industrial and residential areas requires careful planning, to ensure no detrimental impacts on the residents.

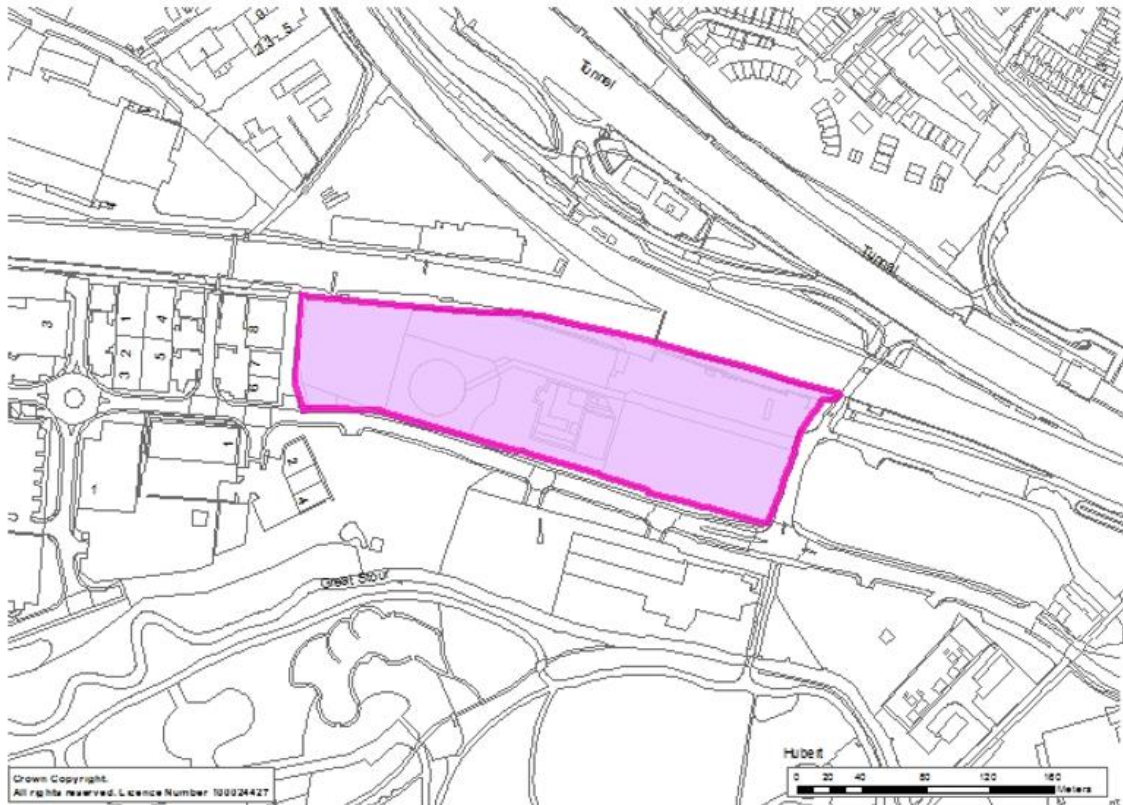
- 4.111 The development should preferably be accessed from a new junction mid way along the boundary with Kennard Way, if land ownership issues here can be resolved. The existing vehicle access between the site and Henwood should be retained for emergency access purposes only, and could be redirected through the new access point. Cycle links and pedestrian footpaths should be created that link in with the existing network.
- 4.112 The site is constrained in the west due to the pond, and lies within flood zone 2 here and a Groundwater Protection Zone. Therefore the western area should be landscaped and kept free from development, to be used as an ecological area and/or informal open green space and/or SUDS. This will also create a green buffer area between the residential areas of Wallis Road and Gordon Close and the existing employment buildings in Henwood, and the boundaries should be enhanced with additional landscaping. A full flood risk assessment and appropriate site investigation and risk assessment must be undertaken to prevent pollution of controlled waters, in consultation with the Environment Agency should be undertaken prior to any development taking place. Where Sustainable Drainage systems include infiltration, an assessment may be required to demonstrate that this will not cause pollution.
- 4.113 The site falls within an area of archaeological potential, and is underlain by Sandstone (Sandgate Formation) which is vulnerable to sterilisation. The site also has the potential to contain contamination due to the neighbouring uses. Appropriate surveys should be undertaken in consultation with the relevant bodies prior to planning application stage.
- 4.113.1* There is existing sewerage infrastructure on the site that needs to be taken into account when designing the proposed development. An easement width of between 6 and 13 metres would be required depending upon the pipe size and depth. This easement should be clear of all proposed buildings and substantial tree planting.

Policy S9 - Kennard Way, Henwood

Land at Kennard Way, Henwood is proposed for residential development with an indicative capacity of 25 dwellings. Development proposals for this site shall:

- a) Be designed and laid out to take account of residential amenity. Particular attention needs to be given to the relationship between the residential and industrial areas around the site;**
- b) Provide primary vehicle access on Kennard Way, preferably in the centre of the site. An emergency access point should be retained between the site and Henwood Industrial Estate;**
- c) Ensure residential parking provision is provided in accordance with policy TRA3(a) and fund implementation of suitable on-street parking restrictions for non-residents;**
- d) provide new pedestrian and cycle routes throughout the development with connections to existing routes in Henwood and Kennard Way and local services;**
- e) Retain and extend the tree boundary between the site and Henwood, to screen the industrial buildings from the new residential development and provide new landscaped boundary along the southern edge of the site to lessen the visual impact of the development, particularly from Gordon Close;**
- f) Protect and enhance ecological areas in the western part of the site, including the existing pond;**
- g) Include a full flood risk and groundwater risk assessment to prevent pollution of controlled water both prepared in consultation with the Environment Agency and provide SUDS in accordance with ENV9;**
- h) Provide future access to the existing sewerage infrastructure for maintenance and upsizing purposes.**

Gasworks Lane



- 4.114 This site is adjacent to the Town Centre and located between the railway and Leacon Road. The site was used for the storage and distribution of gas, and as a depot for Southern Gas Networks. However the site is now clear and the gas holder that was on part of the site has been decommissioned and demolished. The site is an opportunity to deliver sustainable development on a brownfield site next to the Town Centre.
- 4.115 Given the size of this site and its relationship to adjacent sites, development should be planned comprehensively and proposals will need to be consistent with a wider agreed approach based on a masterplan for the redevelopment of the whole site. This will also determine if phasing is required and how this will be achieved.
- 4.116 Residential development should be the principal use on this site and should be in the form of mainly flatted accommodation, however townhouses are also acceptable. They should be designed in a way that provides a strong street frontage to Leacon Road and generally range from 3 to 4 storeys in height. A gradual transition in scale to the lower height employment buildings to the west will be required. The northern elevations along the railway frontage should create a positive edge to the development and include dual frontages.
- 4.117 Towards the western end of the site, where it adjoins the existing Leacon Road Industrial estate, some employment development could be appropriate in order to provide a transition from an industrial to a more residential character. This could be in the form of some mixed use buildings or smaller scale buildings suitable for light industrial or office uses. Employment development and site layout issues may warrant an additional access to the approved access to Gasworks Lane.

- 4.118 In addition, there may also be scope to include complementary small scale retail or office uses at the ground floor. With this in mind, residential development provided at ground floor level facing Leacon Road shall have internal heights that are a minimum of 4 metres, to provide greater flexibility for uses at ground floor level.
- 4.119 Proposals for developing the site will need to be accompanied by an assessment of any contamination arising from the existing or previous uses and proposals will need to demonstrate how any remaining contamination issues can be resolved.
- 4.120 Sustainable drainage should be provided inline with policy ENV9 and early liaison is required with Southern Water regarding connections to the sewerage system at the nearest point of adequate capacity and future access to the existing sewerage system for maintenance and upsizing purposes.
- 4.120.1 While it is expected that the delivery of improvements to the strategic road network will greatly enhance the ability of sites to come forward at pace, there will still be a need to ensure that traffic movements resulting from development proposals are sustainably managed. Therefore, where traffic generation to and from the site is expected to exceed that of previous lawful uses, a Transport Statement/Transport Assessment should be provided in accordance with Policy TRA8.
- 4.120.2 Southern Water's assessment has revealed that additional sewerage infrastructure would be required to serve the proposed development. The development will therefore be required to make a connection to the nearest point of adequate capacity in the sewerage network. Early liaison should take place with the service provider in this regard.

Policy S10 - Gasworks Lane

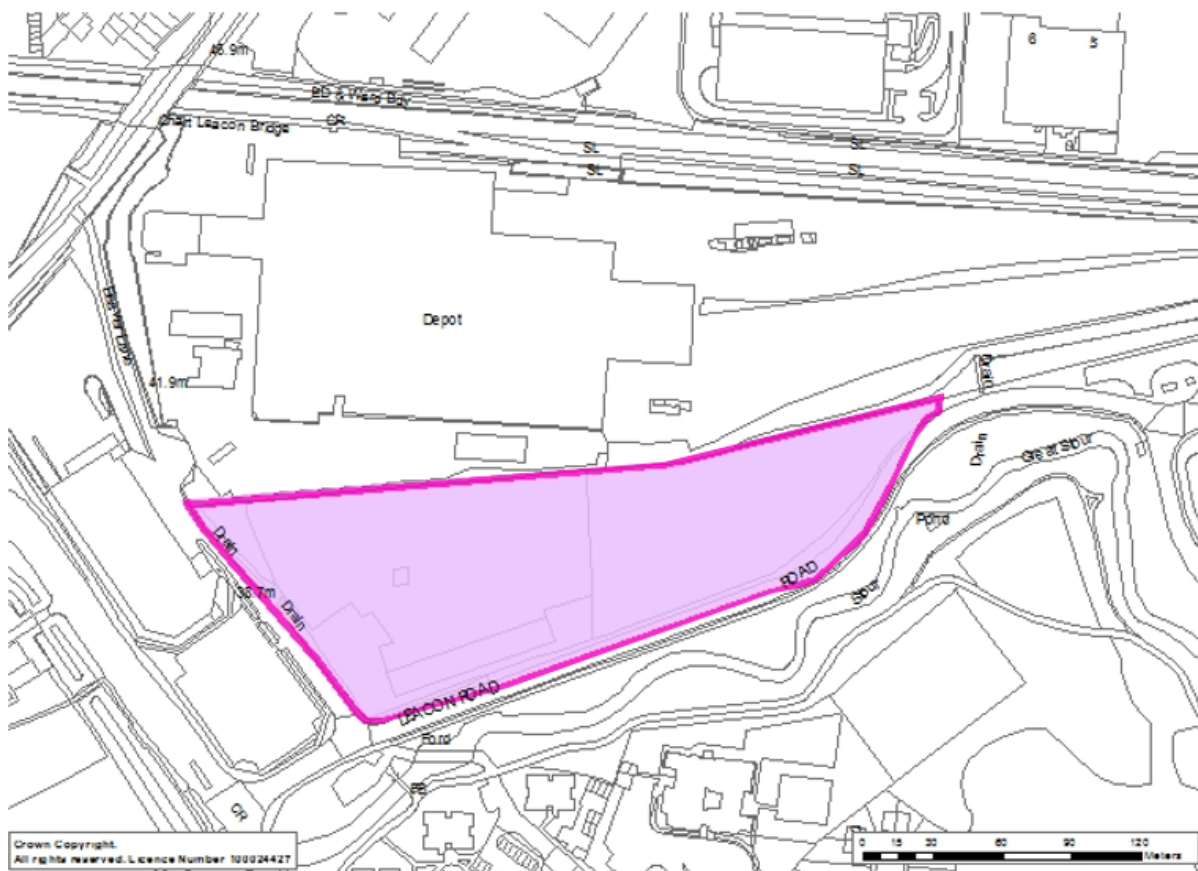
This site is proposed for residential development (up to 150 units) and should be of a general scale of between 3-4 storeys in height. A masterplan for the whole site will need to be agreed prior to the granting of planning permission.

Schemes should provide a range of different types and sizes of housing accommodation in the form of flats and potentially townhouses. Some limited employment use towards the western end of the site and retail / office uses at ground floor level is also encouraged.

Development proposals shall:-

- a) **Ensure residential parking provision is provided in accordance with policy TRA3 (a) and fund implementation of suitable on-street parking restrictions for non-residents;**
- b) **Provide new pedestrian and cycle routes throughout the development with connections to existing routes and local services;**
- c) **Include a full flood risk assessment prepared in consultation with the Environment Agency.**
- d) **be accompanied by an assessment of any contamination arising from the existing or previous uses and demonstrate how any remaining contamination issues can be resolved;**
- e) **provide a connection to the nearest point of adequate capacity in the sewerage network, in collaboration with the service provider.**

Leacon Road



- 4.121 The site directly fronts onto Leacon Road and the route into the industrial area to the east that links through to the Domestic and International Stations.
- 4.122 The site is considered suitable for residential development. The connection of Leacon Road and Victoria Road has transformed the potential of this area, creating a high quality urban street with good public transport connections into the town centre, as well as providing an efficient through-road for traffic wanting to by-pass the town centre. It has a prominent position along Leacon Road with the eastern and south west corners of the site being highly visible in the streetscape.
- 4.123 The scale of any residential development should relate well to the surrounding area. Residential development along the Leacon Road frontage should be primarily 3 storeys in height reflecting a narrower corridor along this part of the route reducing in scale from development allocated in the town centre to the east. However, the prominent eastern and south western corners could accommodate an additional one or two storeys to create some variety and interest in the streetscape. Development should have a strong built form with well

designed frontages to reflect the high quality urban route and a positive built return frontage should also be created along Beaver Lane.

- 4.124 Part of the site lies within flood zone 3. It is critical that development follows sustainable design principles to mitigate any risk of flooding either on the site or elsewhere. A detailed flood risk assessment, prepared in consultation with the Environment Agency, will be required to support any planning application for development here.
- 4.126 The site to the north is allocated for a mix of B1 to B8 uses as well as retention of the railway sidings for operational railway use. The relationship between uses on these two sites is crucial and the layout of the proposed development will need to ensure appropriate and adequate separation of uses that delivers a high quality environment for any future residents on the site.
- 4.127 While it is expected that the delivery of improvements to the strategic road network will greatly enhance the ability of sites to come forward at pace, there will still be a need to ensure that traffic movements resulting from development proposals are sustainably managed. Therefore, where traffic generation to and from the site is expected to exceed that of previous lawful uses, a Transport Statement/Transport Assessment should be provided in accordance with Policy TRA8.
- 4.128 Access to the site should be provided from Leacon Road and/or Beaver Lane. A small strip of land along the southern boundary of the site will be required to fully create the parameters for the Leacon Road / Victoria Road route and this land should not be developed.
- 4.129 The site lies opposite the Stour river corridor which lies within the identified green corridor area and in accordance with policy ENV2 proposals on this site should make a positive contribution to the setting, role, biodiversity, accessibility and amenity value of adjacent green corridor area. In relation to this, the national cycle network runs through the green corridor opposite the site, connecting Victoria Park and Singleton Lake which are important areas of open space within this urban setting. Development must be designed so that it is well connected to the existing footpath and a cycle network and provides an attractive and safe route for pedestrians and cyclist to the town centre.
- 4.129.1 Southern Water's assessment has revealed that additional sewerage infrastructure would be required to serve the proposed development. The development will therefore be required to make a connection to the nearest point of adequate capacity in the sewerage network. Early liaison should take place with the service provider in this regard. There is also existing sewerage infrastructure on the site that needs to be taken into account when designing the proposed development. An easement width of between 6 and 13 metres would be required depending upon the pipe size and depth. This easement should be clear of all proposed buildings and substantial tree planting.

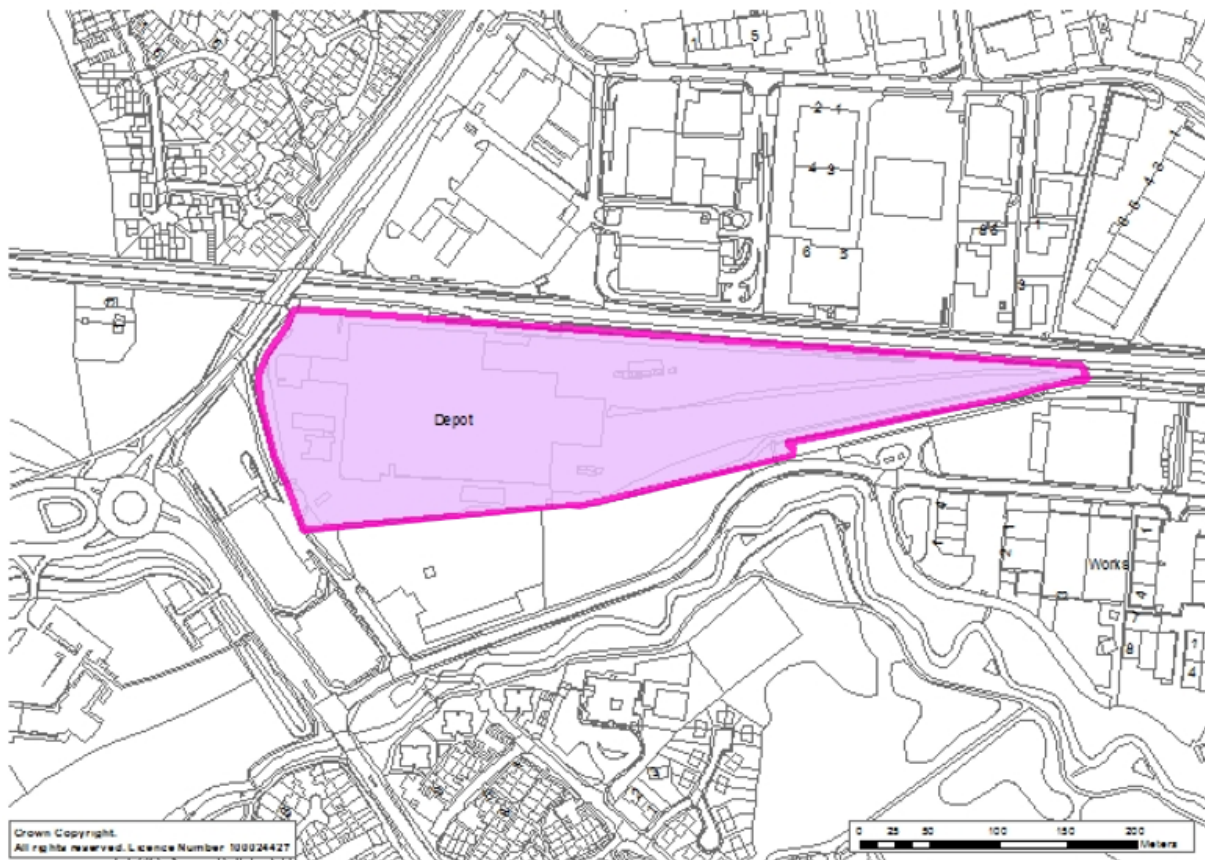
Policy S11 - Leacon Road

This site is allocated for residential development (indicative capacity 100 dwellings).

Development proposals for the site shall:

- a) Provide a high-quality development with built frontages to Leacon Road and Beaver Lane;**
- b) Be designed and laid out to take account of the proposals for commercial development on land to the north of the site;**
- c) Create new access points to the site from Leacon Road and retain a small strip of land along the southern frontage for the creation of the full extent of the highway;**
- d) Connect to the existing network of footpath and cycleway routes;**
- e) Include a full flood risk assessment prepared in consultation with the Environment Agency;**
- f) Make a positive contribution to the setting, role, biodiversity, accessibility and amenity value of the adjoining green corridor area;**
- g) Provide a connection to the nearest point of adequate capacity in the sewerage network, in collaboration with the service provider and provide future access to the existing sewerage infrastructure for maintenance and upsizing purposes.**

Former Bombardier Works



- 4.129.2 This site lies to the south of the Ashford – Tonbridge railway line and to the immediate east of the Matalan retail building and car park. The site is that of the former Bombardier Works site, and is now vacant. The land contains railway sidings within the northern section of the site, which provide a signalled connection to the mainline.
- 4.129.3 The site and in particular the railway sidings, has been identified by Southeastern Railways, the Department for Transport and Network Rail as a highly important piece of infrastructure that needs to be maintained for rail purposes. The site has the potential to provide facilities for the berthing of trains for storage, cleaning and light maintenance. Additional provision of train berthing is required in the Borough in order to accommodate additional rolling stock that is required to meet the increased demand for rail services from Ashford and the surrounding network. It is therefore considered vital that the site is safeguarded for that purpose. An initial feasibility study for the proposals has indicated that only part of the site would be required for rail use, leaving the remainder of the land open for development. It is considered that employment uses, with a mix of B1-B8 would be most appropriate on the remainder of the site.
- 4.129.4 If, for any reason, the rail operating company / Network Rail subsequently decide that alternative berthing facilities are to be pursued, then that part of the site may be also be

redeveloped for an appropriate type and scale of commercial development, in discussion with the local planning authority.

4.129.5 The land to the south is allocated for residential development (site S11), and in all circumstances, the need for appropriate mitigation of noise and disturbance from activities on this site will need to form part of any redevelopment proposals.

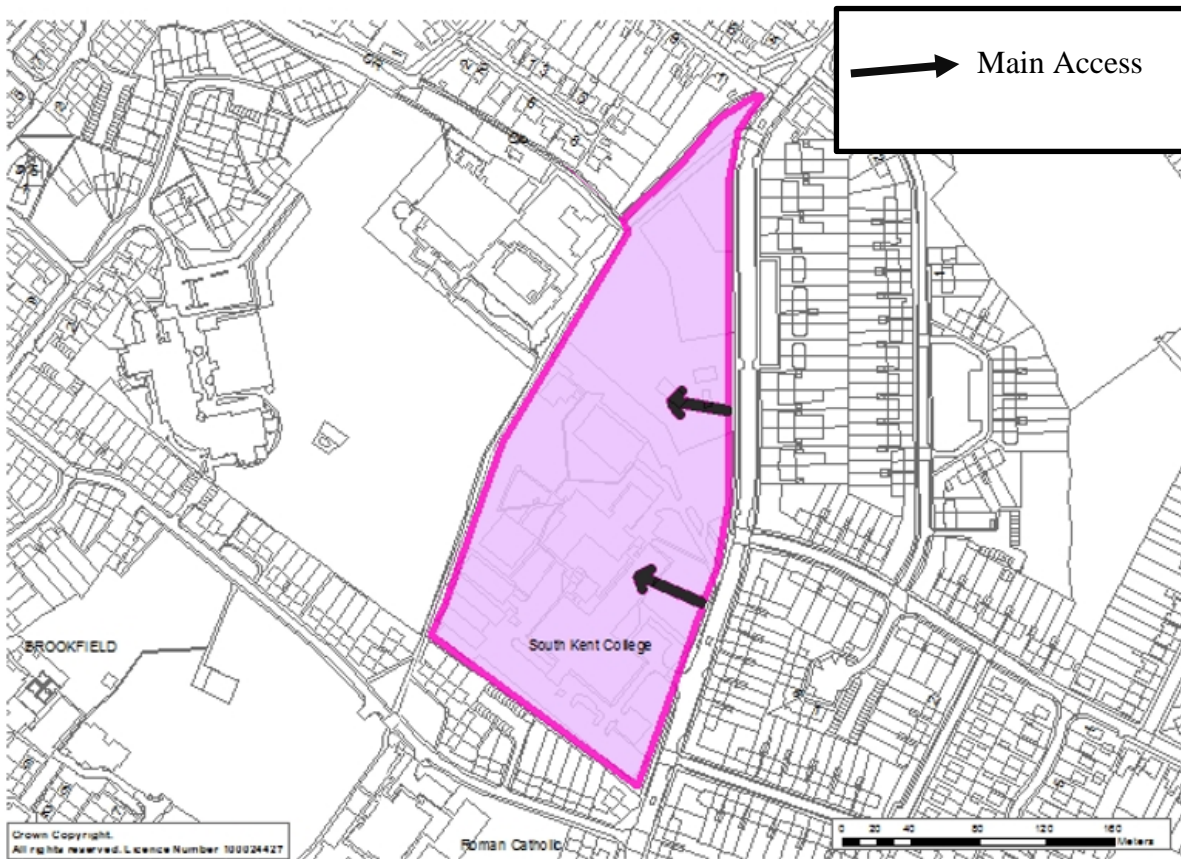
4.129.6 Southern Water's assessment has revealed that additional sewerage infrastructure would be required to serve the proposed development. The development will therefore be required to make a connection to the nearest point of adequate capacity in the sewerage network. Early liaison should take place with the service provider in this regard. There is also existing sewerage infrastructure on the site that needs to be taken into account when designing the proposed development. An easement width of between 6 and 13 metres would be required depending upon the pipe size and depth. This easement should be clear of all proposed buildings and substantial tree planting.

Policy S11a - Former Bombardier Works site

The site is allocated for a mix of operational railway use and commercial (B1-B8 uses) development. Development proposals for the site shall:

- a) Safeguard an area of land to the north of the site adjacent to the railway line, including the existing railway sidings, for operational railway use in accordance with the requirements of the train operators;**
- b) Provide commercial development on the remaining land that is not required for operational railway use**
- c) Ensure the commercial uses along the southern boundary of the site are compatible with the residential development proposed on land to the south of the site;**
- d) Provide access to the site via an improved access from Beaver Lane;**
- e) Provide a connection to the nearest point of adequate capacity in the sewerage network, in collaboration with the service provider.**

Former K College, Jemmett Road



- 4.130 This site is currently a further education college campus located on Jemmett Road within walking distance of the town centre, railway station and Victoria Park. The site is currently in use as an important educational facility for the borough but the College will shortly re-locate to a site within the town centre which is under construction and hence there is the potential to redevelop this site once the relocation has taken place.
- 4.131 Most of the southern half of the site accommodates the college buildings and a significant amount of hard standing and car parking. The northern half of the site tapers into the former Ashford South Primary School access road and is largely overgrown scrub with a number of trees, although it was once occupied by buildings in educational use. The disused nature of this part of the site means that it has a degree of ecological value.
- 4.132 The principle of redevelopment to residential uses has been established on this site linked with the redevelopment of the adjoining Former Ashford South Primary School (Policy S13). Residential redevelopment of the site was previously granted outline planning permission by the Council under reference 07/00117/AS.
- 4.133 Immediately abutting the western boundary of much of the site is the public right of way, Jemmett Path, that is also part of the 'Learning Link' which is a major north-south enhanced pedestrian / cycleway route from the town centre to Stanhope. Development proposals for the site must not detrimentally impact on the retention or use of Jemmett Path and must widen and make enhancements and improvements to it in order to increase its attractiveness to users.

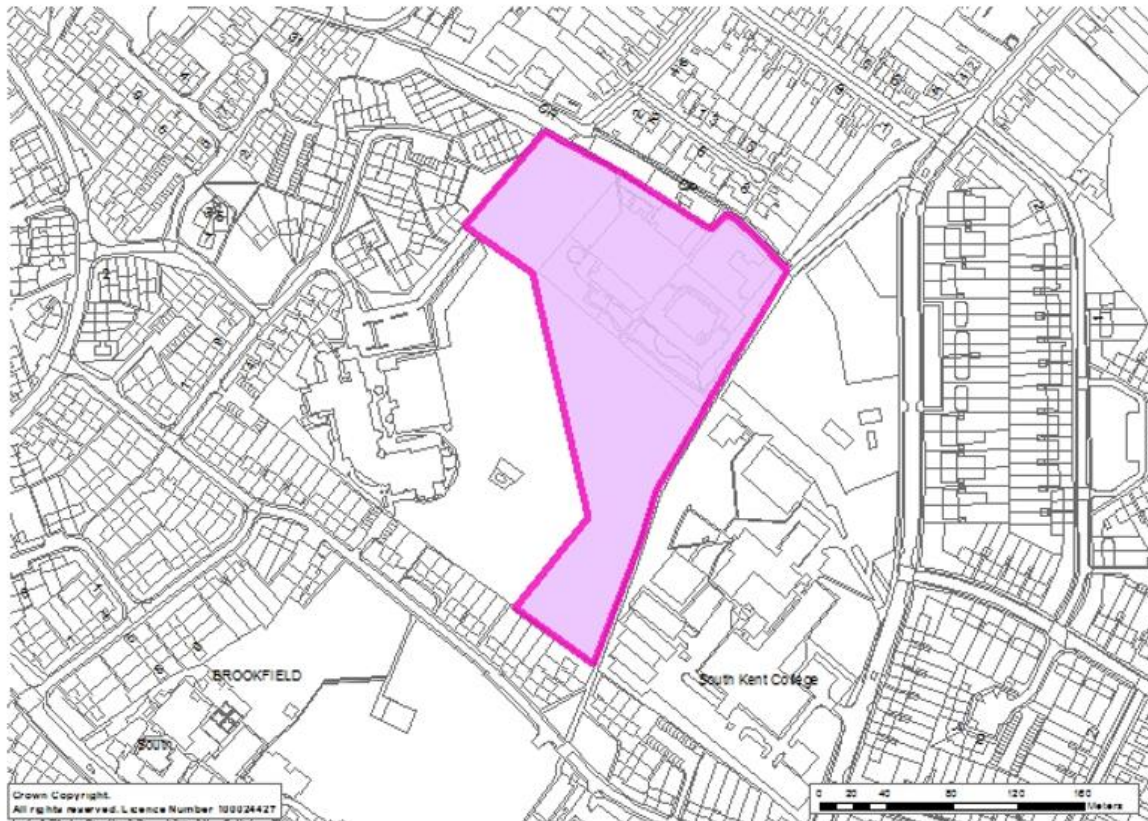
- 4.134 Development of this site must facilitate the ability to bring forward development on the adjacent former primary school site and must be designed to be cohesive with the design approach taken on the adjacent site. As part of the development, one all-movement access point from Jemmett Road shall be provided through to the site boundary adjoining the learning link for vehicular access to site S13 to be created, in addition the 'Learning Link' should be retained as a vehicular emergency access, in accordance with recommendations from Kent County Council Highways and Transportation.
- 4.135 The design and scale of development here will need to take account of the character of the surrounding residential areas of Noakes Meadow and Jemmett Road and any scheme proposed on the adjoining former school site. The design should ensure that the residential amenity of existing neighbouring occupiers is protected. Any development proposals would need to provide a frontage to Jemmett Path and public open space to ensure that safety through natural surveillance of this community area is achieved.
- 4.136 The site is within close proximity (150 metres) of Victoria Park, a strategic recreation facility providing play equipment for different age groups, areas of open space for informal play and more formal areas of planting. Therefore, a contribution towards enhancement of these facilities at the park may be more suitable than the requirement for development of play facilities on-site. However, the site does provide the opportunity to provide more local areas of public open space, which should form part of the overall site design.
- 4.137 The northern part of the site contains a number of mature trees within the site curtilage, some of which are protected by a Tree Preservation Order. These should be considered for retention to help provide wildlife havens, habitat links and visual softening of the development.

Policy S12 - Former K College Site

Subject to the relocation of the K College campus to the Town Centre Site, the site in Jemmett Road is proposed for residential development. Development proposals for the site shall:

- a) provide a vehicular route through the site from Jemmett Road to the site boundary adjoining Jemmett Path and the Former Ashford South School, Jemmett Road;**
- b) enhance and improve the Jemmett Path/Learning Link pedestrian and cycle route and cease existing vehicular use (apart from for emergency access) of the Learning Link once the route required under a) has been provided;**
- c) ensure that the scale, design and character of the development takes account of the character of the surrounding area and any scheme proposed on the Former Ashford South School, Jemmett Road;**
- d) ensure that there is no significant impact on the residential amenity of neighbouring occupiers;**
- e) provide contributions towards the provision, enhancement and maintenance of Victoria Park; and**
- f) retain the protected trees within the site and provide appropriate additional planting.**

Former Ashford South School, Jemmett Road



- 4.138 This former primary school is principally vacant with a small number of the buildings being let on a short-term basis for community uses and clubs. It is located off Jemmett Road and provides a rare opportunity to develop a partly brownfield site within walking distance of the town centre, railway station and the existing strategic Victoria Park. However, there are current plans to re-use the school buildings for a period of time of no more than 8 years, as a temporary school to meet the education needs of development in the urban area, currently under construction, until new provision is provided in that specific location.
- 4.139 The site is land-locked, located to the west of the existing K College site (Policy S12) and north of the Ashford Oak Tree Primary School. However, with the college pursuing a scheme to re-locate to the town centre and a redevelopment scheme proposed for the Jemmett Road K College site redevelopment of this former primary school site becomes deliverable with access to the site being provided through the adjoining college site.
- 4.140 The concept of redevelopment to residential uses has long been established on this site and on the adjoining K College sites. The Council has previously resolved to grant planning permission (07/01789/AS) for up to 158 units and the site is currently allocated in the adopted Urban Sites and Infrastructure Development Plan Document.
- 4.141 Immediately abutting the eastern boundary of the site is the public right of way, Jemmett Path, that is also known as the 'Learning Link' which is a major north-south pedestrian / cycleway route identified in the Core Strategy. This strategic routeway is termed the 'Learning Link' due to its close proximity to several schools and colleges and extends from

the town centre to Stanhope. Development proposals for the site should not detrimentally impact on the retention of the 'Learning Link'.

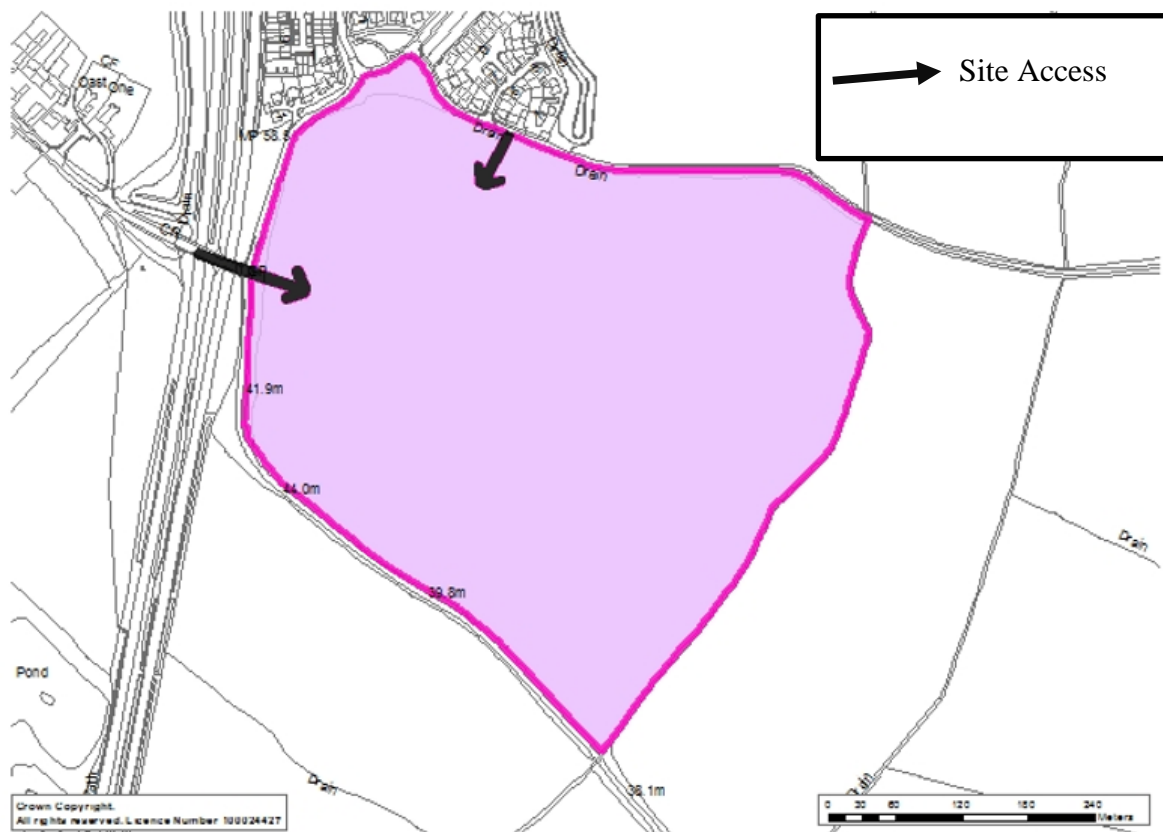
- 4.142 Development of this site should be cohesive with the adjacent K College re-development proposals but it is important that the development of this site is able to function as a self contained development in its own right. Consequently, the design and scale of development of the scheme would need to take account of the character of the surrounding area and the scheme proposed on the adjoining K College site and ensure that the residential amenity of neighbouring occupiers is protected and not over-burdened, this is particularly the case on the northern boundary. Any development proposals would need to provide a frontage facing the Learning Link to ensure that natural surveillance of this community area is achieved.
- 4.143 The site lies adjacent to the Ashford Oak Tree Primary School and the opportunity should be taken to provide an additional pedestrian and cycle access to the school via this development site.
- 4.144 The site is within close proximity (150 metres) of Victoria Park, a strategic community facility providing play equipment for a number of age groups, areas of open space for informal play and more formal areas of planting. Therefore a contribution towards this facility may be more suitable than the requirement for an onsite play facility. However, the site does provide the opportunity to provide more local areas of open space, which could form part of the overall site design and aesthetics.
- 4.145 The closure of the school has led to loss of a playing field that was used by the wider community and arrangements will have to be made to secure the use of an appropriate alternative playing field in the locality.
- 4.146 The western boundary of the site contains a number of mature trees which would need to be retained as part of any new proposal, this will not only provide a natural boundary to the site but help smooth the transition between the surrounding housing and new development. The existing mature trees within the site curtilage, some of which have a TPO should also be retained to add design features to the new development and to provide wildlife havens and habitat links.
- 4.146.1* Southern Water's assessment has revealed that additional sewerage infrastructure would be required to serve the proposed development. The development will therefore be required to make a connection to the nearest point of adequate capacity in the sewerage network. Early liaison should take place with the service provider in this regard.

Policy S13 - Former Ashford South School, Jemmett Road

The former Ashford South Primary School site is proposed for residential development (up to 110 units) Development proposals for the site shall:

- a) be accessed via the adjoining K College (S12) site;**
- b) enhance and improve the 'learning link' pedestrian and cycle route way;**
- c) ensure that the scale, design and character of the development takes account of the character of the surrounding area and the scheme proposed on the adjoining K College site;**
- d) ensure that there is no significant impact on the residential amenity of neighbouring occupiers;**
- e) provide a connection to the nearest point of adequate capacity in the sewerage network, in collaboration with the service provider;**
- f) provide an additional pedestrian and cycle access through the site to the adjacent Ashford Oak Tree Primary school; and**
- g) retain the mature trees on the site.**

Park Farm South East



- 4.147 The site is located adjacent to the new residential development known as Bridgefield. The site is currently in agricultural use. Finn Farm Road forms the western and southern boundary of the site and it also adjoins the Ashford to Hastings railway line. Directly to the west is a bridge that crosses the railway line and the A2070 meeting at a three-way traffic light junction joining Finn Farm Road, Brockman's Lane and Cheeseman's Green Lane. The north and north western boundary of the site is formed by Cheesmans Green Lane which directly adjoins the existing development at Bridgefield. Once built, the Park Farm Southern Link Road will link this area to new extensive residential development being constructed at Finberry to the east of the site. The site rises to a ridgeline in the southern western corner of the site and the eastern part of the site lies within flood zones 2 and 3.
- 4.148 The overall context of this site has recently changed as it now adjoins the new development at Bridgefield and, with the extent of other development that has taken place in this part of Ashford since the adoption of the Core Strategy (2008) and that is currently underway, it is considered that the site can now form part of an integrated network of development and supporting infrastructure that could be well connected to adjoining development and services and therefore the principle of development in this location is now considered to be sustainable. The existing developments in the area are well served by public transport via local bus services and there is a proposal for a rail station along the adjacent Ashford - Hastings railway line. Development of this site should make provision for local bus services and contribute towards the provision of the Ashford-Hastings rail station if required.
- 4.149 The net site area is approximately 11 hectares which includes a much smaller developable area which is not affected by flooding constraints. This smaller area has potential for

development with an indicative capacity of 325 dwellings depending on size and layout considerations and could achieve net residential densities to reflect the adjoining development at Bridgefield.

- 4.150 Given the location, size and number of housing units envisaged on the site, 30% of the dwellings shall be provided as affordable housing in accordance with policy HOU1.
- 4.151 Given the character and appearance of the adjacent development, a scheme of 2-3 storey buildings would be most appropriate here. A mix of dwelling sizes and types will be required. The design and layout must take account of residential amenity of neighbouring occupiers. Due to the ridgeline in the south of the site, particular attention is needed to be paid to the site's topography and it is crucial that the higher, more prominent parts along the ridgeline within the site are kept free from development. There should be soft landscaped edges provided along the southern and eastern boundaries to provide a transition into the wider landscape and to minimise the visual impact of new development in this location. Existing trees and hedgerows which define the other boundaries should be retained where possible.
- 4.152 In terms of vehicular access to the site, the primary vehicular access point to the site is shown on the Policies Map and is located in the western edge of the site and would adjoin to the existing controlled junction at Finn Farm Road. The existing arrangement at this junction is unsatisfactory with a three way signalised junction and the opportunity must be taken to improve the junction arrangements if possible by providing an access point into this site. There is also a proposed vehicular access point into the site from Cheesmans Green Lane indicated on the Policies Map. Cycle and pedestrian links will need to be provided throughout the site to help integrate the development with existing development at Bridgefield. A Transport Assessment should be produced in accordance with Policy TRA8 and measures proposed to mitigate any impact of development on the wider transport network.
- 4.153 The eastern part of the site lies within flood zone 2 and 3 which is unsuitable for development but may provide an area for sustainable drainage, the conveyance of water, and open space including an extension to the existing green corridor that runs adjacent to the eastern boundary of Park Farm East, in accordance with the Green Corridor Action Plan.
- 4.154 Development of this site presents an opportunity to incorporate sustainable drainage that will contribute to managing surface water for the benefit of flood risk, water quality, biodiversity and amenity. The Sustainable Drainage SPD should be adhered to in establishing suitable options for surface water disposal.
- 4.155 The developable area outside of the flood constraints will need to be supported by a full flood risk assessment which should be carried out in consultation with the Environment Agency.
- 4.156 Southern Water's assessment has revealed that additional sewerage infrastructure would be required to serve the proposed development. The development will therefore be required to make a connection to the nearest point of adequate capacity in the sewerage network. Early liaison should take place with the service provider in this regard.

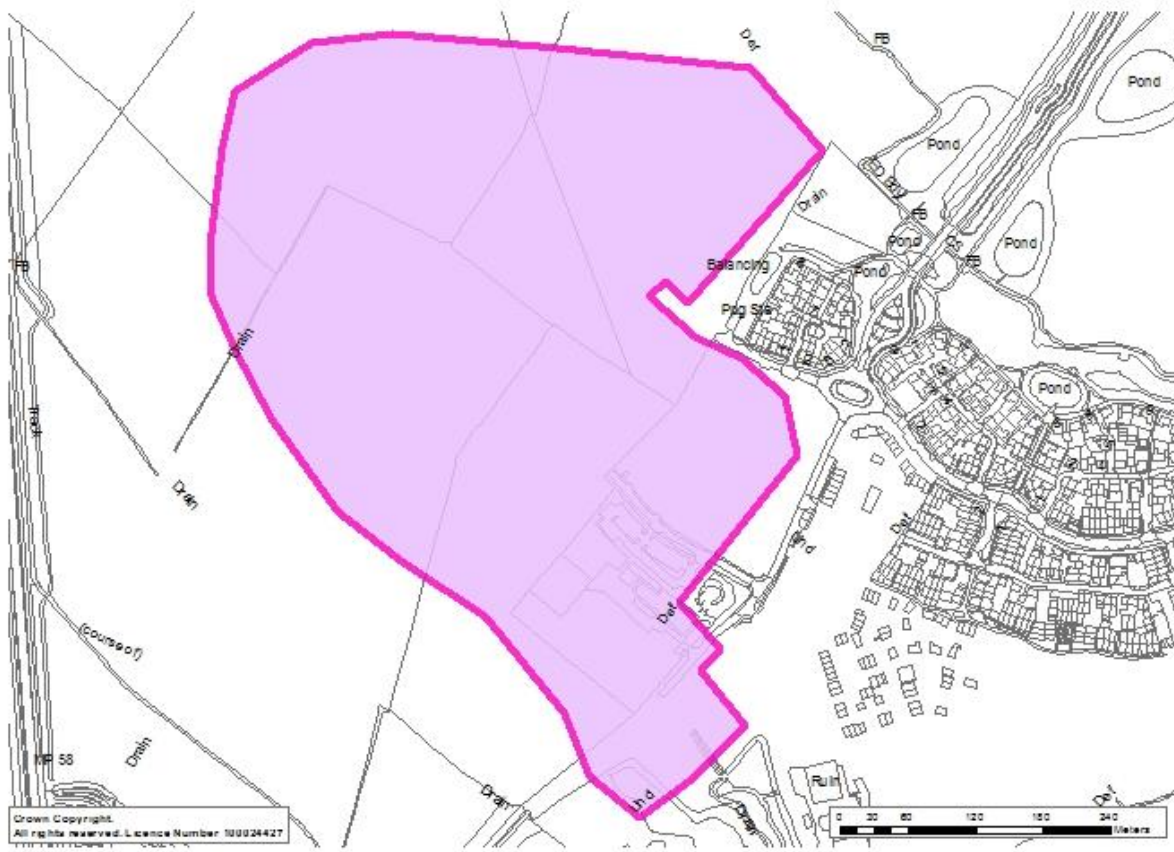
Policy S14 - Park Farm South East

The site south east of Bridgefield is proposed for residential development with an indicative capacity of 325 dwellings.

Development proposals for this site shall:

- a) Be designed and laid out to take account of the residential amenity of neighbouring occupiers. Particular attention needs to be given to the topography of the site and dwellings should be orientated to enable overlooking and natural surveillance of open areas. The development should be no more than 2-3 storeys in height;**
- b) Investigate the potential to provide a primary vehicle access from the traffic controlled junction at Finn Farm Road to improve the overall junction arrangements, as shown on the policies map. A Transport Assessment should be produced in accordance with Policy TRA8 and measures proposed to mitigate any impact of development on the wider transport network;**
- c) Make provision for links to the public transport network including contributions to the rail station along the Ashford-Hastings railway line if required;**
- d) Provide new pedestrian and cycle routes throughout the development with linkages into the wider network and adjoining developments;**
- e) Provide soft landscaping throughout the development to lessen the visual impact and retain existing trees and hedging where possible;**
- f) Extend the existing green corridor along the eastern part of the site in accordance with the Green Corridor Action Plan;**
- g) Include a full flood risk assessment prepared in consultation with the Environment Agency; and Provide SUDS in accordance with the SPD;**
- h) Provide a connection to the nearest point of adequate capacity in the sewerage network, in collaboration with the service provider.**

Finberry North West



- 4.157 The site lies to the south of the A2070 and west of the Ashford - Hastings railway line. It represents an opportunity to integrate additional residential development with a currently under construction and award winning high quality residential led development called 'Finberry' on the edge of Ashford. The current development is being delivered pursuant to outline planning approval (02/00278) for a total of up to 1,100 residential units (including 110 live work units) and 70,000 sqm of business floorspace, together with mixed use community facilities, landscaping and public open space.
- 4.158 The land covered by this policy was to be the location of 70,000 sqm of business floorspace, live work units and residential uses approved in the outline permission. It was envisaged to come forward in large scale employment buildings and relatively high density residential accommodation, although the outline permission for this part of the development has now expired.
- 4.159 The Council and landowners have been in dialogue regarding this land parcel for some time, as it has been clear that the significant scale and form of the employment space permitted was unlikely to be delivered. This position is reinforced by employment evidence that supports this Local Plan which identifies the area as a secondary location for employment use. Significant levels of employment growth should instead be focused towards the 'primary' employment areas (Commercial Quarter, Eureka Park, Waterbrook and Sevington).
- 4.160 The Local Plan therefore provides the opportunity to re-examine what role this land should now play in achieving a sustainable and deliverable planning solution – one which meets the wider objectives of this Local Plan and is consistent with the NPPF. With this in mind, this

site is proposed to deliver up to 300 residential units and 8,500 sqm of employment space, alongside additional community uses to cater for the increase in local population.

- 4.161 Given the complexities associated with the site in terms of its integration with what is being delivered and the wider schemes now more residential focus, a masterplan shall be prepared and agreed prior to planning permission being granted. The masterplan will need to consider the following.
- 4.162 New development coming forward at this site will be delivered in a way that complements the existing and planned development at Finberry, in terms of its scale, density, design and materials used. It will be consistent with the established design principles in that it achieves the ‘sustainable village’ principles which are embedded within the current scheme, including the creation of a distinct identity and architectural style, the promotion of a range of dwellings types and sizes and the promotion of an active and vibrant central area that is a defining feature of the scheme and includes a range of complementary uses.
- 4.163 This central area will be expanded (to that currently planned) to include 8,500 sqm of employment floorspace to maximise its accessibility, promote activity and movement and complement the other non-residential uses that will be delivered here which combined will give the central area much of its vibrancy and sense of place. This scale of employment floorspace will cater for small and medium employment uses in line with evidence that supports the Local Plan that identifies a need for such space in accessible locations – such as those which enjoy easy access to the strategic road network.
- 4.164 In addition, the masterplan shall explore how the delivery of not less than 10 live/work units around the central area can be achieved as a means of providing flexible space at ground floor level to cater for start-up businesses or very small scale operations. This approach will complement similar units which are being implemented through the current scheme, help to enhance the central area and allow for flexibility to cater for changing employment demands over time.
- 4.165 Where residential development is proposed adjacent to the central area it will be designed in a way that provides an appropriate sense of enclosure with strong building lines to promote clear legibility throughout the development. Higher density development will be sought in this location. Elsewhere, residential development will be delivered in a way that provides a gradation of housing density across the site from medium densities in the middle part of the site to lower densities on the periphery, to mark a suitable and soft transition into the countryside.
- 4.166 In line with policy HOU1 of this Local Plan suitable affordable housing provision will be delivered on-site, including starter home provision. Its suitable integration with the general market housing offer will be explored through the masterplan process.
- 4.167 A green spine consisting of open space and a cycle route will form a key design feature for development on this site. It will connect with the green spine that is currently being implemented and provide clear desire lines and direct access to the countryside and beyond. A local children’s play space area will be delivered along this green spine to provide accessible play for the new residents of this area. The Masterplan will also need to demonstrate how public rights of way and bridleways will be incorporated within the Green Spine.

- 4.168 The masterplan shall be supported by a landscape strategy and a detailed ecological and flood mitigation strategy that will need to ensure that the impact of the whole development is suitably mitigated and any provisions are consistent, where applicable, with what is currently being implemented.
- 4.169 As reflected in the housing trajectory that supports this Local Plan (Appendix 5) – and as reflected through the current outline permission – housing development is limited to 700 dwellings at Finberry until M20 Junction 10a is completed. However, should planning permission be granted before this date then the dwellings on this site can come forward provided the overall total figure for the wider site does not exceed the current capacity constraints. This position will need to be agreed with the Council and the Highways Authorities.
- 4.169.1* Southern Water’s assessment has revealed that additional sewerage infrastructure would be required to serve the proposed development. The development will therefore be required to make a connection to the nearest point of adequate capacity in the sewerage network. Early liaison should take place with the service provider in this regard.

Policy S15 - Finberry North West

Finberry north-west is allocated for an indicative capacity of 300 residential dwellings and 8,500sqm of B1-8 employment floor space. Development proposals for this site will be implemented in accordance with a masterplan that has been jointly agreed between all the landowners and the Borough Council which will set out how:

a) Residential development is delivered in a way that provides:

- A continuation of the current scheme in terms of the design, scale, layout, materials used and style of build.**
- A gradation of average densities across the site with high density development framing the central area through to lower density development where the scheme will mark a soft transition to the countryside.**
- Affordable housing in line with Policy HOU1 of this Local Plan in a way that is suitably integrated with the general market housing offer.**

b) Employment space is delivered to cater for a mix of small and medium sized uses that provides an extension to the currently planned central area. The masterplan will also establish how not less than 10 live/work units are provided with flexible ground floor space, adjacent to the central area.

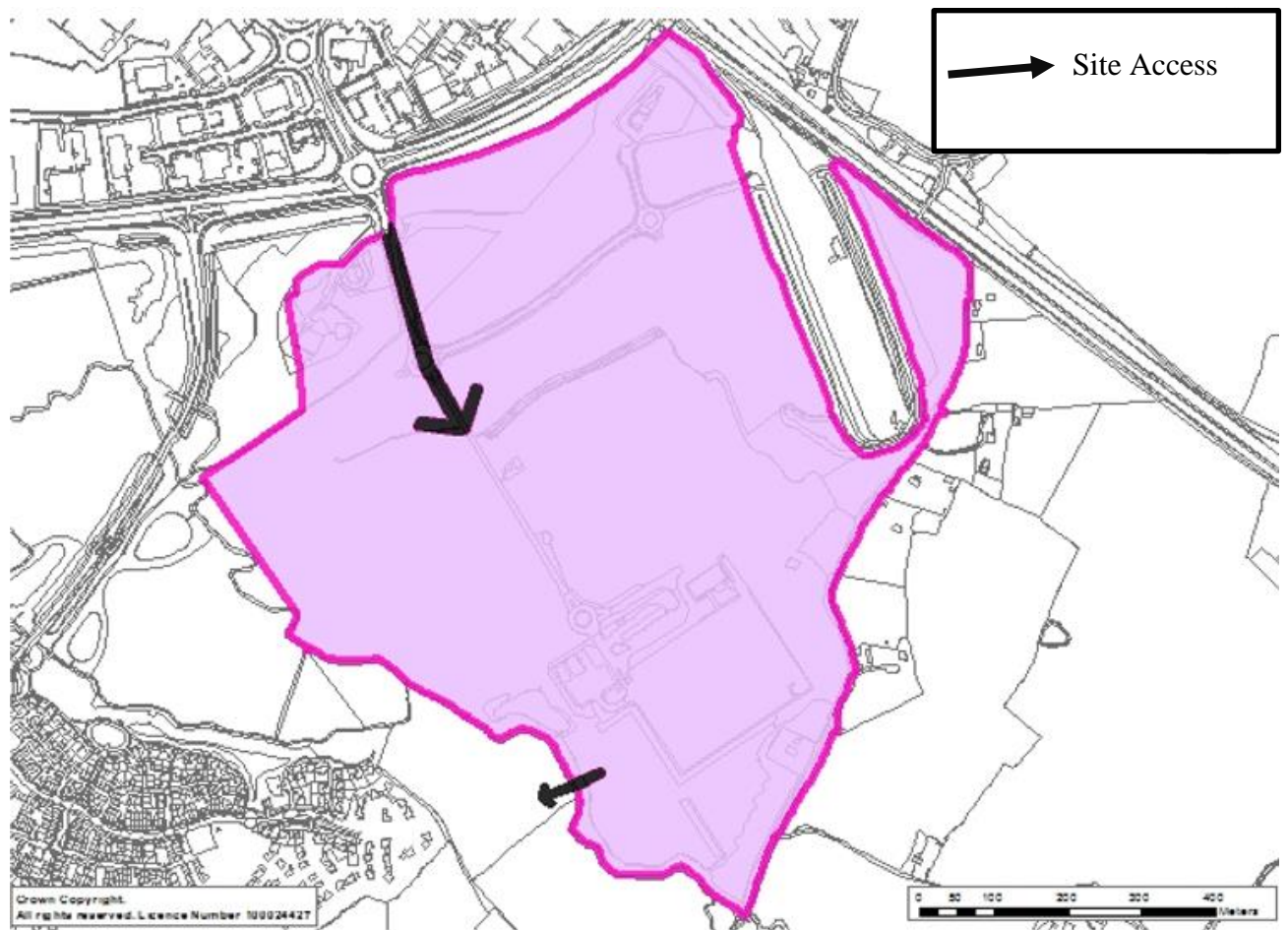
c) Landscaping and open space shall be provided in a way that:

- Provides connectivity and legibility with what is currently being planned.**
- Delivers a ‘green spine’ – a strategic corridor and cycle route through the site that is complemented by a local children’s play space.**
- Provides a suitable buffer for the development where it adjoins the countryside**

d) Suitable ecological and flood alleviation measures are delivered.

Development on this site shall also provide appropriate financial contributions towards the delivery of Highway England’s scheme for a new M20 Junction 10a.

Waterbrook



- 4.170 The site is a key development opportunity located on the south eastern edge of the built up part of the Ashford urban area and lies adjacent to the Orbital Park commercial area. It is bounded to the north by the A2070 / Southern Orbital Road, to the north- east by the Ashford – Folkestone railway line and Cheeseman’s Green Lane to the east. The south western boundary of the site adjoins the East Stour river corridor with the Finberry development on the opposite side of the river.
- 4.171 The Waterbrook site has been allocated since 2000 and, most recently, in the Core Strategy 2008 as part of the wider Cheeseman’s Green/Waterbrook area for mixed use development. Under this policy the wider Cheeseman’s Green / Waterbrook area was proposed to provide around 4,300 homes and at least 1475 jobs by 2021 with further development thereafter.
- 4.172 Planning permission currently exists for mineral and waste operations on land adjoining the site. Permission has been granted for the permanent retention and use of sidings for the importation and distribution of construction aggregates. There is also permission for

aggregate storage, construction and demolition waste recycling, hot tarmac storage, concrete crushing and screening, concrete batching, and provision for a domestic, commercial and industrial waste transfer station. This area falls outside the draft policy site area.

- 4.173 Planning permission also exists for a vehicle testing facility – this is a facility operated by VOSA (the Vehicle Operating Standards Authority) which is currently under construction – vehicle and plant storage and maintenance facility, B1, B2 and B8 units, and associated highway and earth works on part of the site. Otherwise, the site is currently undeveloped except for the area in use as a commercial lorry park on the eastern edge of the site.
- 4.174 The site is proposed for a mix of residential and commercial uses. Proposals will be required to be in accordance with a masterplan that will determine the detailed quantities of development and the overall layout of the site.
- 4.175 The masterplan shall include the provision of an additional 300 commercial lorry parking spaces on the site as part of a relocated and enlarged truck stop facility that will be designed to cater for currently unmet overnight lorry parking needs. This currently results in lorries parking in unauthorised locations around the area. The most suitable location for this facility is in the northern part of the site adjacent to the railhead – accessed via the proposed commercial area which would minimise impact upon the proposed residential development. There are residential properties on the adjoining Cheeseman’s Green Lane that will be relatively close to the re-located lorry park and the noise, artificial lighting and visual impact will need to be carefully mitigated, including with noise attenuation and substantial landscaping and planting.
- 4.176 Elsewhere on the site, the principal uses should be commercial development (B1, B2 or B8) and residential development. Some ‘sui generis’ uses, such as those found at Orbital Park (e.g. car showrooms) will also be acceptable in principle here. The masterplan shall make provision for a minimum of 20 hectares of commercial development. An additional area of land adjacent to the entrance to the site for similar commercial uses has been included within the site policy area and this could provide an additional 2 hectares of commercial development to enable the delivery of 22 hectares in total.
- 4.177 Residential development can also be accommodated on the site for circa 350 dwellings, depending on detailed layout, dwelling size and mix. It is critical that any residential scheme is physically separated from the commercial development and the extended lorry park. The most suitable locations for residential development are on the south western edge of the site, which lies across the river corridor from Finberry; on the site of the existing truck stop at the south of the site, and on the eastern side of Waterbook Avenue.
- 4.178 The location of the residential development and its relationship to adjoining commercial uses will be a key consideration. It is critical that there is a high quality and imaginative landscape framework with significant scale and density of landscaping and screening included as part of the open spaces that separate land uses and link to the river and countryside to the west. Proposals for the mitigation of noise from lorry movements and any associated commercial operations will need to be specifically addressed as part of the masterplan.
- 4.179 Given the location, size and number of residential units envisaged on the site, 30% of the dwellings shall be provided as affordable housing in accordance with Policy HOU1.

- 4.180 The primary access to the site is from the A2070 Southern Orbital Road junction. There is currently an access road in place through to the existing lorry park and another access road within the site being constructed that gives access to the VOSA facility that is under construction and will provide access to other commercial buildings, railhead site and the proposed replacement lorry parking facility.
- 4.181 The junction with the A2070 has recently been improved to accommodate the initial development stages of the Finberry site and further improvements are planned to improve access to both Waterbrook and Finberry in due course.
- 4.182 A secondary link to the site shall need to be provided to the Finberry development where the majority of new local services that will support the residential development at Waterbrook will be sited. This should become an ‘all-movements’ link to accommodate public transport services, a cycle and pedestrian route as well as car traffic. The masterplan should also consider opportunities for more cycleway and footpath links to the wider network of rights of way towards the Ashford urban area and the surrounding countryside. All development on this site should be served from either of these two access points with no vehicular access from Cheeseman’s Green Lane.
- 4.183 Development of the Waterbrook site is also dependent on the delivery of the additional motorway junction capacity proposed in the M20 Junction 10a scheme. Whilst an initial stage of development (which has planning permission) may come forward in advance of the new junction, occupation of new development on the remainder of the site will need to be restricted until Junction 10a is completed.
- 4.184 The south western edge of the site adjoins the East Stour river corridor and falls within flood zone 3, it also is part of Ashford’s green corridor network and is a Local wildlife site. Acceptable proposals for this site will need to show how the opportunity has been taken to enhance this significant landscape corridor to help set the development of this site in the wider landscape and at the same time improve the green corridor environment and ecology.
- 4.184.1* Southern Water has advised that there is a pumping station on the boundary of the site that need to be taken into account so that the proposed design safeguards the amenity of future occupiers of the proposed development. The developer should liaise with Southern Water to ensure this can be taken into account when designing the layout of the proposed development.

Policy S16 - Waterbrook

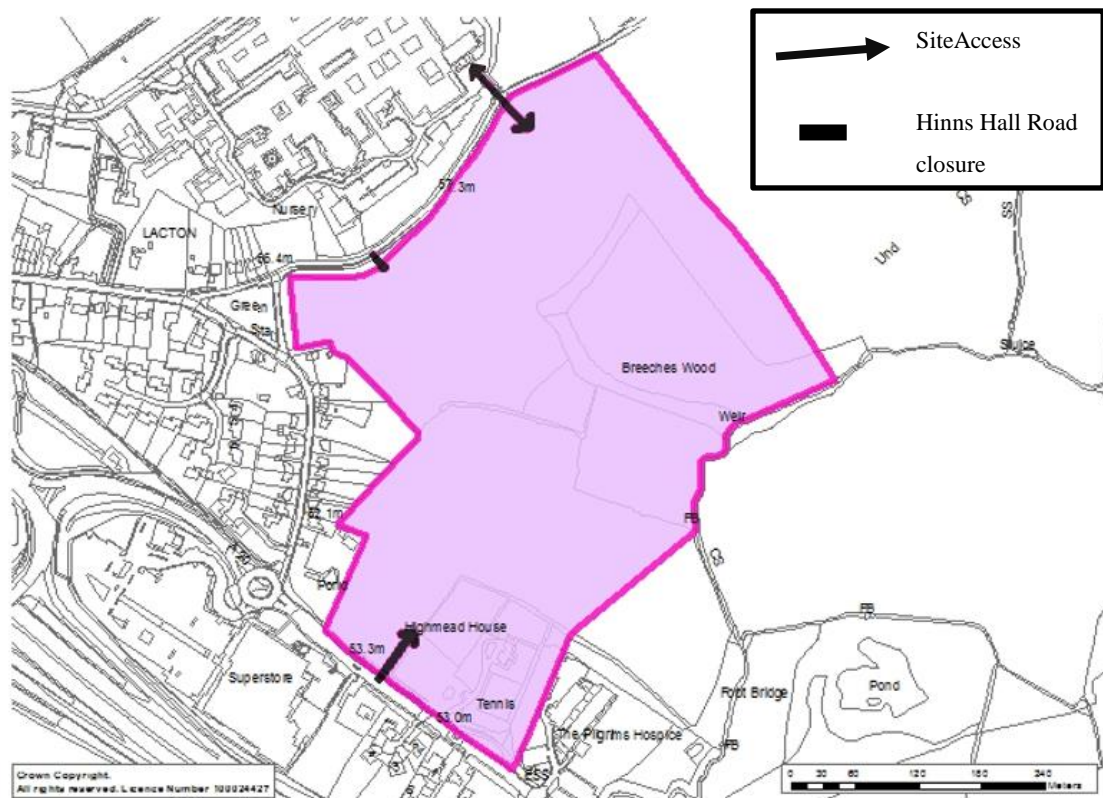
Land at Waterbrook is proposed for a mix of residential and commercial development together with a re-located and extended commercial lorry parking facility.

Detailed proposals for this site shall be developed in accordance with an approved masterplan that:-

- a) **provides a re-located 600 space lorry park on the eastern part of the site, adjacent to the aggregates facility;**
- b) **provides an indicative 350 dwellings on the western and southern parts of the site;**
- c) **provides a minimum of 22 hectares of commercial development;**
- d) **ensures the proper segregation of uses within the site through the provision of substantial landscaping and screening based on a strong landscape framework for the site;**
- e) **provides suitable mitigation to deal with noise, visual impact and artificial lighting to restrict the impact of the new development on the new residential properties to be developed on the site and the existing properties along Cheeseman's Green Lane, Finberry and Church Road, Sevington;**
- f) **provides vehicle access from the A2070 and to the Finberry development with no access from the Waterbrook site to Cheeseman's Green Lane;**
- g) **provides new pedestrian and cycle routes throughout the development and connections to existing urban and rural routes;**
- h) **protects and enhances the East Stour river corridor local wildlife site;**
- i) **contributes to the improvement of the green corridor that runs through the site;**
- j) **includes a full flood risk assessment prepared in consultation with the Environment Agency;**
- k) **ensures that any land contamination issues are satisfactorily resolved or mitigated;**
- l) **provides a connection to the sewerage system at the nearest point of adequate capacity, as advised by Southern Water, and ensure future access to the existing sewerage system for maintenance and upsizing purposes;**
- m) **provides a proportionate financial contribution towards the delivery of Highway England's scheme for a new M20 Junction 10a.**

No residential development or any commercial development (beyond that with an extant planning permission) shall be occupied until the proposed scheme for M20 Junction 10a is complete, in accordance with policy TRA1.

Land at Willesborough Lees



- 4.185 The site to the south east of the William Harvey Hospital was identified in the 2008 Core Strategy and Urban Sites and Infrastructure DPD 2012 as suitable for development which also enables a secondary access point for the Hospital to accommodate its growing sub-regional role.
- 4.186 The site directly adjoins the built up urban area of Ashford and links in to attractive open countryside on the eastern edge of the town. At its western edge, the site directly adjoins the Conservation Area at The Street. Hinxhill Lane forms the northern edge that slopes up to the small settlement of Hinxhill and at the southern edge is the A20. The site is characterised by rolling countryside with some substantial areas of woodland.
- 4.187 The built footprint of development on this site needs to be carefully planned. It should avoid any of the existing areas of woodland that provide both natural screening and habitat whilst also including a distinct gap and soft green buffer along part of the western boundary to help mitigate the impact on the adjacent residential occupiers and on the character and setting of the Conservation Area.
- 4.188 This area is residential in character consisting mainly of large detached properties, some of which are listed and so, the scale and density of new development in this part of the site should also be low. In the central area of the site, particularly along the new link road to the hospital, slightly higher densities can be achieved but overall, the site is suitable only for lower net residential densities (i.e. below an average net 30 dph).
- 4.189 The opportunity exists, by detailed design, layout and landscape planning, to create a distinct neighbourhood to help create a real sense of place in this attractive location. Street frontages

should be 'active' to add interest, life and vitality to the public realm. This can be achieved by minimising blank walls and making all primary entrances overlook the street. The layout of the site should be designed to allow views, and pedestrian links where possible, through to the countryside and woodland to the north and east of the site.

- 4.190 Cycle and pedestrian links are critical. They should provide easy access to bus stops and serve all areas of the site. A pedestrian crossing on the A20 to the supermarket is essential, to connect with the improved walking/cycling environment around M20 Junction 10, and to link with the existing pathways and enable access towards the Town Centre. Links to existing rural footpaths should also be provided.
- 4.191 The main access point to the site is shown on the Policies Map and is located on the A20 to the west of the Highmead House/Warren Lodge land. To accommodate the whole of the development and the link to the hospital, this junction must be signal-controlled due to the amount of traffic that will be entering the area and to enable the smooth flow of traffic on the A20. However, up to 100 dwellings could be accessed from a more simple priority junction prior to completing the link road to the hospital and the resulting closure of Hinxhill Lane (see below).
- 4.192 The access route through the site to the hospital should be delivered by an appropriate layout of the 200 dwellings allocated in this policy. The phasing of the opening of the access route should be agreed with the Council, the local highway authority and the Highways Agency and should follow highway works to the existing secondary access point to the hospital, which would increase capacity and pedestrian and vehicle safety at this new junction.
- 4.193 As a consequence of the above, Hinxhill Lane should be closed south of the hospital access in order to avoid traffic using this narrow road to access the Hospital and having a detrimental impact on the existing residential area, although a gated access should remain for emergency vehicles. The proposed closure of Hinxhill Lane should benefit the existing residents of The Street as it will mean that the road will no longer be used as a through route to and from Wye and the villages north-east of Ashford. However, the Council will endeavour to monitor this change to the road layout once the link road is opened and should it be identified that there are increased traffic movements on The Street as an alternative route is sought to the A20 by road users, then the Council will look at potential schemes for closing The Street and creating two separate two-way cul-de-sacs.
- 4.194 The site lies close to M20 Junction 10. Development of the site will generate additional peak hour traffic movements around the existing motorway junction. Although a full Transport Assessment will be required to support a planning application for development here, an initial assessment indicates there is sufficient capacity at the existing motorway junction to cater for a 200 dwelling scheme on this site to be brought forward within the DPD period, based on the likely trip generation from the site set out in the Jacobs 2010 Study which indicates a peak hour generation of 250 two-way movements.
- 4.195 The eastern edge of the site is mainly open countryside and long established woodland (Breeches Wood). This woodland spreads into the centre of the site and the landscape and topography of the north eastern edge would act as a boundary and screening for any development. Development should not occur in the area east of the woodland as this would be greatly visible in this location. Additional screening should be placed on the north eastern

boundary of the site, from the woodland edge to the Hospital, to reduce the visibility of the development from the north.

- 4.196 The site also includes Highmead House and Warren Lodge on the A20, west of the Pilgrims Hospice. This part of the site contains some large trees protected by Tree Preservation Orders, so lower densities in this part of the site would also be appropriate. This section of the site could be redeveloped as a separate scheme, although it must be accessed through the new A20 junction as the existing residential access would not be suitable. In either circumstance, development shall not prejudice the delivery of the main site access and the associated development.
- 4.197 The connection of the link road through the site to the hospital should be provided prior to the completion of development. A phasing programme will need to be agreed with the Council and the Highways Authorities to ensure that the opening to hospital-bound traffic would not have an adverse effect on the operation of the surrounding highway network identified in the Transport Assessment. In order to ensure that hospital staff and visitors are not encouraged to park on the residential streets of the new development, appropriate on-street parking restrictions within the new development would need to be provided as an extension of the existing arrangements in the area and funded as part of any Section 106 agreement.
- 4.198 The land to the north of this site, adjacent to the existing secondary access of the hospital is a Local Wildlife Site - Willesborough Lees and Flowergarden Wood (AS44). The site is formed of wet woodland and bog habitats and both badger setts and rare plants have been recorded here.
- 4.199 Careful consideration will need to be given to the impact of the proposed development on the adjacent LWS and this could include the development of an appropriate management strategy.
- 4.200 Due to the wet woodland and bog habitats present within the LWS there is a need to ensure no change in the hydrology within the site as the health of the woodland and bog is likely to be dependant, at least in part, on water from the U14 site. Therefore a hydrological survey may be required at the planning application stage to ensure water feed to the LWS is not impacted. The possibility of producing this strategy in partnership with the developers of site U5 would be seen as an acceptable approach.
- 4.201 The south eastern edge of the site (behind the Pilgrims Hospice into the woodland) falls within Flood Zone 2 and is close to Flood Zone 3. Therefore, a full flood risk assessment must be provided, in consultation with the Environment Agency. In addition, the depth of groundwater is limited and thus the use of soakaways may not be permissible due to the risks of direct discharge to groundwater. The Sustainable Drainage SPD should be adhered to in establishing suitable options for surface water disposal.
- 4.202 There is evidence of soil contamination on parts of the site and detailed proposals will be needed to deal with this prior to development taking place. In addition, capacity in the local sewerage system is insufficient to service the proposed development. It will be necessary to upgrade the existing local sewerage infrastructure before development can connect into it. It is also important that existing sewerage infrastructure which crosses the site is protected and future access secured for the purposes of maintenance and upsizing. Liaison with the relevant infrastructure company at the time is recommended.

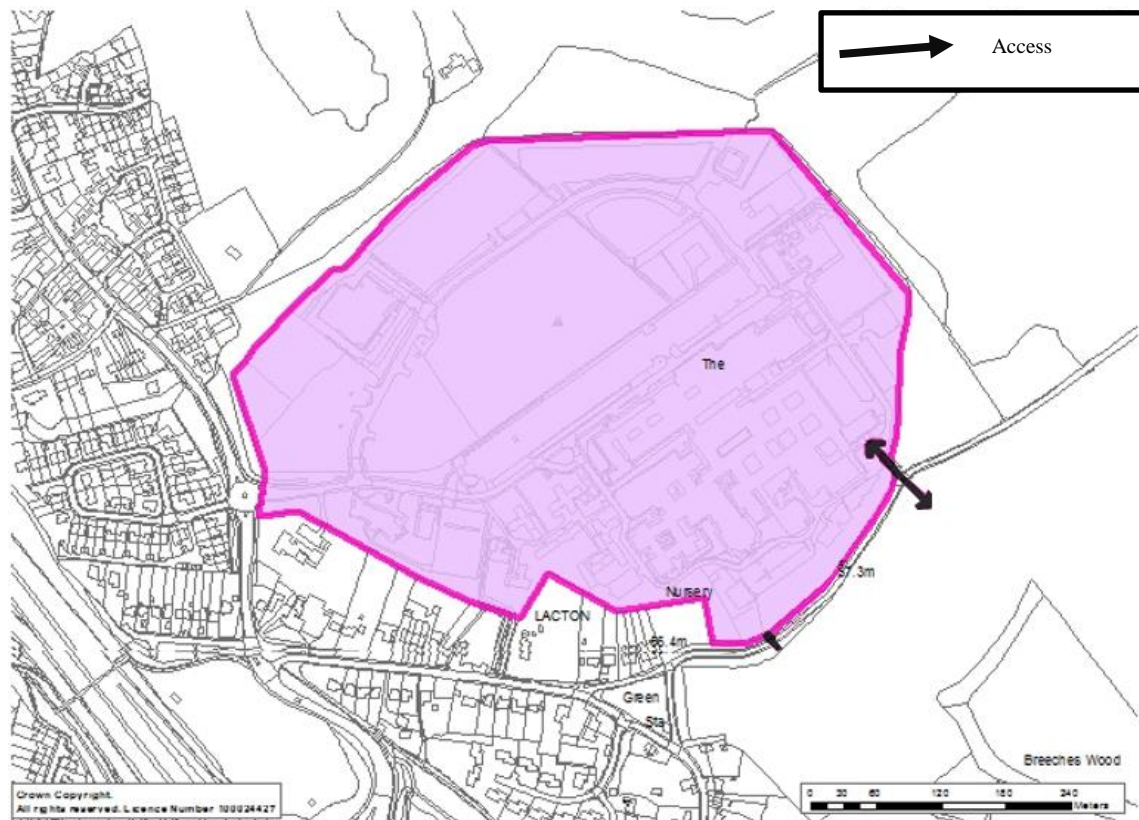
Policy S17 - Land at Willesborough Lees

The site to the south east of the William Harvey Hospital is proposed for residential development for up to 200 dwellings.

Development proposals for this site shall:

- a) **provide a new signal-controlled junction, including a pedestrian crossing on the A20 at the point shown on the Policies Map;**
- b) **provide a road through the site to act as a secondary link to the hospital at the point shown on the Policies Map;**
- c) **make improvements to the existing emergency access to the Hospital, and Hinxhill Lane, to accommodate a new link road and junction, and close Hinxhill Lane to traffic south of the hospital access. A restricted access shall remain on Hinxhill Lane for emergency vehicles, pedestrians and cyclists only;**
- d) **include a phasing programme to be agreed with the Borough Council, local Highway Authority and Highways Agency that will include the construction and opening of the access road from the A20 to the hospital and the closure of Hinxhill Lane;**
- e) **provide new pedestrian and cycle routes throughout the development and connections to existing urban and rural routes and local services;**
- f) **Fund the implementation of suitable on-street parking restrictions via a new traffic order, restricting non-residents parking on the roads of the new development;**
- g) **be designed and laid out in such a way as to protect the character and setting of the adjoining Conservation Area and neighbouring listed buildings;**
- h) **retain the woodland (Breeches Wood) in the north east of the site and extend the tree boundary between the woodland and the hospital, to screen the development of the site from the north;**
- i) **include a full flood risk assessment prepared in consultation with the Environment Agency;**
- j) **ensure that any land contamination issues are satisfactorily resolved or mitigated;**
- k) **contribute towards the monitoring of the traffic situation on The Street to enable an assessment to be made of the need to secure amendments to the existing access arrangements and to deliver those amendments if required; and,**
- l) **provide a connection to the sewerage system at the nearest point of adequate capacity, as advised by Southern Water, and ensure future access to the existing sewerage system for maintenance and upsizing purposes.**

William Harvey Hospital



- 4.203 The Council recognises the importance of the William Harvey Hospital and the range of services it provides for the community for Ashford Borough and the wider area. The Council is working closely with the relevant health providers in order to understand the requirements for the future of the hospital site. The continued improvement, expansion, reconfiguration and consolidation of the hospital is therefore supported in principle.
- 4.204 The main area of land available lies to the north-west of the existing hospital car park. There has been a recently completed development on the site, that of a private hospital, but there still remains land available for development. This is a prominent site and given the scale and nature of many hospital buildings, careful attention will be needed to create an attractive layout of buildings with strong, structural planting to limit the impact of buildings here. Planting at the boundaries of the site will need to be carefully designed to screen any long views into the site.
- 4.205 As this complex of buildings grows, the need for good pedestrian and cycle routes increases for both visitors and staff. These should be designed as an integral part of future expansion. Equally there may be a need for bus access to new facilities and this should be designed to be convenient for bus users and operators.
- 4.206 There will also be an impact of any development on the wider transport network, and a transport assessment should be submitted in support of applications for development, to identify the impact and provide for mitigation measures. A Travel Plan should also be produced in line with Policy TRA8.

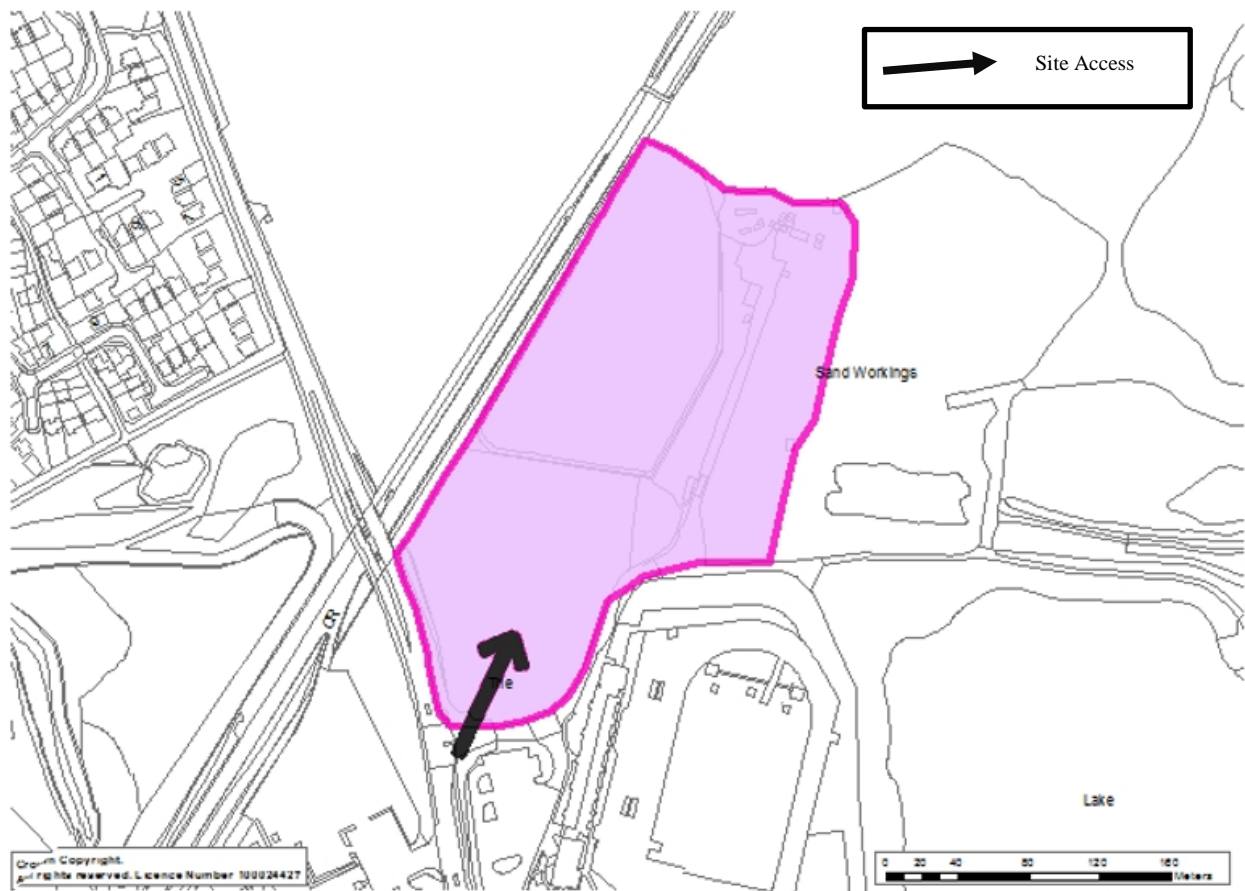
- 4.207 The Council is concerned that adequate car parking exists to serve health facilities at the William Harvey Hospital and a survey of existing demand for spaces will be required before additional facilities are built. Additional parking provision for staff and visitors shall be provided, with total levels being informed by evidence of likely need and demand.

Policy S18 - William Harvey Hospital

The Council will support proposals to improve, expand, reconfigure and consolidate the range of medical facilities at the William Harvey Hospital, subject to the following:

- a) **Design, scale and layout should take account of the prominent site and site typography;**
- b) **Landscaping should be provided to limit the impact of built development and protect long views into the site;**
- c) **Suitable provision of pedestrian and cycle routes;**
- d) **Additional car parking to be provided to meet additional need, informed by a car parking survey of existing demand and evidence of the likely future need;**
- e) **A Transport Assessment and Travel Plan should be produced in accordance with Policy TRA8 and measures proposed to mitigate any impact of development on the wider transport network;**
- f) **Provide a financial contribution to the extension of existing bus services in the area to serve the development.**

Conningbrook Residential Phase 2



4.208 Conningbrook Lake and the land surrounding have long been outlined as a location for a strategic park and water sports facility following a long period of mineral extraction. The site was originally outlined for this purpose in the Core Strategy and more recently allocated in policy U22 ‘Conningbrook Strategic Park’ in the Urban Sites and Infrastructure DPD (2012) which set out a clear vision for the park and lake, both of which could be delivered through an ‘enabling’ residential development of 300 dwellings.

4.209 A masterplanning exercise was undertaken to plan for the park and a planning application for the Conningbrook Park and Lake, plus enabling residential development was granted planning permission in October 2014. The first phase of the country park opened in September 2015, which included access tracks and public rights of way, watersport facilities and ecological conservation areas. Further phases of the country park scheme are due for completion following the end of mineral workings and extraction. It is likely that building of the first phase of dwellings will begin in 2016.

4.210 Conningbrook Residential Phase 2 is on the area of land that has planning consent for a mineral produce packing, storage and distribution facility and is located at the western extent

of the original Conningbrook policy area and therefore forms part of the wider vision for recreational open space and enabling development for the area.

- 4.211 It is crucial that any development on this site accords with the wider aspirations for the Conningbrook Country Park area, including the Julie Rose stadium, the lake and the permitted residential development.
- 4.212 This site is bounded to the north by the railway and to the west by the A2070 Kennington Road, lying opposite the Premier Foods and Givaudan manufacturing facilities. The Julie Rose athletics stadium and the permitted residential scheme are located to the east of the site. There is an existing access road between the Phase 2 site and the existing Julie Rose Stadium - this road link will extend into the first phase of residential development when it is completed.
- 4.213 The site is considered suitable for redevelopment for residential use with an indicative capacity of 170 units. Any proposed scheme should be in accordance with the current Conningbrook Masterplan and be designed to complement the existing and proposed buildings and facilities. In accordance with Policy HOU1 of this Local Plan a minimum proportion of 30% affordable housing will be delivered on site.
- 4.214 The site is located in a visually prominent part of the Conningbrook site. An opportunity exists to provide an attractively designed frontage onto the A2070, whilst providing a key entrance to the site. Given the character and appearance of the surrounding areas, including the commercial buildings on the opposite side of the A2070 and the permitted housing development, 2-3 storey buildings would be most appropriate on the site. The design and layout of Phase 2 must take account of the permitted layout of Phase 1 and the relationship of adjoining properties, with particular attention being given to the topography of the site.
- 4.215 The primary vehicular access should continue to be provided from the A2070 at the main Julie Rose Stadium entrance, with an additional throughway access to Phase 1 at the north of the site. The site is currently utilised as an overflow carpark for the Julie Rose Stadium that is utilised during major events at the stadium. Any proposals coming forward should set out how excess parking during events should be managed and this would need to be agreed with the Borough Council before any development is approved. Proposals will need to include a solution to prevent visitor parking on residential roads on event days.
- 4.216 The woodland area in the northern section of the site will need to be cleared, and options should be explored to retain the trees along the north-western edge to provide for natural screening and a buffer between the new development and the railway line. If this buffer cannot be provided, other screening options should be explored and provided.
- 4.217 Due to the loss of woodland on this site, the impact on biodiversity must be assessed at the early stages of any planning application. Where species are identified, plans for their relocation should be undertaken and delivered prior to any development being started. Utilising a wider approach to biodiversity surveying and management across the whole masterplan area would be seen as a suitable approach.
- 4.218 Sustainable drainage should be provided inline with policy ENV9 and early liaison is required with Southern Water regarding connections to the sewerage system at the nearest

point of adequate capacity and future access to the existing sewerage system for maintenance and upsizing purposes.

- 4.219 A new two-form entry primary school is proposed on the adjoining site (Land north of Willesborough Road – policy S2). It is anticipated that this school will cater for the primary educational needs generated by this development and so a proportionate contribution to the delivery of this school will be required as part of any planning permission here.
- 4.220 It is not expected that this site will come forward in advance of the permitted 300- dwelling scheme in Phase 1 as that scheme will enable the delivery of the full country park and its facilities. In any event, the occupation of this site should be dependent on the delivery of the proposed M20 Junction 10a scheme as this provides the additional off-site junction capacity necessary to mitigate the additional traffic generated by the development.
- 4.220.1 To the north-west of the site, within easy walking distance, there is an existing at-level crossing of the railway line. The Council’s preferred solution to this would be to replace the existing crossing with a new pedestrian / cycleway bridge over the railway in order to provide safer access. Therefore, any masterplan for 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 PRow’s as far as possible.
- 4.220.2 Southern Water’s assessment has revealed that additional sewerage infrastructure would be required to serve the proposed development. The development will therefore be required to make a connection to the nearest point of adequate capacity in the sewerage network. Early liaison should take place with the service provider in this regard.

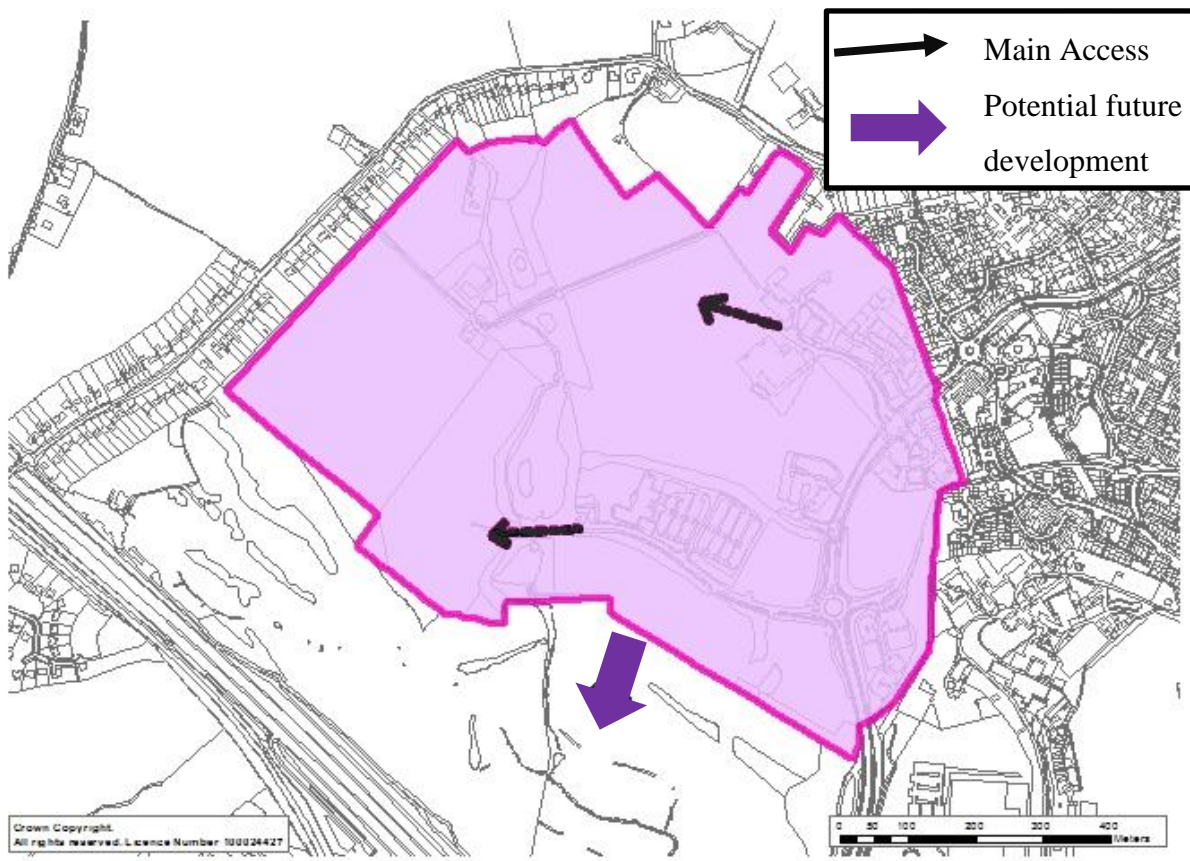
Policy S19 - Conningbrook Residential Phase 2

The Conningbrook Phase 2 site is proposed for residential development with an indicative capacity of 170 dwellings. Development proposals for this site shall:

- a) **Be designed and laid out to take account of the proposals set out in any agreed masterplan for the wider Conningbrook development area;**
- b) **Provide a designed active frontage of the site onto the A2070 Kennington Road;**
- c) **Be designed and laid out to take account of the adjoining residential development at Conningbrook Residential Phase 1, including providing a link between the two schemes;**
- d) **Minimise the impact of noise and vibration from the railway line on the amenity of future occupiers of the development, informed by a noise and vibration assessment.**
- e) **Provide a substantial landscaped screening between the development and the railway line;**
- f) **Proposals for ecological mitigation and enhancement measures are to be provided on the site informed by a habitat survey;**
- g) **Ensure that any land contamination issues are satisfactorily resolved or mitigated;**
- h) **Provide a proportionate contribution towards primary education to contribute towards the delivery of the primary school on the adjoining site (policy S2).**
- i) **Provide a proportionate contribution to be used towards delivering the vision of the Conningbrook Country Park masterplan;**
- j) **Provide and agree proposals for managing overflow parking from large events at the Julie Rose Stadium;**
- k) **Provide a proportionate financial contribution to the delivery of Highway England's scheme for a new M20 Junction 10a;**
- l) **Provide a connection to the nearest point of adequate capacity in the sewerage network, in collaboration with the service provider.**

Development on this site shall not be occupied until the proposed scheme for M20 Junction 10a is complete, in accordance with Policy TRA1.

Eureka Park



- 4.221 The site is located in the north western part of the Ashford urban area and is bounded by Sandyhurst Lane to the north which is characterised by ribbon residential development that directly abuts the Eureka site. To the south and south west, the site adjoins the Ashford golf course whilst to the east is the existing residential development of Goat Lees. The A251 Trinity Road runs through the eastern part of the site linking to the M20 junction 9.
- 4.222 The Eureka Park area was identified in the Ashford Local Plan (2000), the Core Strategy (2008) and the Ashford Urban Sites and Infrastructure DPD (2012) as a key strategic employment area. The Urban Sites & infrastructure DPD makes it clear that the Eureka site plays an important role as the principal ‘higher –order’ business park for the town. It is emphasised that it is essential to be able attract headquarter buildings and ‘blue-chip’ companies to an attractive parkland-style business environment with the aim to broaden the economic base of Ashford and provide a wider set of employment opportunities. The area provides a different type of offer to the other business locations in the town and it is important that this type of provision continues to be accommodated.
- 4.223 There are established B1 uses along both sides of Trinity Road and along Nicholas Road (Brake Bothers). The areas known as Northdown 1 and 2 which lie between Nicholas Road and Upper Pemberton are now constructed and fully occupied. Eureka Place is a local centre that provides a range of shops and services for both residents and employees.
- 4.224 The proposed policy area extends beyond the area identified in previous Local Plans to include the area to the north and north-west extending to the boundary with the properties that border Sandyhurst Lane.

- 4.225 The Local Plan provides the opportunity to review the overall approach to this area. It is critical that the site remains a strategic location for higher-order employment development recognising the importance of the area to the overall business offer of the town but there is the opportunity to re-consider the potential for some high quality residential development on part of the extended site that could fit in with the overall development concept on the site and improve the overall development offer. A high quality mix of employment and residential development in an attractive landscaped setting could deliver wider benefits to improve the business attraction of the site in particular as well as the town as a whole.
- 4.226 It is proposed that detailed site proposals should be determined following a detailed and inclusive masterplanning exercise that should inform any planning application for development on the site. The site is proposed for an indicative capacity of 375 dwellings and 20 hectares of commercial development.
- 4.227 In terms of the employment development, the Eureka Park site will not be appropriate for all types of employment uses. For instance, it is unlikely that primarily B2 or B8 uses will be acceptable here. However, it is possible to broaden the scope of potential uses here beyond just B1 office developments. For example, health care facilities or similar high quality services that complement the wider B1 office elements of the site may be acceptable where these generate new jobs for the area. Beyond the existing local centre, retail or leisure uses will not be acceptable as these should be located in, or closer to, the town centre.
- 4.228 The character of the site and its wider strategic role dictates that new commercial development must be of a particularly high quality in respect of its design, layout and materials. In general, B1 commercial building footprints should be limited to not more than 20% of the total area of the Business Park and generous planting and landscaping should be provided to ensure the proper “parkland” character of the area is maintained. The topography of the site varies significantly, generally rising from the south to the north towards the adjoining residential areas. Innovative designs that complement this topography should be considered with the potential for taller buildings (up to four storeys) on the lower-lying parts of the site nearest the golf course being an option. Conversely, on those parts of the site closest to the Goat Lees housing estate, proposals must ensure that buildings are orientated to generally face away from nearby dwellings and should be designed and laid out to minimise the potential impact on residential amenity from noise and disturbance from vehicle movements and intrusive lighting.
- 4.229 Residential development shall be located primarily west of the lake that lies in the middle of the site but would also be suitable on land to the south of Grosvenor bungalow on the higher part of the site and, on a more limited basis, south of Nicholas Road opposite the Brake Brothers office. In locations which adjoin employment areas, the masterplan should determine the precise nature and orientation of the residential development to take account of future residential amenities and the likely operational requirements of the employment sites.
- 4.230 At the western boundary of the site, there should be a generous landscaped buffer provided to reduce the impact and provide some visual separation to the properties on Sandyhurst Lane, and taking into account the proximity of the Kent Downs AONB close to the site’s western boundary. In general, residential development here should be of a lower average density to reflect the wider parkland setting of the whole site with average residential densities for individual parcels determined through the masterplan.

- 4.231 Given the location, size and number of housing units envisaged on this site, 30% of the dwellings shall be provided as affordable housing, in accordance with policy HOU1.
- 4.232 Vehicular access to the site shall only be from Trinity Road. The current access points at Nicholas Road and Upper Pemberton should form the principal access points to the site, with the former providing the main entrance to the residential development west of the lake and the latter forming a loop to serve the employment development west of Trinity Road and a secondary access to the residential areas. There should be no vehicular access from Sandyhurst Lane other than for emergencies, although pedestrian and cycleway connections from the development to Sandyhurst Lane should be provided.
- 4.233 Parking provision for the site shall be in accordance with the standards proposed for residential and employment developments in policies TRA3 (a) and TRA3 (b) of this Plan but proposals for development of the area shall also need to include arrangements for parking and traffic management to minimise the risk of staff parking in nearby residential streets (e.g. a controlled parking zone). Alongside this, development proposals shall contribute financially towards the operation of a regular and frequent bus service to the town centre. This service should directly serve both the employment and residential areas of the site.
- 4.234 Outside the site, strategic highway access is provided by the recently improved M20 Junction 9 and the Drivers Roundabout. It is expected that development here will make a proportionate contribution to the repayment of the forward funding of the junction improvements by the HCA.
- 4.234.1 While it is expected that the delivery of improvements to the strategic road network will greatly enhance the ability of sites to come forward at pace, there will still be a need to ensure that traffic movements resulting from development proposals are sustainably managed. Therefore, a Transport Statement/Transport Assessment should be provided in accordance with Policy TRA8.
- 4.235 Proposals for the site will need to be based around a comprehensive landscaping and open space strategy that incorporates attractive pedestrian routes through the site. The lake that lies in the centre of the development area should provide the focal point for the strategy with landscaped routes feeding out through the site from this location, including the existing wooded area to the north. An east-west route from the Eureka Place local centre to Sandyhurst Lane should also form part of the strategy. This strategy should also include provision of SuDS to serve the surface water drainage requirements for the site.
- 4.236 The proximity of the local centre means that the development is not expected to provide similar facilities as part of the residential area on the site but financial contributions to the delivery of off-site facilities for education, play facilities and sport will be required to meet the demand generated by the development. Informal public open space should be planned into the layout of the development as part of the landscaping and open space strategy.
- 4.237 The site adjoins the Ashford Golf Club land to the south. The Club has considered moving to a new site within the Borough. At the time of preparing this Plan, no firm proposals for relocation have come forward but it is reasonable to anticipate that this may occur during the Plan period. If a suitable site for relocation of the Club can be identified and the Club decide to vacate their current site, this land would form, in principle, a natural extension to the Eureka Park site. As vehicular access to the Golf Club land is from Sandyhurst Lane and thus

heavily constrained, proposals for Eureka Park must ensure access to the golf club land is available via the development and where necessary access roads should be constructed to the site boundary.

Policy S20 - Eureka Park

The site at Eureka Park is proposed for a mix of commercial (around 20ha) and residential development (indicative capacity of 375 dwellings).

Development proposals for this site shall be designed and implemented in accordance with an agreed masterplan for the general layout and delivery of development and related infrastructure on the site.

Development proposals for the site shall include the following elements:-

- a) A comprehensive landscaping and open space strategy, incorporating a linear park based around the existing lake and proposals for the future management and maintenance of the areas of shared open space and SuDS;**
- b) A generous landscaped buffer to residential properties along Sandyhurst Lane;**
- c) A drainage strategy that includes proposals to provide SuDS in accordance with Policy ENV9;**
- d) New pedestrian and cycle routes throughout the development with connections to Sandyhurst Lane and existing routes. The Public Rights of Way running through the site should be maintained and incorporated within the development;**
- e) Vehicular access to the site shall be provided from Trinity Road only;**
- f) Ecological mitigation and enhancement measures informed by a habitat survey with particular regard to The Warren Local Wildlife Site;**
- g) The provision of vehicular connections to the southern boundary of the site;**
- h) Parking provision on-site to meet at least the minimum parking standards for residential and commercial development set out in policies TRA3 (a) and TRA3 (b);**
- i) A proportionate financial contribution towards the repayments of the forward funding that delivered the M20 Junction 9 & Drivers roundabout improvements;**
- j) A proportionate financial contribution to the extension of local bus services to serve the development;**
- k) Laid out and orientated so that the residential amenity of neighbouring occupiers is preserved;**
- l) A connection to the sewerage system at the nearest point of adequate capacity, in collaboration with the service provider, and ensure future access to the existing sewerage system for maintenance and upsizing purposes.**

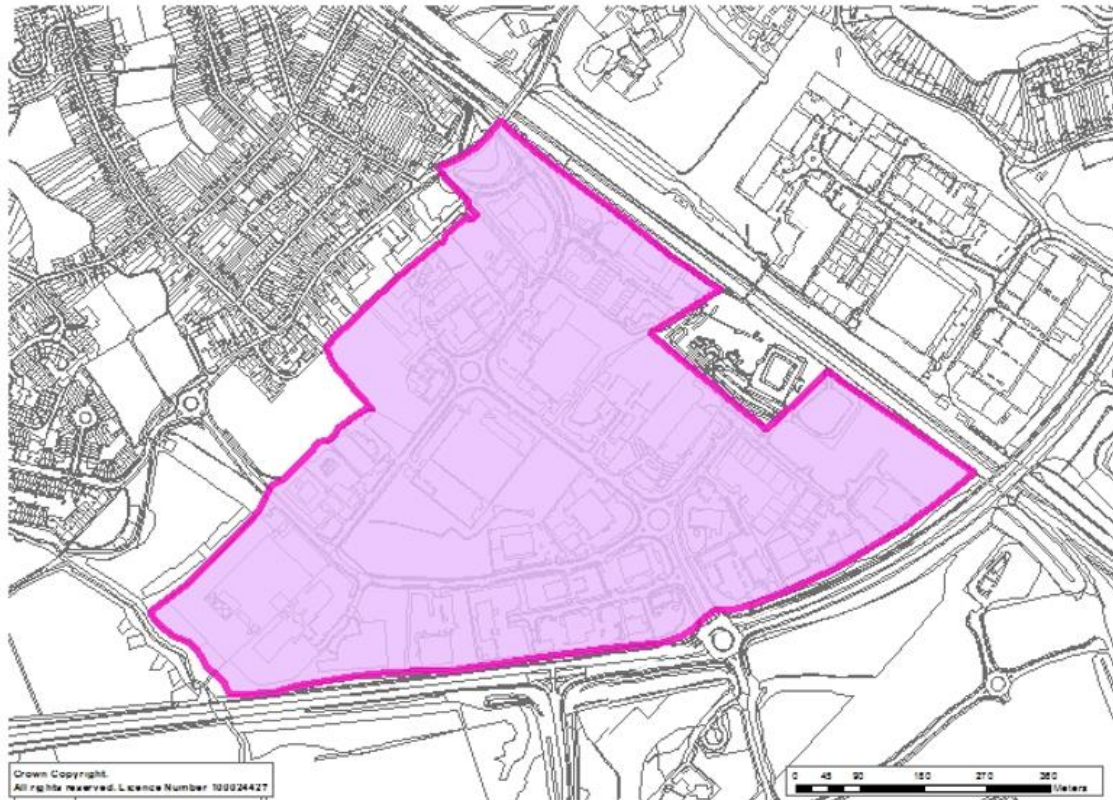
In addition, for commercial proposals on the site, the following will also be required:-

- a) Individual commercial buildings shall be imaginative in their architectural style and designed to sit comfortably in a parkland setting, with car parks and service areas located discreetly, and additional landscaping used where necessary to help reinforce the parkland setting;**
- b) The plot ratio for each commercial development parcel should not exceed 0.4:1;**
- c) The footprints of B1 buildings are limited to no more than 20% of the total area of the Business park and that each development parcel achieves a minimum of 50% of “soft” landscaping**

For residential proposals on the site, the following will also be required:-

- a) A residential design strategy setting out the key design criteria and average net residential densities on different plots and, where appropriate, how residential development will juxtapose with adjacent employment uses.**
- b) The provision of proportionate financial contributions towards off-site primary and secondary education facilities, children’s play equipment and sports facilities.**

Orbital Park



- 4.238 Orbital Park is located on the south eastern edge of the urban area adjacent to the A2070 Southern Orbital Road. The site has been identified as a strategic employment site in previously adopted Plans and has been extremely successful in delivering employment floorspace. The site comprises various employment uses spread over a large site area. Although the majority of the site has now been developed, there are still plots where new development could take place.
- 4.239 Traditionally, Orbital Park has seen a range of different employment –generating uses take place from more general B1 and B8 uses to car showrooms, restaurants, a hotel and the relocation of the cattle market from the town centre. Orbital Park is therefore an important employment location within the urban area. With the proposed development to the south and east of the site at Cheesmans Green/Finberry and Waterbrook this site will play a key role in delivering a variety of local job opportunities.
- 4.240 Given its current important role in delivering employment floorspace, it is more important now that the remaining plots at orbital Park are retained for more traditional B-class employment uses. Alternative provision within the town centre has been made for retail (including restaurants) and hotel uses and further proposals for these uses will not be acceptable at Orbital Park. Other, sui-generis uses may be acceptable where they are significant employment generators, for example motor dealerships that contain a repairs/servicing element.
- 4.241 In common with the Council’s previous policies for development at Orbital Park, it remains appropriate to ensure that the remaining areas (and any redevelopment proposals) deliver a

suitable form and density of development. Higher density office proposals are not suitable for this location and therefore a maximum plot ratio figure of 0.4:1 should apply to all B1 office uses here, so that a 1ha plot should accommodate no more than 4,000m² of B1 office space.

- 4.242 The site is very prominent when viewed from the A2070 Southern Orbital Road and abuts residential development on part of its northern/north-western boundary. New buildings should be designed and oriented to avoid any significant impact on the residential amenity of neighbouring occupiers. Consideration will need to be made regarding the layout and topography of the site. The site slopes down towards the East Stour River and the trees and hedgerows in the area are important features. Detailed proposals should aim to protect these and incorporate them in the overall design of the site.
- 4.243 The site also contains the Boys Hall scheduled Ancient Monument (the remains of a moated house). This requires protection, including an open buffer between it and any development. The effect of any proposal development on the monument will be an important issue, including the proposal's impact on the level of the water table in the area.
- 4.244 Landscaping of developments here should also comply with the approach taken in previous development plans to ensure a consistent approach to the remainder of the development land. At least 20% of each development plot area should be available for "soft landscaping" such as planting or water features with opportunities to enhance existing features such as groups of trees, or hedges, being taken where possible.
- 4.245 As a result of previous planning permissions, developing the majority of the remaining undeveloped plots at Orbital Park is not constrained by the need to deliver any off-site highway improvements, either at junction 10 of the M20 or at the A2070 junction that provides the main access into the site. The remaining vacant plots in the "central island" of the site (enclosed by The Boulevard, Monument way and the long barrow) would be constrained in this way and as such, may also be brought forward for development when it can be demonstrated through a robust Transport Assessment (as per Policy TRA8), that sufficient capacity is available at both the motorway junction and the A2070 junction to accommodate the form of development proposed.

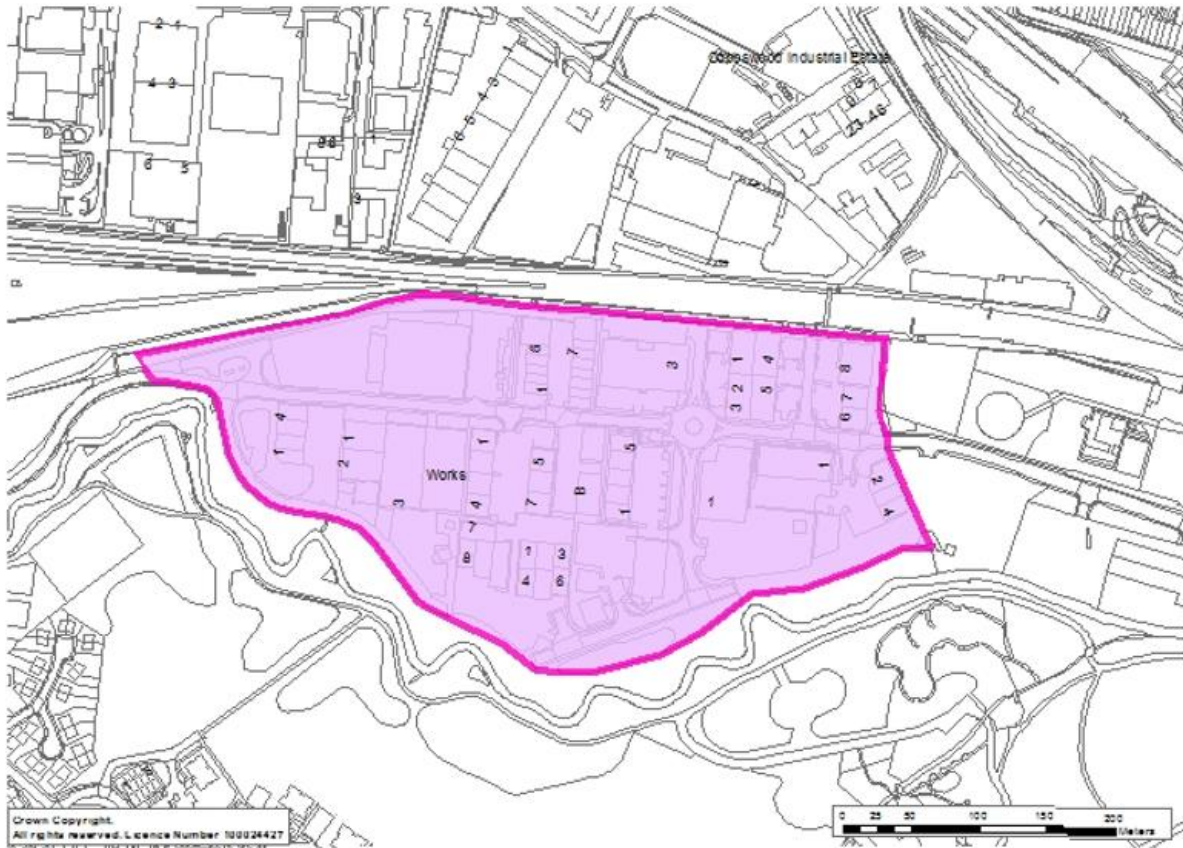
Policy S21 - Orbital Park

Land at Orbital Park is allocated for B1, B2 and B8 uses. Other sui-generis uses that generate a significant employment output may also be acceptable.

Development proposals for this land shall

- a) **Be designed to avoid any significant impact on the amenities of neighbouring residential occupiers on the site's northern boundary;**
- b) **Protect existing important habitats (especially alongside the East Stour river and within the South Willesborough Dykes Local Wildlife Site) wherever practical and design the site layout to provide new habitat links – such as planted areas, hedgerows and ditches – linking habitats and providing routes for wildlife and provide for the long term habitat management of these areas;**
- c) **Ensure that the plot ratio for the development of B1 office plots does not exceed 0.4:1;**
- d) **Protect the setting of the Boys Hall scheduled ancient monument.**

Chart Industrial Estate



- 4.246 The Chart Industrial Estate is a well established employment site in the western part of Ashford, approximately 2km from Junction 9 of the M20 and accessed via Leacon Road and Victoria Way. The site is self contained, bounded to the north by railway lines and to the south by the river corridor, with parts of the area lying in Flood Zone 3. The site has a mix of B1, B2 and B8 uses with a variety of premises from high quality modern industrial space to older premises.
- 4.247 The site lies relatively close to the town centre and adjacent to town centre redevelopment areas making it an important area for locating jobs. The area has been identified as one with redevelopment potential which could accommodate a higher density form of development and the construction of Victoria Way, creating a through route to Leacon Road, has opened up this area improving access to the town centre.
- 4.248 This change in the accessibility of the area means that it becomes suitable for a wider range of uses and potentially a denser form of development, particularly along Victoria Way itself. Redevelopment proposals could be for alternative employment uses within use classes B1-8 as well as other employment generating uses such as tourism, healthcare and education.
- 4.249 The area contains a number of existing employers, and as it is not the Council's policy to encourage redevelopment of their facilities for other uses until alternative land or premises within the town are available, there is likely to be limited potential for redevelopment prior to new employment areas requiring new infrastructure coming forward.

- 4.250 This location is an important transitional area between the higher density mixed use developments envisaged to the east in the town centre and the more suburban character of western Ashford leading out to Singleton and beyond. The existing, relatively low density, warehousing and storage character of the area would provide a sudden and jarring change to the urban environment envisaged to the east, the vision for the area is for it to gradually evolve to accommodate a greater mix of different, primarily employment generating uses with potential for some residential development in the longer term.
- 4.251 Proposals will need to contribute to this overall vision for the area with Victoria Way being a major determining factor in a scheme's design and layout. The public realm and design of buildings fronting Victoria Way will be particularly important. Currently, buildings in this area tend to present blank facades to Leacon Road but redevelopment proposals should re-orientate buildings to present the main facade to this main thoroughfare, with the aim of creating more active streetscene through this area which will complement the high quality public transport linkage that has been created. It is important that schemes here relate well to the site's location adjoining the town centre.
- 4.252 A large area south of Victoria Way lies within Flood Zone 3. This area has the attraction of a riverside setting next to the Green Corridor but any proposal for development will need to adhere to policy ENV2. Proposals will need to demonstrate that adequate mitigation measures against flooding will be in place as well as providing a protective buffer from the building line to the river bank. A flood risk assessment should be produced in consultation with the Environment Agency.
- 4.253 An existing sewer runs beneath the site and any layout of development will need to ensure that the existing sewerage infrastructure on site is protected and future access secured for the purposes of maintenance and upsizing. Liaison with the relevant infrastructure company at the time is recommended.
- 4.254 The location of the site along the riverside Green Corridor is important. At present the existing development does not relate well to the riverside area so any new development should improve the relationship of the site to the riverside and have regard to nature conservation interests. There is extensive open space within the Green Corridor at Victoria Park and Watercress Fields on the southern side of the river and accessibility should be improved by providing a new pedestrian/cycleway bridge link.

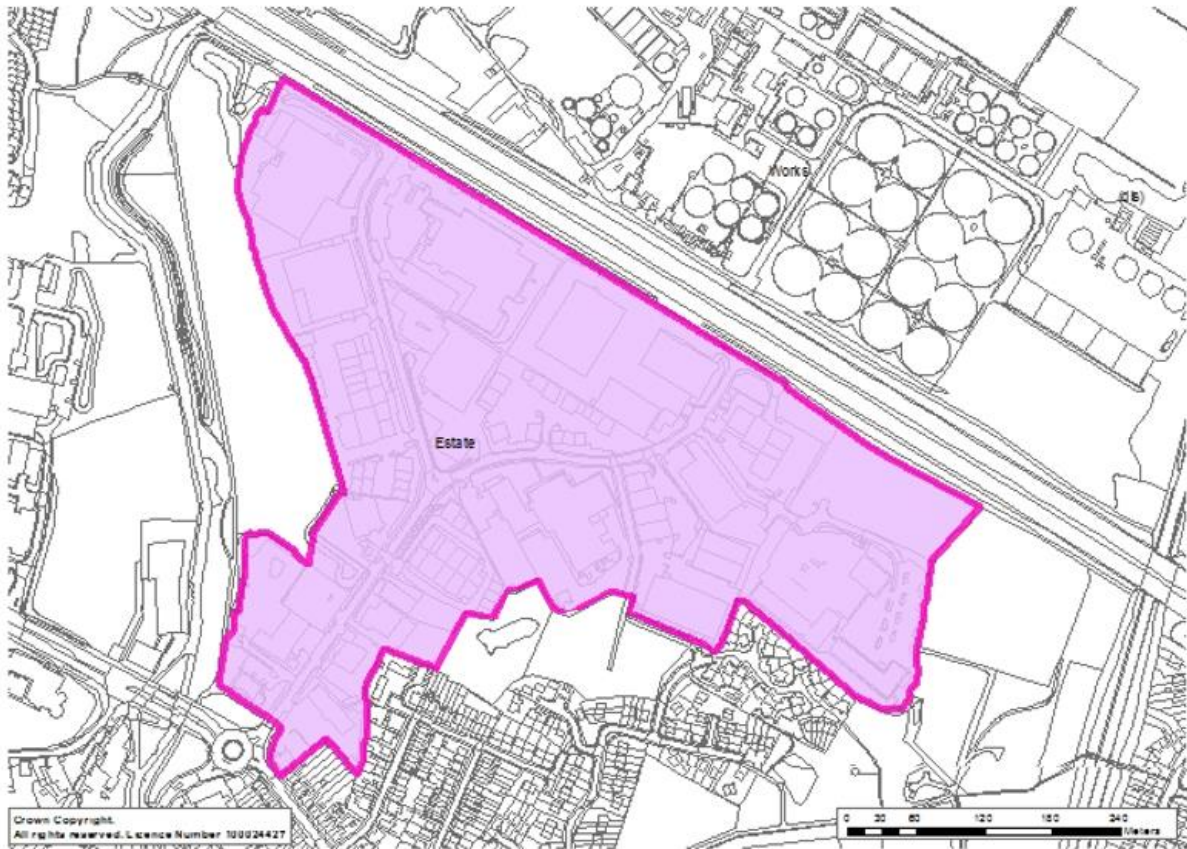
Policy S22 - Chart Industrial Estate

Land at the Chart Industrial Estate is allocated for B1, B2 and B8 uses and has the potential to be redeveloped more intensively than its current layout. Proposals for bulky goods retail warehousing and other employment generating uses would also be acceptable in principle provided that existing employment uses can be relocated within Ashford and Policy EMP2 is complied with.

Development proposals for this site shall:

- a) create a built form with a scale, design and layout which respects the long term vision for this part of Victoria Way;**
- b) ensure that future development has regard to the riverside setting of the site, nature conservation interests and the need to take account of the wider riverside corridor area;**
- c) include a full flood risk assessment prepared in consultation with the Environment Agency. Where necessary, innovative design solutions should be employed to achieve appropriate mitigation measures;**
- d) provide a pedestrian/cycle bridge over the Great Stour to link with the greenspaces to the south of the river; and,**
- e) ensure future access to the existing sewerage infrastructure for maintenance and upsizing purposes.**

Henwood Industrial Estate



- 4.255 Henwood Industrial Estate accommodates a range of B1, B2 and B8 uses. It is an important strategic employment location within the town and has been allocated for primarily employment uses in previous Local Plans. It lies to the north east of the town centre close to local services. The site is reasonably self-contained, bounded to the west by the river and green corridor, to the north by the M20 and to the south east by existing residential development.
- 4.256 The potential for expansion of the area is limited to one relatively small piece of land located north of the recently developed KCC highways depot. This is bounded to the north by the M20 and has the potential for a wide range of B class uses.
- 4.257 Henwood is an older estate where redevelopment of poorer buildings could upgrade the stock and add more employment floorspace, while refurbishment or subdivision of units would also be appropriate. An example of this is the Javelin Enterprise Park which is a conversion of an older factory to small industrial units. In principle, this approach is encouraged where this would generate new jobs and investment but this will need to be considered against the range of premises available across the town to ensure that a suitable range of types and sizes remain.
- 4.258 Proximity to existing residential properties - therefore need to demonstrate that they would not have any adverse impact on residential amenity.

- 4.259 Minimum rather than maximum parking standards will be applied to ensure new development does not compound existing inappropriate parking in residential streets. Where development necessitates highway and transport improvements, these will need to be agreed by KCC as part of the planning application process and may need to be wholly or partially funded by the developer.
- 4.260 A part of the site to the west falls within flood zone 2 and 3, and the site is located in a groundwater source protection zone. Any development proposals for this area of the site will require a flood risk assessment, which includes the vulnerability of the area to surface water flooding, and a groundwater risk assessment, to be produced in consultation with the Environment Agency.

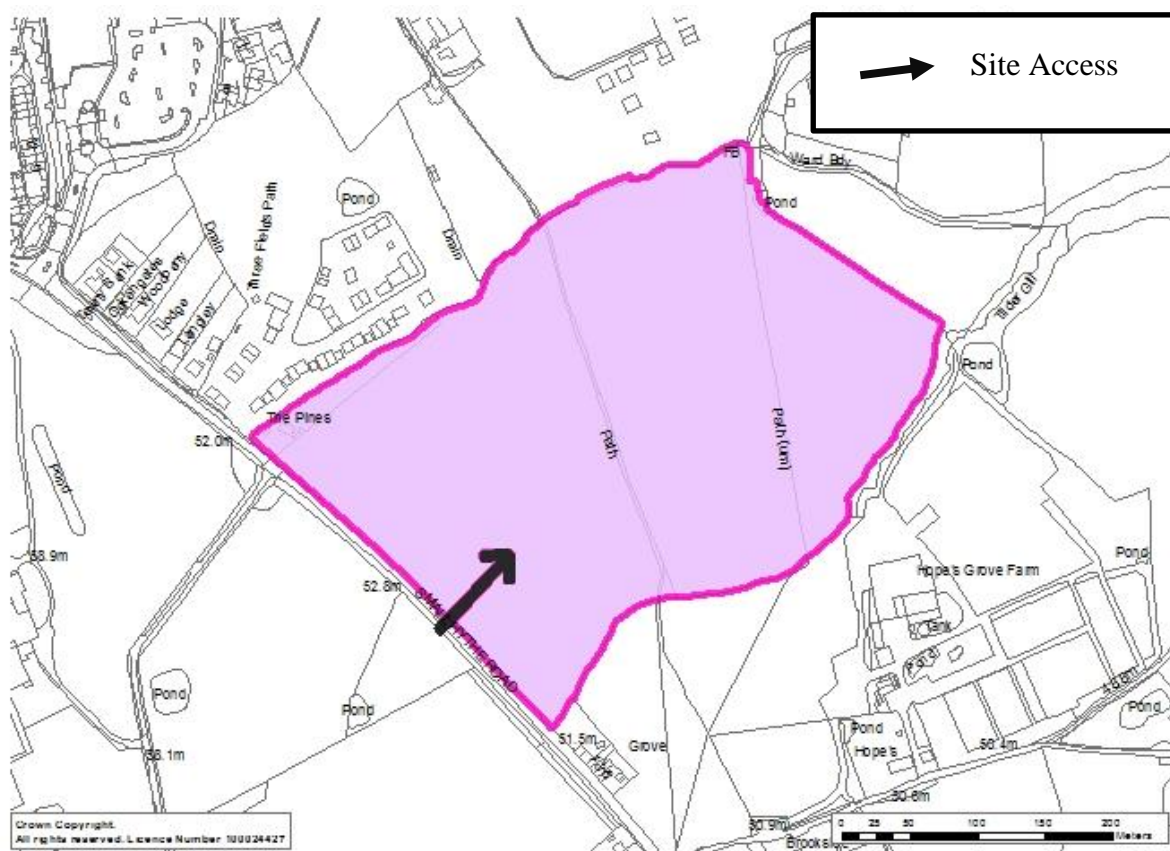
Policy S23 - Henwood Industrial Estate

The Henwood industrial estate is proposed for B1, B2 and B8 uses. This industrial estate has potential for gradual upgrading and replacement of older premises. Detailed proposals for any new development on vacant plots or redevelopment will need to ensure:

- a) **that future redevelopment or intensification of existing developments will not result in a shortage of available premises of a particular size or type in Ashford;**
- b) **proposed uses would not have a significant adverse impact on the amenity of local residents: and,**
- c) **include a full flood risk and groundwater risk assessment to prevent pollution of controlled water both prepared in consultation with the Environment Agency and provide SuDS in accordance with ENV9.**

Tenterden

Tenterden Southern Extension Phase B



4.261 The whole area to the south of the Tenterden town centre site was identified for development in the Tenterden and Rural Sites DPD adopted in 2010 (policy TENT1) and was subdivided into the two phases - A and B. The whole site is a unique opportunity to create a small urban extension to Tenterden that lies outside any designated landscape areas. The 2010 DPD identified the site principally for housing but there was also a recognised need for additional public car parking to serve the town centre. It was also indicated that the site may be suitable for small scale employment and local services.

4.262 Following a detailed masterplanning exercise and extensive local consultation phase A was granted planning permission for 250 dwellings. This site policy refers to the remaining phase B of the TENT1 allocation.

4.263 The site forms part of the wider southern edge of the built-up area of Tenterden town centre. To the north lies the proposed TENT 1A development site, the main commercial core of the town centre and the major services and facilities, including the town's leisure centre and main public recreation ground, whilst to the south lies open countryside and the boundary of the High Weald AONB. The whole site lies entirely within an easy walking distance of the heart of the town and has the potential to be developed as a relatively sustainable extension and bolster Tenterden's successful and vibrant economy without damaging the essential character that makes it such an attractive location to live and visit.

- 4.264 The Phase B land lies to the south of the stream that crosses the site from near Heronden in the west towards the east and the character of the land here is more open and agricultural at present. The land is less constrained by topography and other natural features and so, within this part of the site a new landscape framework should be produced by the development, framing views of the church, producing recognisable neighbourhoods, providing a clear frontage to the linear green space complementary to that created in Phase A and respecting existing water features.
- 4.265 The Phase B land will, in future, form the southern edge of Tenterden and it is important that this new urban edge is properly integrated into its landscape setting as the existing form of Tenterden is a product of geology, landform, and therefore landscape. The High Weald AONB wraps around the site to the south-east and south-west, and the southern boundary is marked by an identifiable landscape feature, in the form of the stream running eastwards from near Morghew. For these reasons the southern boundary to the site should be marked by a substantial woodland (incorporating wetland) belt, joining the existing woodland to the east (including Local Wildlife Site ASO5) and effectively reinforcing the connection between the two parts of the AONB into one integrated whole, and having particular regard to its setting. The precise depth and arrangement of this strategic planting / wetland belt should be determined in the masterplanning of the site but it should be at least 20 metres in order to:
- act as landscape containment of the edge of the town,
 - act as a biodiversity (woodland and wetland) resource,
 - act as a habitat corridor,
 - provide for water retention in the event of the heavier rainfall conditions expected as a result of climate change and the run-off from the development itself; and,
 - augment the footpath system, providing access to the countryside for the wider population
- 4.266 As this planted / wetland area should lie within the site boundary, and given the transition towards the open countryside beyond, the Phase B land should produce an average residential density of around 30 dwellings per hectare. The precise quantum of development that could be achieved in Phase B should be determined by a detailed masterplanning exercise but the overall capacity of the Phase B site is likely to be in the region of 225 units.
- 4.267 Phase B needs to be seen and planned as an evolution of the Phase A development, in line with an overall masterplan that creates a clear and coherent framework for this significant extension to the town. The Phase B land should not be occupied before Phase A as this would produce a separate settlement which would not strengthen the town centre and would leave a fragmented open area between the Phase B land and the existing town centre without clear purpose or structure. Furthermore, the Phase B land could not successfully be linked to the town centre by high quality routes through the Phase A development if these had not been provided and / or Phase A was still under construction.
- 4.268 The masterplan / development brief should investigate the matters referred to above including the extent to which built development should extend southwards in Phase B, the precise scale and location of the strategic woodland / wetland belt, key pedestrian and vehicular routes within and through the development site, including the conservation of historic routes.
- 4.269 The masterplan / development brief should also address requirements for on site community infrastructure such as public open space, play facilities, recreational facilities and the

maintenance of these as well as more strategic infrastructure requirements, such as the provision of education , health and social care facilities that may be provided on or off-site. The location of potential local community facilities / services and any employment land within the site, and their phasing and delivery will also form part of the masterplan for the site.

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

Policy S24 - Tenterden Southern Extension Phase B

Land to the south of the TENT 1A development is proposed for residential development and the site (known as Phase B) is suitable for an additional indicative capacity of 225 dwellings. The Phase B site shall not be occupied until the TENT1A development has been completed.

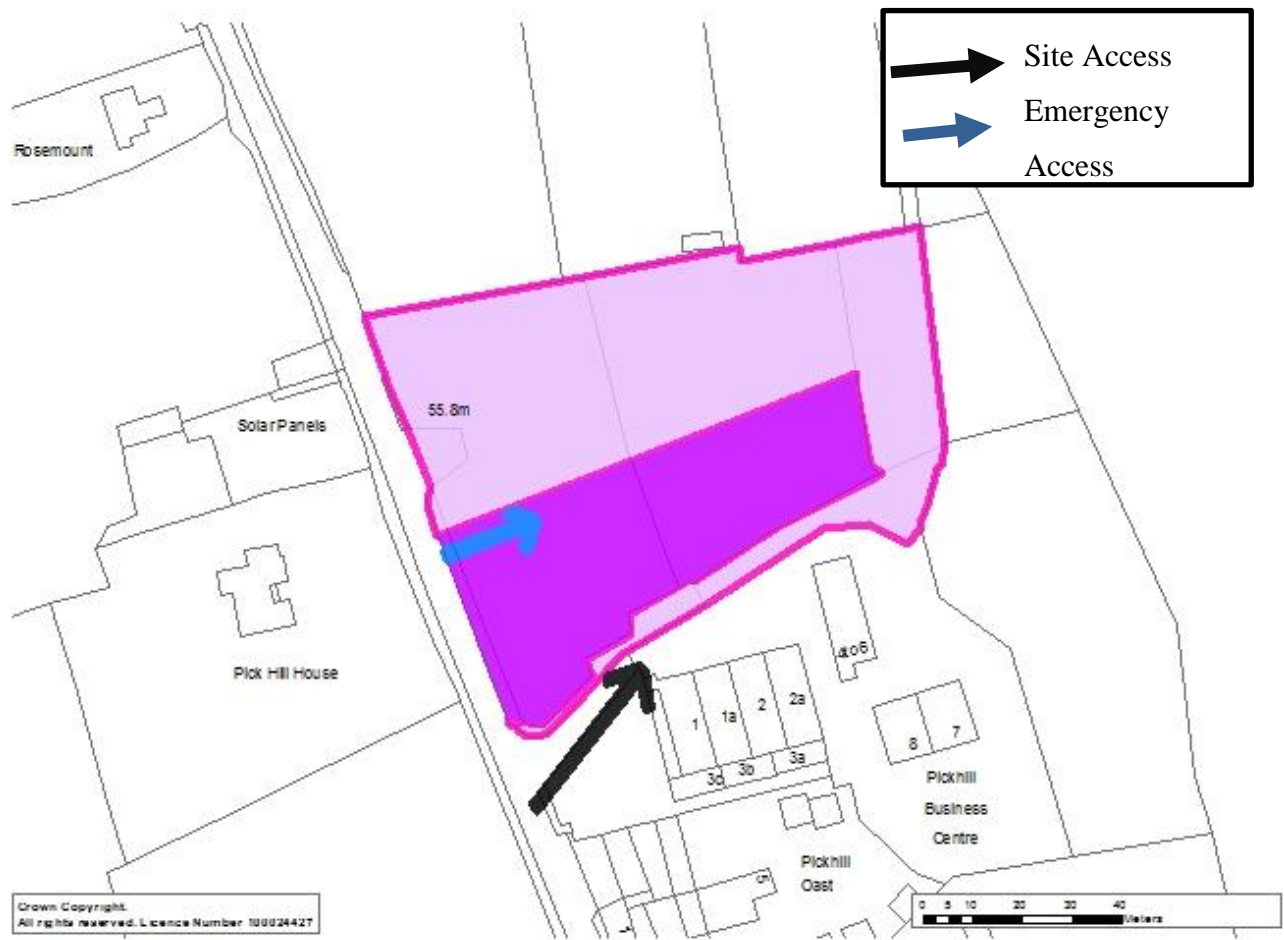
Development of this site shall be in accordance a masterplan / development brief that has been submitted to and approved by the Borough Council. The masterplan / development brief shall identify the timing of the planting of a substantial woodland (incorporating wetland) belt to the south of the built development area within this site and define the extent, location and phasing of community infrastructure and employment land to be delivered both on and off- site.

The site shall be accessed from Smallhythe Road with links to the TENT 1A development.

Acceptable forms of development on this site shall also achieve the following:

- a) **The retention and enhancement of existing hedges and natural watercourses and ponds on the site;**
- b) **The creation of pedestrian and cycleway routes through the site to link with the TENT 1A development, the town centre and existing public rights of way both on and off-site, whilst also protecting historic and existing routes through the site;**
- c) **A layout that enables views of St Mildred’s Church tower to be achieved through the site from both within and beyond it;**
- d) **Provision of off-site highway improvements identified as being necessary through the masterplanning process;**
- e) **The creation of public open space that falls within this site’s boundary as part of the linear public open space through the centre of both phases of the development that follows the line of the existing stream;**
- f) **Be designed and laid out in such a way as to protect the character and setting of the AONB;**
- g) **Provide a connection to the nearest point of adequate capacity in the sewerage network, in collaboration with the service provider.**

Pickhill Business Village, Tenterden



4.270 Pickhill Business Centre is located on Smallhythe Road a short distance from the town of Tenterden. It is an established business site having been originally converted from agricultural buildings to employment uses in 1997. The existing premises host a number of small and medium sized B1-B8 businesses, utilising 16 units. This policy promotes an extension to the north of the existing site through the allocation of a 0.35ha parcel of land.

4.271 The site is currently divided into two characteristic areas, the eastern end of the site is a small orchard and the western end of the site is a grazing area, enclosed by wooden post and rail fencing and a large landscaped hedge which is directly adjacent the Small Hythe Road. The two sites are bounded on the northern boundary by a large hedgerow, which extends along a large proportion of its length. This hedgerow provides existing screening to the development from views from the north. To the east of the site, outside of the site boundary is an area of hardstanding currently utilised as an informal parking area. The site is contained wholly within the High Weald AONB.

4.272 The site is considered suitable for development for business uses within the use classes B1-B8. Given the character and appearance of the surrounding areas, a scheme of no more than

two stories would be most appropriate here. This will ensure the development settles nicely into its surroundings and will not be visually intrusive for residential properties in the surrounding area and the wider AONB.

- 4.273 A landscaped buffer exists on the frontage of the site, directly adjoining the Small Hythe Road, this should be retained as part of any scheme, as should the hedge on the northern boundary which should be retained and extended to ensure the site has minimal visual intrusion when viewed from the north
- 4.274 The primary vehicular access should continue to be provided through the main entrance to the Pickhill Business Village, with an additional emergency access only route provided through the existing field entrance opposite Pick Hill House. This will ensure that the residents of Pick Hill House are not affected by vehicles entering and leaving the site.
- 4.275 Parking for the new business units should be providing in accordance with the Parking Standards Policy TRA3 (b). Any existing parking which is lost due to the new development will also need to be re-provided in order to ensure the existing tenants of the business units are not unduly affected. There is a large area of hardstanding to the north east of the site, which is currently utilised as an informal parking area, with suitable landscaping and design, making this parking area a more formal arrangement could be seen as an acceptable approach and should be explored further at planning application stage.
- 4.276 The depth to groundwater is limited at this site and thus the use of soakaways may not be permissible due to the risks of direct discharge to groundwater. The Sustainable Drainage Policy should be referred to in establishing suitable options for surface water disposal.
- 4.277 It will be necessary to upgrade the existing local sewerage infrastructure before development can connect into it. It is also important that existing sewerage infrastructure which crosses the site is protected and future access secured for the purposes of maintenance and upsizing. Liaison with Southern Water at the time is recommended.

Policy S25 - Pickhill Business Village, Tenterden

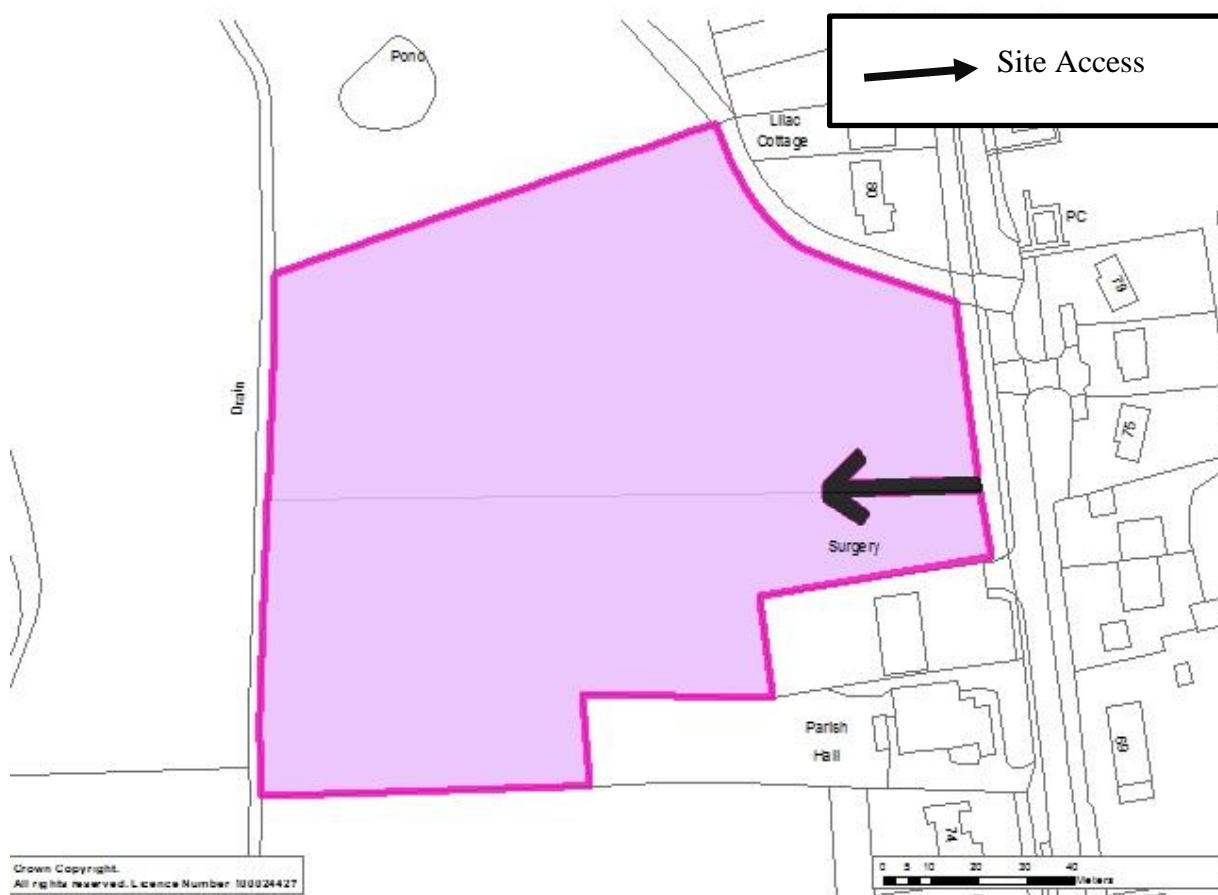
The land adjoining the Pickhill Business Centre is proposed for rural employment development within the use classes B1-B8

Development proposals for this site shall:

- a) **Provide primary vehicle access via the existing main entrance to the Pickhill Business Centre and an emergency access via the existing field entrance opposite Pick Hill House;**
- b) **Be no taller than two-storeys in height;**
- c) **Provide parking to serve the new business units in accordance with parking policy TRA3 (b).**
- d) **Reprovide any existing parking for the Business Centre which has been lost to the new development;**
- e) **Consider the impact upon views to and from the site to determine appropriate structural and internal landscaping and building heights, and having particular regard to the impact on the AONB and its setting.**

The Villages

Appledore - The Street



- 4.278 This site is located on The Street, the main route through village, situated to the north of the Village Hall and a residential property which was formerly a GP surgery. The two individual parcels of land are fields in agricultural use, bounded by hedgerows and trees and is a gap in the linear form of built development along this road. The site is located centrally in the village confines and in walking distance of the services and community facilities available.
- 4.279 To the north of the site is a row of 2-storey housing along the road frontage, with Magpie Farm and its associated outbuildings to the North West. There are properties adjacent to and opposite the site along The Street, in linear form, mainly detached or semi-detached 2-storey properties. To the east, on the opposite side of the road is the recreation field and play area. To the west, open countryside and an area that dips towards a stream and falls within floodzones 2 & 3.
- 4.280 At approximately 1.2ha in size of developable area, the site is considered suitable for around 20 units, dependant on a suitable layout and design. It also offers an opportunity to provide an

area to extend the village hall and its car park. The residential area of the development should be provided in a cul-de-sac arrangement, in the northern section of the site.

- 4.281 The southern area of the site lies within the Appledore Conservation Area (CA) and the whole site is within an area of Archaeological Importance (Viking Encampment). However, the site is located away from the historic core and main area of the CA, which is situated to the south of the site. Development of this site is therefore proposed at a low density (20dph) to be in keeping with the CA setting, open landscape, and the low density of the surrounding linear development. Archaeological investigation work should be undertaken prior to construction work commencing.
- 4.282 The hedgerows and trees must be retained around the boundary of the site and new planting should be placed around the western edge of the new development to provide screening between the site and the countryside. The hedgerows that currently divide the site should be retained where possible and integrated within the design and layout. It should be shown in the design proposals that care has been taken to limit the visibility of the new development from the main road to minimise the impact on neighbouring residents.
- 4.283 The Dungeness, Romney Marsh and Rye Bay Ramsar site lies immediately to the north east of the village and south along the Royal Military Canal. In addition, an area of the Dungeness, Romney Marsh and Rye Bay Special Protection Area (SPA) lies across the boundary in Shepway District to the south east. All applications for the development of this site should therefore include an Environmental Impact Assessment study demonstrating how the proposals will effect upon the integrity of the biodiversity of these designated wildlife environment areas. Development that will have an adverse effect on the integrity of the Ramsar site will not be permitted.
- 4.284 Opportunities to incorporate and enhance biodiversity will be encouraged. In particular, development should take opportunities to help connect and improve the wider ecological networks in this area and to mitigate against any potential increase in recreational pressure that may arise from the development of this site. There is an opportunity along the western edge, within the area of flood zone 2 and 3 to work with the Parish Council to enhance the biodiversity and ecology of the area utilising the existing ponds, and potentially create an informal nature reserve. A pedestrian access point should therefore be retained at the rear of the village hall to access this part of the site.
- 4.285 The main vehicular access will be provided on The Street, as shown on the policy map. There is a Public Right Of Way (PROW) that runs through the site from Magpie Farm in the north, to the front of the former GP surgery. This pathway should be retained/re-routed and enhanced to ensure safe access through the new development proposals.
- 4.286 Due to the close proximity of the village recreation ground, on-site provision of public open space will not be expected but appropriate contributions towards the management, maintenance and enhancement of the village recreation ground offer will be sought.

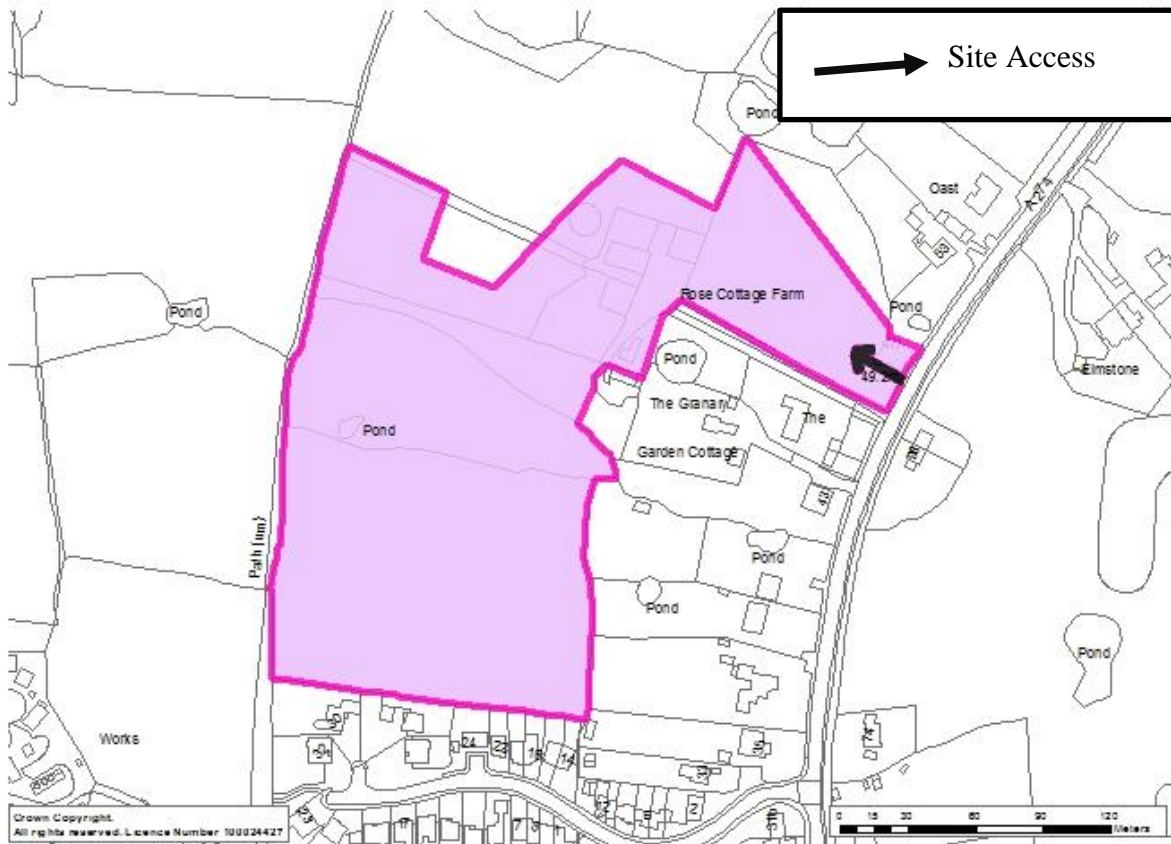
Policy S26 - Appledore - The Street

The site in The Street, Appledore is proposed for residential development for up to 20 dwellings with potential to provide an extension to the village hall and its car park.

Development proposals for this site shall:

- a) Be designed and laid out in such a way as to preserve and enhance the character and setting of the Conservation Area. Particular attention needs to be given to the visibility of new development from the road;**
- b) Retain the existing hedge and tree boundary around the site and create soft landscaping to screen the development from the open countryside. Retain as much as possible of the hedgerows that divide the site and incorporate within the new development;**
- c) Retain and enhance the PROW that crosses the site to ensure safe access;**
- d) Provide an Environmental Assessment study; to address any potential adverse impacts of the proposals on the biodiversity of the Dungeness, Romney Marsh and Rye Bay Ramsar and SPA sites and how they can be avoided or adequately mitigated;**
- e) Undertake biodiversity surveys and explore potential of providing an informal nature reserve along the western edge of the site, utilising the existing ponds and allowing ecological connections to the wider countryside; and**
- f) Provide a connection to the nearest point of adequate capacity in the sewerage network, in collaboration with the service provider.**

Biddenden - North Street



- 4.287 This site is located on North Street (A274), the main road through the village of Biddenden which connects to St.Michaels and Tenterden to the south and Headcorn (Maidstone) to the north. The site lies to the rear of existing detached properties in linear form along the western side of North Street and to the north of Mansion House Close, a cul-de-sac development of mainly 2 storey, mixed size properties. The site is currently a field in mixed agricultural and equestrian use, with woodland to west and open countryside to the north.
- 4.288 The site is considered suitable for residential development of up to 45 units, which should be located on the southern half of the site. This part of the site is approximately 2.3ha and therefore development will be less than 20 dwellings per hectare. This reflects the density of adjoining properties and is suitable for a setting adjoining the countryside in this location.
- 4.289 The vehicular access will be provided on North Street as shown on the policy map. As this site is located on the edge of the village, the new development must be designed in a way that integrates it, visually and functionally, as much as possible to the existing settlement. There is pedestrian access to the village centre through a well used ProW (Public Footpath AT10), which runs alongside the western boundary of the site and joins Mansion House Close, the Meadows and the recreation field. However, this route into the centre of the village is unlikely to be suitable for all users, particularly when wet, and therefore development must provide for improvements to the surfacing and drainage of this footpath. In addition, a pedestrian crossing and traffic calming measures must be provided on the A274, from the site entrance, to the footpath on the opposite side of North Street.

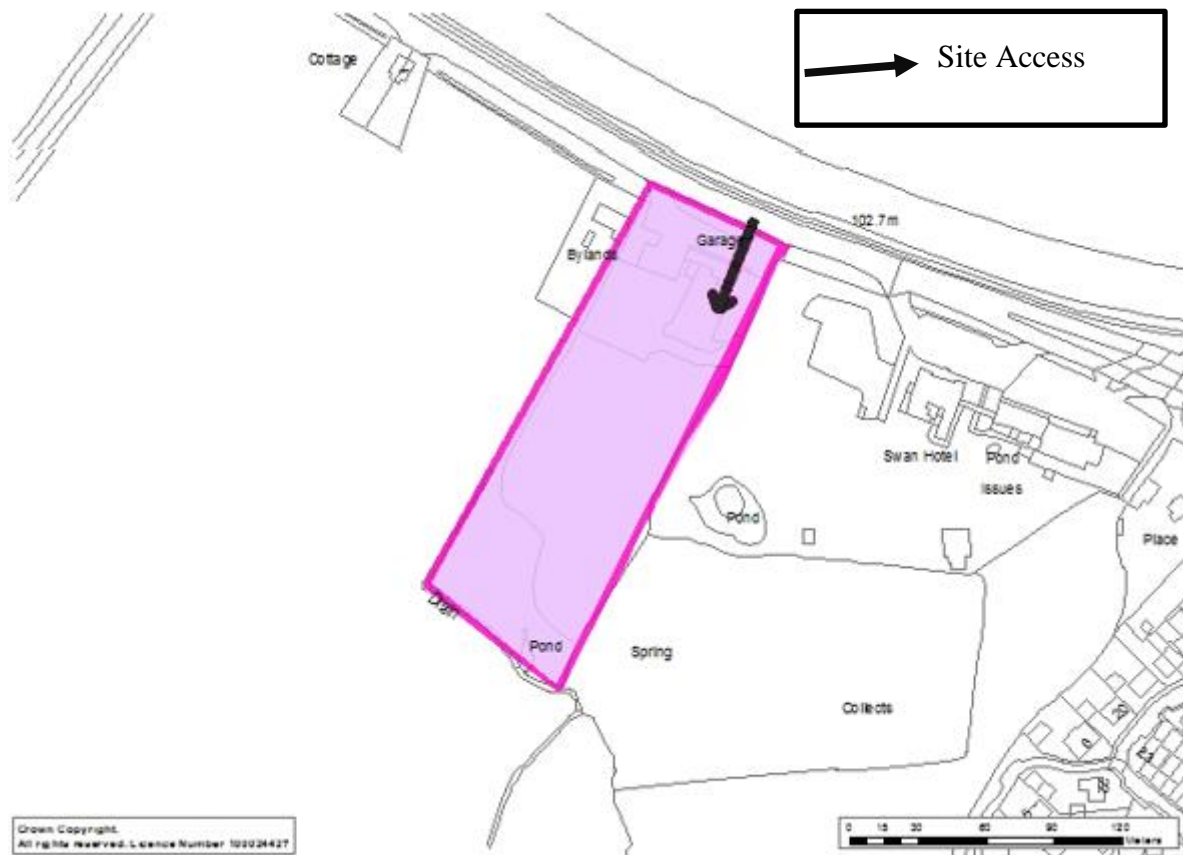
- 4.290 The village of Biddenden offers a range of services and community facilities, however, at present there is an identified need in the Biddenden Community Led Plan 2014 for a new community facility that could be used to provide improved healthcare facilities such as a GP surgery/branch (branch currently operating out of a small room in the village hall) and other village activities. Development of this site provides an opportunity to provide a mixed use community building that could meet these needs. Liaison with the Parish Council, local healthcare providers, the Village Hall Committee and other local stakeholders is essential to ensure that the community building meets reasonable local requirements and is built to appropriate building specifications for the range of uses it could be used for.
- 4.291 Careful consideration must be given to the overall site layout to ensure the community facility is accessible to all, without impacting on the residential amenity of the new homes in ways such as parking and overlooking. This can be achieved by locating the community building on the northern part of the site, close to the site entrance on North Street, and providing sufficient car parking for the facility to ensure that on-street parking of its users does not adversely affect residents. The design and layout of the development should reflect the local surroundings and must take into account design guidance in the adopted Biddenden Parish Design Statement.
- 4.292 The site is currently visually well screened by mature trees and hedgerows. This screening and landscaping should be retained and enhanced to minimise the visual impact of the new development on the existing residents to the east and south of the site and on the character and setting of the nearby Conservation Area and listed buildings. As there are ponds on site, an ecological survey should be undertaken to assess if any mitigation is required.
- 4.293 Informal public open space must be provided on-site, but due to the proximity of the village recreation ground, on-site provision of formal public open space will not be expected, but appropriate contributions towards the management, maintenance and enhancement of the village recreation ground provision will be sought.
- 4.293.1 Southern Water's assessment has revealed that additional sewerage infrastructure would be required to serve the proposed development. The development will therefore be required to make a connection to the nearest point of adequate capacity in the sewerage network. Early liaison should take place with the service provider in this regard.

Policy S27 - Biddenden - North Street

The site is proposed for residential use with an indicative capacity of 45 dwellings. Development proposals for this site shall:

- a) **Provide a community facility building on-site to accommodate local services and functions, designed in consultation with appropriate stakeholders;**
- b) **Be designed and laid out in such a way as to integrate the development into the existing settlement, taking into account design guidance in the Biddenden Parish Design Statement;**
- c) **Create a pedestrian crossing and appropriate traffic calming measures on North Street and provide improvements to the surfacing and drainage of the existing Public Right of Way on the western edge of the site that leads to the village centre (Public Footpath AT10)**
- d) **Ensure appropriate bespoke on-site parking is provided for the community facility building;**
- e) **Retain and enhance current hedge and tree boundaries around the site to create a soft landscape buffer between new development and neighbouring properties;**
- f) **Create informal open space on-site and provide contributions towards the management, maintenance and enhancement of formal open space and play equipment located on the village recreation ground;**
- g) **Undertake ecological survey work;**
- h) **Provide a connection to the nearest point of adequate capacity in the sewerage network, in collaboration with the service provider.**

Charing - Northdown Service Station, Maidstone Road



- 4.294 This site is located within the village of Charing, on southern side of the A20 and is currently in operation as a Service Station and associated retail shop. The frontage of the site is the drive-in forecourt area with fuel pumps with parking and a grassed verge buffer along the roadside. The service station buildings, are located just beyond the forecourt area. The original building is a 2-storey dwelling, which has single storey extensions containing the shop and storage rooms. To the west of the service station is a recently built steel framed car workshop, operated by Charing Motors. This larger structure extends further into the rear of the site and which is an area of hardstanding for vehicle storage/parking. The remainder of the site to the south is a field with mature tree and hedge boundaries.
- 4.295 To the west of the site on the frontage is a single residential dwelling with a large curtilage, and beyond this open countryside. To the east of the site is a restaurant, The Swan Hotel. However, both properties are well screened from the site with high hedges and mature tree boundaries.
- 4.296 Charing is a large settlement with a variety of services, including a primary school, train station and small high street. The site is in close proximity to these services and following recent developments in the village to the south east, this site is considered suitable for a residential allocation. The layout of development should be designed to allow for vehicular and pedestrian connections to the land adjoining the site to the rear of the Swan Hotel. The current employment use of the service station, and associated retail development should be retained on as much of the existing area as possible, whilst allowing for a new access road to be provided from the A20 as shown on the Policies Map.

- 4.297 The area of the site considered appropriate for built development (excluding the current garage/workshop area) is around 0.8 hectares and therefore is considered suitable for up to 20 units which is equivalent of around 25 dwellings per hectare. Consideration must be given to the Charing Parish Design Statement when planning the style and layout of development. There is a pond/spring on the southern edge of the site which must be considered.
- 4.298 Given the character and appearance of the surrounding countryside area and proximity to the AONB to the north, larger properties in generous plots should be generally located in the most sensitive locations on the rural edge. Consideration must be given to the Charing Parish Design Statement when designing the style and layout of development.

Policy S28 - Charing - Northdown Service Station, Maidstone Road

Land at Northdown Service Station is proposed for residential development for up to 20 dwellings. Development proposals for this site shall:

- a) **Be designed and laid out in such a way as to protect the character and setting of the countryside. Particular attention needs to be given to the topography of the site and advice in the Charing Parish Design Statement;**
- b) **Provide vehicle access onto the A20 Maidstone Road, as shown on the policies map;**
- c) **Retain the existing employment uses on the frontage where possible;**
- d) **Retain and enhance the hedge and tree boundaries around and within the site, particularly where there is adjoining countryside;**
- e) **Ensure that any land contamination issues are satisfactorily investigated and resolved or mitigated.**

Charing - Land south of the Arthur Baker Playing Field



- 4.299 The site is located at the eastern entrance to the village along the A20. The site adjoins existing built development at The Moat but adjoins open countryside to the southeast which includes the 'Alderbeds', an area with local biodiversity value. The woodland and meadow which comprise the adjoining Alderbeds Local Wildlife Site are dependent upon the site remaining characteristically wet and relatively undisturbed. It is therefore important that development of this site is carried out in compliance with policy ENV1 (Biodiversity). Compliance with ENV1 is likely to require both hydrological and ecological surveys to be carried out as well as the submission of a scheme showing how any necessary mitigation measures will be carried out and maintained. The extensive Arthur Baker playing field is located to the north. A ribbon of residential properties lies opposite on the southern side of the A20.
- 4.300 The prominence of the site at this key entrance point makes it essential that careful attention is paid to design and layout issues. The creation of a built-up frontage with dwellings facing the A20 to mirror the form of development on the opposite side of the A20 would be appropriate. Equally, the position of the site adjoining open countryside makes it essential that the extent of any built development on the site is carefully considered. The framing of the site by the adjacent playing fields (which themselves are bounded by development to the west and north) provides the limit to the eastern extent of built development footprint here. This enables the opportunity to be taken to create a definitive edge to this part of the village through a significant landscaped strip along the south eastern edge of the site. This should include the planting of mature trees to provide an appropriate natural screening for development here.

- 4.301 The layout of development on this site should also ensure that an attractive built frontage to the playing fields is achieved. Dwellings should be designed with their primary aspect overlooking the playing fields. In addition, proposals should also reflect the 'design guidelines' set out in the Charing Parish Design Statement (2002).
- 4.302 Vehicular access to the site shall be from the A20. The levels between the highway and the site mean that this should be towards the eastern end of the site in order to minimise the difference in levels. Frontage properties may need to be set back from the highway boundary in order to achieve good design and amenity for residents.
- 4.303 The playing fields to the north of the site are a well used and popular local facility. Existing access to the playing fields is unsatisfactory being via the adjoining residential development at The Moat. The layout of this site should enable a separate access to be created for vehicles, pedestrians and cyclists to the playing fields from the A20. Similarly, the pavilion and changing facilities are poor which undermines the ability of the playing fields to cater for the additional demand that will occur from the proposed significant increase in development in Charing. Development of this site should make a financial contribution towards the provision of a new or upgraded pavilion. The scale of such a contribution will be negotiated with the Borough Council (in consultation with the Parish Council).
- 4.304 Due to the proximity of the playing fields, on-site provision of public open space will not be expected but a financial contribution towards the provision of play equipment on the playing field will be required in accordance with policy COM2.

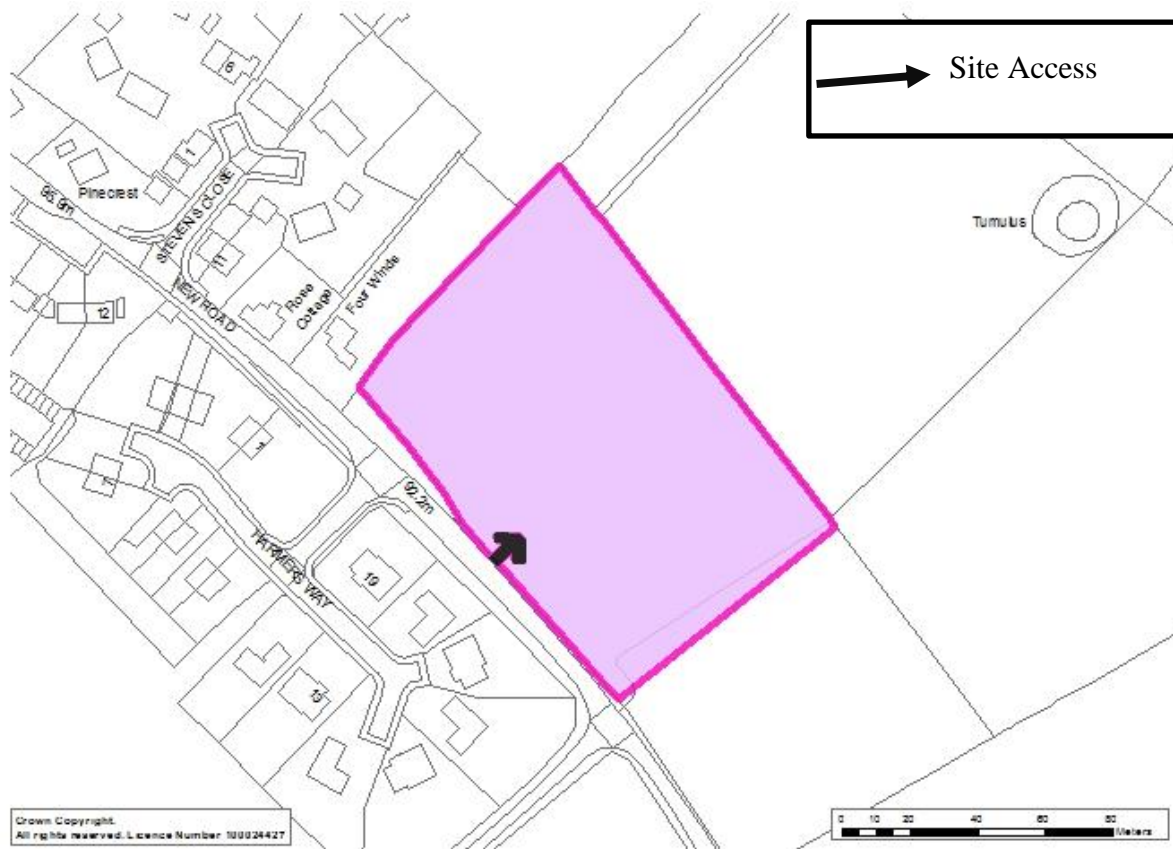
Policy S29 - Charing - Land South of the Arthur Baker Playing Field

The land south of the Arthur Baker playing fields is proposed for residential development, up to 35 units.

Development proposals for this site shall:

- a) **provide a vehicular, pedestrian and cycle link from the A20 through the site to the adjoining Arthur Baker playing fields;**
- b) **provide footpath and cycleway links to the playing fields;**
- c) **be designed to include a built-up frontage to the A20 (and provide footpath and cycle links along the frontage);**
- d) **provide a landscaped edge to the development along the south eastern edge of the site;**
- e) **provide play equipment on the adjacent playing field in accordance with policy COM2; and,**
- f) **provide a financial contribution towards the provision of a new or upgraded pavilion at the Arthur Baker playing field.**

Egerton - Land on New Road



- 4.305 This site is located in the south eastern edge of Egerton village on New Road, opposite Harmers Way, a modern housing estate. The site is in agricultural use and is currently used for grazing. The site is bounded by hedgerows and a limited number of trees creating a natural buffer to the countryside to the east and south. There is an existing PRow footpath along the south eastern boundary.
- 4.306 This site provides the opportunity to create a natural extension to the village as it lies within walking distance of the village centre and the wide range of services provided there. At 1ha the site is considered suitable for residential development of around 15 dwellings (at 15dph).
- 4.307 The prominence of the sites location at the entrance of the village makes it essential that detailed consideration is given to design and layout issues. This site has a rural aspect and its development will impact on views of the village church when approached from the south, a scheme of no more than 2 storeys would be most appropriate here. The site should mirror the building line on the opposite side of the road. The Egerton Parish Design Statement should be taken into account to achieve a suitably designed development that reflects local character and that makes a positive contribution to the built environment.
- 4.308 With the exception of creating a suitable point of access at the point shown on the policies map, existing hedgerows should be retained to provide a natural buffer between the new development and the countryside. New planting is needed to soften the southern edge of built development to minimise visual impact and to make an attractive entrance to the village.

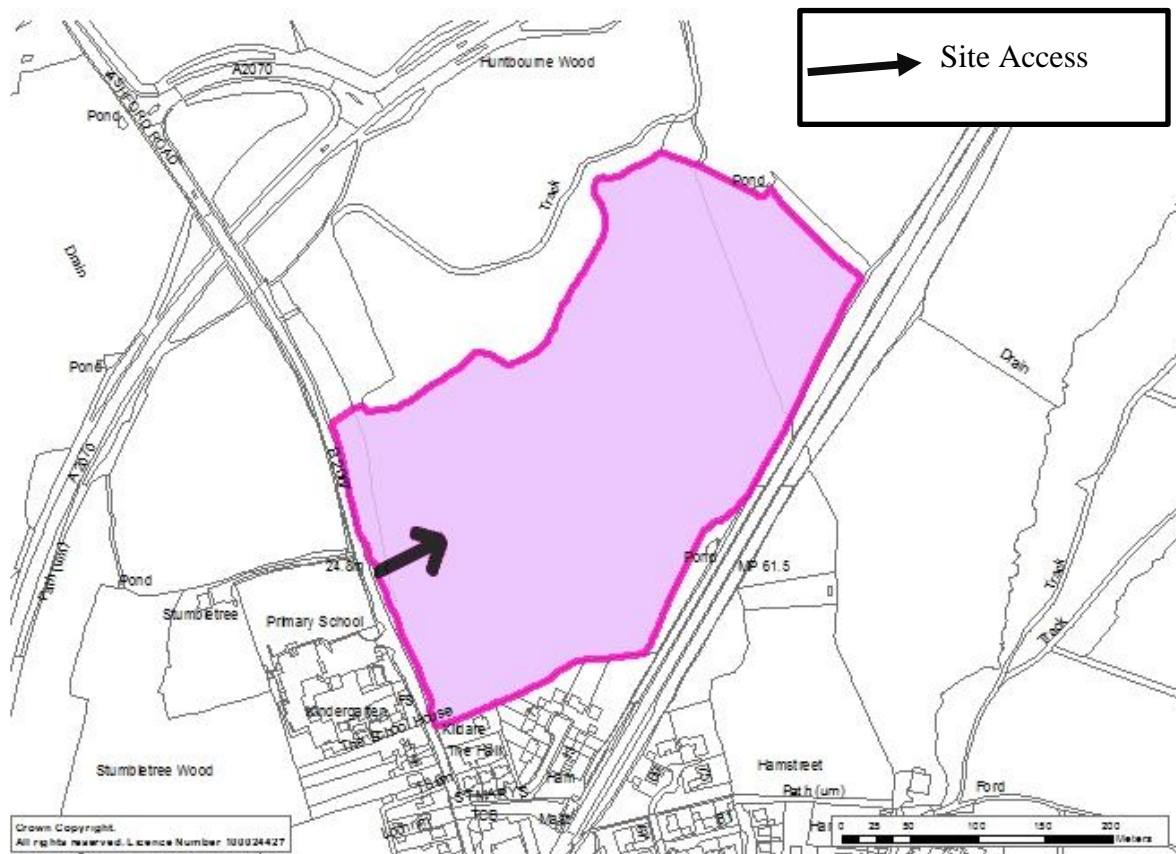
- 4.309 Pedestrian access with a safe road crossing point should be provided linking the new development to existing footpaths that facilitate Harmers Way and lead to the centre of the village. The developer will also need to negotiate the existing 30mph speed limit being extended further south along New Road with the local Highways Authority.
- 4.310 The site lies within an Area of Archaeological Potential and is approximately 80 metres from a Bronze Age barrow. Archaeological investigation work should be undertaken to access the archaeological potential within the site prior to construction work commencing.
- 4.311 Due to the close proximity of the village recreation ground, on-site provision of public open space will not be expected but appropriate contributions towards the management, maintenance and enhancement of the village recreation ground provision will be sought.

Policy S30 - Egerton - Land on New Road

The land north east of New Road is proposed for residential development for up to 15 units. Development proposals for this site shall:

- a) **Be designed and laid out to take account of the residential amenity of neighbouring occupiers. Particular attention needs to be given to the topography of the site and views of the village church. The Egerton Parish Design Statement should be taken into account;**
- b) **Create soft landscaping along the south eastern edge to lessen the visual impact of development when approaching the village from the south;**
- c) **Provide primary vehicle access on New Road, as shown on the policies map and the extension of the existing 30mph speed restriction;**
- d) **Provide new pedestrian routes throughout the development and connections to existing rural routes, including the Greensand Way, facilitating connections to the countryside, Harmers Way and local services; and**
- e) **Undertake Archaeological investigation work.**

Hamstreet - Land North of St Mary's Close



- 4.312 This site is located in the north of Hamstreet village covering an area of land between the Ashford to Rye Railway line and Ashford Road. The site is currently cultivated agricultural land. The northern boundary adjoins Court Wood which is ancient woodland and a narrow strip of woodland borders the western boundary. There are open views to the north east of the site where a Public Right of Way bisects the site. St. Mary's Close, a residential development built in the 1980's, adjoins the site's southern boundary.
- 4.313 The site adjoins existing development and is within easy walking distance of Hamstreet railway station, the village centre and the range of services provided there.
- 4.314 The site is opposite the Hamstreet Primary Academy and the development of this site presents a unique opportunity to deliver improved facilities for the school which currently has limited space within its existing site. Development of the site would enable the provision of a youth football pitch (Under 14/15's) with an associated changing room facility (2 rooms and storage) for the use of the Academy that could also be used by the wider community. Also, the Academy currently has limited car parking on site and this is an opportunity to provide additional staff car parking spaces within the new development. The site will also enable the provision of an outdoor classroom facility and this should be located on the eastern edge of the site within the second phase of the development. The expansion and improvement of the Academy's facilities will also help to facilitate the expansion of the academy to a full 2FE school.
- 4.315 Alongside these facilities, the site is considered suitable for residential development with an indicative capacity of 80 dwellings (15dph). In addition, this site is considered suitable for

development of a care home of circa 60 beds subject to there being sufficient evidence of need.

- 4.316 Vehicular and pedestrian access shall be provided from Ashford Road but the road will separate the school from its new facilities associated with the development site and the control of traffic and parking along Ashford Road will be crucial in ensuring a safe environment for children, parents and the residents of the new development.
- 4.317 Any development scheme for this site must contain detailed proposals for the management of traffic, including traffic calming measures, along this section of Ashford Road to improve vehicular and pedestrian safety at this point in the village. Such traffic management proposals shall need to indicate how vehicle speeds can be slowed on the approach to the access, especially from the north, and will be required to facilitate the delivery of suitable measures to improve pedestrian safety at this point in the village. The treatment of the access point and the immediate area outside the school needs careful consideration to deliver a safe crossing between the site and school.
- 4.318 The location of the development site adjoining open countryside and sensitive woodland areas means that the density of new development should be relatively low and provide generous landscaped buffers to the northern and eastern boundaries. A mix of dwelling types and sizes should be provided. The site has a rural aspect and given the character and appearance of the surrounding area, dwellings no greater than 2 storeys in height would be appropriate here. The design and layout of any scheme must take account of the residential amenity of neighbouring occupiers. The Hamstreet Village Design Statement should be taken into account to achieve a suitably designed development that reflects local character and to ensure that any development makes a positive contribution to the built environment.
- 4.319 The existing Public Right of Way that runs through the site leading to Bourne Lane and Hamstreet Woods (a SSSI and National Nature Reserve) should be retained within the overall layout of the new development. The developer will need to work with Network Rail to minimise risks to pedestrians when crossing the railway line.
- 4.320 The topography of the site means that the site slopes generally from north to south and it will be important to ensure that sustainable drainage systems are provided as part of the development to mitigate against runoff to the existing properties to the south. Any drainage scheme should be provided in line with the SuDS Policy.
- 4.321 The Dungeness, Romney Marsh and Rye Bay Ramsar site lies immediately to the south west of the village along the Royal Military Canal. All applications for the development of this site should therefore include an Environmental Impact Assessment study demonstrating how the proposals will effect upon the integrity of the biodiversity of this designated wildlife area. Development that will have an adverse effect on the integrity of the Ramsar Site will not be permitted. Opportunities to incorporate and enhance biodiversity will be encouraged. In particular, development should take opportunities to help connect and improve the wider ecological networks in this area and to mitigate against any potential increase in recreational pressure that may arise from the development of this site.
- 4.321.1 Southern Water's assessment has revealed that additional sewerage infrastructure would be required to serve the proposed development. The development will therefore be required to

make a connection to the nearest point of adequate capacity in the sewerage network. Early liaison should take place with the service provider in this regard.

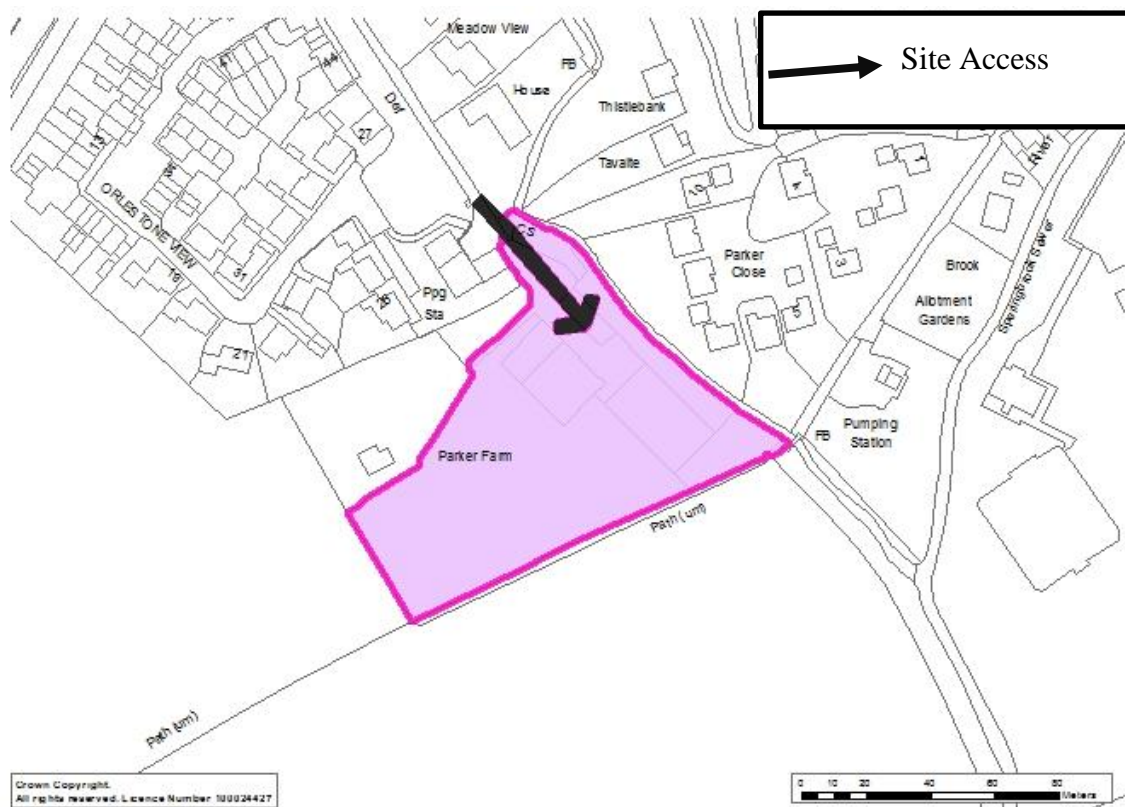
Policy S31 - Hamstreet - Land North of St. Mary's Close

Land North of St. Mary's Close, Hamstreet is proposed for residential development with an indicative capacity of 80 dwellings and associated facilities for use in conjunction with Hamstreet Primary Academy.

Development proposals for this site shall:

- a) **Provide a new youth football pitch to Football Association standards with changing room facilities and storage, for use by the Academy and by the wider community at other times;**
- b) **Provide a new area of staff car parking for the Academy with a minimum of 60 spaces which would be used to serve the new football pitch at other times;**
- c) **Provide an outdoor classroom facility for the Academy at the eastern edge of the site;**
- d) **Be designed and laid out to take account of the residential amenity of neighbouring occupiers. Particular attention needs to be given to the topography of the site and dwellings should be orientated to enable overlooking and natural surveillance of open areas. The development should be no more than two storeys in height. The guidance in the Hamstreet Village Design Statement shall inform the design and layout of the development;**
- e) **Provide vehicular and pedestrian access from Ashford Road;**
- f) **Provide and fund the implementation of an agreed detailed traffic management plan for the scheme that includes measures that reduce vehicle speeds along Ashford Road and improve pedestrian safety at this point in the village, including the enhancement of pedestrian routes between the site and local services;**
- g) **Fund implementation of suitable on-street parking restrictions for non-residents;**
- h) **Provide new pedestrian and cycle routes throughout the development and connections to the existing PRoW that runs through the site, and work with the relevant authorities to enable improvement of the pedestrian crossing at the railway line as part of the PRoW, and pedestrian routes to the village centre;**
- i) **Provide a generous landscaped buffer to the northern and eastern boundaries of the site;**
- j) **Provide for the installation of children's equipped play facilities ;**
- k) **Provide an Environmental Assessment Study to address any potential adverse impacts of the proposals on the biodiversity of the Dungeness, Romney Marsh and Rye Bay Ramsar site and how they can be avoided or adequately mitigated;**
- l) **Consider the impact upon views to and from the site, informed by a landscape and visual impact assessment, to determine appropriate structural and internal landscaping and building heights, and having particular regard to the significance of the adjacent SSSI and Ancient Woodland; and**
- m) **Provide a connection to the nearest point of adequate capacity in the sewerage network, in collaboration with the service provider.**

Hamstreet - Land at Parker Farm



4.322 The site is located to the south west of the village, and is directly adjacent to the recent development at Orlestone View. The site is currently in agricultural use and there are several large agricultural buildings located along the eastern boundary. The Springbrook sewer and 2 pumping stations are adjacent to the site boundaries. The southern boundary of the site abuts open countryside but the topography of the land means that long views to the south are contained.

4.323 This site was allocated for residential development within the Tenterden and Rural Sites DPD (as policy HAM2) with an indicative capacity of 20 dwellings, phased post 2016. However, the latest Environment Agency flood mapping shows that flood zones 2 and 3 have extended into the site since its previous allocation in 2010, and is now covering approximately half of the site area. For this reason, the developable area has been reduced to 0.38ha and only includes the area outside of the flood zones. This has lowered the capacity of the site for up to 10 dwellings (at 26dph).

4.324 The farm currently owns the private vehicular access onto Warehorne Road. This road also provides access to five existing properties and will need to be widened in places to provide appropriate passing points and re-surfaced along its length to accommodate the level of development proposed. Access to the site via the Orlestone View estate would not be acceptable, given the tightly-knit nature of this estate and its limited capacity.

4.325 The large agricultural buildings are of no great architectural value and therefore, it is required that these buildings be removed as part of the development of this site. This will enable safe vehicle access into the site and to improve the visual amenity of the immediate area for existing and new residents.

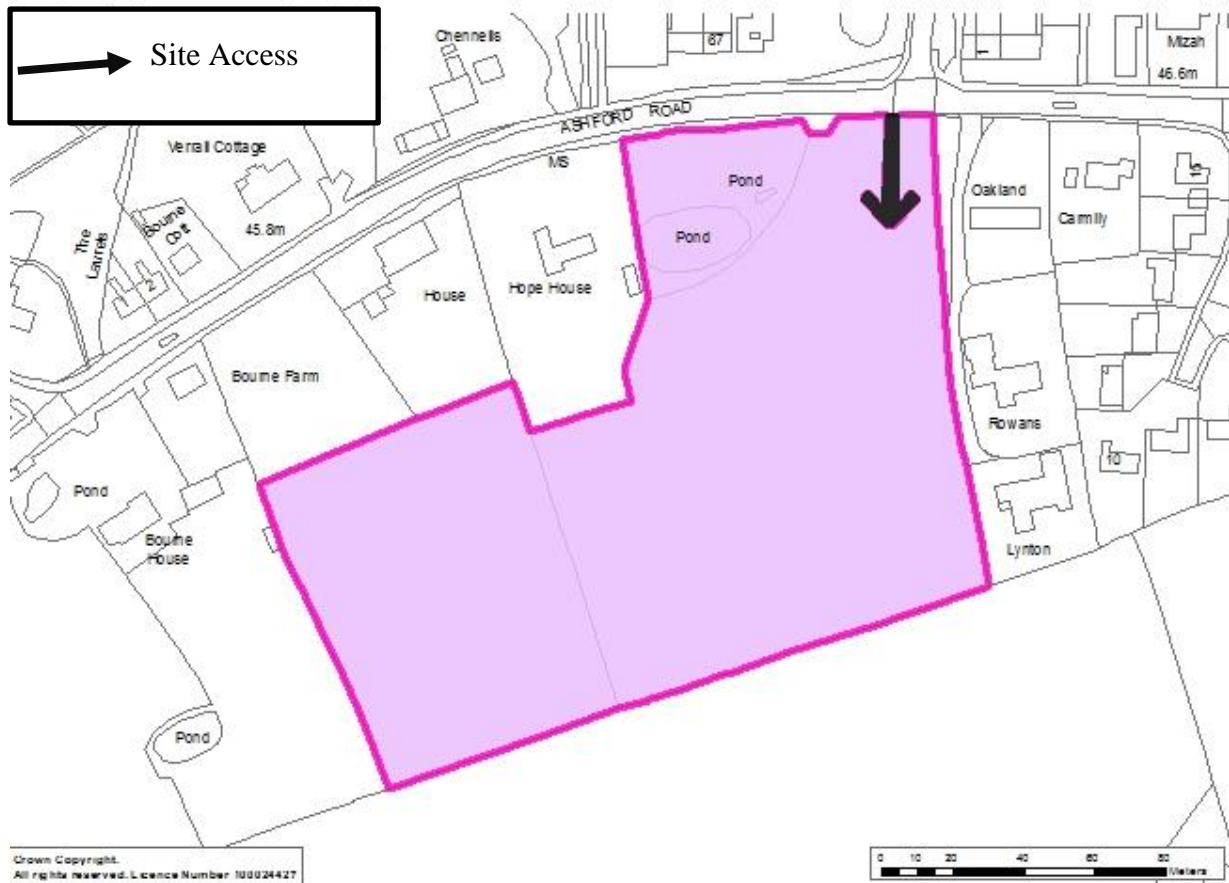
- 4.326 Development of the site must provide landscaped screening along the southern boundary to ‘break up’ the urban edge of the site and help create a clear edge to the settlement and provide a transition from the built form of the village to the open countryside. Screening must also be enhanced along the site boundaries with the residential areas, to limit the visual impact on these neighbouring properties, particularly the one farm property directly adjacent to the site.
- 4.327 A public right of way runs alongside the southern boundary of this site. The layout of development on this site should enable pedestrian access to this public footpath to create links to the wider countryside and the village services to the east.
- 4.328 Due to the close proximity of the Pound Lees recreation ground on-site provision of public open space will not be expected but appropriate contributions towards the management, maintenance and enhancement of the Pound Lees provision will be sought. The area of the site within the floodzones should be designed as informal open space.
- 4.329 The Dungeness, Romney Marsh and Rye Bay Ramsar site lies immediately to the south west of the village along the Royal Military Canal. All applications for the development of this site should therefore include an Environmental Impact Assessment study demonstrating how the proposals will effect upon the integrity of the biodiversity of this designated wildlife area. Development that will have an adverse effect on the integrity of the Ramsar Site will not be permitted. Opportunities to incorporate and enhance biodiversity will be encouraged. In particular, development should take opportunities to help connect and improve the wider ecological networks in this area and to mitigate against any potential increase in recreational pressure that may arise from the development of this site.

Policy S32 - Hamstreet - Land at Parker Farm

Land at Parker Farm is proposed for residential development for up to 10 units. Development proposals for this site shall:

- a) **Retain and enhance the existing hedge and tree boundary around the site to screen the development from the open countryside and create soft landscaping along site boundaries. The Hamstreet Village Design Statement should be taken into account when considering design and layout;**
- b) **Provide a dedicated vehicular access directly onto Warehorne Road via the existing private access lane, creating appropriate vehicle passing places along its length and re-surfaced to accommodate new traffic;**
- c) **Remove the existing agricultural structures;**
- d) **Create a pedestrian link to the public right of way that runs alongside the southern boundary of the site;**
- e) **Provide informal open space in the flood zone area of the site; and**
- f) **Provide a flood risk assessment in consultation with the Environment Agency;**
- g) **Provide an Environmental Assessment Study to address any potential adverse impacts of the proposals on the biodiversity of the Dungeness, Romney Marsh and Rye Bay Ramsar site and how they can be avoided or adequately mitigated.**

High Halden - Land at Hope House



- 4.330 This site is located within the village of High Halden on the southern side of the A28, and is currently a gap in the built frontage opposite the housing estate, Hopes Grove. The site also wraps round the rear of Hope House, a Grade II listed building, Monarch House and Bourne Farm. The site is currently an open area of grassland comprising of two fields with a large pond which adjoins the boundary with Hope House. The land slopes upwards towards the southern boundary where there is a substantial hedge and tree line. There are also some small trees growing in the area around the ponds and some more substantial trees to the rear of Hope House.
- 4.331 This site has been identified as a suitable location on the edge of the confines of a large village, for residential development whilst providing an opportunity to retain and improve the wildlife habitat around the ponds and enhance ecological links with the adjoining countryside to the south.

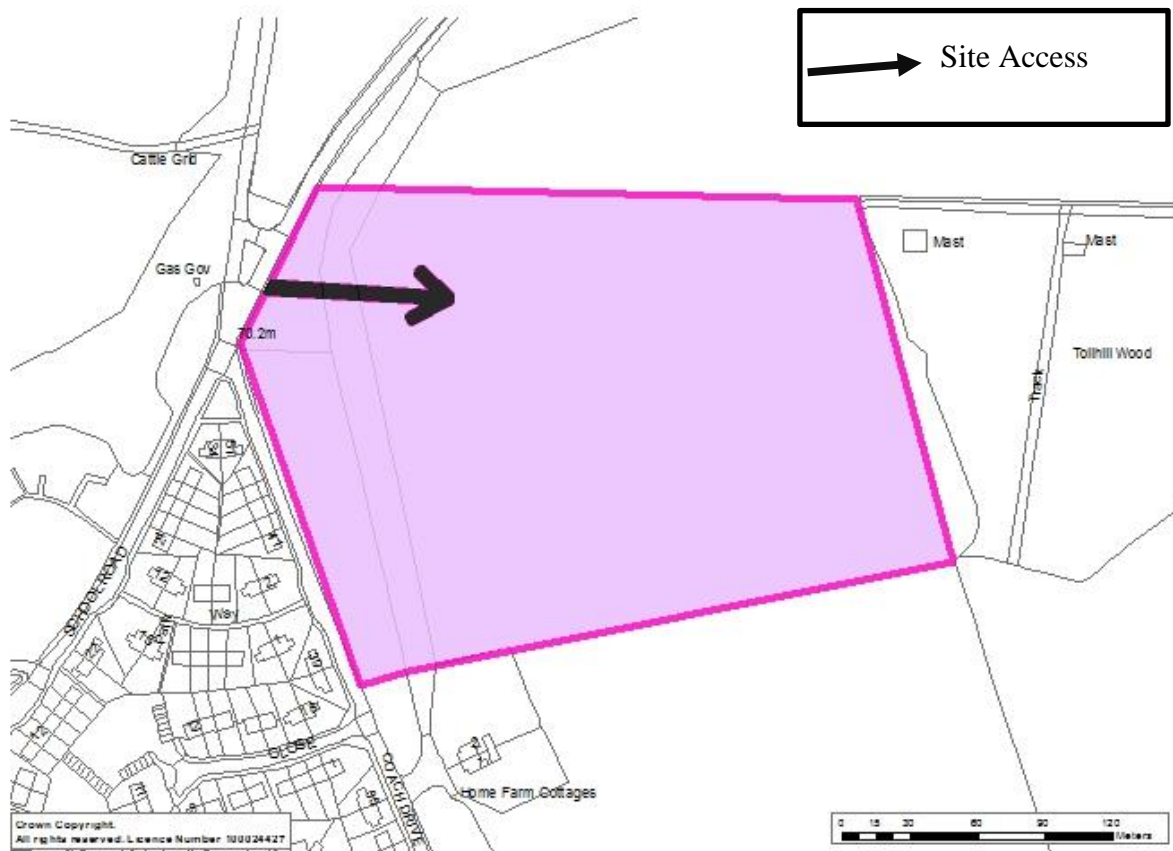
- 4.332 The part of the site considered appropriate for development is approximately 1.7 hectares, which is the land between Rowans and Lynton in the east including the land immediately to the rear of Hope House, Monarch House and Bourne Farm. The area in which the ponds are located on the road frontage has not been taken into account for built development due to the ecological mitigation required on-site and must be enhanced to create a wildlife area. The site is therefore considered suitable for up to 35 units, which is equivalent to around 20 dwellings per hectare.
- 4.333 Given the character and appearance of the surrounding areas, a scheme of 1 – 2 storey buildings would be most appropriate here. The design and layout must take account of the residential amenity of neighbouring occupiers, particularly on the eastern boundary and avoid any adverse impact upon the adjoining listed building. Particular attention needs to be given to the topography of the site.
- 4.334 Dwellings should be orientated to enable overlooking and natural surveillance to the enhanced pond and wildlife area. Larger properties in generous plots should be generally located in the most sensitive locations on the rural edge and around the listed building.
- 4.335 In view of the limited visibility splays currently available, the development will be dependent upon the provision of 2.4 x 43m visibility splays being provided in conjunction with the extension of the 30mph limit to cover the site access, to be agreed with the local highway authority. The new speed limit area will need to be accompanied by traffic calming measures such as traffic islands and interactive signs to help reduce traffic speeds to the desired level or red surfacing with speed limit roundels as in the case of the existing adjoining 30mph restriction. Proposals for the site must also include the provision of a footpath between Oakland and Hope House.
- 4.336 Due to the site's proximity to a Grade II listed farmhouse (Hope House), high quality design must be achieved within the new development. For example, development proposals should include details of the design of outdoor lighting and street furniture, signage, and landscaping. The built footprint of development on this site needs to be carefully planned. It should avoid and enhance the existing areas of hedges and trees that provide both natural screening and habitat whilst also including a soft green buffer along part of the western and southern boundaries to help mitigate the impact on the adjacent residential occupiers and on the character and setting of the adjoining countryside.
- 4.337 Due to the close proximity of the village recreation ground, on-site provision of public open space will not be expected but appropriate contributions towards the management, maintenance and enhancement of the village recreation ground provision will be sought.
- 4.337.1 Southern Water's assessment has revealed that additional sewerage infrastructure would be required to serve the proposed development. The development will therefore be required to make a connection to the nearest point of adequate capacity in the sewerage network. Early liaison should take place with the service provider in this regard.

Policy S33 - High Halden - Land at Hope House

Land at Hope House is proposed for residential development with an indicative capacity of 35 dwellings. Development proposals for this site shall:

- a) Enhance the north western area of open space associated with the existing pond/s and mitigate against impacts from development on the biodiversity. Provide a wildlife corridor from this area to the adjoining countryside by retaining existing trees and hedging within the site, where possible;**
- b) Be designed and laid out in such a way as to protect the character and setting of the village and the residential amenity of neighbouring dwellings, particularly to preserve and enhance the setting of the listed building, Hope House; attention needs to be given to the topography of the site and dwellings should be orientated to enable overlooking and natural surveillance of the wildlife/pond area;**
- c) Provide primary vehicle access onto the A28 Ashford Road, as shown on the policies map and include the provision of traffic calming measures to slow the traffic to 30mph or less, in accordance with the recommendations of Kent Highways;**
- d) Retain and enhance the hedge and tree boundaries around the site, particularly those adjoining countryside and listed building;**
- e) Provide a connection to the nearest point of adequate capacity in the sewerage network, in collaboration with the service provider.**

Hothfield - Land East of Coach Drive



- 4.338 Hothfield is a relatively compact village with a central residential core and clearly defined edges to open countryside along its eastern and southern boundaries. It lies to the west of the A20 and is well screened by a combination of the local topography and the wooded areas that form part of the Hothfield Common SSSI.
- 4.339 This site is located on the north eastern edge of Hothfield at the main entrance point to the village when approached from the A20. The site adjoins Coach Drive which, on its eastern side, has a substantial tree belt that is the subject of a Tree Preservation Order and hence the site is relatively well screened from the existing built part of the village.
- 4.340 Hothfield has been designated as a Neighbourhood Area with the intention that there will be a Neighbourhood Plan prepared for the parish. This site has been identified in this Local Plan as the most appropriate location for additional residential development in the village but it may be possible for an emerging Neighbourhood Plan to identify alternative locations for development.
- 4.341 The site provides an opportunity to create a modest expansion to the village that can help to sustain and support local services but it is important that the development is limited to an area that would not be visible from the northern approach to the village, particularly from the A20, and hence the site is proposed for 40 units. This may necessitate the provision of single storey accommodation on the eastern and northern edges of the built footprint of the development with a suitable buffer of mature landscaping provided to screen mid to long range views. The

central residential core of the village contains relatively high density residential development so some relatively low density development is appropriate on part of the site.

- 4.342 The site should be accessed by vehicles via a single access point from the junction of Coach Drive and Station Road. Suitable traffic management arrangements will need to be implemented to ensure a satisfactory junction arrangement at this point.
- 4.343 The existing tree belt along Coach Drive is a significant local feature that will be a barrier between the existing built part of the village and the new development. However, it is important that the proposed development is integrated into the rest of the village whilst retaining the large majority of the tree belt and hence it is proposed that provision should be made for a pedestrian and cycleway link through the tree belt on Coach Drive to provide direct links and connectivity to the main part of the village.
- 4.344 Hothfield Common SSSI lies to the north of the village and is also designated as a Local Nature Reserve. This is a site of national importance that is already under considerable pressure from recreational use. Any development proposal needs to give careful consideration through a detailed assessment to potential additional recreational use of the common, and contributions towards appropriate mitigation measures will be required, which should include on-site provision of open space which acts as informal recreation, meeting 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.

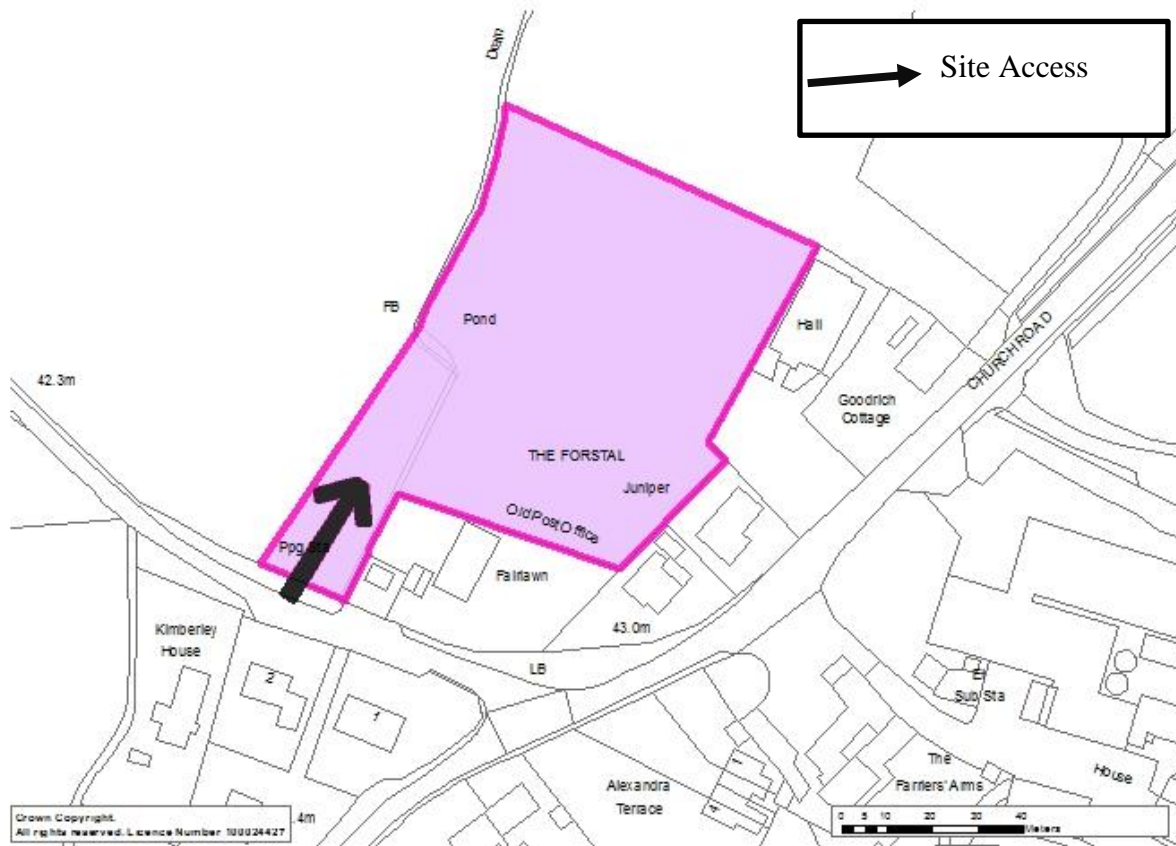
Policy S34 - Hothfield - Land East of Coach Drive

Land to the east of Coach Drive, Hothfield is proposed for residential development for an indicative capacity of 40 units.

Development proposals for this site shall:

- a) **be designed and laid out with particular attention given to the topography of the site and dwellings should be orientated to limit the impact of the development on the landscape to the north and east of the site;**
- b) **Provide vehicular access from the junction of Station Road and Coach Drive as shown on the policies map;**
- c) **Provide a new pedestrian and cycle route from the development to Coach Drive;**
- d) **With the exception of meeting clauses b and c above, retain the existing trees along the boundary to Coach Drive that are subject to a Tree Preservation Order;**
- e) **Provide a financial contribution towards the provision, management and maintenance of existing community facilities, open space and play equipment in the village;**
- f) **Ensure that any direct or indirect impacts 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.**

Mersham - Land adjacent to Village Hall



- 4.345 This site is located in the south western edge of Mersham village behind Church Road. The north eastern part of the site adjoins Mersham Village Hall and associated parking facilities, in addition to three detached bungalows that wrap around the southern boundary. The site is in agricultural use and is currently used for grazing. The western boundary of the site is lined with trees and hedgerows providing a natural buffer to the countryside beyond. The northern boundary is a continuation of the field beyond and so there is currently no natural boundary.
- 4.346 This site provides an opportunity to facilitate an extension to the Village Hall as well as additional parking provision. It is within walking distance of the village centre and the range of services provided there. It is considered suitable for residential development for up to 10 dwellings (15 dwellings per hectare).
- 4.347 This area is residential in character and consists mainly of detached dwellings and bungalows, some of which are listed and so, the scale and density of new development should also be low. A mix of dwelling sizes and types should be provided, within a scheme of no more than 2 storeys in height. The design and layout must take account of the residential amenity of neighbouring occupiers.
- 4.348 The site has a rural aspect and abuts open countryside to the north and west. Trees and hedgerows must be retained where possible along these edges. New screening may be needed along the western edge beside the new access road to soften this edge and provide a gradual transition from the village to the countryside. The development should be well designed and

must not result in any significant adverse impact on the character of the area or the surrounding landscape or the residential amenity of neighbouring occupiers.

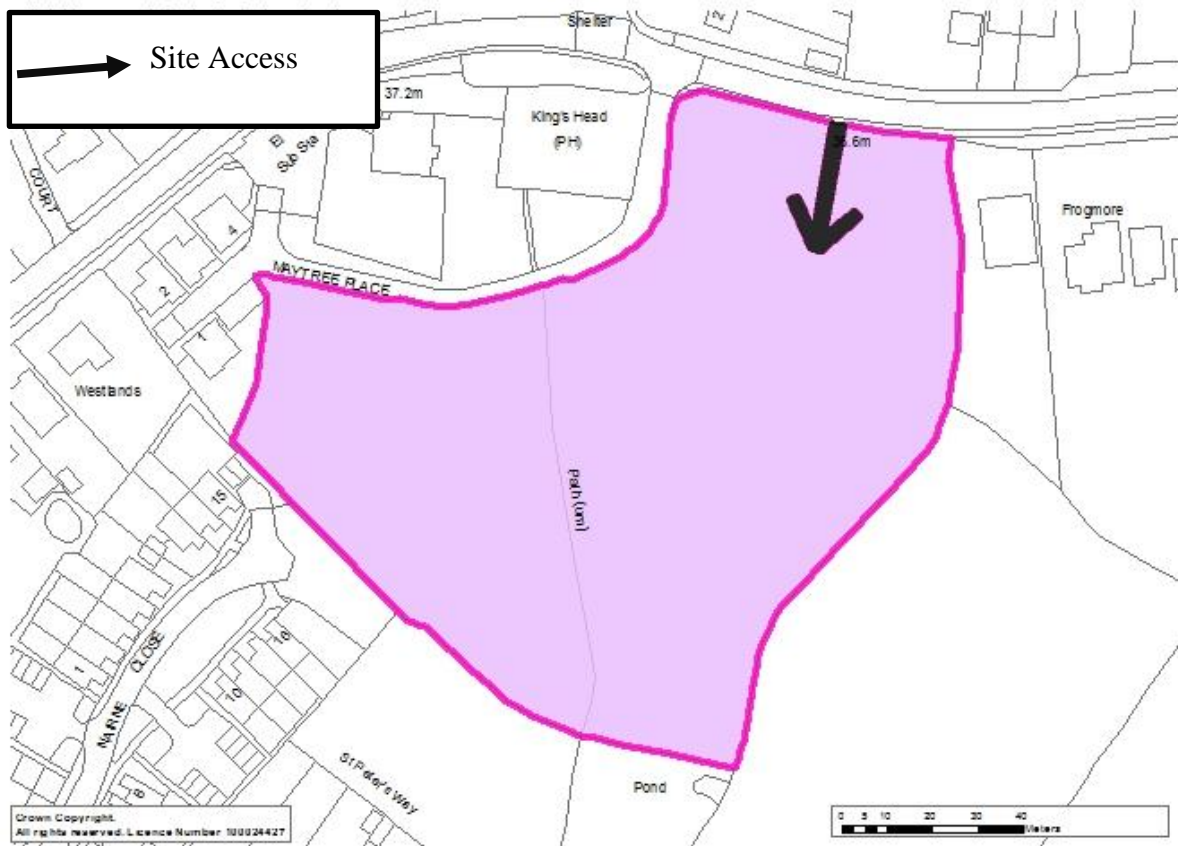
- 4.349 A new vehicle access point shall be created to provide access to the development from Blind Lane. The layout of the site should enable direct access from the new residential development to the village hall for pedestrians. This will enable new residents to safely access existing facilities within the village such as the school.
- 4.350 Village halls have an important role to play in helping to keep local communities active. Mersham Parish Council has identified the need for a village hall extension and to increase the capacity of existing parking provision which serves the village hall. This development provides a unique opportunity to deliver an extension to the village hall and additional parking which should be undertaken in consultation with Mersham Parish Council.
- 4.351 Due to the close proximity of the village recreation ground, on-site provision of public open space will not be expected but appropriate contributions towards the management, maintenance and enhancement of the village recreation ground provision will be sought

Policy S35 - Mersham - Land adjacent to the Village Hall

The site on land adjacent to Mersham Village Hall is proposed for residential development, for up to 10 dwellings. Development proposals for this site shall:

- a) **Be designed and laid out to take account of the residential amenity of neighbouring occupiers. Dwellings should be orientated to enable overlooking and natural surveillance of open areas;**
- b) **Provide new pedestrian routes throughout the development and connections to existing rural routes facilitating the village hall and local services;**
- c) **Create soft landscaping along the northern and western boundaries to lessen the visual impact of development on the countryside beyond;**
- d) **Provide an extension to the Village Hall in consultation with the Parish Council with additional parking provision. These elements should be completed before work can commence on the residential elements of the scheme.**

Shadoxhurst - Rear of Kings Head PH



- 4.352 This site is located on the eastern side of the village of Shadoxhurst, which has a very linear settlement form. This part of the village has seen more development in recent years and is emerging as the core of the village, centred around the Kings Head Public House (PH). The site wraps around the south of the PH, and has already been partly developed in the western edge as 'Maytree Place', a small development of 4 detached units, with a private access road which also serves the pub car park.
- 4.353 There is a cul-de-sac development which adjoins the site on the south west, Nairne Close, which is terraced 2-storey housing and contains a small open space area (this used to include play equipment). The close is well screened from the site by a line of mature trees. To the east of the site the built form is mostly in linear form along the road frontage and is a mix of styles.
- 4.354 At 1.4ha in size, the site is considered suitable for up to 25 units, depending on the size and layout of the dwellings. Larger properties should be located on more spacious plots joining on to the open countryside to the south and east. Development should front onto Woodchurch Road, Maytree Place and the proposed new access road, creating rows of development. There is also opportunity for small clusters of development in the southern area of the site.
- 4.355 The design of proposals coming forward should take into account the setting of the Public House which is a listed building. The existing hedgerows trees must be retained around the boundary of the site and new planting should be placed around the new development to

provide screening between the site existing residents and create soft landscaping to lessen the visual impact of the development.

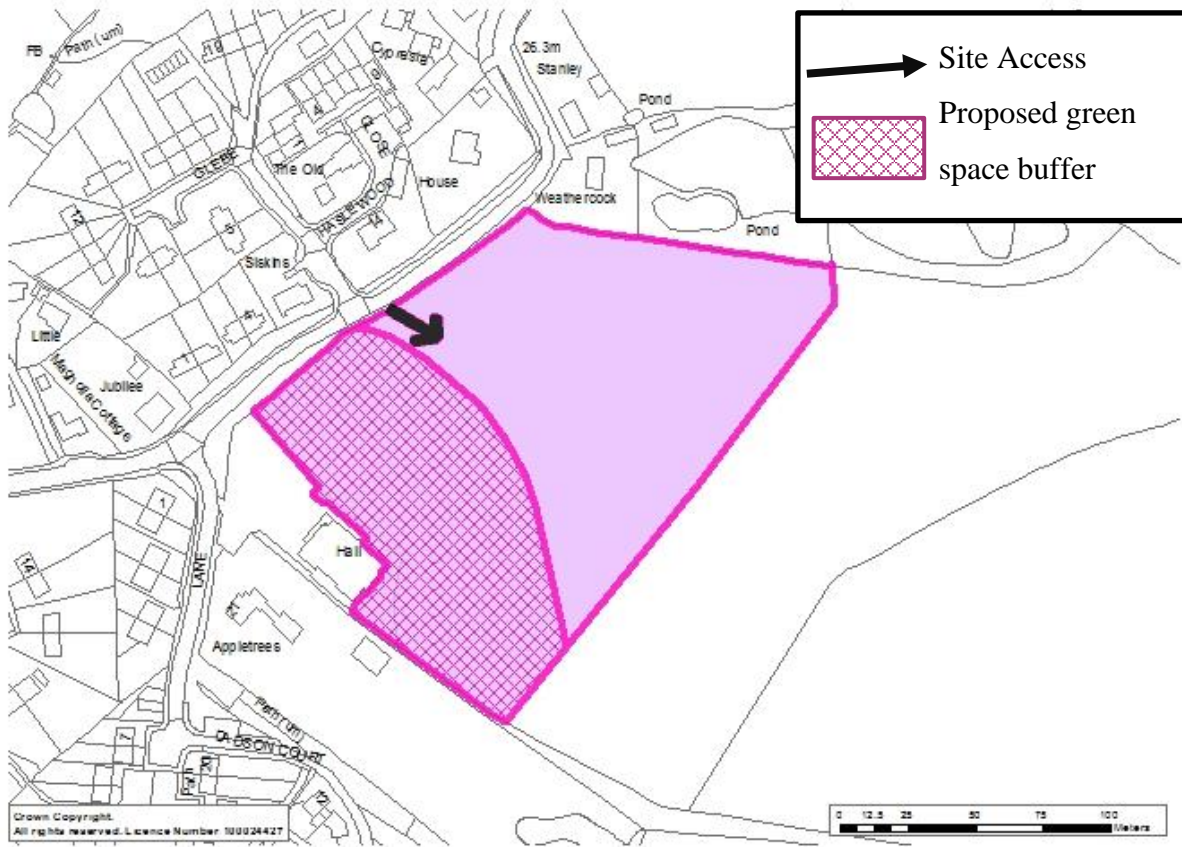
- 4.356 The main vehicular access will be provided on Woodchurch Road, as shown on the policy map. This new access road should be designed in a way that the current Maytree Place access will connect to it. The current Maytree Place access will be closed to only serve the PH car park in future. The visibility splays that have been created along the roadside verge at the front of the PH must be retained.
- 4.357 The development site has a prominent frontage to Woodchurch Road and there is the potential to create a central feature for the village that could be in the form of a village green. Any development on this site should investigate the potential to deliver this as part of the development, together with suitable arrangements for its management. There is potential for this site to provide additional benefits to the village in the form of retail space. This should be explored further through the design and planning of this development.
- 4.358 There are 2 north/south public rights of way across the site which are well used as connections across the village. A new pedestrian/cycle access should be provided through the site to enhance these connections. This creates an opportunity to connect to the Nairne Close open space area, which should be enlarged to provide a wider open space community benefit and assist with village integration.
- 4.359 The site is in an area of archaeological potential, and close by to known Iron Age/Romano activities. Evaluation and Investigation work should be undertaken, in consultation with KCC Heritage team prior to development commencement.

Policy S36 - Shadoxhurst - Rear of Kings Head PH

The site rear of the Kings head in Shadoxhurst is proposed for residential development for up to 25 dwellings. Development proposals for this site shall:

- a) **Be designed and laid out in such a way as to protect the setting of the PH listed building and take account of the residential amenity of neighbouring occupiers.**
- b) **Proposals should seek to link the new development with adjoining Nairne Close, to create an area of shared public space;**
- c) **Provide primary vehicular access to the site from Woodchurch Road, Development should explore the possibility of incorporating access to Maytree Place to enable the existing access to serve only the public house car park.;**
- d) **Create a pedestrian/cycle route through the site to enhance the current connections and retain or enhance the existing PRow's;**
- e) **Development proposals should investigate the potential to create an area of open space along the frontage to Woodchurch Road along with appropriate management arrangements;**
- f) **Retain the hedge and tree boundary around the site to screen the development of the site and create soft landscaping to lessen the visual impact of the development;**
- g) **Assess the opportunity of providing retail facilities within the site to serve the wider community.**

Smarden - Land adjacent to Village Hall



- 4.360 This site is located along The Street, the main route through village. It is currently a field in agricultural use, bounded by hedgerows and trees. The site is a gap in the linear form of built development along this road and is situated to the north of the Village Hall. Smarden is a village with much historic character and contains many unique listed buildings in its central core, which is designated as a Conservation Area. The site is situated outside of this historic core of the village but is still within walking distance of the many community facilities and services available there.
- 4.361 To the north and north-west of the site are a number of 2-storey detached dwellings along the road frontage. There are also a number of cul-de-sac developments off the main road in this area, to the north-west and south of the site. To the east is open countryside, and an area that falls within floodzones 2 & 3 along the river Beult, over 400m away. There is a mature hedgerow along the road frontage, but no footpath in this location.
- 4.362 At approx. 1.2ha in size, the site is considered suitable for around 25 units, dependant on a suitable layout and design. Development should enhance the character of this part of the street by providing attractive frontage development with fits in with the street scene, whilst preserving the rural edge by backing on to the countryside.
- 4.363 Development of this site is proposed at a low density (around 25dph), and should reflect the open landscape, and the density of the surrounding developments by providing lower densities along the countryside edge. The design of proposals coming forward should also reflect the 'guidelines' set out in the Smarden Parish Design Statement.

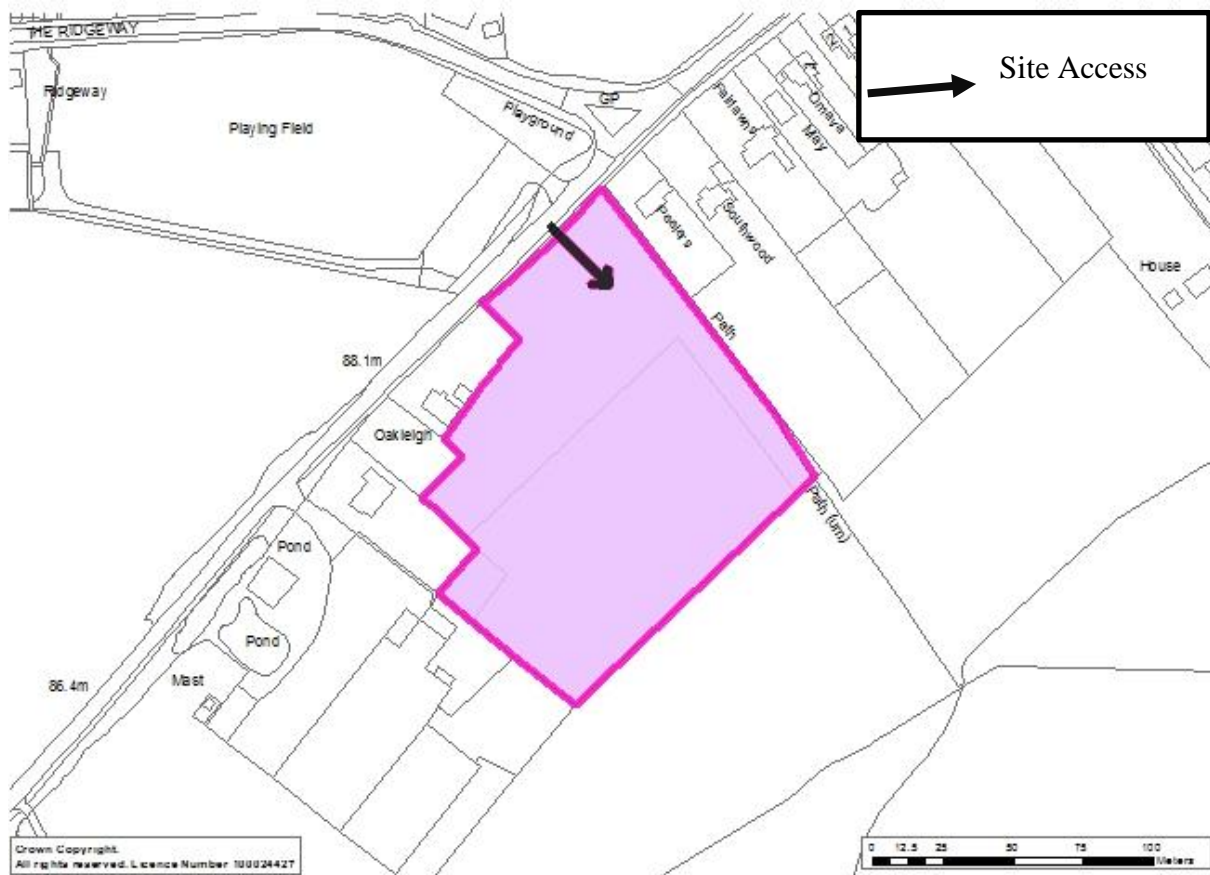
- 4.364 The hedgerows and trees must be retained around the boundary of the site and new planting should be placed around the eastern edge of the new development to provide screening between the site and the countryside. It should be shown in the design proposals that care has been taken to limit the visibility of the new development from the main road and the nearby Public Right of Way (PRoW) and also must minimise the impact on neighbouring properties by providing planting, particularly in the area adjacent to the property 'Weathercock'.
- 4.365 The area alongside the village hall in south is highly visible from the main street, and is an important aspect of the village hall setting and usage. It also contains a PRoW that leads into the countryside. This area should be provided as informal Public Open Space, as shown on the policies map, which will benefit the village hall users and new residents and will also minimise the visibility of the new development.
- 4.366 Access to the site should be close to the village hall, as shown on the policies map. There is currently no footpath on this side of the road, and one should be provided within the development. However, proposals should attempt to preserve the green edge of the street, the hedgerow and ditch along the road frontage here.
- 4.366.1 Southern Water's assessment has revealed that additional sewerage infrastructure would be required to serve the proposed development. The development will therefore be required to make a connection to the nearest point of adequate capacity in the sewerage network. Early liaison should take place with the service provider in this regard.

Policy S37 - Smarden - Land adjacent to Village Hall

The site adjacent to the Village Hall in Smarden is proposed for residential development for up to 25 dwellings. Development proposals for this site shall:

- a) **Be designed in accordance with the Smarden Parish Design Statement. Particular attention needs to be given to the visibility of new development from the Street and the village hall and minimise the impact on adjoining countryside;**
- b) **Create an area of informal Public Open Space along the southern parcel of the site, adjacent to the memorial hall, which includes the existing PRoW, as shown on the policies map;**
- c) **Retain and create new hedge and tree boundary's to screen the development from the open countryside and neighbouring residents and create new soft landscaping throughout the development;**
- d) **Provide primary vehicle access on The Street, as shown on the policies map;**
- e) **Provide a new footpath along the road frontage, which must retain hedgerows where possible;**
- f) **Provide a connection to the nearest point of adequate capacity in the sewerage network, in collaboration with the service provider.**

Smeeth - Land south of Church Road



- 4.367 This site is located on the south western edge of Smeeth village along Church Road opposite the village playing field. This area of the village is characterised by detached dwellings. The site is currently a gap between development along Church Road and also wraps behind Walnut Tree Farm. The north western boundary of the site is lined by a mature hedge providing screening of the site along Church Road. A PRoW runs along the north eastern edge of the site with sporadic hedging. The site is open in the south-eastward direction however distance views are restricted by a wooded area approximately 200m beyond.
- 4.368 At approximately 1.4 hectares in size, the site is considered suitable for residential development with an indicative capacity of 35 dwellings depending on the size and layout (around 25 dwellings per hectare).
- 4.369 A mix of dwelling sizes and types should be provided within a scheme of no more than 2 storeys in height. The design and layout must take account of the residential amenity of neighbouring occupiers.
- 4.370 With the exception of creating a suitable point of access at the point shown on the policies map, existing hedgerows should be retained. The site abuts open countryside to the southeast

and so new soft landscaping with an element of screening will be required to soften this edge and to provide a gradual transition from the village to the countryside.

4.371 Due to the close proximity of the village recreation ground opposite, on-site provision of public open space will not be expected but appropriate contributions towards the management, maintenance and enhancement of the village recreation ground provision will be sought.

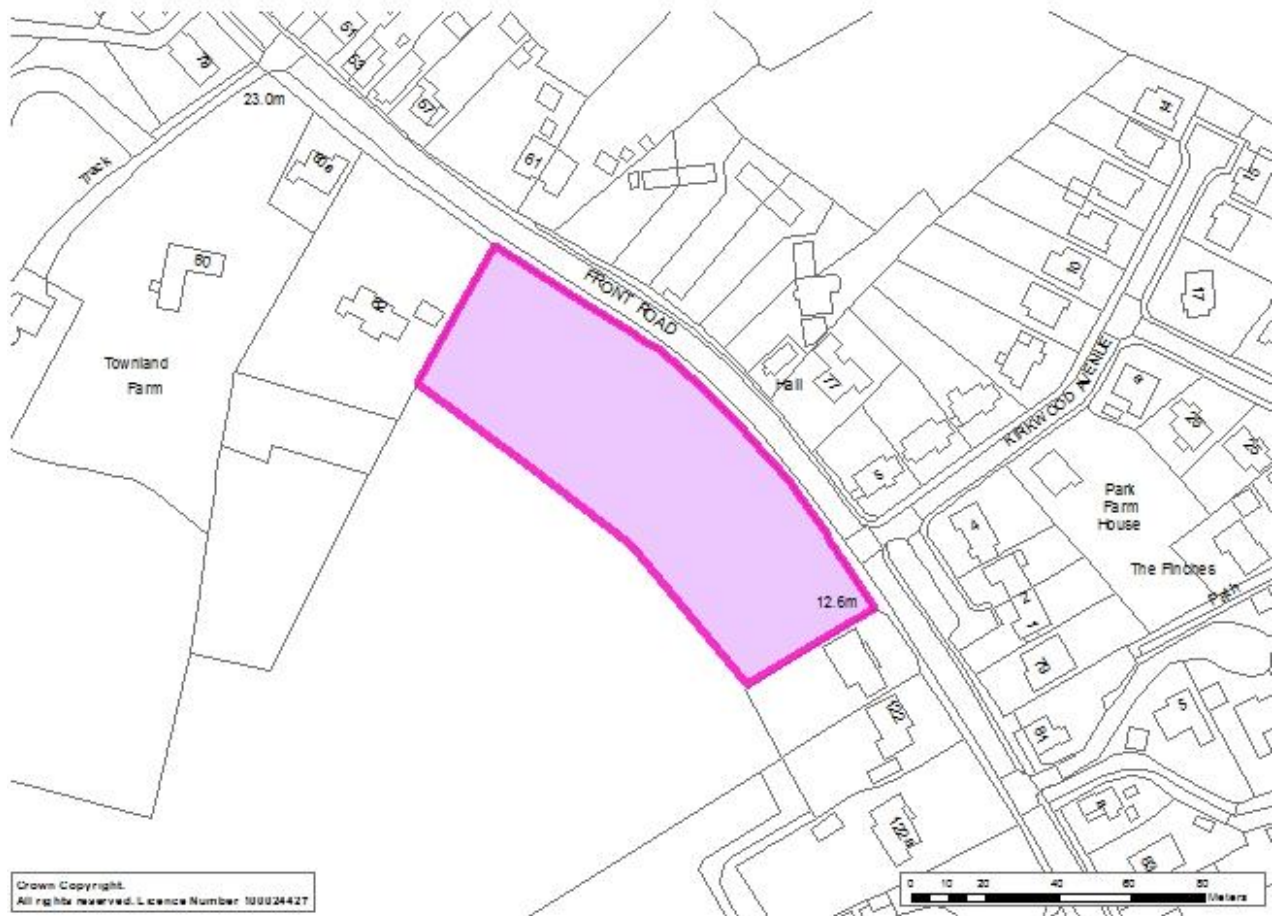
4.371.1 Southern Water's assessment has revealed that additional sewerage infrastructure would be required to serve the proposed development. The development will therefore be required to make a connection to the nearest point of adequate capacity in the sewerage network. Early liaison should take place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

Policy S38 - Smeeth - Land South of Church Road

The land south of Church Road is proposed for residential development with an indicative capacity of 35 dwellings. Development proposals for this site shall:

- a) **Be designed and laid out to take account of the residential amenity of neighbouring occupiers. Dwellings should be orientated to enable overlooking and natural surveillance of open areas. The development should be no more than two stories in height;**
- b) **Provide a pedestrian link to the public footpath that runs alongside the eastern boundary of the site;**
- c) **Create soft landscaping along the south-eastern edge to lessen the visual impact of development on the countryside beyond;**
- d) **Provide a connection to the nearest point of adequate capacity in the sewerage network, in collaboration with the service provider.**

Woodchurch - Front Road



- 4.379 This site is located on Front Road, the main road through the village centre which also serves many of the services and community facilities. The site is located on the western side of Front Road, approximately halfway between the village green to the north and the Stonebridge Inn Junction to the south and is within walking distance of the many services and community facilities available at the centre of the village.
- 4.380 The site is currently a field in agricultural use, located between the linear form of built development along this road which comprises of different dwelling types, styles and ages but has a very rural ‘informal’ nature. The site is raised above road level, has a hedged road frontage and open character. Visibility of the site from Front Road is currently limited at most times of the year due to the high hedge.
- 4.381 The linear form of this road has been punctuated in several locations by cul-de-sac layouts on the eastern edge, including Kirkwood Avenue, a ‘T’ shaped cul-de-sac development of detached bungalows, located opposite the site, but this would be out of character on this western edge.

- 4.382 This 0.6ha site was allocated for residential development within the Tenterden and Rural Sites DPD (as policy WOOD1) with an indicative capacity of 10 dwellings. However, a number of planning applications for the site have shown that this scale does not achieve an appropriate, design in this prominent location, which is situated at the entrance to the village and forms part of the setting of the Conservation Area.
- 4.383 In order to respect the rural setting of this part of the Conservation Area, proposals for development in this area must have a sufficient degree of openness and visual connection with the countryside. The design and layout of the scheme should allow for significant spaces between buildings to allow for long views through the site to the countryside beyond. This could be achieved with varying plot sizes.
- 4.384 In order to respect the adjoining Townland Green Character Area within the Conservation Area and the siting of properties opposite the site, development should be set well back from Front Road and not be of a scale or massing which would dominate this approach to the Conservation Area or the public views from it.
- 4.385 The site is now therefore considered suitable for up to 8 units depending on the size and layout of the dwellings. Development here is proposed at a low density (>14dph).
- 4.386 Due to the height of the land above the road and rise in land from south to north, a maximum of 2-storey housing only will be acceptable. The design of proposals coming forward should reflect the 'guidelines' set out in the Woodchurch Village Design Statement and take into account the Conservation Area setting of the site, with reference to the updated Conservation Area Appraisal.
- 4.387 The layout and design of the development must be consistent with the current linear building line and principal elevations should be located on the road frontage, with parking located on the front and side of properties.
- 4.388 The main vehicular access will be provided on Front Road as shown on the policy map, however access to properties fronting the road may be achieved individually if this does not require significant hedge loss. A pedestrian footpath must also be provided along the frontage.
- 4.389 The south western boundary of the site is open to long views from the South (Brook Street) and therefore appropriate, substantial landscaping must be provided along this boundary to lessen the visual impact on the landscape, but also be designed to allow views through the site to the countryside beyond..
- 4.390 The area around Woodchurch is one of the areas of darkest skies in the county and meets the criteria for designation as an 'intrinsically dark landscape' as described by the NPPF. It provides important opportunities for stargazing activity. All applications for the development of this site should therefore include a full lighting scheme and should comply with policy ENV4 and with the guidance contained in the Council's Dark Skies SPD 2014 with regard to the installation of external lighting schemes.

Policy S40 - Woodchurch - Front Road

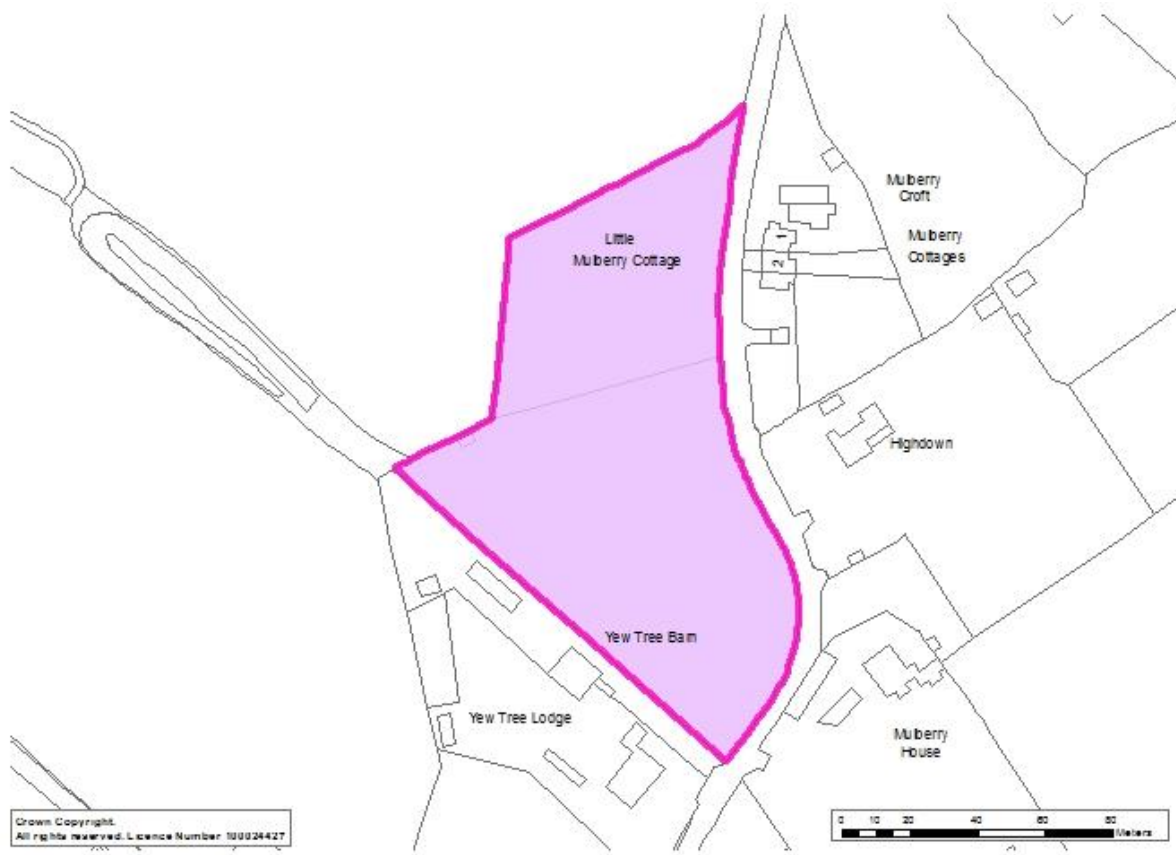
The site in Front Road, Woodchurch is proposed for residential development for a maximum of 8 dwellings. Development proposals for this site shall:

- a) Be designed and laid out in such a way as to protect and enhance the character and setting of the Woodchurch Conservation Area. The updated Conservation Area Appraisal and Woodchurch Village Design Statement guidelines must be taken into account when considering the design of the site;**
- b) Be of a scale or massing which would not dominate this approach to the Conservation Area and ensure a maximum height of 2-storey properties;**
- c) Be set well back from Front Road with the principal elevations facing the road frontage;**
- d) Subject to providing safe access to the site, retain and enhance a hedge boundary to Front Road and provide substantial soft landscaping around the site to screen the development from the open countryside and protect the amenity of neighbouring properties, whilst retaining key historic views through the site to the countryside.**

Exclusive Home Sites

- 4.391 Following the NPPF guidance which requires LPAs to promote a wide choice of quality housing, it is part of the vision of this Local Plan to provide a full range of housing that meets a wide variety of needs and choice of home for all residents. The opportunity for local need, affordable and starter housing for those not yet on the property ladder will be achieved through policies HOU1 and HOU2, and general market housing, of mixed sizes and varying locations, will be met through the wide range of site allocations within this plan.
- 4.392 However, there is also a need to provide opportunities for delivering housing which is of an ‘exclusive’ nature, at the top end of the housing market, and will cater for those people wishing to design their own, larger properties.
- 4.393 Although the NPPF directs that ‘isolated’ dwellings in the countryside should be avoided, it also allows for special circumstances. Paragraph 55 directs that where the design of a dwelling is of ‘exceptional quality’ or ‘innovative in nature’ it is considered an exception to the principle of restraint. The criteria to meet this special circumstance states that such a design should:
- “be truly outstanding or innovative, helping to raise standards of design more generally in rural areas;
 - reflect the highest standards in architecture;
 - significantly enhance its immediate setting; and
 - be sensitive to the defining characteristics of the local area”.
- 4.394 To meet the requirements of the NPPF that all development should be sustainable, the council has assessed sites on the edges of settlement confines across the borough that would not be suitable for general market housing due to the location or other constraints, but could be appropriate for this type of extremely low density ‘exclusive’ housing. This has resulted in two sites that are considered appropriate for allocation for this exceptional use, which can accommodate a small number of ‘exclusive’ high quality designed properties and which would not be detrimental to the setting and character of the countryside and local area they are situated within.

Chilham - Mulberry Hill



- 4.395 This site is located between the built area of Chilham village and the small hamlet of Old Wives Lees, on a connecting road between the two settlements. The road is a narrow rural lane, on a steep gradient, with limited vehicle passing places and no footpaths to either settlement. It is therefore unable to accommodate a large increase in vehicular traffic and would not be sustainable for general market housing due to the restricted access to services. However, there are a small number of large detached properties located around the site boundary, and therefore the site is not considered to be completely 'isolated' in the countryside.
- 4.396 The site considered to be suitable for the provision of 2 'exclusive' properties. The properties must be of outstanding design and quality or 'innovative' in nature, reflecting highest standards of architecture in accordance with paragraph 55 of the NPPF.
- 4.397 The site is located within the Kent Downs Area of Outstanding Natural Beauty and has views of the surrounding countryside setting. The innovative and high quality design of the 2 properties and the landscaping of the curtilage must not harm the immediate or wider setting, or have a detrimental impact on the amenity of the neighbouring properties.
- 4.398 The buildings should be located on the eastern side of the site, a similar distance from the road to that of the neighbouring properties, to minimise views of the buildings from the AONB to the west.

4.399 The nearby village of Chilham is particularly important in heritage terms as it contains Chilham Castle and a large number of Listed Buildings within a Conservation Area which covers most of the settlement. There are also sites of archaeological importance in close proximity to the site. The design of the properties here must be sensitive to these defining heritage assets and characteristics of the local area. Design proposals coming forward must also indicate how the immediate setting will be enhanced.

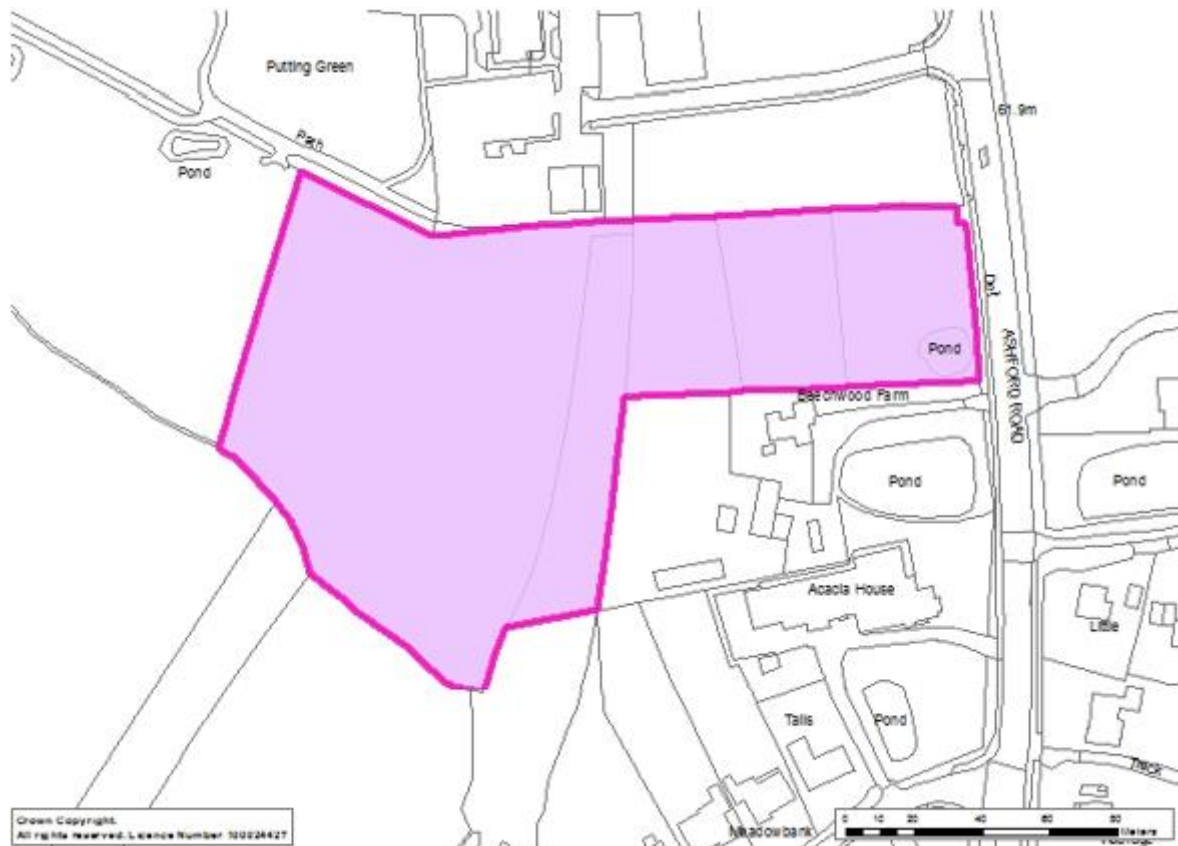
Policy S41 - Chilham - Mulberry Hill, Old Wives Lees

Land on Mulberry Hill is allocated for 'exclusive' residential development of up to two dwellings.

Development proposals for this site must:

- a) **Meet exceptional quality or innovative nature of design criteria:**
 - **be truly outstanding or innovative, helping to raise standards of design more generally in rural areas;**
 - **reflect the highest standards in architecture;**
 - **significantly enhance the immediate setting; and**
 - **be sensitive to the defining characteristics of the local area.**
- b) **Retain and enhance the existing hedge and tree boundary around the site and screen the development from the AONB and open countryside by creating soft landscaping along site boundaries;**
- c) **Provide a dedicated vehicular accesses for each dwelling, as shown on the policies map;**
- d) **Provide a connection to the sewerage system at the nearest point of adequate capacity, as advised by Southern Water, and ensure future access to the existing sewerage system for maintenance and upsizing purposes.**

St. Michaels - Beechwood Farm



- 4.400 This site is located on the A28, Ashford Road on the entrance to the built up settlement of St. Michaels, Tenterden. The London Beach Golf Club and Hotel is situated to the north of the site but is not visible, due to the set back nature of buildings. The site is overgrown scrub and contains a significant mature tree and hedgerow boundary, including a prominent Oak on the road frontage. There are views to the open countryside on the opposing side of the road and the housing directly to the south comprises of detached dwellings in large curtilages, creating a rural setting.
- 4.401 The site contains many trees and hedgerows within and around, and a TPO protects high trees to the rear of the site. If these mature trees and hedges are removed it would significantly harm this rural setting and the character of the neighbouring properties and local area. The site is not suitable for average density, general market housing due to this impact, however, there is a footpath along the road towards the services in St. Michaels, and therefore the site is not considered to be completely 'isolated' in the countryside.
- 4.402 The site was submitted for low density 'high quality' detached dwellings and is considered suitable for this 'exclusive' home purpose, for up to 3 dwellings only. This amount of

development enables the retention of the mature trees and hedges, in particular the large Oak and enhancement of the pond that lies beneath it.

- 4.403 The design of the properties here must be sensitive to characteristics of the local area and design proposals must indicate how the immediate setting will be enhanced. The buildings must be of innovative and high quality design and must not harm the immediate or wider setting. The properties should be situated away from the road frontage, in large plots, reflecting the built form of neighbouring properties to the south, and will share one access from Ashford Road as shown on the Policies Map.

Policy S42 - St. Michaels - Beechwood Farm

Land at Beechwood Farm is allocated for ‘exclusive’ residential development of up to three dwellings.

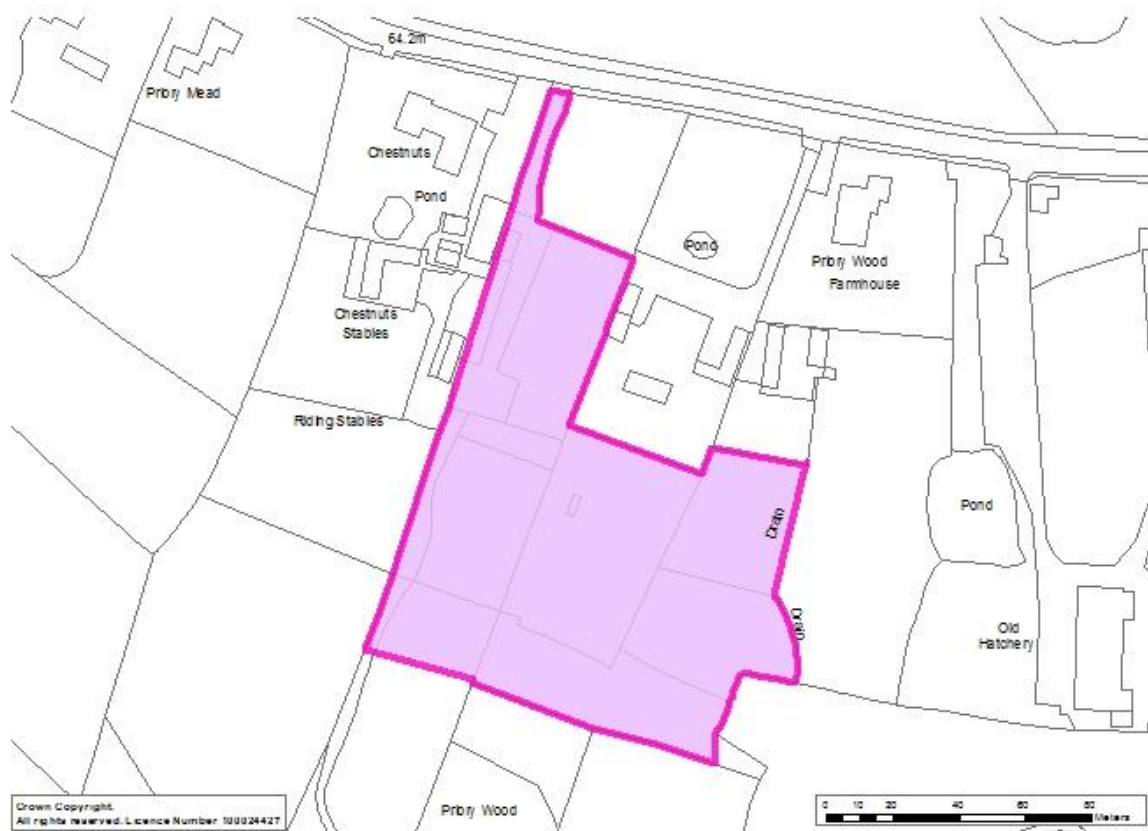
Development proposals for this site must:

- a) **Meet exceptional quality or innovative nature of design criteria:**
 - **be truly outstanding or innovative, helping to raise standards of design more generally in rural areas;**
 - **reflect the highest standards in architecture;**
 - **significantly enhance the immediate setting; and**
 - **be sensitive to the defining characteristics of the local area.**
- b) **Retain and enhance the existing mature hedge and tree boundary around and within the site where possible to screen the development and reduce impacts on neighbouring properties;**
- c) **Provide a singular vehicular access, as shown on the policies map;**
- d) **Provide a connection to the sewerage system at the nearest point of adequate capacity, as advised by Southern Water, and ensure future access to the existing sewerage system for maintenance and upsizing purposes.**

Traveller Sites

4.404 The following two sites are specific allocations for sites for travellers in accordance with the need to plan for the housing requirements of the gypsy and traveller population in line with government guidance contained in the National Planning Policy Framework and its companion document "Planning policy for Traveller sites"

Biddenden - Priory Wood



4.405 This existing gypsy and traveller site is located in the parish of Biddenden on the main Tenterden Road and within the Clapper Hill wooded farmlands landscape character area. It is located within a row of linear, low density development with a single access point provided between an extensive hedgerow, it is not visible from the road. The site currently has permission for one pitch which was granted in 2005. It is proposed that the area outlined above, which is only a small area of the overall site, has the capacity to provide for two additional pitches.

4.406 Due to the location of the site, the new pitches should be placed on the site where there is the least impact on neighbouring occupiers and any landscape views. This approach to caravan 'siting' could also be complimented with additional tree screening to lessen the impact. The 'siting' of the pitches and the need for any additional screening should be considered further at the planning application stage.

4.407 The wider boundary of the existing gypsy and traveller site is located directly adjoining ancient woodland to the south. However, the proposed position of the additional pitches is

located 120m from this woodland. Despite this distance from the ancient woodland the site for the new pitches does contain a number of trees and prior to the positioning of any static caravans or hard standing for touring caravans, a survey of the trees that could be impacted upon must be undertaken to identify trees that are of merit. If this is found to be the case, then new trees of the same species should be re-provided elsewhere, planting these on the wider site would be seen as an acceptable approach.

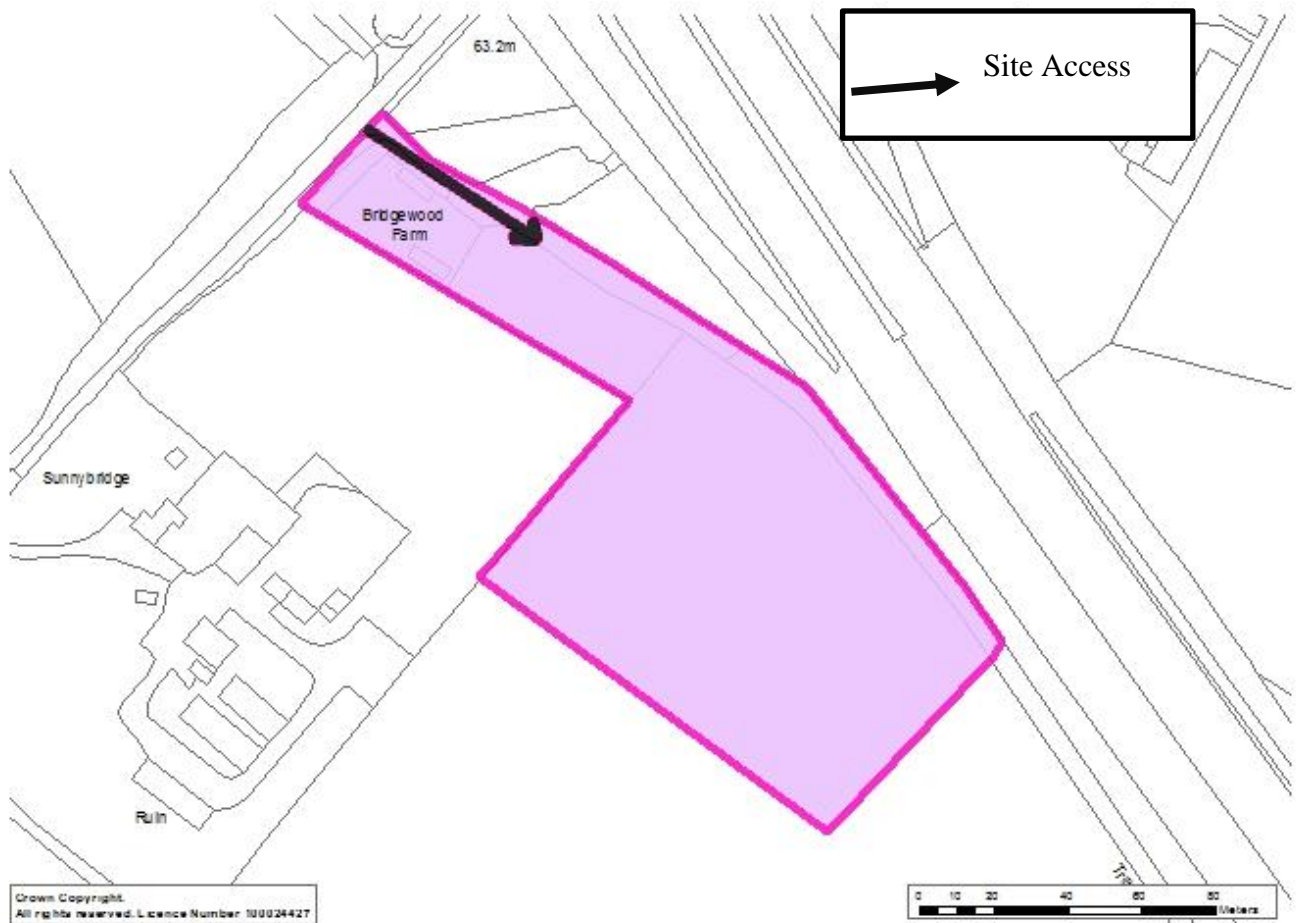
- 4.408 Finally, to ensure that the site can be provide for the benefit of the wider gypsy and traveller community any pitches should only be occupied by those persons who meet the most current definition of Gypsies and Travellers.

Policy S43 - Biddenden - Priory Wood

Planning permission for 2 permanent pitches at Land at Priory Wood, as shown on the policies map, will be granted if the following criteria are met:

- a) **The total capacity of the site does not exceed 3 traveller pitches.**
- b) **Access to the site is via the existing access off Tenterden Road**
- c) **The additional pitches are sited in a location that provides the least impact on neighbouring occupiers and the landscape.**
- d) **New trees are planted to replace any trees of merit that have been lost due to the development**

Westwell - Watery Lane



4.409 This site is currently located on a parcel of land on the outskirts of the village of Westwell. The site directly adjoins the sidings of the M20 motorway to the north and is located within a wider agricultural field to the south, which itself is bounded by the railway line. The buildings of Sunnybridge Farm are located to the southwest, some 80 metres from the site entrance.

4.410 Area A of the larger site is currently utilised as a single Gypsy and Traveller pitch, which is resided on by a specific named family on a temporary permission basis.

4.411 Area B of the site is currently an agricultural field, which has the ability to accommodate an additional 4 pitches

4.412 Although both sites are currently separate, proposals that unify the sites into one single site of 5 pitches would be seen as a suitable approach, although keeping them independent in their

own right would also be considered acceptable. In both instances the design and layout should facilitate proper management and access, in addition to providing a layout conducive to community and individual well being. Utilising the guidance set out in the licencing document ‘Model Standards 2008 for Caravan Sites in England- Caravan Sites and Control of Development Act 1960’ should be used when designing the layout of the site, as this is currently the most up-to-date standards available on pitch design. However, any design for the scheme should utilise the most up-to-date guidance available at the time.

- 4.413 The overall site is located within an area designated as AONB. The primary purpose of AONB designation is to conserve and enhance the natural beauty. Despite this designation the provision of a Gypsy and Traveller site in this location is considered tolerable, as the area has been significantly altered by the provision of the M20 Motorway. In addition, the site is relatively low lying, and although visible from the Motorway itself, can be easily screened and remodelled through landscaping and planting. Therefore, any proposals for development of this site should provide a landscaping scheme to mitigate against any potential impacts on the AONB, which would need to be agreed by the Council.
- 4.414 Due to the location of the site within direct proximity of the M20 motorway, the site would need to provide some form of acoustic protection on its northern boundary, to ensure the well being of the residents that will reside there. Whether this could be provided via planting or other acoustic measures would need to be explored in further detail at the planning applications stage. The possibility of providing this acoustic protection in connection with the landscaping scheme would be seen as an acceptable approach.
- 4.415 Finally, to ensure that the site can be provide for the benefit of the wider gypsy and traveller community any personal permissions regarding parts of the site should be removed at planning applications stage and the site shall only be occupied by those persons who meet the most current definition of Gypsies and Travellers.

Policy S44 - Westwell - Watery Lane

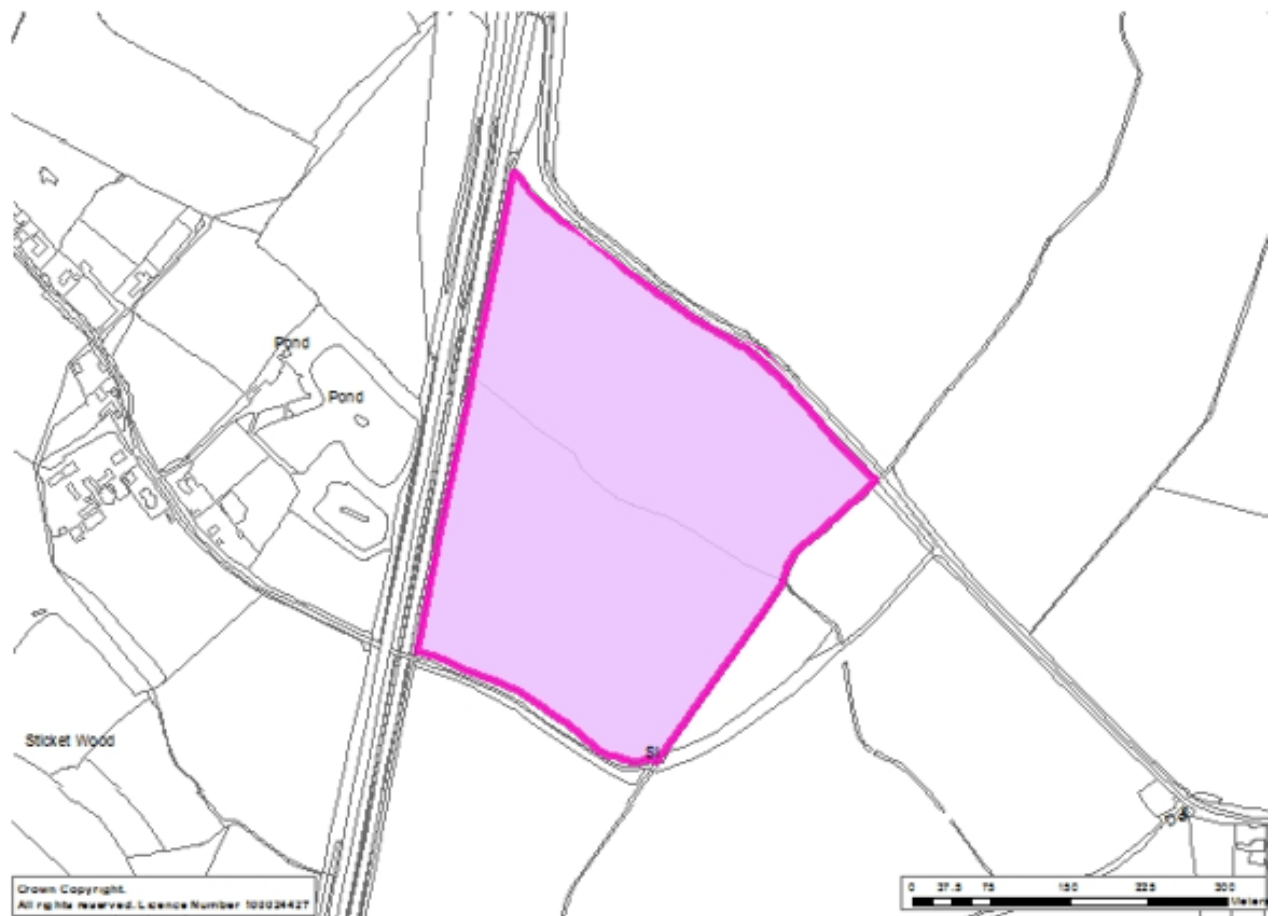
Planning permission will be granted for a maximum of 5 pitches at Watery Lane, Westwell, if the following criteria are met:

- a) **Noise mitigation measures are provided on the northern boundary of the site**
- b) **Suitable landscaping is provided for the site to minimise its visual impact on the landscape**
- c) **The design of the site utilises the most up-to-date guidance on pitch design and layout.**

Additional Site Policies

Urban Area

Land South of Brockman's Lane (Bridgefield)



- 4.416 The site is located between Brockman's Lane to the north, the Ashford- Hastings railway line and A2070 bypass to the east and the southern boundary of the site is formed by a mature hedge and a bridleway, which crosses the A2070 and into Steeds Lane. Beyond this, the south and east is open countryside. The eastern edge of the site adjoins a section of the South Willesborough Dykes. The site is currently in agricultural use.
- 4.417 Critically, land on the northern side of the Brockman's Lane is identified for residential development in this Local Plan in Policy S14 and the allocation of that site presents the opportunity to bring forward this additional area of land to achieve a comprehensive approach to the area and form part of the wider network of development and supporting infrastructure that could be well connected to adjoining development and services. Park Farm

is well served by public transport via local bus services and there is a proposal for a rail halt station along the adjacent Ashford-Hastings railway line. Development of this site should make provision for local bus services and contribute towards the provision of the Ashford-Hastings rail station if required.

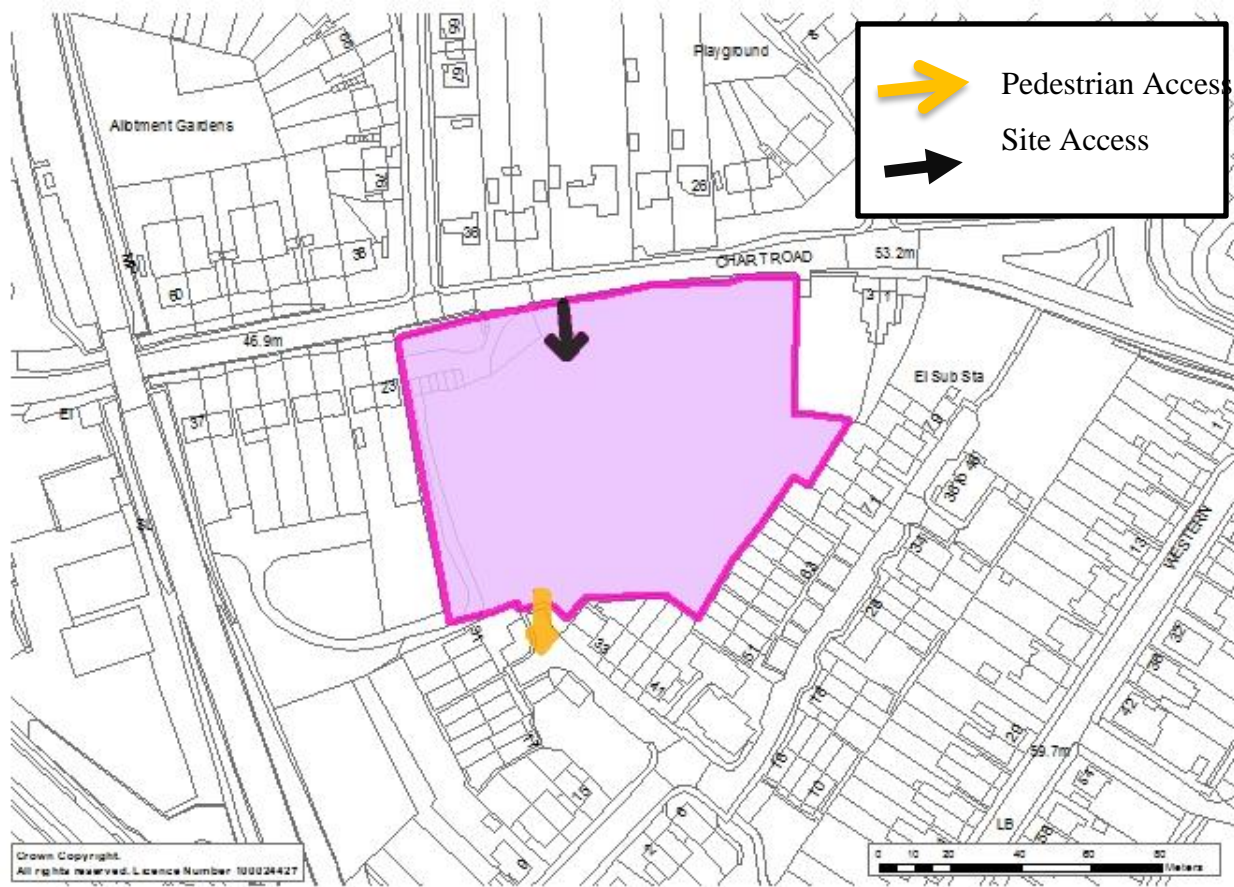
- 4.418 The total site area is approximately 11 hectares but there are significant flooding constraints in the area that affect the southern and eastern parts around the South Willesborough Dykes and as a consequence the developable area in the north western areas of the site is approximately 5 hectares with a development capacity of 100 dwellings which reflects the net residential densities of the adjoining development at Bridgefield.
- 4.419 Designed and layout proposals must take account of the topography of the site. Dwellings should be orientated to enable overlooking and natural surveillance of any open areas. The development should be no more than 3 storeys in height due to the edge of countryside location, and 3 storeys would be most appropriate along the railway line edge, reflecting the Bridgefield scheme.
- 4.420 Access is proposed via Brockmans Lane, and it is recommend that as part of this development that the speed limit along Brockmans Lane is reduced to 40mph. The proposed development at the adjacent site (S14) indicates a proposed site access adjoining the existing controlled junction at Finn Farm Road and it is proposed that the development of the S14 site should investigate the potential to improve the overall junction arrangements in this vicinity. The development of this additional site will impact upon this junction and if deemed appropriate then it should make a proportionate contribution to junction improvements in this location.
- 4.421 There is a pedestrian connectivity constraint with regards to delivery of this site, which is that this site should not come forward until the Park Farm South East (S14) is developed as there is no footway connection and no means of providing a footway connection until connections with Park Farm South East can be achieved. Therefore the council could not support this site coming forward in advance of S14. Furthermore, more thought needs to be given about bus provision and how the Park Farm South East site and this site will be served. A new service is likely to be required to serve these two sites due to the distance from the existing services at Park Farm East (Bridgefield).
- 4.422 Flood zone 2 and 3 covers the eastern and southern part of the site which is unsuitable for development but may provide opportunities for sustainable drainage solutions, and is also identified as potential future area for Green Corridor designation. The developable area outside of the flood constraints will need to be supported by a full flood risk assessment which should be carried out in consultation with the Environment Agency.
- 4.423 Southern Water's assessment has revealed that additional sewerage infrastructure would be required to serve the proposed development. The development will therefore be required to make a connection to the nearest point of adequate capacity in the sewerage network. Early liaison should take place with the service provider in this regard.

Policy S45 – Land South of Brockman’s Lane, Bridgefield

The site to the south of Brockman’s Lane is proposed for residential development with an indicative capacity of 100 dwellings, to be delivered after completion of S14 site. Development proposals for this site shall:

- a) Be designed and laid out to take account of the topography of the site. Dwellings should be orientated to enable overlooking and natural surveillance of open areas. The development should be no more than 3 storeys in height;**
- b) Be accessed from Brockman’s Lane. Potential contribution to junction improvements at Finn Farm Road if required;**
- c) Make provision for links to the public transport network including contributions to the rail station along the Ashford-Hastings railway line if required;**
- d) Provide new pedestrian and cycle routes throughout the development with linkages into the wider network and adjoining developments – emphasise pedestrian/cycle linkages to the adjoining site and network;**
- e) Provide generous landscaping along the southern edge, retain hedging along Brockman’s Lane and create a suitable and appropriate landscape buffer along the western edge adjoining the Ashford – Hastings railway line;**
- f) Facilitate and contribute to the proposed extension to the Green Corridor designation along the southern and eastern parts of the site;**
- g) Include a full flood risk assessment prepared in consultation with the Environment Agency;**
- h) Provide a connection to the nearest point of adequate capacity in the sewerage network, in collaboration with the service provider.**

Chart Road (A28), Ashford



4.424 This site is part of the former Ashford Hospital site in Kings Avenue, which was identified as a potential redevelopment opportunity in the Urban Sites and Infrastructure DPD adopted in 2012, and has been mostly redeveloped for residential use. This remaining part of the site, which adjoins Chart Road (A28) was initially retained as a potential site for a healthcare facility, however, it has now been determined that this use is not to be pursued, and therefore this area is now available for residential development. The site currently lies vacant with hoardings around its perimeter.

4.425 The site is located close to the town centre within a largely residential area, and at 0.8ha is therefore considered suitable for around 25 dwellings. The primary vehicular access should be from Chart Road, as shown on the policies map, and a connection to the footpath on Chart road with a formal pedestrian crossing facility across Chart Road is required. Pedestrian and cycle access should also be provided through to the new development of Kings Avenue, at the point shown on the policies map.

4.426 Given the character and appearance of the surrounding areas, a scheme of 2 - 3 storey buildings would be most appropriate here. The design and layout must take account of the residential amenity of neighbouring occupiers. Particular attention needs to be given to the

topography of the site which slopes up from Chart Road towards the old hospital buildings and any potential impact on residents on the northern side of Chart Road. The site lies in close proximity to the Ashford-Maidstone railway line and the Channel Tunnel Rail Link. The potential noise impact of both will need to be taken into account in any detailed design and layout.

- 4.427 On the north-west corner of the site, there is a row of garages and an informal parking area which serve 20-33 Chart Road. The previous policy identified that this area could be redeveloped as part of the site and replacement parking facilities for those properties provided within the redevelopment. This is optional and should be considered in consultation with the homeowners.
- 4.428 Due to the close proximity of the new open space and play area in King's Avenue, there will be no requirement to provide open space provision on site, but contributions to the maintenance of that facility will be sought.
- 4.429 Development of this site presents an opportunity to incorporate a sustainable drainage system that would contribute to managing surface water for the benefit of flood risk, water quality, biodiversity and amenity. This site has a sensitive groundwater setting and significant area of brownfield land. Contamination assessments will need to be carried out and drainage schemes will need to be sympathetic to the results to ensure no future risk to groundwater.
- 4.430 Southern Water's assessment has revealed that additional sewerage infrastructure would be required to serve the proposed development. The development will therefore be required to make a connection to the nearest point of adequate capacity in the sewerage network. Early liaison should take place with the service provider in this regard.

Policy S46 - Chart Road

The site in Chart Road is proposed for residential development with an indicative capacity of 25 dwellings. Development proposals for this site shall:

- a) **provide vehicular access from Chart Road;**
- b) **provide an extension to the existing footways and create a formal pedestrian crossing facility across Chart Road;**
- c) **provide a pedestrian/cycle access through to Kings Avenue;**
- d) **have a design/layout appropriate for the site's location adjacent to residential areas and addresses the possible noise impact from the railway and Channel Tunnel Rail Link;**
- e) **provide replacement parking facilities for the residents of 23-33 Chart Road, if redevelopment is to include the current area which they are located; and,**
- f) **Provide a connection to the nearest point of adequate capacity in the sewerage network, in collaboration with the service provider.**

A20 Corridor

Land east of Hothfield Mill, A20



- 4.431 This site is located along the A20, directly to the east of Hothfield Mill which is in operation as a mixed employment site. The A20 is a main transport route into Ashford and therefore by road the site is a short distance from the Town Centre and the nearby local centres within Eureka Park, Repton Park and Hothfield village.
- 4.432 The boundaries of the site are defined by mature established hedgerows. Of particular importance is the boundary of the detached property 'Woodside', which is located directly to the east of the site entrance on the A20. The isolated detached property is served from a layby which is used frequently as an informal lorry parking area.
- 4.433 To the east of the site is a small residential settlement located around Westwell Lane, Potters Corner and Sandyhurst Lane. These residential areas are a mixture of ribbon development and cul-de-sacs to the rear of them, and dwellings here are typically detached or semi-

detached 2 storey properties.

- 4.434 Along the western boundary of the site beyond the Mill is an Ancient Woodland belt, which is protected by a Tree Preservation Order and prevents wider views of the site from the west. A railway line and the M20 directly to the north of the site disconnects it from the wider countryside and the Kent Downs AONB.
- 4.435 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.
- 4.436 The site is currently in agricultural use as two separate fields, the land is generally flat, although rises from lower ground around Hothfield Mill area and A20 frontage to the east and north, peaking in the centre of the site before declining again as it adjoins the Railway line. However, the AONB beyond the M20 to the north is much higher land and is prominent in the landscape from the north and eastern areas of the site.
- 4.437 The southern area of the site, between the Mill and ‘Woodside’ property on the A20 is suitable for residential development of up to 75 dwellings, a scale which is considered sustainable in this edge of town location. The indicative area for built development is shown on the Policies map. This part of the site is less visible in the wider landscape and is largely screened by the woodland belt on the west of the site, which can be extended. The developable area is around 4ha in size and therefore depending on the layout of development proposals, the overall density would be less than 20dph which is suitable on this countryside edge location and reflective of the nearby residential areas.
- 4.438 It is important that the eastern boundary is sensitively screened to mitigate any visual impact from new development. A lower residential density will be appropriate in this part of the site and a landscaping scheme that ‘breaks up’ the urban edge created by built development here will be necessary as it is visible to the properties in Westwell Lane and ‘Woodside’, and within the setting of the AONB. Design and layout must also take into consideration of the Listed Buildings within the adjoining Mill site. At present these are screened by mature trees, and these should be retained.
- 4.439 The primary vehicular access should be provided from a new access directly from the A20, as shown on the policies map, which will also require Highway improvements to accommodate a right turn lane into the new access. In addition, Highway improvements may be required with regards to the nearby layby, to ensure appropriate separation from the site access. The closure of this layby and a new private access directly from the A20 to serve ‘Woodside’ could be provided. There may be options as to how this can be achieved and proposals for this would need to be consulted on with the relevant homeowners and Kent Highways, who have control of the layby and land up to the A20.

- 4.440 Due to the location of the site, there is no nearby provision of public open space or recreation, and therefore the site should provide an area of designated space within the proposal. There is also potential to connect the site by way of a new footway from the development, across the field to Westwell Lane.
- 4.441 Southern Water's assessment has revealed that additional sewerage infrastructure would be required to serve the proposed development. The development will therefore be required to make a connection to the nearest point of adequate capacity in the sewerage network. Early liaison should take place with the service provider in this regard.

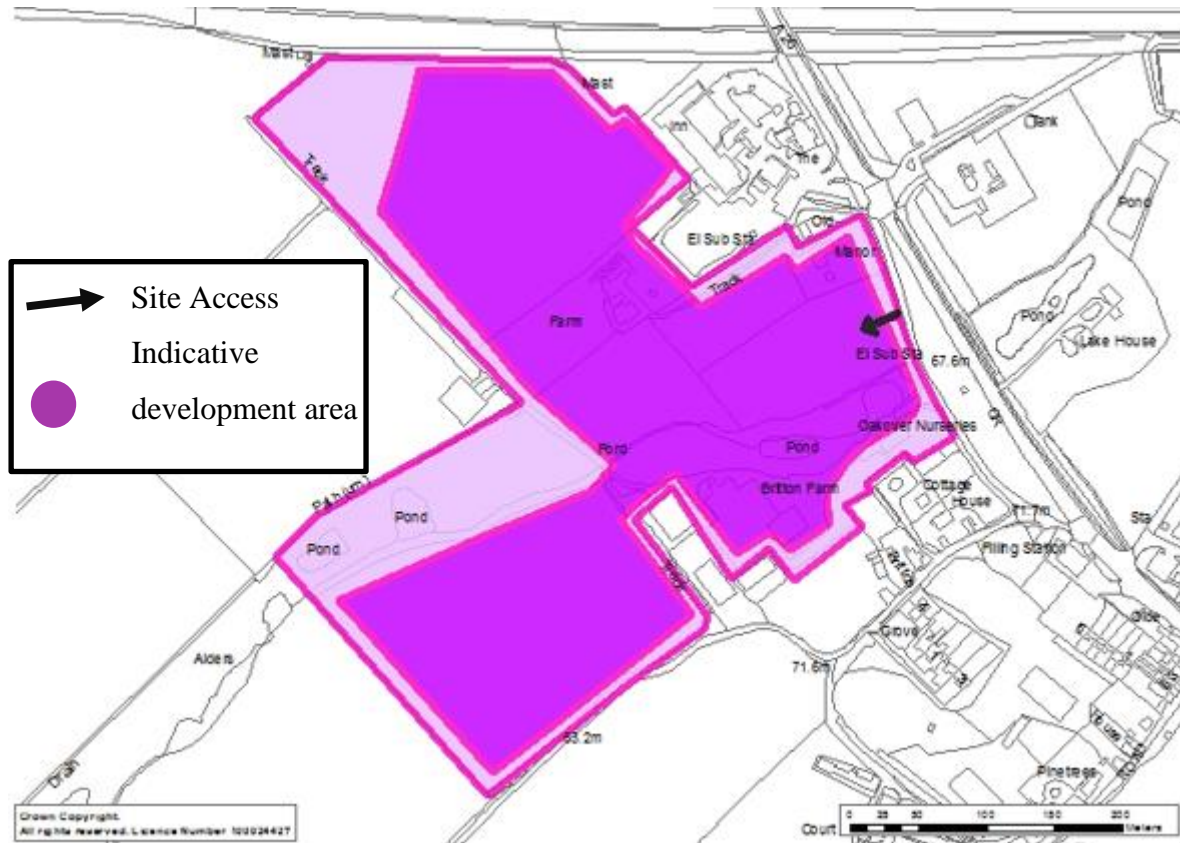
Policy S47 - Land East of Hothfield Mill, A20

The site to the east of Hothfield Mill, is proposed for residential development with an indicative capacity of 75 dwellings.

Development proposals for this site shall:

- a) **Be designed and laid out to take account of the residential amenity of the 'Woodside' property, and those that overlook the site in Westwell Lane. Particular attention needs to be given to the topography of the site, adjacent Listed buildings and the wider countryside and AONB settings. The development should be no more than 2 storeys in height;**
- b) **Provide primary vehicular access from the A20 Ashford Road in the location indicated on the policies map, with the provision of a right turn lane on the A20, in accordance with Kent County Council Highways and Transportation recommendations;**
- c) **Investigate the provision of a direct access to the property 'Woodside' from the A20, with closure of the current layby, in accordance with recommendations from Kent County Council Highways and Transportation, and in liaison with the property owners;**
- 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;**
- e) **Provide a connection to the nearest point of adequate capacity in the sewerage network, in collaboration with the service provider;**
- f) **Provide an area of public open space and play provision in accordance with guidance contained within the SPD;**
- g) **Provide new pedestrian and cycle routes throughout the development with linkages into the wider network where possible, including Westwell Lane;**
- 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.**

Land to the rear of the Holiday Inn, Hothfield (A20)



- 4.442 The site is part of the wider conglomeration of development in the Tutt Hill, Hothfield area that is divided by the A20. There are two hotels and a pub/ restaurant, a petrol filling station and small businesses in this vicinity which serve the local population. The site is approximately 1.5 miles distance from the village of Charing which has a range of local facilities and is one the most sustainable larger rural settlements in the Borough.
- 4.443 The site is located on land that lies to the rear of the Holiday Inn hotel at Hothfield. It is bounded by the A20 and the Holiday Inn hotel to the east and the M20 to the north. There is an unused area of land on the frontage to the A20 and the remainder of the site is in use as a landscape gardening/plant nursery with related commercial buildings. The site currently has a frontage onto a lay-by off the A20 that provides an existing access to the current commercial use that occupies part of the site as well as linking directly to Ram Lane.
- 4.444 The whole site divides into three distinct sections that are developable that form part of the wider area of open land that lies to the rear of the Holiday Inn. The land adjoining the immediate frontage to the A20 lies in a dip and is lower lying than the wider area to the west and is considered to be suitable for development incorporating the access onto the A20. The

area of land that adjoins existing development and Ram Lane is relatively well hidden from existing development and adjoins a central woodland area and is also considered to be suitable for development. The area immediately to the rear of the Holiday Inn hotel is part of the much wider area of open land to the west that rises up to adjoin the M20 motorway along its northern edge. The part of this site that lies to the rear of the Holiday Inn is considered to be suitable for development with the area to the west kept free from development to include significant landscape screening.

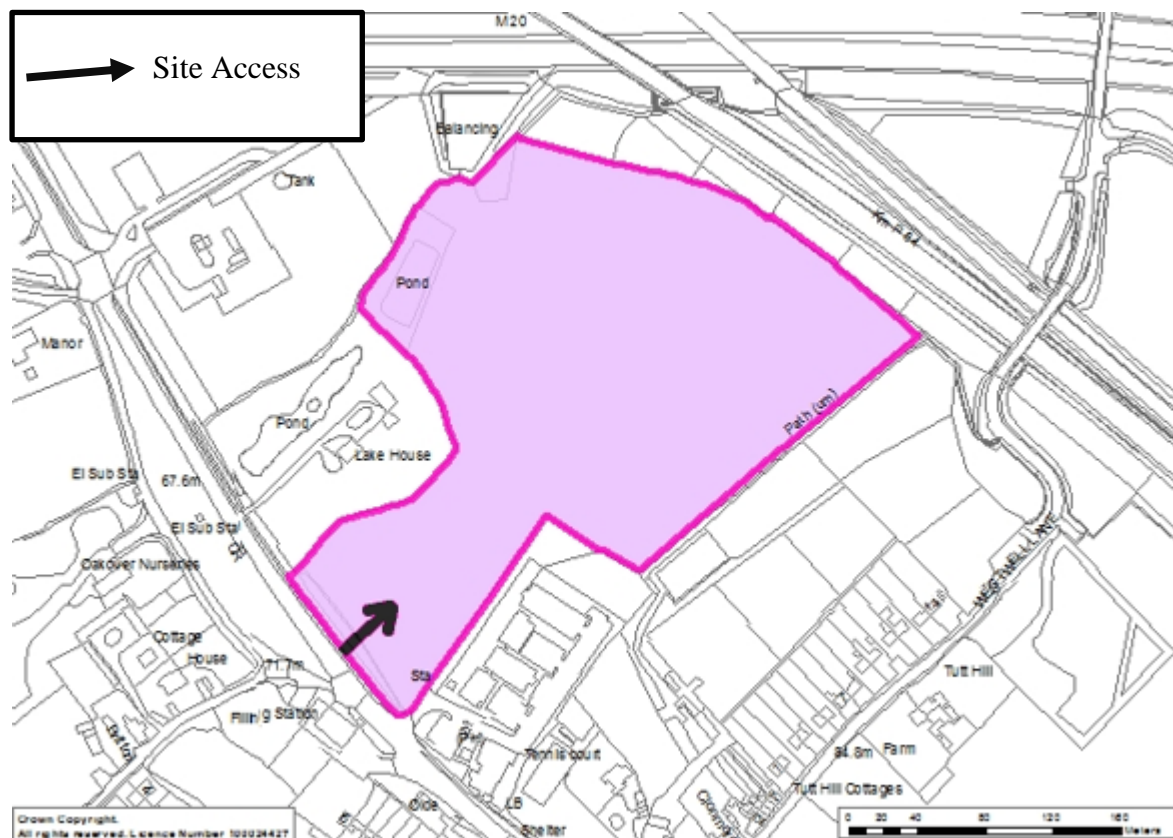
- 4.445 The site is 12 hectares in area and is suitable for 150 dwellings. Development of the site should be limited in terms of its western extent and impact on the more sensitive landscape and wider views from the west. The central woodland area should be retained and enhanced and improved where possible. Due to the close proximity of the site to the M20, the noise impact must be taken into consideration in design and layout with suitable landscaped buffers and acoustic protection.
- 4.446 The existing access arrangement into the site is unusual as the current access to the market garden/nursery business is from a lay-by off the A20. The lay by also gives direct access to Ram Lane which is a rural lane that runs along the southern edge of the site. The development of this site is the opportunity to resolve the access arrangements and it is proposed that access to the site will be directly from the A20.
- 4.447 The site includes the buildings of the current commercial operation of the landscape gardening/plant nursery and as part of the redevelopment of this area these will need to be relocated on a suitable alternative site.
- 4.448 The development should provide effective pedestrian and cycle routes within the development that link in to the wider network of routes adjoining the site and due to the location of the site, there is no nearby provision of public open space or recreation, and therefore the site should provide an area of designated space within the proposal.
- 4.449 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.
- 4.450 Southern Water's assessment has revealed that additional sewerage infrastructure would be required to serve the proposed development. The development will therefore be required to make a connection to the nearest point of adequate capacity in the sewerage network. Early liaison should take place with the service provider in this regard.

Policy S48 – Land rear of Holiday Inn, A20

The site to the rear of the Holiday Inn at Hothfield is proposed for residential development with an indicative capacity of 150 dwellings. Development proposals for the site shall:

- a) **Be designed and laid out to take account of the surrounding uses in particular the existing hotel and the M20 motorway;**
- b) **Provide a primary vehicular access directly from the A20 Ashford Road, to eliminate the current lay by access arrangement whilst maintaining access to Ram Lane and the other commercial uses;**
- c) **Provide significant landscaping screening on the north western edge of the site to limit the impact on the wider landscape and acoustic protection around the site boundaries;**
- d) **Retain the central tree belt;**
- e) **Provide new pedestrian and cycle routes throughout the development with linkages into the wider network where possible;**
- f) **Provide on site public open space and contributions to community facilities in accordance with guidance contained within Policy and SPD;**
- g) **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;**
- h) **Provide a connection to the nearest point of adequate capacity in the sewerage network, in collaboration with the service provider;**
- i) **Re-locate the current commercial buildings on the site to a suitable alternative location;**
- j) **Provide future access to the existing sewerage infrastructure for maintenance and upsizing purposes.**

Land at Tutt Hill, Westwell (A20)



- 4.451 The site is located off the A20 at Tutt Hill. The site is bounded by the A20 to the west, the M20 to the north and the -High Speed 1 railway line forms the north eastern boundary of the site. To the south east lie the rear of the properties that front onto Westwell Lane. The site is secluded from the A20, is relatively self contained and is currently in the ownership of Oakover Nurseries.
- 4.452 The site adjoins a pub/restaurant in the southern corner of the site and the property known as the Banyan Retreat that also fronts onto the A20 to the west of the site and has a boundary to the site of substantial mature planting.
- 4.453 The site is part of the wider area of development in the Tutt Hill, Hothfield area that is divided by the A20. There are two hotels and a pub/ restaurant, a petrol filling station and small businesses in this vicinity which serve the local population. The site is approximately

1.5 miles distance from the village of Charing which has a good range of local facilities and is one of the most sustainable larger rural settlements in the Borough.

- 4.454 The site is currently used as a landscape gardening/ plant nursery and the site is in a significant dip in the landscape that helps to seclude the site from the adjoining A20.
- 4.455 The site area is just under 6 hectares and is considered suitable for a development of up to 75 dwellings. There is already substantial planting around the boundary of the adjoining property known as the Banyan Retreat and this should be retained in any development on the site.
- 4.456 There are a number of properties along Westwell Lane along the south eastern boundary of the site. The proposed development area retains the existing boundaries to the rear of those properties that will be an effective buffer for the new development.
- 4.457 The CTRL and the M20 adjoin the site to the north and there should be effective noise attenuation measures put in place to mitigate any impact in this part of the site. The primary vehicular access should be from the A20 as indicated on the Policies Map.
- 4.458 The development should provide effective pedestrian and cycle routes within the development that link in to the wider network of routes adjoining the site and due to the location of the site, there is no nearby provision of public open space or recreation, and therefore the site should provide an area of designated space within the proposal.
- 4.459 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.
- 4.460 Southern Water's assessment has revealed that additional sewerage infrastructure would be required to serve the proposed development. The development will therefore be required to make a connection to the nearest point of adequate capacity in the sewerage network. Early liaison should take place with the service provider in this regard.

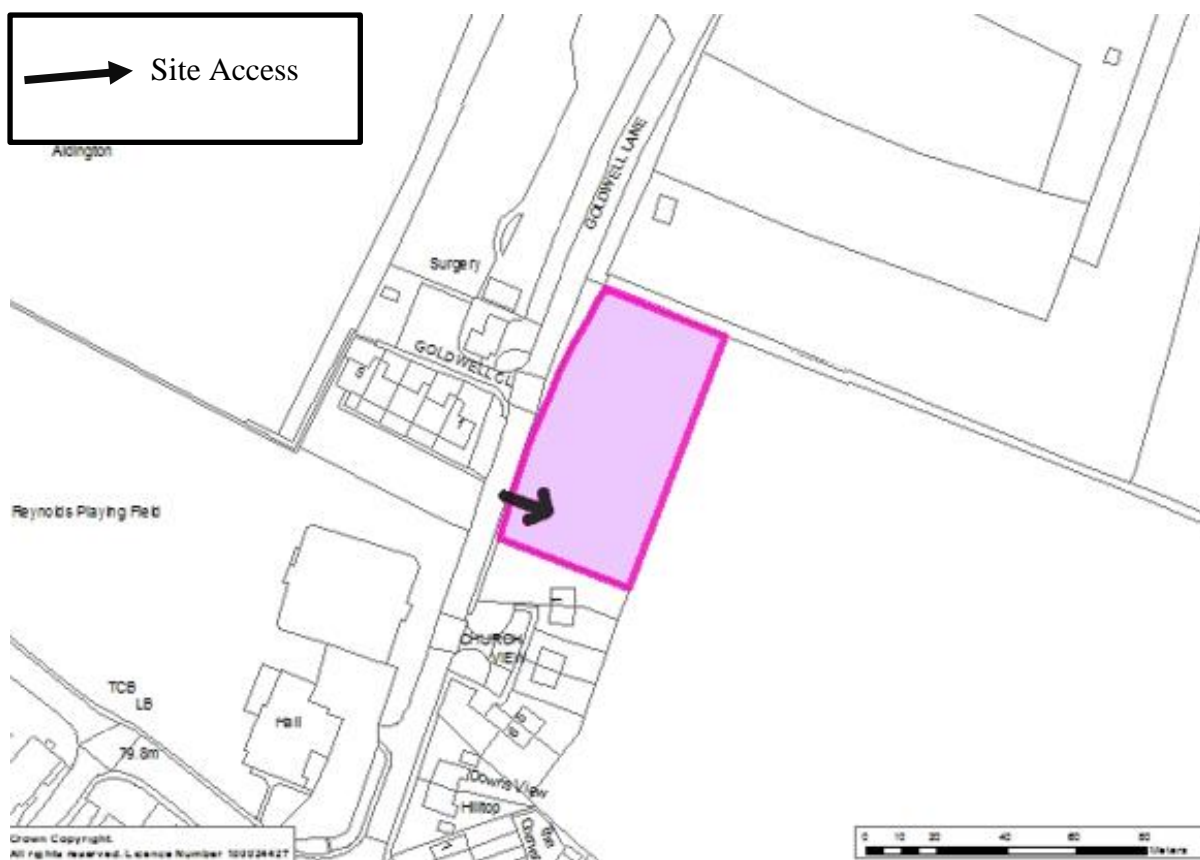
Policy S49 - Land at Tutt Hill, A20

The site to the rear of Westwell Lane at Tutt Hill is proposed for residential development with an indicative capacity of 75 dwellings. Development proposals for this site shall:

- a) Be designed and laid out to take account of the residential amenity of neighbouring occupiers. Particular attention needs to be given to the topography of the site. The development should be no more than 2-3 storeys in height;**
- b) Provide primary vehicular access from the A20 Ashford Road in the location indicated on the policies map;**
- c) Provide appropriate soft landscaping on boundary with adjoining properties and retain and improve screening to existing properties where possible;**
- d) Provide new pedestrian and cycle routes throughout the development with linkages into the wider network where possible;**
- e) Provide effective noise attenuation measures in the part of the site that adjoins the M20 and the CTRL railway line in the north;**
- f) Provide on site public open space and contributions to community facilities in accordance with guidance contained within Policy and SPD;**
- g) 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;**
- h) Provide a connection to the nearest point of adequate capacity in the sewerage network, in collaboration with the service provider.**

The Villages

Aldington, Land north of Church View



4.461 This site is located on the north eastern entrance to Aldington village, adjoining the small cul-de-sac of Church View. On the opposite side of Goldwell Lane are the former surgery, the Aldington Eco Centre, and 5 terraced houses in Goldwell Close. The site is located in close proximity to the village hall/recreation field and Primary School, and a number of other local services in the village centre.

4.462 The topography and landscape setting of the site is significant, as Aldington sits on top of the Greensand Ridge, and the North Downs Frame views to the north. This site is part of a larger agricultural field which slopes down from the Roman Road and existing linear housing development which is located along its frontage, to the north and east, before inclining again towards Aldington Church in the east.

4.463 From within the site, and from Goldwell Lane itself, there are long and important views of the Grade I listed Aldington Church, Court Lodge Farm and the remains of the Archbishops Palace which are also listed. Situated 1km away from the village to the east, this cluster of listed buildings is included within a Conservation Area designation, and together forms an important heritage asset and a key feature in the landscape as it sits prominently on higher ground. For these reasons, it is concluded that only single depth, frontage development is suitable in this location to enable retention of these key vistas and protection of the wider

landscape character. At around 0.35ha, the site is considered suitable for up to 10 dwellings. Given the landscape character and vistas of the heritage assets, only single or two storey buildings would be appropriate here.

- 4.464 There is a PRow located along the northern edge of the site which must be retained and if possible enhanced, in collaboration with the development of Site S52. The important views from this footpath towards the site, and across the Greensand Ridgeway towards the church, must be retained by providing gaps in the built frontage and any screening that should also be provided to lessen the visual impact of the development from this wider setting. The design and layout must also take account of the residential amenity of neighbouring occupiers in Goldwell Close and Church View.
- 4.465 There is currently an agricultural vehicle access on the northern part of the site in Goldwell Lane, however it is recommended that a new vehicle access is created for the development in the southern area, at the point shown on the policies map.
- 4.466 The boundary between the site and the road frontage is currently defined by an established mature hedgerow, and to preserve the existing character it is proposed that this be retained within the development layout where possible. It is suggested that a set back layout similar to that of the adjacent Church View development would achieve this aim.
- 4.467 Due to the close proximity of the village's public open space and equipped play area to the site, no on-site provision is required as part of this development, but there are opportunities through financial contributions to provide enhancements for these areas. A footpath connection must be made to the local network.
- 4.468 Southern Water's assessment has revealed that additional sewerage infrastructure would be required to serve the proposed development. The development will therefore be required to make a connection to the nearest point of adequate capacity in the sewerage network. Early liaison should take place with the service provider in this regard.

Policy S51 – Aldington - Land north of Church View

The site is proposed for residential development of up to 10 dwellings. Development proposals for this site shall:

- a) Be designed and laid out in such a way as to conserve the mature hedgerow along the road frontage if possible, retain gaps in the built frontage of the to preserve views and vistas through the site to the heritage assets and also consider the wider landscape settings, the topography of the site and Greensand Ridge location. Dwellings should be a maximum of 2 storeys in height;**
- b) Retain and enhance the PRow adjoining the site;**
- c) Provide vehicle access from Goldwell Lane, as shown on the policies map, and pedestrian footways to connect to the village centre and the local services;**
- d) Provide a soft landscaped boundary along the eastern and northern edges of the site, which should include mature tree planting in places to lessen the visual impact of the development on the wider landscape, but also enable the longer views to be retained towards the heritage assets cluster around the church;**
- e) Provide a connection to the nearest point of adequate capacity in the sewerage network, in collaboration with the service provider;**
- f) Provide contributions towards the enhancement or maintenance of the nearby public open space and equipped play area provision.**

Aldington, Land south of Goldwell Manor Farm



- 4.469 This site is located on the north eastern entrance to the village of Aldington and is currently agricultural fields situated between a site allocated for residential development (policy S51) to the south, and Goldwell Manor Farm to the north. The area of Goldwell Manor Farm adjoining the site is in operation as a small rural business park, Goldwell Court.
- 4.470 On the opposite side of Goldwell Lane is the former surgery, now an Osteopathy clinic, and the Aldington Eco Centre. The site is located in close proximity to the village hall/recreation field and Primary School, and a number of other local services in the village centre. The site is currently in use as a paddock.
- 4.471 The topography and landscape setting of the site is significant, as Aldington sits on top of the Greensand Ridge, and the North Downs Frame views to the north. From within the site, and from Goldwell Lane, there are long and important views of the Grade I listed Aldington Church, Court Lodge Farm and the remains of the Archbishops Palace which are also listed. Situated 1km away from the village to the east, this cluster of listed buildings is included within a Conservation Area designation, and together forms an important heritage asset and a key feature in the landscape as it is located prominently on higher ground. For these reasons, it is concluded that only single depth, frontage development is suitable in this location to enable retention of these key vistas and protection of the wider landscape character.
- 4.472 At around 0.8ha, the site is suitable for up to 20 dwellings, depending on design and layout. Given the landscape character and vistas of the heritage assets, only single or two storey buildings would be appropriate here. There is a PRoW located along the southern edge of the

site which must be retained and if possible enhanced, in collaboration with the development of Site S51. The important views from this footpath towards the site, and across the Greensand Ridgeway towards the church, must be retained by providing gaps in the built frontage and any screening that should also be provided to lessen the visual impact of the development from this wider setting.

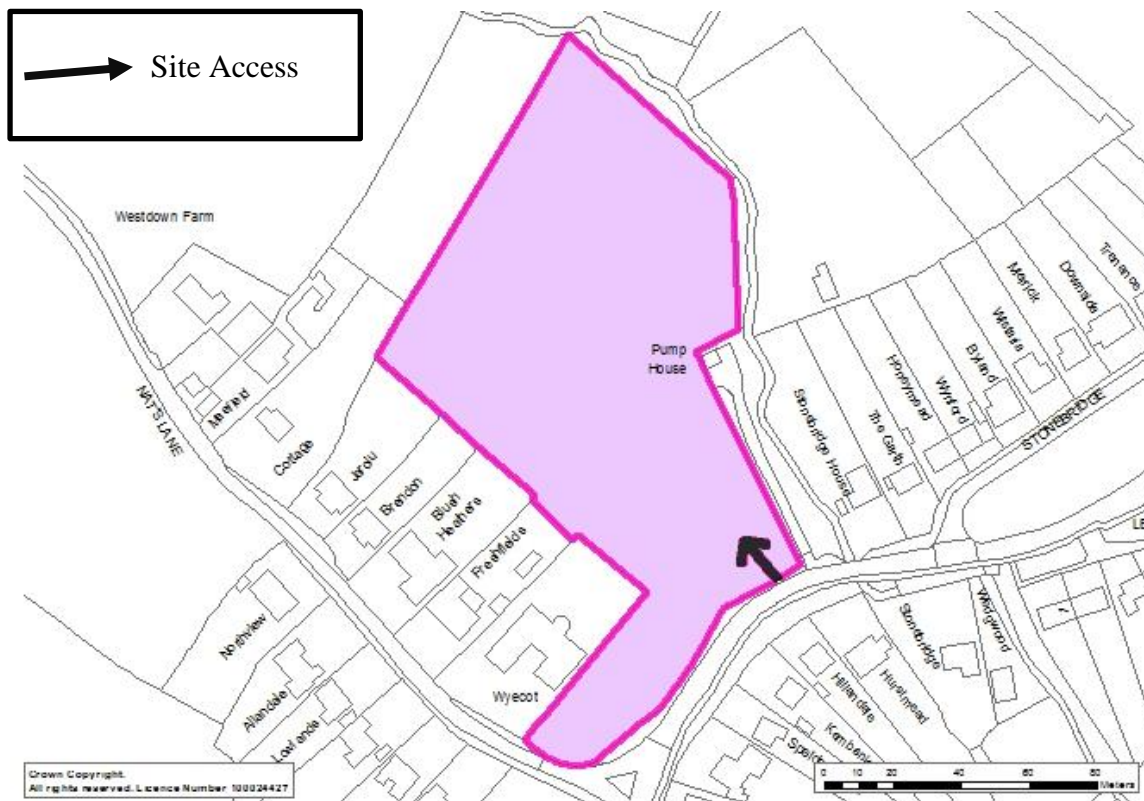
- 4.473 There is currently an agricultural vehicle access on the northern area of the site in Goldwell Lane, however it is recommended that a new vehicle access is created for the development in the south, at the point shown on the policies map. This would ensure the access is located within the 30mph zone.
- 4.474 The boundary between the site and most of the road frontage is currently defined by an established mature hedgerow, and to preserve the existing character it is recommended that this be retained within the development layout where possible. It is suggested that a set back layout similar to that of the nearby Church View development would achieve this aim.
- 4.475 Due to the close proximity to the village public open space and equipped play area from the site, no on-site provision is required as part of this development, but there are opportunities through financial contributions to provide enhancements to this area. A footpath connection to the existing footways along Goldwell Lane must be provided.
- 4.476 Southern Water's assessment has revealed that additional sewerage infrastructure would be required to serve the proposed development. The development will therefore be required to make a connection to the nearest point of adequate capacity in the sewerage network. Early liaison should take place with the service provider in this regard.

Policy S52 – Aldington - Land south of Goldwell Manor Farm

The site in south of Goldwell Court is proposed for residential development of up to 20 dwellings. Development proposals for this site shall:

- a) **Be designed and laid out in such a way as to conserve the mature hedgerow along the road frontage if possible, retain gaps in the built frontage to preserve views and vistas through the site to the heritage assets and also consider the wider landscape settings, the topography of the site and Greensand Ridge location. Dwellings should be a maximum of 2 storeys in height;**
- b) **Retain and enhance the PRoW adjoining the site;**
- c) **Provide vehicle access from Goldwell Lane, as shown on the policies map, and pedestrian footways to connect to the village centre and the local services;**
- d) **Provide a soft landscaped boundary along the eastern and northern edges of the site, which should include mature tree planting in places to lessen the visual impact of the development on the wider landscape, but also enable the longer views to be retained towards the heritage assets cluster around the church;**
- e) **Provide a connection to the nearest point of adequate capacity in the sewerage network, in collaboration with the service provider;**
- f) **Provide contributions towards the enhancement or maintenance of the nearby public open space and equipped play area provision.**

Brook, Nat's Lane



- 4.477 The site is located within the village of Brook, at the corner of Nat's Lane and The Street and is currently in use as agricultural land. It abuts the open countryside to the north and east, and to the south west of the site is a row of detached dwellings set within generous gardens. To the North West is agricultural land, and running along the north eastern boundary is land owned by South East Water which contains a pumping station adjacent to the nearby brook. Beyond this watercourse is the Wye and Crundale Downs Saxon Shore SSSI. The Street, edged by mature hedgerow, forms the south eastern boundary of the site. The site gently slopes from west to east.
- 4.478 The site is located within the Kent Downs Area of Outstanding Natural Beauty and has views of the surrounding countryside. Therefore any development on this site must respect the landscape setting and at around 1.2 hectares in size the site can accommodate up to 10 dwellings at a low density of around 8 dwellings per hectare, which is considered suitable in this context. Development proposals should also seek to retain and enhance existing mature hedgerows to the north east of the site, as well mitigate any impact it might have on the landscape setting through the use of edge of site screening and landscaping within the site.
- 4.479 A very narrow strip of the north western edge of the site falls within Flood Zone 3 and it is therefore unlikely that development in this part of the site would be acceptable but a full flood risk assessment will need to be carried out in consultation with the Environment Agency.
- 4.480 Access to the site should be from The Street, as shown on the policies map, and any proposal should consider the need for suitable visibility from the site entrance along the highway. This site would particularly benefit from improved pedestrian provision on this side of The Street.

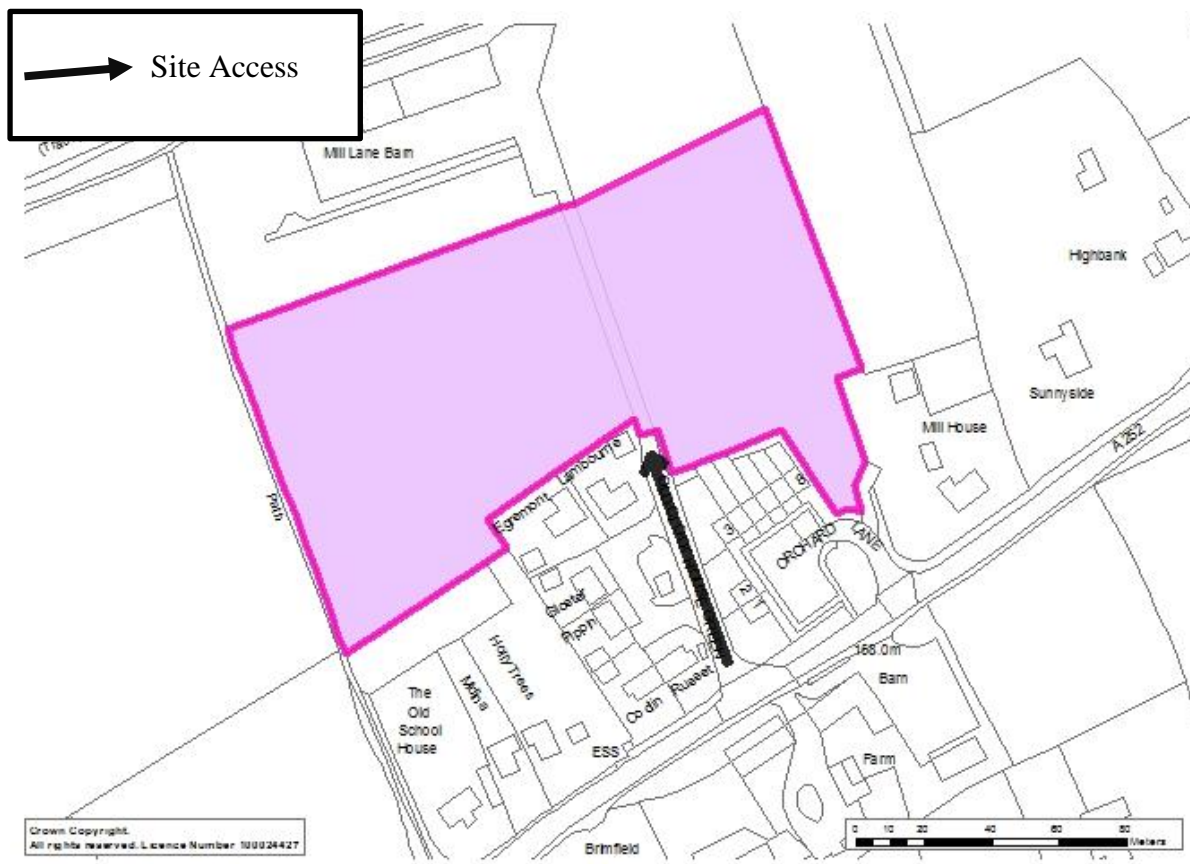
- 4.481 Adjacent to the west of the site is a detached listed building. Particular care should be taken to preserve the setting of the adjacent listed building and to respect the openness of this edge of village site. The scale and density of any development on this site must reflect its surroundings.
- 4.482 The Wye and Crundale Downs SAC is located immediately to the north of the village of Brook. All applications for the development of this site should therefore include an Environmental Impact Assessment study demonstrating how the proposals will effect upon the integrity of the biodiversity of this designated environment and the Wye and Crundale Downs SSSI which adjoins the site. Development that will have an adverse effect on the integrity of these designated sites will not be permitted. Opportunities to incorporate and enhance biodiversity will be encouraged. In particular, development should take opportunities to help connect and improve the wider ecological networks in this area and to mitigate against any potential increase in recreational pressure that may arise from the development of this site.
- 4.483 Southern Water's assessment has revealed that additional sewerage infrastructure would be required to serve the proposed development. The development will therefore be required to make a connection to the nearest point of adequate capacity in the sewerage network. Early liaison should take place with the service provider in this regard.

Policy S53 – Brook, Nat's Lane

Land at Nat's Lane is allocated for up to 10 dwellings. Development proposals on this site should:

- a) **Be designed and laid out in such a way as to preserve the Area of Outstanding Natural Beauty. Any proposal should pay particular attention to landscaping of the edges of the site as well as internally;**
- b) **Limit dwellings to two storeys in height in order to protect character of the surrounding area;**
- c) **Be designed and laid out in such a way as to preserve the setting of surrounding heritage assets, and to reflect the character of the broader built environment;**
- d) **Provide primary vehicle access from The Street and provision of improved pedestrian links;**
- e) **Be accompanied by a full flood risk assessment that has been prepared in consultation with the Environment Agency;**
- f) **Provide an Environmental Assessment Study to address any potential adverse impacts of the proposals on the biodiversity of the Wye and Crundale SAC and SSSI and how they can be avoided or adequately mitigated;**
- g) **Provide a connection to the nearest point of adequate capacity in the sewerage network, in collaboration with the service provider.**

Challock, Clockhouse



- 4.484 The site is located to the north of the A252 on the northern edge of the village of Challock. It is a level agricultural field bounded to the south by housing, to the west by woodland, to the east by residential curtilage and to the north by agricultural land. To the north west of the site lies a commercial unit, which is served by an access track that traverses the site from north to south which will need to be retained. A public right of way (PRoW) runs adjacent to the western boundary of the site. The site is within the AONB and abuts Carpet Wood to the west which is a designated Ancient Woodland, and which provides natural screening and habitat. The plot to the south of the site has recently been developed and contains six large dwelling houses arranged in a compact formation. The wider area is residential in nature, and properties along the A252 are predominantly spaced generously with substantial gardens.
- 4.485 At 1.85 hectares in size, the site is considered suitable for up to 15 dwellings, depending upon their size and layout. An approximate density of around 8 dwellings per hectare is reflective of this site's location and surroundings, and takes into account the proximity of the Ancient Woodland and the sites setting within the AONB.
- 4.486 Given the sites location within the AONB, the well-spaced character of the adjoining dwellings and mature gardens surrounding the site, particular attention needs to be given to the landscaping of the site. Dwellings should be limited to two-storey in height to prevent a prominent visual edge to the village. Existing hedging to the north and east of the site should be retained. The built footprint of the development on this site needs to be carefully planned,

and particular regard should be given to the close proximity of the site to the adjacent Ancient Woodland, and to the TPO to the south east of the site.

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

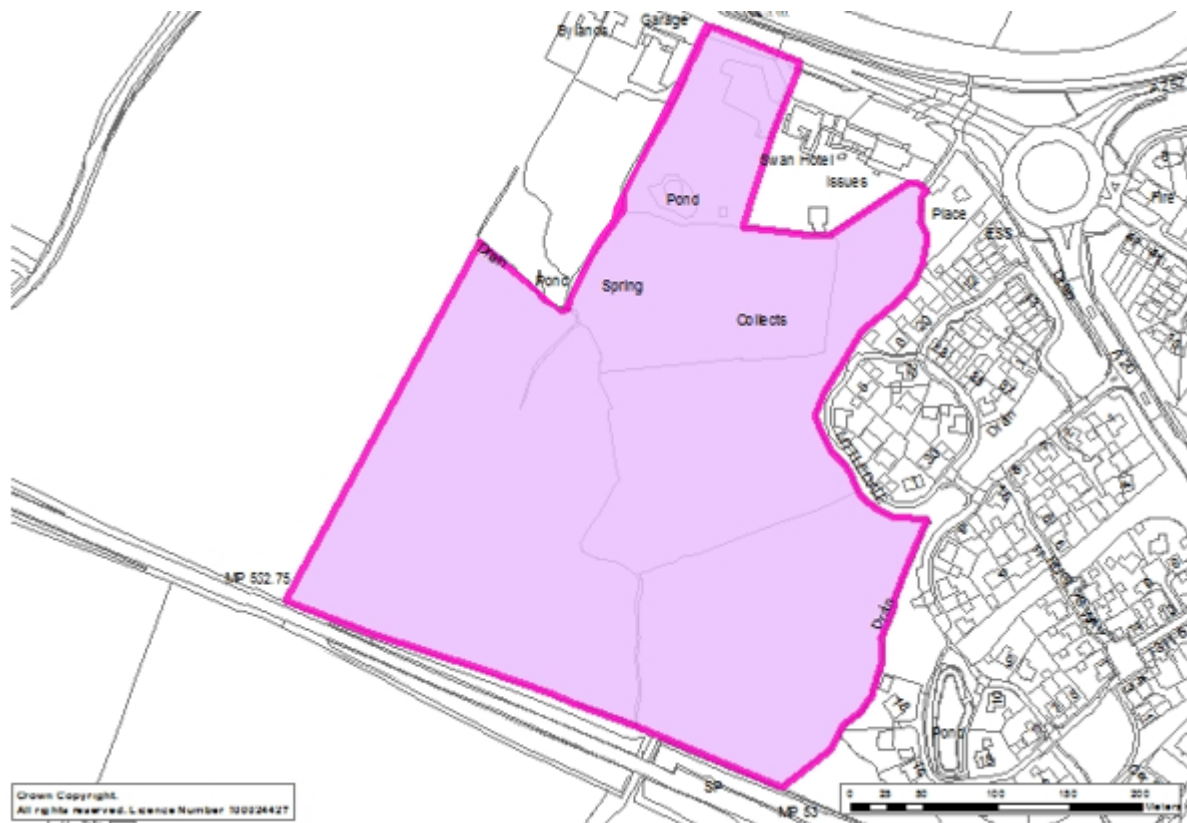
Policy S54 – Challock, Land at Clockhouse

The site at Clockhouse is proposed for residential development for up to 15 dwellings.

Development proposals for this site shall:

- a) **Be designed and laid out in such a way as to conserve and enhance the character of the AONB and this edge of settlement area, paying particular attention to the well-spaced nature of nearby development;**
- b) **Dwellings should be limited to two storeys in height in order to protect character of the surrounding area.**
- c) **The built footprint of any proposed development should be laid out so as to ensure the protection of the adjacent Carpet Wood ancient woodland.**
- d) **Retain and enhance the hedge and tree boundaries around the site, particularly where these abut the open countryside;**
- e) **Provide primary vehicle access off the track known as Old Clockhouse Green and retain vehicular access to the commercial unit to the north; and**
- f) **Provide a connection to the nearest point of adequate capacity in the sewerage network, in collaboration with the service provider.**

Charing, Land adjacent to Poppyfields



- 4.488 This site lies immediately west of the recently completed Poppyfields development in Charing village. It is bounded to the north by the A20 and existing development that fronts onto the A20. The site also adjoins the existing allocation at S28 which also fronts onto the A20. To the south the site boundary is formed by the Ashford – Maidstone railway line.
- 4.489 The site is currently open agricultural land that rises up towards the west and Hook Lane. There are a number of individual trees and hedgerows that form the boundary with the Poppyfields development but there are few other features on the site. To the north of the site, beyond the route of the A20 the land rises up significantly into open countryside and the North Downs escarpment. The alignment of the A20 is the boundary of the Kent Downs AONB. 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.
- 4.490 Development in this location would be a continuation of Charing’s existing built form and would not encroach into the more visually sensitive areas to the north and east of the village. The site is approximately 11 hectares in area and is proposed for development of up to 180 dwellings. This would result in an approximate density of 16dph, which is considered suitable on this countryside edge location. A mix of dwelling types of two storeys is proposed. Proposals should reflect the design guidelines set out in the Charing Parish Design Statement.

- 4.491 The approach into the village of Charing along the A20 from the west is an important entrance to the village and the development of the site presents the opportunity to establish a clear edge on this western boundary with suitable boundary treatment of planting and landscaping adjoin lower density development on this western edge. In addition there are existing tree and hedge boundary between this site and Poppyfields and this should be retained and enhanced as part of this development.
- 4.492 There are a number of options to access the site directly from the A20 along the northern edge of the site which could be in co-ordination with the access to the adjoining S28 site allocation. There is no vehicular access into the adjacent Poppyfields development but there is the opportunity to create pedestrian and cycle access into this development that can link into the wider network connecting with the village and the other footpaths in the area.
- 4.493 Charing is a large village with a good range of local facilities and there has 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. The scale of development proposed on this site is significant in a village context and it is therefore particularly important that the scheme makes an appropriate contribution to the facilities of the village so as to cater for the additional demand generated. The scale of such a contribution will be negotiated with the Borough Council (in consultation with the Parish Council).
- 4.494 Southern Water's assessment has revealed that additional sewerage infrastructure would be required to serve the proposed development. The development will therefore be required to make a connection to the nearest point of adequate capacity in the sewerage network. Early liaison should take place with the service provider in this regard.

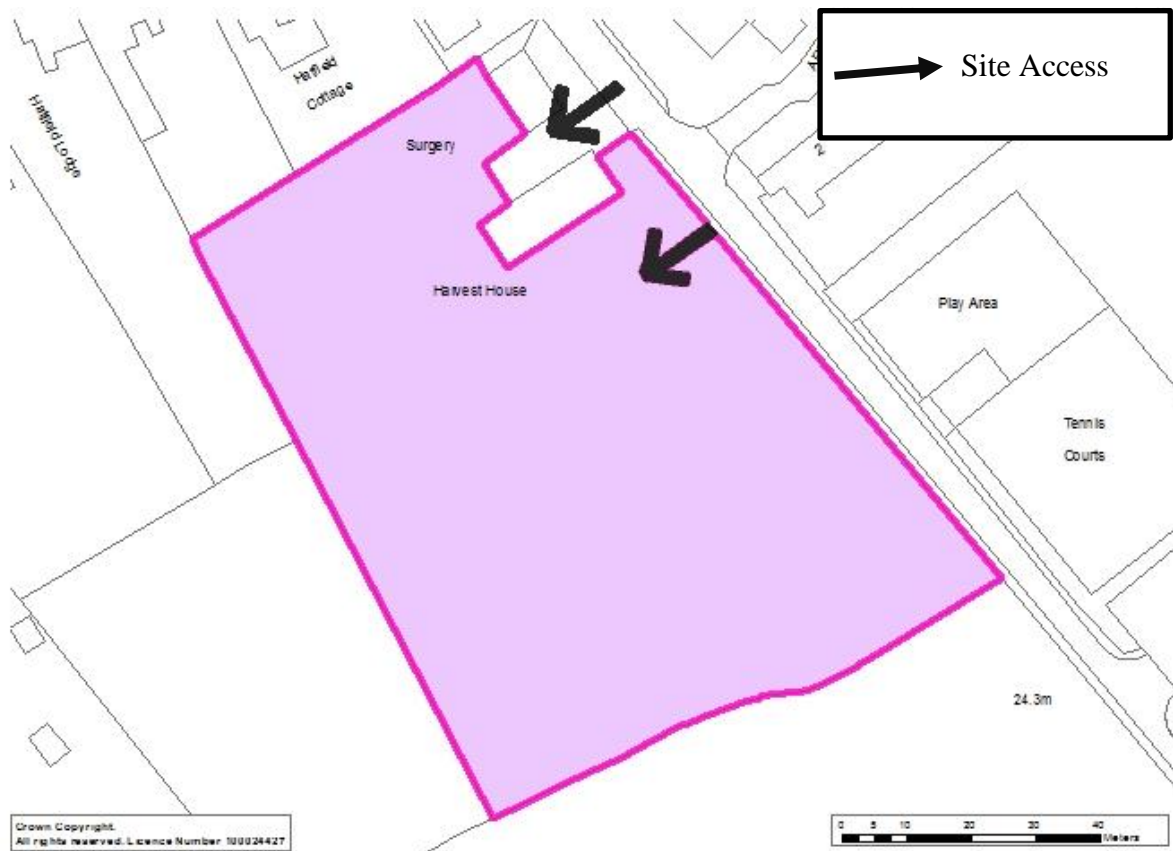
Policy S55 – Charing, Land adjacent to Poppyfields

Land to the west of the Poppyfields development is proposed for residential development for an indicative capacity of 180 dwellings.

Development proposals for the site shall:

- a) **Be designed and laid out in such a way as to integrate the development into the existing settlement, with particular attention given to the topography of the site, taking into account design guidance set out in the Charing Parish Design Statement and impact upon the adjoining AONB. 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;**
- b) **Create an appropriate soft landscaped northern and western edge to the development to establish a clear western edge to the development with substantial boundary planting;**
- c) **Retain and enhance the current hedge and tree boundaries between the site and the Poppyfields development;**
- d) **Be accessed directly from the A20;**
- e) **Provide new pedestrian and cycle routes throughout the development to connect with the adjoining Poppyfields development and to existing adjacent PRow;**
- f) **Provide an appropriate contribution towards the provision, management and maintenance of related community facilities and infrastructure;**
- g) **Provide a connection to the nearest point of adequate capacity in the sewerage network, in collaboration with the service provider;**
- h) **Provide future access to the existing sewerage infrastructure for maintenance and upsizing purposes.**

Chilham, Branch Road



- 4.495 The site is located on the South west of the settlement of Chilham, on Branch Road, a rural entrance road to the village from the A28. The site wraps to the south of a 2-storey single residential property of Harvest House and is currently garden land associated with this property. To the north of Harvest House is a single storey building, in use as the village GP surgery. Opposite the site to the east of Branch Road is a small cul-de-sac of detached houses, Arden Grange, and the village sports and recreation ground which includes an indoor hall, outdoor facilities and a children's equipped play area with a large car park. To the north is the built residential area of the settlement, with the site adjoining the rear gardens of properties in Hambrook Lane.
- 4.496 This site has been identified as a suitable location, on the edge of a large village, for a small residential development of up to 10 dwellings, whilst also being able to improve the current problem of on-street parking associated with the GP surgery with the provision of a new parking area within the site. The parking area will provide a minimum of 5 spaces, in addition to retaining existing spaces located at the front of surgery. However, these existing spaces could be relocated within the new parking area.
- 4.497 The vehicle access for the new residential area should be located on Branch Road, as shown on the policy map. Access to the GP surgery and new parking area, will remain in the current location.

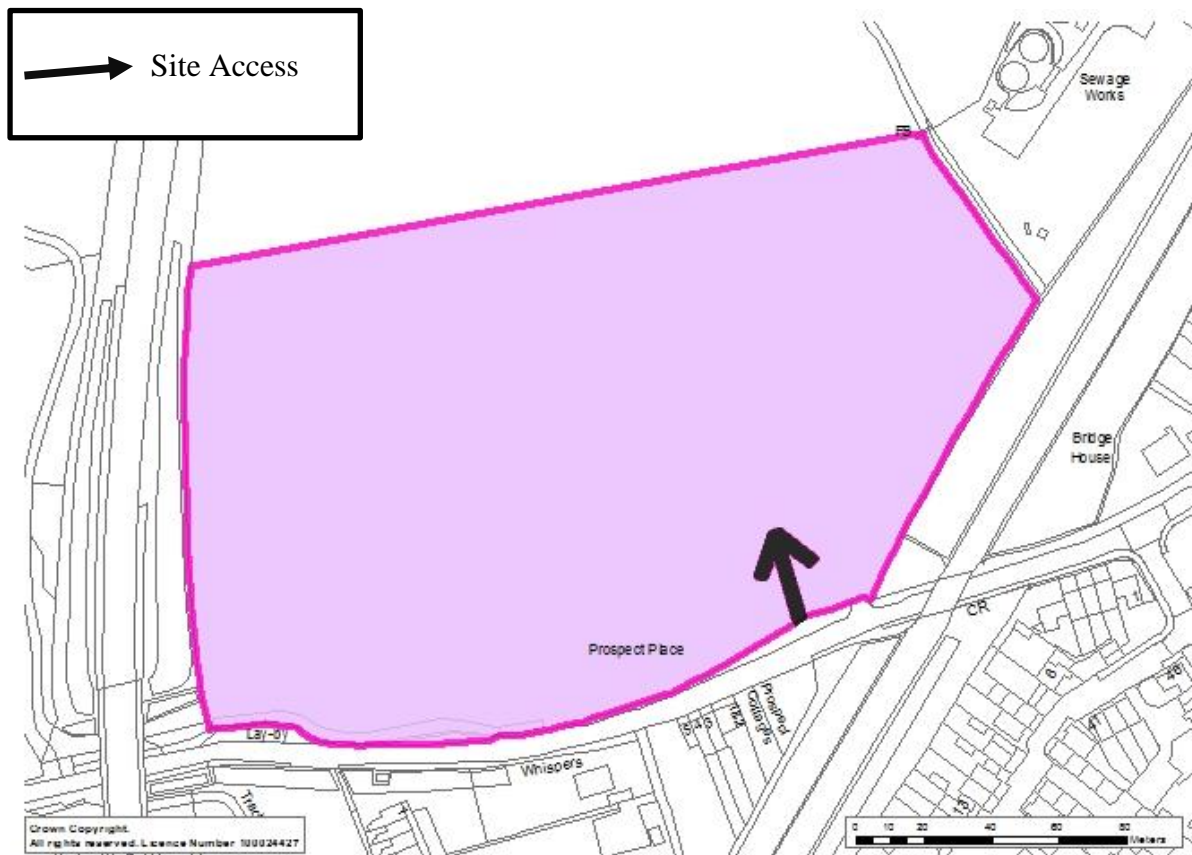
- 4.498 The whole settlement lies within the designated Kent Downs Area of Outstanding Natural Beauty (AONB), and therefore development proposals for this site must conserve the natural beauty of the landscape. The boundary of the site along Branch Road is defined by a mature and maintained hedgerow and trees and there are a number of mature trees on the southern boundary of the site, within the site and a small woodland area on the land parcel to the west of the site. Therefore the site is reasonably well screened from the wider setting.
- 4.499 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.
- 4.500 The village of Chilham is particularly important in heritage terms as it contains Chilham Castle and a large number of Listed Buildings within a Conservation Area which covers most of the settlement. This site is located within the Conservation Area on its eastern edge, and there are two semi-detached properties adjoining the North West corner of the site which are Grade II Listed (Hatfield Lodge and Hatfield House). Development proposals for this site must ensure that the setting of these heritage assets is conserved.
- 4.501 The developable area of the site, after providing GP surgery parking area and retaining a curtilage for Harvest House, is around 0.6ha, and therefore residential development would result in a maximum density of 17dph, which is appropriate and suitable with regards to the AONB and Conservation Area location and reflects local character and density. Given the character and appearance of these surrounding areas, a scheme of 2 storey buildings would be most appropriate here. The design and layout must take account of the residential amenity of neighbouring occupiers and be guided by the principles set out in the Chilham Village Design Statement.
- 4.502 Due to the close proximity of the village recreation ground, on-site provision of public open space will not be expected but appropriate contributions towards the management, maintenance and enhancement of the village recreation ground provision will be sought. Enhancements to the pedestrian access around the area through the creation of traffic calming measures along Branch Road, should also be explored in consultation with Kent Highways.
- 4.503 Southern Water's assessment has revealed that additional sewerage infrastructure would be required to serve the proposed development. The development will therefore be required to make a connection to the nearest point of adequate capacity in the sewerage network. Early liaison should take place with the service provider in this regard.

Policy S56 - Chilham, Branch Road

Land at Branch Road is proposed for residential development for up to 10 dwellings. Development proposals for this site shall:

- a) **Provide a car park of a minimum of 5 additional spaces for the use of the GP surgery;**
- b) **Be designed and laid out in such a way as to protect and conserve the character and setting of the village Conservation Area and the residential amenity of neighbouring dwellings, particularly listed buildings, whilst also taking into account the guidance in the Chilham Village Design Statement;**
- c) **Provide primary vehicle access to the residential area on Branch Road, as shown on the policies map and retain the current access for the GP surgery and associated parking;**
- d) **Include the provision footpaths and/or traffic calming measures in Branch Road, in accordance with the recommendations of Kent Highways;**
- e) **Retain and enhance the hedge and tree boundaries within and around the site, and make enhancements to the southern boundary ensuring the character of the Kent Downs AONB is conserved and enhanced and the development is well screened from the wider area;**
- f) **Provide a connection to the nearest point of adequate capacity in the sewerage network, in collaboration with the service provider.**

Hamstreet, Warehorne Road



- 4.504 The site, although located within Warehorne Parish boundary, is situated to the west of the built up part of the village of Hamstreet and lies along the northern edge of Warehorne Road. It is bounded by the A2070 on its western edge, the Ashford - Hastings railway line on the eastern edge, and a ditch and sewage treatment works on the north east. Beyond the railway line is residential development marking the edge of Hamstreet's built up area.
- 4.505 The landscape surrounding the site is characterised by a mix of rolling agricultural fields and urban infrastructure. The boundary with Warehorne Road, the A2070, and the railway line, are defined by mature hedgerows which limit visibility of the site. There is currently no built development on the northern side of Warehorne Road in this location, but there is a small amount of housing opposite the site which consists of 2 rows of terraced cottages. The site is currently part of a larger field, used for grazing, and the topography of the land rises from east to west.
- 4.506 The site, being close to the built up edge of Hamstreet, is within easy walking distance of a range of services as well as transport links including Hamstreet Station. Vehicular access to the site would be from Warehorne Road however there are off site constraints, particularly pedestrian accessibility along Warehorne Road, which must be addressed before the site can be commenced.

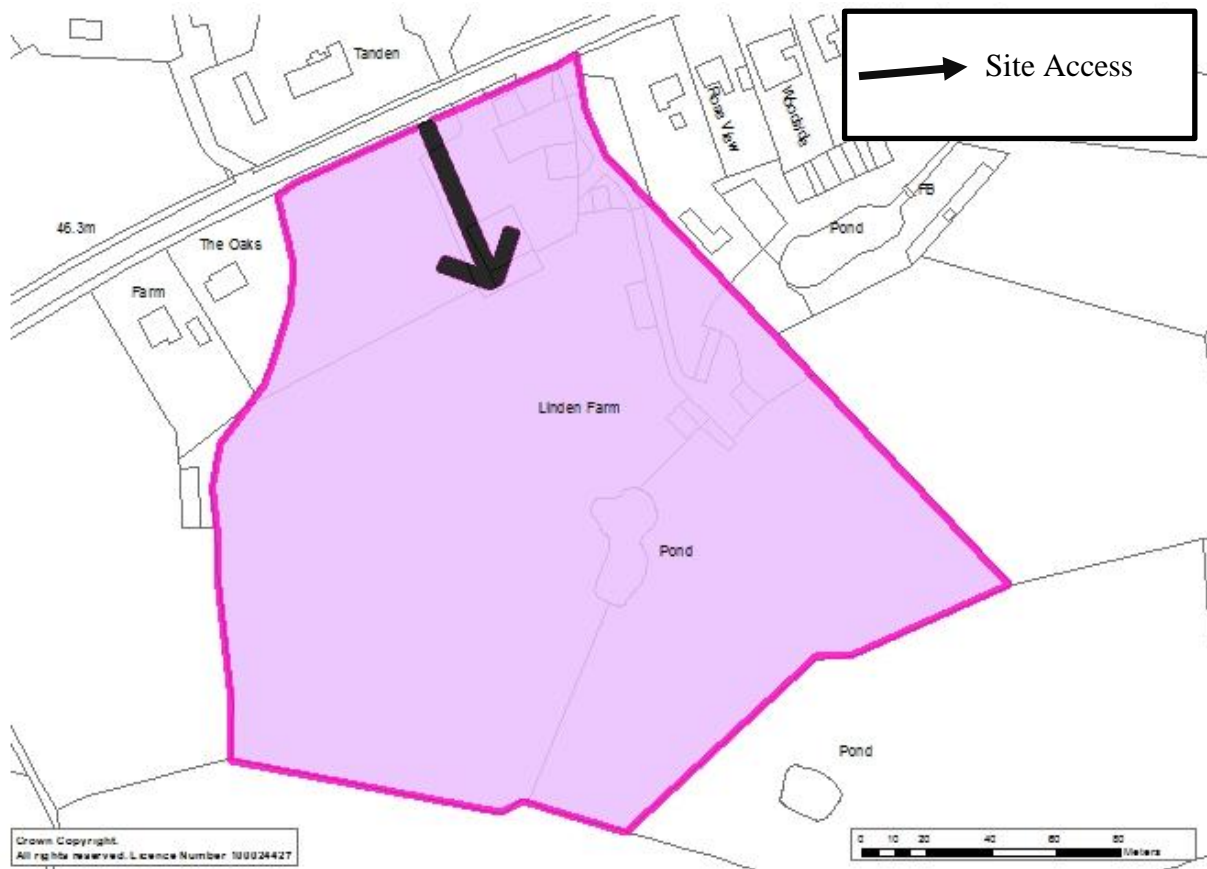
- 4.507 A small part of the eastern area of the site lies within Flood Zones 2 and 3 and therefore it is unlikely that development in this part of the site would be acceptable; however a full flood risk assessment would need to be carried out in consultation with the Environment Agency.
- 4.508 At 3.0 hectares in size the site is considered suitable for approximately 50 dwellings. This would result in a density of around 17 dph, which is reflective of the edge of a settlement location of the site, and takes into account flooding constraints. Given this edge of settlement location, the character and appearance of the surrounding areas and varying topography of the site, a scheme of 2-3 storey buildings would be most appropriate here. The design and layout must take account of the amenity of nearby residents and the occupiers of the site, given its close proximity to the sewage works, A2070 and railway line.
- 4.509 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. The scale of development proposed on this site is significant in a village context and it is therefore particularly important that the scheme makes an appropriate contribution to the facilities of the village so as 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).
- 4.510 The northern extent of the Dungeness, Romney Marsh and Rye Bay Ramsar site lies to the south of the site in the vicinity of the Royal Military Canal. All applications for the development of this site should therefore include an Environmental Impact Assessment study demonstrating how the proposals will effect upon the integrity of the biodiversity of this designated wildlife environment area. Development that will have an adverse effect on the integrity of this designated site will not be permitted. Opportunities to incorporate and enhance biodiversity will be encouraged. In particular, development should take opportunities to help connect and improve the wider ecological networks in this area and to mitigate against any potential increase in recreational pressure that may arise from the development of this site.
- 4.511 Southern Water's assessment has revealed that additional sewerage infrastructure would be required to serve the proposed development. The development will therefore be required to make a connection to the nearest point of adequate capacity in the sewerage network. Early liaison should take place with the service provider in this regard.

Policy S57 – Hamstreet, Warehorne Road

The site at Warehorne Road is proposed for residential development with an indicative capacity of 50 dwellings. Development proposals for this site shall:

- a) Be designed and laid out in such a way as to protect the character and setting of the site, paying particular attention to the frontage on Warehorne Road, the topography of the site and the sites relationship with agricultural land to the north;**
- b) The site should be designed and laid out so as to protect the amenity of those living within the new development, paying particular attention to adjacent transport uses and the nearby sewage treatment works;**
- c) Primary vehicle access shall be from Warehorne Road and any proposal shall consider the need to make improvements to the highway to facilitate safe vehicle and pedestrian movement;**
- d) Include a comprehensive landscaping scheme that seeks to make provision for the retention and enhancement of existing natural features within the site. In addition, proposed new landscaping should provide generous soft landscaping along the northern edge of the site in order to lessen its visual impact;**
- e) Retain and enhance the current hedge boundaries fronting Warehorne Road;**
- f) Be accompanied by a full flood risk assessment that has been prepared in consultation with the Environment Agency. The development shall be laid out to ensure that the built footprint avoids the flood zones;**
- g) Provide an appropriate contribution towards the provision, management and maintenance of related community facilities and infrastructure;**
- h) Provide new pedestrian and cycle routes throughout the development to connect with the adjoining development and to improve links to the existing built up part of the village;**
- i) Provide a connection to the nearest point of adequate capacity in the sewerage network, in collaboration with the service provider;**
- j) Provide an Environmental Assessment Study to address any potential adverse impacts of the proposals on the biodiversity of the Dungeness, Romney Marsh and Rye Bay Ramsar site and how they can be avoided or adequately mitigated;**
- k) Provide future access to the existing sewerage infrastructure for maintenance and upsizing purposes.**

High Halden (A28) – Stevenson Brothers



4.512 This level site occupies land adjacent to the A28 Ashford Road and lies approximately mid-way between the settlements of Bethersden and High Halden. The south, west and east of the site are bounded by agricultural land, and the north by dwelling houses and the A28. Further to the west, approximately 70m from the site, is a residential development known as The Martins. Beyond the A28 to the north is a grade II listed pair of semi-detached cottages. Dwellings fronting the A28 are generally set back from the highway with generous front gardens.

4.513 The north of the site is occupied by a former petrol filling station forecourt with associated buildings, a small in-use workshop, and a small freestanding single storey retail unit. The workshop is currently in use by Stevenson Brothers and surrounding these uses is hard standing. The workshop and former petrol station uses have the potential to generate land contamination, and therefore any proposal on this site shall be accompanied by a contamination assessment as well as proposed mitigation measures.

4.514 The east of the site contains a collection of small agricultural buildings associated with Linden Farm, and the remainder of the site is in agricultural use. Access to the site is direct from the A28 which offers good visibility on this relatively straight stretch of highway. Mature trees and hedgerow edge the west and southern boundaries of the site and a ditch runs through the site from north to south, dissecting the natural pond in the centre of the site.

Public Right of Way footpath AT158 traverses the site, connecting the A28 with footpath AT167.

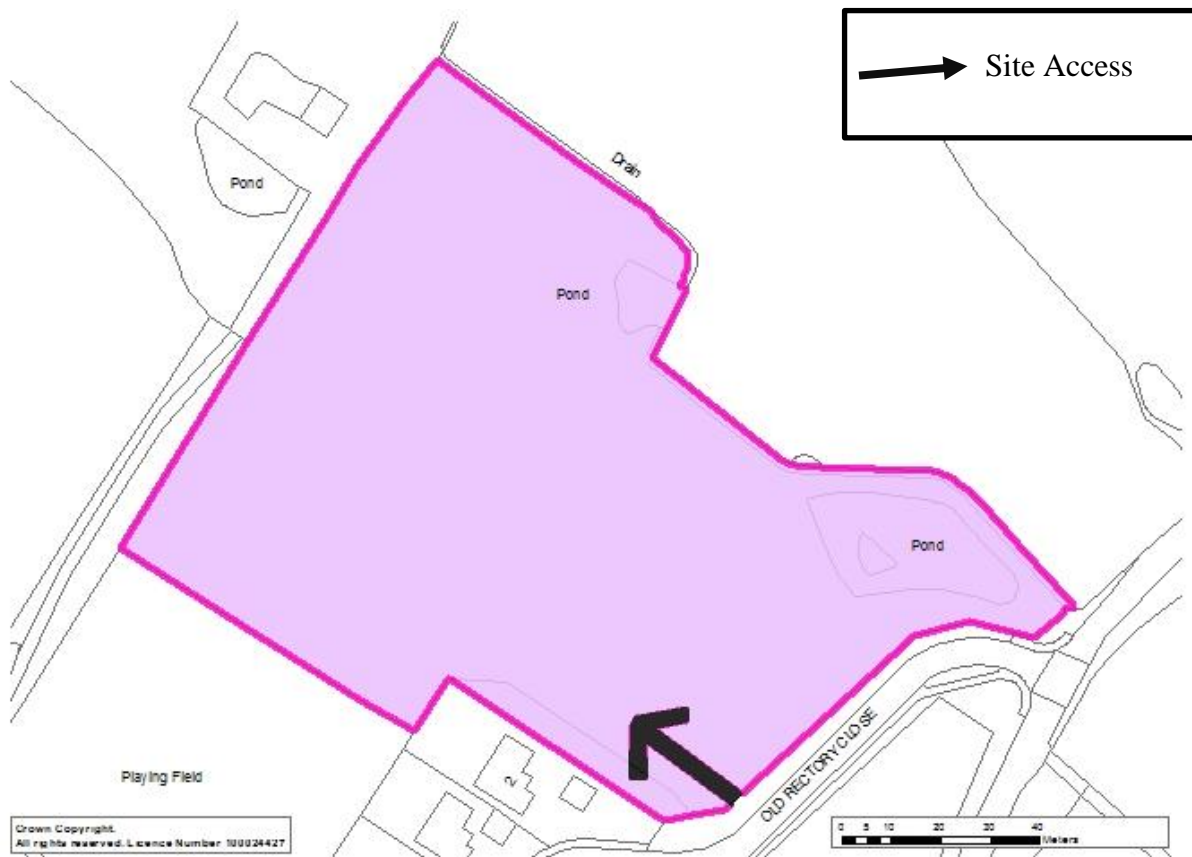
- 4.515 The gross site area is approximately 3.5 hectares; however this includes the pond within the centre of the site. Given its rural location and the spacious layout of nearby developments, the site is considered suitable for around 50 dwellings, depending upon the size and layout. This would result in an approximate density of 14.3 dph is reflective of the site location and its surroundings.
- 4.516 Given the character of surrounding uses and buildings, a scheme of 2 storey buildings would be most appropriate here. The design and layout of any proposal must take account of the rural character of the area, and should respect established building lines along the A28. Redevelopment on this site offers the opportunity to improve its appearance through the removal of the disused forecourt, and any proposal must seek to capitalise on this opportunity and enhance the setting of the adjacent listed building.
- 4.517 Within the site provision should be made for the retention of existing landscape. Proposals for development should be accompanied by a detailed landscaping scheme which pays particular attention to retaining and enhancing natural boundary features such as mature trees and hedges. A landscaping scheme should also propose suitable natural screening where not currently present and where the site abuts the open countryside. Due to the location of the site, there is no nearby provision of public open space or recreation, and therefore the site should provide an area of designated space within the proposal.
- 4.518 Southern Water's assessment has revealed that additional sewerage infrastructure would be required to serve the proposed development. The development will therefore be required to make a connection to the nearest point of adequate capacity in the sewerage network. Early liaison should take place with the service provider in this regard.

Policy S58 – High Halden (A28), Stevenson Brothers

The site at Stevenson Brothers is proposed for residential development for an indicative capacity of 50 dwellings. Development proposals for this site shall:

- a) **Be designed and laid out to take account of the rural character of the area and the surrounding building layouts. Particular attention should be given to the enhancement of the setting of the Listed Building adjacent to the site. The development should be no more than 2 storeys in height;**
- 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;**
- c) **Ensure that land contamination issues are assessed and satisfactorily resolved or mitigated;**
- d) **Be accessed directly from the A28, as shown on the policies map;**
- e) **Provide suitable public open space and facilities within the development;**
- f) **Provide a connection to the nearest point of adequate capacity in the sewerage network, in collaboration with the service provider;**
- 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.**

Mersham, Land at Old Rectory Close



- 4.519 This site is located immediately adjoining the northernmost part of the built up part of the village of Mersham, on The Street, one of the main entrance roads into the village from the A20. To the north of the site is open fields, which are then dissected from the wider area by the M20 motorway and the A20. To the south is the residential edge of the settlement, and the south western corner adjoins a recreation field which is accessed from Glebelands cul-de-sac.
- 4.520 The site is currently an enclosed field bounding the entrance to a small cul-de-sac of housing, Old Rectory Close, which consists of 7 large detached properties, and wraps around to the rear of and to the side of Glebe House, a Grade II listed building located on the frontage of The Street. The site and the relatively new 7 properties once formed a paddock relating to Glebe House. There is an open space area on the left side of the road entrance which contains a flagpole but is mainly mature trees and hedgerows, limiting views into the site and the existing housing in the close from the main road.
- 4.521 The site is considered suitable for up to 15 dwellings. The developable area of the site, taking into account the existing trees and ponds, is around 1ha, and therefore residential development would result in a low maximum density of 15dph, which is appropriate and suitable with regards to the Conservation Area location and reflects local character and

density. The access to the site should be from Old Rectory Close, as shown on the policies map.

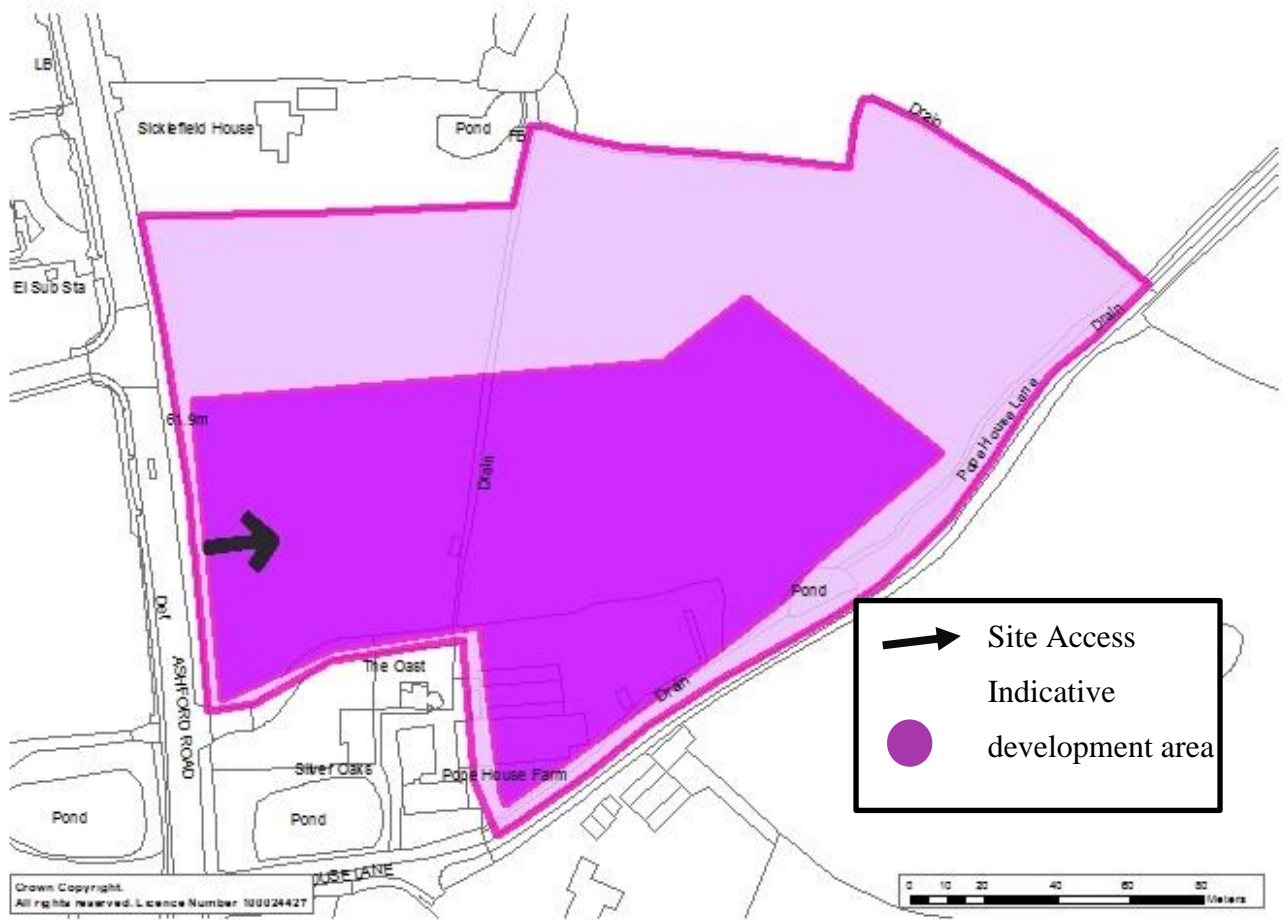
- 4.522 Along the north-east boundary of the site runs a drain as well as two ponds bounded by mature trees. The pond at the site's eastern boundary, adjoining the road, is substantial, and there are other ponds in the surrounding landscape.
- 4.523 The site is located within the Mersham Conservation Area, and in addition to the neighbouring Glebe House, there are a number of other significant heritage assets in the immediate location, including the Grade II* Listed 'Newhouse', which is a substantial property located on the opposite side of The Street. In addition there are further associated assets of Gardeners Cottage and the original Garden Walls which are both Grade II Listed. However, there is already significant screening with mature trees and hedgerows between the site and these heritage assets, which must be retained and enhanced where possible. Development proposals for this site must ensure that the setting of these heritage assets is conserved.
- 4.524 Given the character and appearance of the surrounding areas, countryside edge, Conservation Area location and the setting of the nearby Listed Buildings, a scheme of 2 storey buildings would be most appropriate here. The design and layout must take account of the residential amenity of neighbouring occupiers, and minimise views of the development with improved landscape screening, in addition to ensuring that the trees and ponds are retained within the layout of the development to create ecological corridors.
- 4.525 Due to the close proximity of the village recreation ground, on-site provision of public open space will not be expected but appropriate contributions towards the management, maintenance and enhancement of the village recreation ground provision will be sought. There is an opportunity to create an informal footpath access to the adjoining recreation field which should be explored and connections to footpaths and cycleways provided which link to the local network.
- 4.526 Southern Water's assessment has revealed that additional sewerage infrastructure would be required to serve the proposed development. The development will therefore be required to make a connection to the nearest point of adequate capacity in the sewerage network. Early liaison should take place with the service provider in this regard.

Policy S59 – Mersham, Land at Old Rectory Close

The site at Old Rectory Close is proposed for residential development of up to 15 dwellings. Development proposals for this site shall:

- a) Be laid out to complement and not detract from the setting of the listed buildings adjacent to and nearby the site and conserve the setting of the Conservation Area within which it is located;**
- b) Be designed and laid out to take account of the residential amenity of neighbouring occupiers. Layout should take account of surrounding areas, marking a transition between open countryside and rural settlement;**
- c) Provide primary vehicle access on to the Old Rectory Close, as shown on the policies map;**
- d) Retain mature trees on site, incorporating these into a coherent overall landscape design;**
- e) Provide new pedestrian and cycle routes throughout the development and connections to existing rural routes and local services; in particular provide an access through the site to the adjacent playing fields;**
- f) Retain the on-side ponds integrated into a coherent landscaping scheme that maintains and enhances ensure habitat connectivity to the wider area for biodiversity benefit;**
- g) Provide a connection to the nearest point of adequate capacity in the sewerage network, in collaboration with the service provider.**

St.Michaels, Pope House Farm



4.527 This site is located on the A28, Ashford Road, on the northern entrance to the built up settlement of St.Michaels (but within the Parish of High Halden). The settlement of St.Michaels contains a number of local services, such as schools, shops and good transport connections. The settlement also forms part of Tenterden, which is a main service centre in the Borough with a large number of services available.

4.528 The site is currently agricultural, with large buildings in place around Pope House Farm in the southern nib, and two fields making up the remaining area. These fields have a distinct north south boundary line in the centre, which is defined by a mature tree and hedgerow and also a natural drainage ditch. The boundaries of the site are also largely defined by tree and hedgerow boundaries and the site is flat with long views to the wider countryside.

4.529 The London Beach Golf Club and Hotel and Little Silver Hotel are situated to the west of the site on the opposite side of the A28, but are either well set back from the road frontage or well screened. There are also a number of large detached properties along Ashford Rd to the

south, west and north of the site, with Sicklefield House, directly adjacent to the north. To the south of the site, is Pope Farm House, which is a Grade II Listed building and associated oast and other buildings of heritage importance. Beyond this is a narrow rural lane, Pope House Lane, which serves a few large properties to the south.

- 4.530 Parts of this site are considered suitable for a residential development of around 50 dwellings, depending on design and layout. These areas suitable for residential development are broadly defined in shading on the policies map above, and is approximately 1.5ha in size. The area identified does not include the northern and most easterly parts of the site which have the constraint of underground gas mains, or would cause a detrimental visual impact on the wider landscape.
- 4.531 The site adjoins the open countryside to the east and the adjoining residential areas to the south currently consist of mainly of large detached properties, some of which are listed. Therefore the scale and density of new development in the eastern and southern parts of the site should also be relatively low. In the western area of the site, particularly along road frontage, slightly higher densities can be achieved but overall, the site is suitable only for net residential densities with an average of 30 dph.
- 4.532 The primary vehicle access will be provided directly on to the A28, as shown in the policies map. The current access which serves the Pope House Farm and Oast House properties must be retained to serve these dwellings. A pedestrian footway connection must be made to the current network.
- 4.533 Due to the site's heritage and the features of the adjoining listed building and housing cluster around it, high quality design must be achieved within the new development, in addition to a suitable buffer area around this heritage cluster. However, development around this location also has the opportunity to provide an enhanced setting to the the listed building with the removal of the large agricultural buildings which currently lie in close proximity.
- 4.534 The impact on trees and biodiversity must be assessed prior to any development as there are a number of mature trees and hedgerows and ponds and drainage ditches in and around the site boundary. These should also be taken into consideration in the design and layout of the site, and incorporated where possible to limit the impact of the built development on the wider landscape. Additional structural screening and planting will be required around the development, particularly on the north eastern boundary where the site is visible in the wider landscape.
- 4.535 The established hedgerow boundary on the road frontage should be retained where possible, where not impacted by the access arrangements. The northern areas of the site should be designed as natural open space areas with the potential to provide ecological zones.
- 4.536 Southern Water's assessment has revealed that additional sewerage infrastructure would be required to serve the proposed development. The development will therefore be required to make a connection to the nearest point of adequate capacity in the sewerage network. Early liaison should take place with the service provider in this regard.

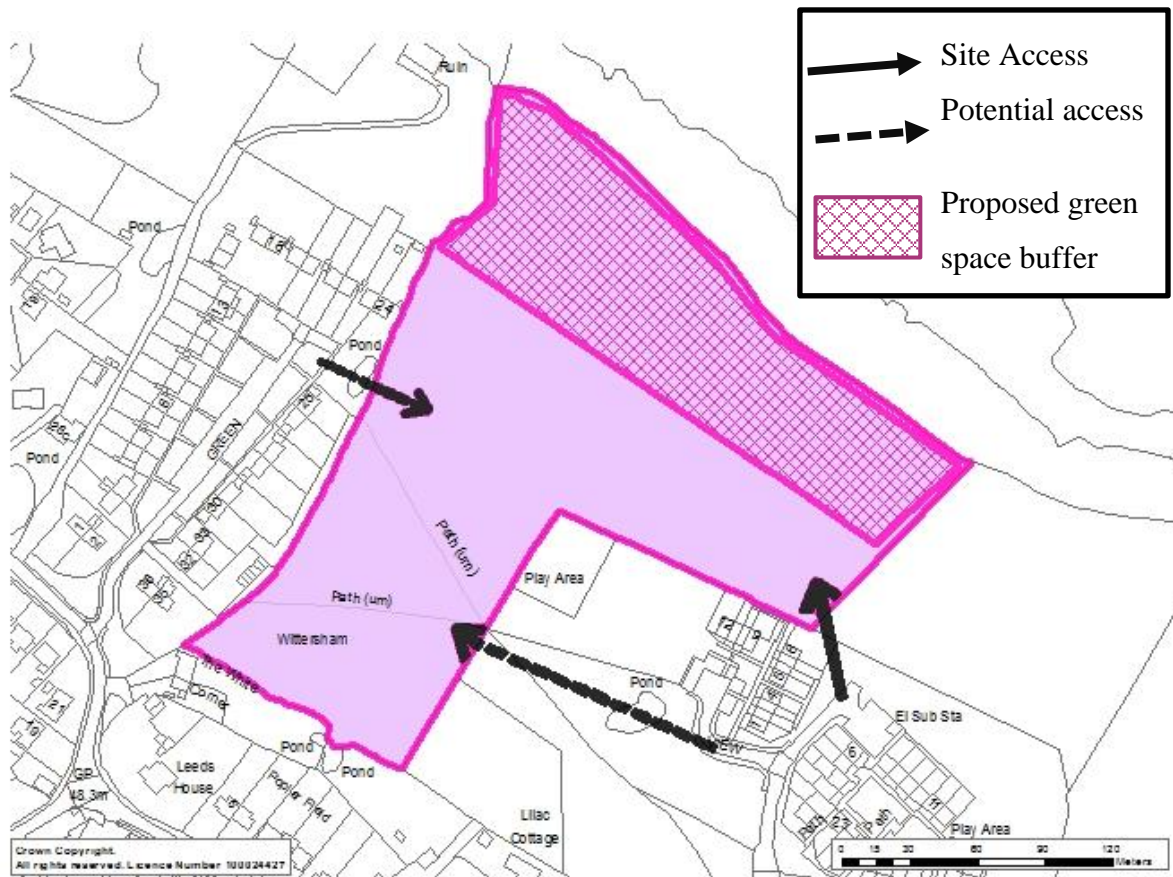
Policy S60 - St.Michaels, Land at Pope House Farm

The site at Pope House farm is proposed for residential development with an indicative capacity of 50 dwellings.

Development proposals for this site shall:

- a) Be designed and laid out in such a way as to protect and enhance the character and setting of the adjoining listed building and associated properties. Particular attention also needs to be given to the eastern area of the site, where it adjoins the open countryside and is visible in the wider landscape. Densities should reflect the surrounding character of these locations and overall the site density should be around 30dph;**
- b) Provide primary vehicle access on Ashford Road, as shown on the policies map;**
- c) provide new pedestrian routes throughout the development and connections to existing urban and rural routes and local services, with the potential of a pedestrian crossing explored with the Highway Authority;**
- d) Retain the existing mature trees and hedgerows boundaries where possible and enhance the planting in the north eastern areas, to screen the development of the site from the wider countryside and create additional soft landscaping throughout the site to lessen the visual impact of the development;**
- e) Provide appropriate ecological mitigation and provision of ecological corridors through the site and an area of open recreation space in the northern areas of the site which are not identified for residential development;**
- f) Provide a connection to the nearest point of adequate capacity in the sewerage network, in collaboration with the service provider.**

Wittersham, Land between Lloyds Green and Jubilee Fields



4.537 This site is located on the northern edge of the settlement of Wittersham, between Lloyds Green, a residential cul-de-sac in the west, and Woodland View, a small residential close accessed off the larger Forge Meads and Jubilee Field cul-de-sac. The site wraps around the north and west of open recreational space, a large informal sports field with an equipped play area in the northern corner. The boundary between the site and the recreation space is currently defined by an established hedgerow, but there are two informal footpaths which cross the open space and link Lloyds Green and Forge Meads for pedestrians.

4.538 There is currently no vehicle access between the two residential cul-de-sacs, and due to the piecemeal housing additions in Forge Meads, which have extended the close numerous times, there are identified highway concerns. Development of this site provides an opportunity to link the two cul-de-sacs together with a link road running from Jubilee Field to Lloyds Green. This proposal has the support of the local Highway Authority as it removes the problems associated with single access points to large residential cul-de-sacs in an emergency situation. The options for the proposed link road are shown on the policies map.

- 4.539 Along 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. This woodland extends 400m or more to the east, west and north of the site, providing screening to the majority of the site from the wider countryside setting. On the northern parcel, to the east of the site is open countryside and agricultural fields, and at this point there is no planted boundary between them.
- 4.540 The whole settlement lies within the designated High Weald Area of Outstanding Natural Beauty (AONB), and therefore development proposals for this site must conserve the natural beauty of the landscape. The significant woodland screening along the northern boundary, and the limited views of the site from the main road in the settlement and the wider area, provide an opportunity to deliver additional housing in this settlement, which does not significantly impact on the views and setting within this important landscape designation.
- 4.531 However, from the east, there is some visibility of the site from the wider area particularly from a PROW footpath that leads from Jubilee Field, and therefore it is proposed that the development footprint of this site must not extend up to the woodland edge of the site boundary, leaving a minimum of a 50m green buffer between the built edge and the woodland, indicatively shown on the policies map. This buffer also enables protection and mitigation of the effects of development on the Ancient woodland and LWS, and could be enhanced as an informal green space and ecological mitigation area.
- 4.532 Based on the requirements for the buffer area in the north of the site and the link road requirement across the site, the remaining developable area of the site is around 2.5ha, and therefore the site is proposed for a residential development of around 40 dwellings. This would result in a density of less than 20dph, which is appropriate and suitable with regards to the AONB location and reflects local character and density.
- 4.533 Given the character and appearance of the surrounding areas and the AONB location, a scheme of 2 storey buildings would be most appropriate here. The design and layout must take account of the residential amenity of neighbouring occupiers, particularly where they will be in close proximity to the new link road access points. Although located some distance from the Conservation Area, there are two semi-detached properties adjoining the south west corner of the site which are Listed (The White Cottage and Corner Cottage). Development proposals for this site must ensure that the setting of these heritage assets is conserved.
- 4.534 Dwellings should be orientated to enable overlooking and natural surveillance to the village recreation area where possible, and should also front the link road. A mix of unit sizes and types will be required here in accordance with policy ** but the larger detached properties should be generally located at the northern / north-eastern parts of the site where the impact on the wider landscape is most sensitive. It is important that the eastern boundary is sensitively developed to mitigate any visual impact from new development. A lower residential density will be appropriate in this part of the site and a landscaping scheme that 'breaks up' the urban edge created by built development here will be necessary. This should include the planting of some mature trees to create screening in the short-term.
- 4.535 Due to the close proximity to the public open space and equipped play area adjacent to the site, there are opportunities to upgrade this provision and provide enhancement to the current un-adopted pathways through the area, creating enhanced pedestrian access around the village.

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

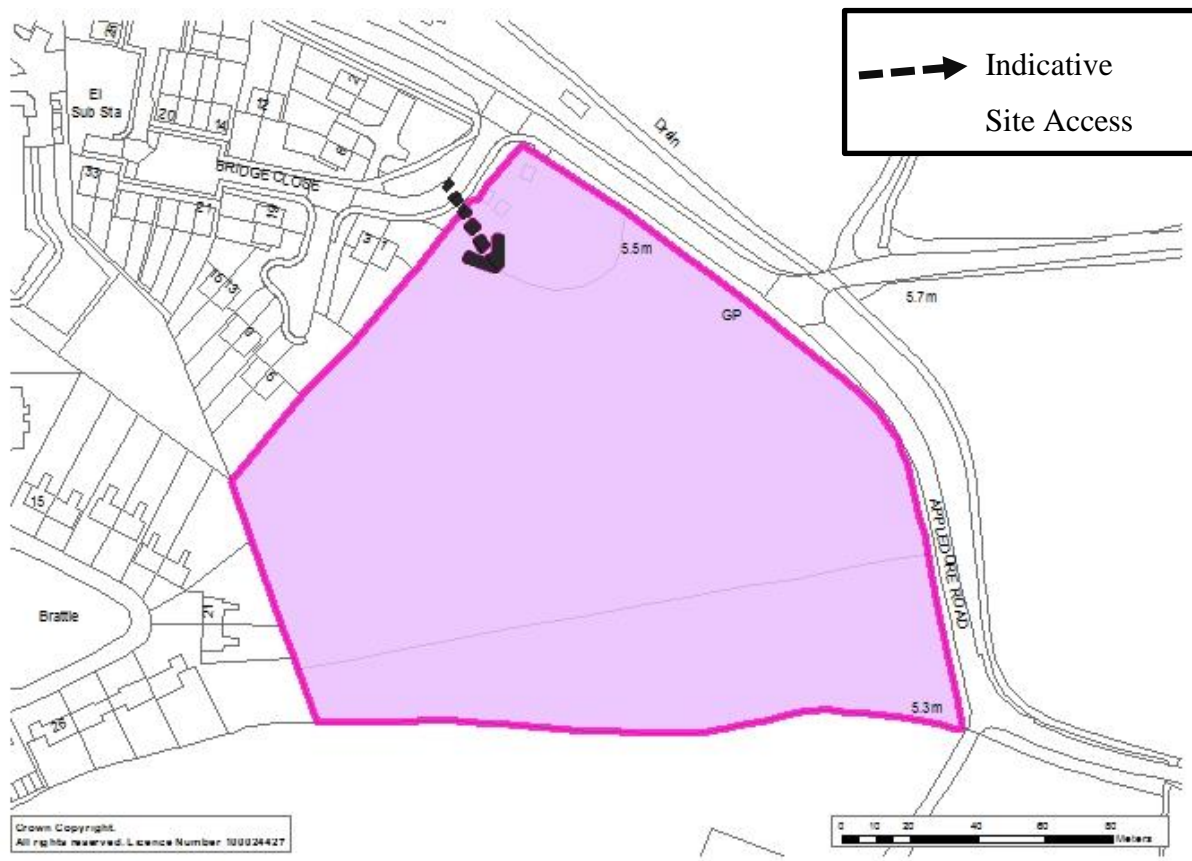
Policy S61 – Wittersham, Land between Lloyds Green and Jubilee Fields

The site between Lloyds Green and Jubilee Fields is proposed for residential development with an indicative capacity of 40 dwellings.

Development proposals for this site shall:

- a) **Provide a minimum buffer of 50m between built development and the woodland edge to the north, to conserve the Ancient woodland and LWS designations, and limit views of the development from the PRoW and wider AONB landscape to the east. This buffer provides an opportunity to create informal greenspace and ecological mitigation if required;**
- b) **Be designed and laid out in such a way as to conserve and enhance the character and setting of the AONB and adjoining listed buildings, and must take account of the residential amenity of neighbouring occupiers, particularly those in close proximity to the access roads. Dwellings should be a maximum of 2 storey and orientated to enable overlooking and natural surveillance of the adjoining public open space area, and should also front the link road;**
- c) **Provide dual primary vehicle access from Lloyds Green, and one of the options in Jubilee Fields as shown on the policies map, creating a through link road between the two areas;**
- d) **Provide a landscaped boundary along the eastern edge of the northern parcel of the site, which should include mature tree planting in the short term to lessen the visual impact of the development, from the wider countryside;**
- e) **Provide a connection to the nearest point of adequate capacity in the sewerage network, in collaboration with the service provider;**
- f) **Upgrade and enhance the adjoining open space and equipped play area provision if required and enhance pedestrian access around the area to a more formal arrangement than the current un-adopted pathways;**
- g) **Provide new pedestrian and cycle routes throughout the development and connections to existing routes and local services;**
- h) **Provide future access to the existing sewerage infrastructure for maintenance and upsizing purposes.**

Woodchurch, Appledore Road



- 4.537 This site is located to the south east of the settlement of Woodchurch, adjacent to Bridge Close, with frontage onto Appledore Road. This is one of the main roads into the village and is also an important route between the larger settlements of Tenterden and Hamstreet (B2067).
- 4.538 The site is an agricultural field, currently used for grazing. On the north eastern boundary of the site is an agricultural vehicle entrance onto the main highway, and a small copse. Within the copse there appears to be building debris and sheds in disrepair and the area appears not to be maintained. There is a mature hedgerow boundary around the perimeter of the site.
- 4.539 To the south is a large double gabled corrugated iron farm building and beyond this, open countryside and farmland. To the north west of the site is a relatively recent local needs housing development, Bridge Close, with a large 4 storey care home beyond it which also fronts Appledore Road. To the south west is a residential close, Brattle, which is accessed on the opposite side of a 'loop' in the highway network. Development of this site would complete the current built form within the 'loop' and therefore is a natural extension to the settlement form in this part of the village.
- 4.540 At over 1.7 hectares in size, development of this site will provide around 30 dwellings, including a mix and range of housing in accordance with policy HOU18. Development would be of low density (under 20dph), which reflects the location and adjacent countryside setting.

- 4.541 Given the character and appearance of the surrounding areas, a scheme of 2 storey buildings would be most appropriate here. The design and layout must take account of the residential amenity of neighbouring occupiers. Particular attention needs to be given to the topography of the site. The design of proposals coming forward should reflect the 'guidelines' set out in the Woodchurch Village Design Statement.
- 4.542 Access must be provided from Bridge Close, as shown indicatively on the policies map. This has been identified as a specific requirement by the Local Highway Authority due to the unsuitability of the Appledore Road entrance visibility and proximity of nearby junctions. Pedestrian footways should be provided throughout and link with existing footways in Bridge Close.
- 4.543 Vehicle access and the pedestrian footway may require removal of the copse, but there is an opportunity to improve the appearance of this area, whilst retaining some of the trees. There is one mature tree on the road frontage which must be retained as it is an important feature at the entrance to the village. The hedgerows around the site boundary must also be retained and enhanced where possible, to provide screening to the development. This should include the planting of some mature trees around the southern and eastern boundaries.
- 4.544 Southern Water's assessment has revealed that additional sewerage infrastructure would be required to serve the proposed development. The development will therefore be required to make a connection to the nearest point of adequate capacity in the sewerage network. Early liaison should take place with the service provider in this regard.

Policy S62 – Woodchurch, Appledore Road

The site in Appledore Road is proposed for residential development with an indicative capacity of 30 dwellings. Development proposals for this site shall:

- a) **Be designed and laid out in such a way to reflect the edge of countryside location and take account of the residential amenity of neighbouring occupiers. Particular attention needs to be given to the topography of the site and rising land. Dwellings should be no more than 2 storeys and design of proposals should reflect the guidelines set out in the Woodchurch Village Design Statement;**
- b) **Provide primary vehicle access from Bridge Close, as shown indicatively on the Policies map;**
- c) **Provide new pedestrian footways throughout the development and connections to existing routes;**
- d) **Retain the mature tree on the road frontage and the hedgerows around the site boundary and enhance where possible. This should include the planting of mature trees around the southern and eastern boundaries to create screening;**
- e) **Provide a connection to the nearest point of adequate capacity in the sewerage network, in collaboration with the service provider;**
- f) **Provide future access to the existing sewerage infrastructure for maintenance and upsizing purposes.**

CHAPTER 5 - TOPIC POLICIES

SECTION A - HOUSING

Affordable Housing

- 5.1 The National Planning Policy Framework requires local planning authorities to ensure that Local Plans meet the full, objectively assessed need for market and affordable housing in the housing market area. Where there is an identified need for affordable housing, policies must be set to meet this need on site or where robustly justified through an off-site contribution of broadly equivalent value. The NPPF states that such policies should be sufficiently flexible to take account of changing market conditions over time.
- 5.2 The Council's 2014 Strategic Housing Market Assessment (SHMA) establishes that around 50% of all future houses delivered in the borough should be affordable, in order to meet our 'full' objectively assessed housing needs. However it also states that this figure is unlikely to be delivered on the ground, mainly due to the housing market's inability to deliver it.
- 5.3 This conclusion is supported by whole plan viability testing that has been carried out in support of this Local Plan, which tested various levels of affordable housing requirements, including different thresholds and tenure mixes. The policy has been set at a level which is considered deliverable in terms of viability, when tested alongside all of the other policies set out in this Local Plan, balanced against the need to maximise potential affordable housing delivery to meet the identified need.
- 5.4 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.
- 5.5 The provision of affordable home ownership products set out in this policy has been set in line with the government's current position as set out in the Housing White Paper in that all sites of 10 units or more (or 0.5 ha or more in size) will provide for a minimum of 10% of such dwellings. 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.
- 5.6 The viability evidence demonstrates significant variation in the viability of residential development across the Borough, which is mainly due to variations in sales values. The requirements for affordable housing have therefore been set at different levels across the value areas of the Borough in order to ensure development is viable and can be delivered. These areas are shown on the map in Chapter 7. 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.
- 5.7 Ashford Town area covers the wards of Victoria, Aylesford Green, South Willesborough, Norman, Beaver and Stanhope. The viability evidence shows that developments in this area can only deliver 20% home ownership products. As an exception to this, higher density

flatted development is not viable at this level of starter home provision, and it is therefore proposed that such development will not be required to provide any affordable housing.

- 5.7.1 In a case of flatted development which is being promoted as Build to Rent, consideration will be given on a case-by-case basis, through the provision of independently verified viability evidence, to its ability to deliver affordable private rented housing, up to a maximum of 20% of total dwellings.
- 5.8 Ashford Hinterlands area covers the wards of Godinton, Bockhanger, Stour, Bybrook, Little Burton Farm, Kennington, North Willesborough, Highfield, Park Farm North, Park Farm South, Singleton South, Washford, Great Chart with Singleton North, the southern area of Boughton Aluph and Eastwell, the northern part of Weald South and the eastern area of Weald East. In this area, development can support up to 30% affordable housing, with 2/3 of this provided as affordable home ownership products, and 1/3 affordable/social rent.
- 5.9 Rest of Borough includes the villages and rural area covering the wards of Saxon Shore, Wye, Downs North, Downs West, Charing, Weald North, Weald Central, Biddenden, Rolvenden and Tenterden West, Tenterden South, St Michaels, Tenterden North, Isle of Oxney. The northern area of Boughton Aluph and Eastwell, the western area of Weald East and the southern area of Weald South. This area has the potential to support higher levels of affordable housing, and it is proposed that development within this area will provide a minimum of 40% affordable housing, with 3/4 of this provided as affordable home ownership products, and 1/4 affordable/social rent.
- 5.10 In line with national policy, the provision of affordable housing will normally be expected to be provided on-site. Where this is not possible, specific justification will need to be provided.
- 5.11 Given that this Plan has been subject to much more stringent viability testing than previous ones, and the policy has been framed from this evidence, it is expected that the number of applications where viability issues are identified should significantly reduce, and it will certainly not be expected as the norm.
- 5.12 Site specific circumstances will need to be clearly set out in any case being put forward. This will not include where land has been purchased speculatively above realistic threshold land values.
- 5.13 Whilst the viability testing has considered impacts of changing market conditions, it is impossible to predict what may happen within the housing market in the future. Should market conditions shift dramatically from those assumed within the viability assessment, flexibility in provision of affordable housing will be allowed for these reasons.
- 5.14 Where the requirements of this policy are proposed not to be met, viability evidence will be required to be submitted in support of an application and will be rigorously tested by independent advisors, paid for by the applicant. In these circumstances the Council will consider on a case-by-case basis flexibility in the provision of affordable housing, including whether changes are needed to the tenure mix or the overall level of affordable housing, whether a financial contribution is justified to provide equivalent provision elsewhere or whether the application of the Council's deferred contributions policy (Policy IMP2) is justified.

5.16 The following policy seeks to maximise the provision of affordable housing to meet identified needs, taking into account the government’s proposals for affordable home ownership products, whilst ensuring the requirements do not put the delivery of the Local Plan at risk as a whole.

Policy HOU1 – Affordable Housing

The Council will require the provision of affordable housing on all schemes promoting 10 dwellings or more (and on sites of 0.5 hectares or more), with provision being not less than the area specific requirements set out in the following table. All proposals are expected to meet their full affordable housing provision on-site.

Area	Affordable/Social Rented Requirements (% of total dwellings)	Affordable Home Ownership Products (% of total dwellings)	Total affordable housing requirements (% of total dwellings)
Ashford Town*	0%	20% (including a minimum of 10% shared ownership)	20%
Ashford Hinterlands*	10%	20% (including a minimum of 10% shared ownership)	30%
Rest of Borough*	10%	30% (including a minimum of 20% shared ownership)	40%

All proposals will be expected to meet their full affordable housing provision on-site except in the following circumstances:

1. In the Ashford Town area*, flatted development (including the proportion of flats provided on a mixed flat and housing scheme) will not be required to provide any form of affordable housing. In the case of flatted development which is being promoted as Build to Rent, consideration will be given on a case-by-case basis, through the provision of independently verified viability evidence, to its ability to deliver affordable private rented housing, up to a maximum of 20% of total dwellings.
2. Should independently verified viability evidence establish that it is not possible to deliver the affordable housing as required by this policy, and the viability position is agreed by the Council; the Council will consider on a case-by-case basis flexibility in the provision of affordable housing, including through the consideration of the following options:

- a. **Change in the tenure mix required,**
- b. **Reductions in the overall proportion of affordable housing,**
- c. **Provision of an off-site financial contribution in lieu of affordable housing provision on site, to secure the equivalent provision of affordable housing off-site,**
- d. **A combination of the above,**
- e. **Deferred contributions in line with policy IMP2.**

If a site comes forward as two or more separate schemes, of which one or more falls below the appropriate threshold, the Council will seek an appropriate level of affordable housing on each part to match in total the provision that would have been required on the site as a whole.

** For boundaries see Affordable Housing Viability Areas Map in Chapter 7*

Local Needs / Specialist Housing

- 5.17 This policy applies to the delivery of local needs housing and specialist housing schemes. These are defined as:
- 5.18 *Local needs housing: Subsidised 'affordable' housing for people who have a genuine need and local connection to the area, as per the Council's housing procedure note.*
- 5.19 *Specialist housing schemes: A specific type of subsidised housing accommodation (self-contained or communal) to cater for more vulnerable local residents who have a genuine need and local connection to the area. It allows certain residents to live a higher quality of life near to where they have support or are where they are familiar with their surrounding area.*
- 5.20 Both these types of housing are normally delivered on sites that would not normally be permitted for housing development because they are subject to planning policies of restraint. Therefore a specific exception sites policy for promoting their delivery is required in the Local Plan.
- 5.21 The NPPF supports this position by setting out under Para 54 that LPA's should 'be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate.....(and) should in particular consider whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs.

Local needs housing

- 5.22 Ashford Borough Council, working with Housing Associations and Parish Councils has an excellent record of local needs housing delivery. Over 300 local needs homes have been completed since the 1990s and this has been achieved through various iterations of Local Plan policies where 100% of local needs housing is delivered on ‘exception’ sites.
- 5.23 In order to qualify as a local needs housing scheme, a proposal will need to meet all of the following criteria in that:
- it meets an identified housing need in the particular parish that cater for people who have a genuine local connection, in line with the Council’s Rural Local Needs Housing Guidance Note,
 - it provides local needs housing that is appropriate in terms of its tenure, type, size and cost to meet the needs identified,
 - the local need housing element is conditioned so that subsequent occupancy of the dwelling will be controlled by a binding agreement to ensure the property remains available to meet local needs in the future and does not only benefit the first occupier.
 - has the support of the relevant Parish Council.
- 5.24 Proposals may provide for one or more groups of people, although it should be noted that decisions on exception sites and the specific needs to be catered for are essentially local issues and the views of the local Parish Council will be taken into consideration. The requirements of a variety of groups of people that will be considered when assessing local needs is set out under the Council’s Affordable Rural Local Needs Housing Guidance note.
- 5.25 The scale of any proposal for local needs housing will need to take account of:
- what affordable housing provision is planned nearby (on sites with planning permission or sites allocated in this Local Plan, including potential future starter homes) that could play a role in meeting some of the need identified and,
 - its sustainability in planning terms with regards the impact on the character of the area, the landscape setting, the local road network and the amenity of existing residents.

Specialist housing

- 5.26 The Council recognises that some residents within the rural areas require specialist accommodation to enable them to live a certain quality of life and where moving away to a more urban area is not always appropriate.
- 5.27 Where an identified need for specialist accommodation from a Parish or a group of Parishes that share a common need for such accommodation is identified, the Council will consider the use of exception sites to bring forward carefully planned and designed schemes that meet the needs of a specific client group from within the local area. Where applicable, this could also involve specialist accommodation needs from outside the Borough boundary where there are linked with the needs from parishes within the Borough.
- 5.28 Such schemes could be brought forward for a range of vulnerable people. This varies from main local needs (as set out above) in that any proposals will be developed for a specific

client group whose needs may require a degree of communal facilities incorporated together with the provision of self-contained accommodation.

- 5.29 The Council will support and encourage Parish Councils to work collectively to identify specific needs, appropriate sites and delivery partners to bring forward specialist housing to serve residents of rural communities in the Borough.

Delivery of local needs/ specialist housing

- 5.30 It is expected that local needs/ specialist housing schemes are delivered without any cross subsidy from the market being required. This approach has been the mainstay of the Council's policy in the past and has not, in the large majority of cases, adversely affected the delivery of local needs housing coming forward.
- 5.31 However, the Council accepts that in light of the reduction in government subsidy for Registered Providers (e.g. Housing Associations) and the requirement within the NPPF to provide a flexible policy approach to assist delivery, there may be occasions where cross subsidy might be needed to bring 'local needs' schemes forward. In this context there are several similarities with other issues of viability referenced in this Local Plan.
- 5.32 Any viability case will be rigorously tested by independent advisors for the Council. Where issues of viability demonstrably exist, the Council will adopt a hierarchical approach (as set out in the policy below) with regarding the nature of any cross-subsidising market housing.
- 5.33 Any enabling element of a scheme that is needed should fall within two targeted sectors of the housing market – starter homes and custom/ self-build properties. The merits of these schemes, and the desire for the Council to deliver these types of properties are set out under policies HOU1 and HOU6 within the Local Plan.
- 5.34 Focusing on these sectors of the housing market boosts their potential delivery and also maintains an element of 'affordability' to the overall approach which is consistent with the overall aim of this policy, even though these particular types of houses can't be conditioned to remain for local people in perpetuity.
- 5.35 Proposals which promote general market housing as a means of enabling the identified need element of a scheme will not normally be supported unless it can be demonstrated that there is an overriding planning benefit from its delivery (this includes where it is required to deliver a specialist housing scheme)* or where there is no other cross subsidy solution.
- 5.36 This is to avoid general market housing in the countryside in unsustainable locations – a key spatial aim of this Local Plan.

**For specialist housing schemes on exception sites where it has been demonstrated to not be viable to deliver 100% affordable housing, an element of open market sale could be incorporated in order to cross-subsidise the development as these schemes do not tend to lend themselves to starter home or custom / self-build housing. For example an extra care scheme for older people developed as a scheme with shared communal facilities and support services.*

Policy HOU2 - Local needs / specialist housing

Planning permission will be granted for proposals for local needs / specialist housing within or adjoining rural settlements identified under policy HOU3a as ‘exceptions’ to policies restraining housing development provided that all the following criteria are met:

- a) **the local need or requirement for specialist housing is clearly evidenced,**
- b) **the scheme has the support of the relevant Parish Council/s,**
- c) **the development is well designed, would not result in a significant adverse impact on the character of the area or the surrounding landscape and is appropriate to the scale and character of the village,**
- d) **there would be no significant impact on the amenities of any neighbouring residential occupiers.**

It is expected that all local needs/ specialist housing schemes will be delivered without the need for any cross market subsidy.

Where this is not the case a proposal will need to be supported by robust and transparent viability evidence that will be independently verified by the Council. Should a viability case be proven, the Council will accept an enabling amount of starter homes and /or custom build/ self-build plots as a means of providing the necessary subsidy to allow the identified need to be delivered, providing the proposal remains in accordance with criteria b) – d) above.

Proposals which promote general market housing as a means of enabling the identified need element of a scheme will not normally be supported unless it can be demonstrated that there is an overriding planning benefit from its delivery and that there is no other cross subsidy solution.

Residential Windfall Development within Settlements

- 5.38 Residential development which comes forward on sites outside of those allocated in the Local Plan are known as housing ‘windfalls’. Historically, the Borough has had a strong tradition of delivering housing windfalls and they will contribute towards meeting our objectively assessed housing needs (see Strategic Policies chapter 3).
- 5.39 In line with the NPPF and supporting PPG, it is important that suitable development opportunities for housing within the built-up confines of particular settlements are allowed to come forward. The scale and quantity of housing development proposed should not be out of proportion to the size of the settlement concerned and the level of services present.
- 5.40 This allows for a sustainable pattern of development across the Borough and avoids the environmental, social and economic impacts that typically occur where development is proposed that is out of scale with the settlement. This approach is consistent with the strategic distribution of allocated sites, identified under policy SP2 of this Local Plan.

- 5.41 Ashford is the largest settlement in the Borough and is clearly the most sustainable location, enjoying access to good transport links and a range of services, facilities and shops. Although there is currently limited available land in the urban area to develop that has not been allocated in this plan or is not already subject of a planning approval, it is likely that there will be opportunities for new development or infilling to come forward over the plan period.
- 5.42 The NPPF and PPG require that Local Planning Authorities promote sustainable development in rural areas to support the vitality of rural communities. Blanket policies restricting housing development in settlements should be avoided unless clearly supported by evidence.
- 5.43 New housing can enable rural communities to retain their existing services and community facilities and help to create a prosperous rural economy. However, a balance must be achieved between allowing new housing with the need to protect the character, form, heritage and attractiveness of the settlements themselves and the surrounding countryside.
- 5.44 Across the borough there are a number of settlements which play a service centre role in that they contain a number of services such as a primary school; a GP service; a community venue (such as a pub or a village hall); shops which are able to meet a range of daily needs and a commuter-friendly bus or train service. There are also a number of rural settlements which are smaller and play a more 'secondary' role, yet they still have a limited number of community facilities and services. These settlements often rely on the services of the nearby primary settlements or the town of Ashford and are therefore relatively 'accessible' in a rural context. 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.
- 5.45 The Borough's remaining rural settlements not mentioned in policy HOU3a below are not considered to play a service centre or secondary role on account of their small size and their lack of services and facilities (or proximity to these services/facilities). Residents of these settlements are typically reliant on the private car to meet all of their everyday needs. These settlements are considered to be countryside for the purposes of determining planning applications.

Important considerations

- 5.46 In order to ensure that windfall schemes are integrated properly within an existing settlement, all development proposals will need to show how they can complement the existing settlement character in terms of their layout, design, scale and appearance.
- 5.47 Many rural settlements include important green spaces or gaps within the built up confines that contribute to the form and attractive character of the settlement and any harm or loss of these areas should be avoided. Proposals promoting the development of residential garden land must also meet the requirements of policy HOU10 of this Local Plan.
- 5.48 Development proposals must also avoid causing significant harm to nearby local heritage assets and take into account environment, biodiversity and landscape considerations. Where proposals fall either within or within the setting of an AONB then the high level status of the intrinsic landscape value of the area will be an important material consideration.

- 5.49 Where proposals fall within an area that has an adopted village design statement that is supported by the Parish Council, schemes should be designed in accordance with the key principles contained within them.
- 5.50 Windfall residential opportunities within the rural area should focus on sites that are not in active use, particularly where those uses are contributing to the vitality of the area by providing employment or community facilities.

Settlement confines

- 5.51 The traditional approach taken to defining settlement confines in the Borough has been to rely on a written definition, rather than a boundary line drawn on a map. This can provide a more flexible approach to assessing windfall developments, particularly given the number of settlements within the Borough and given that the built-up confines may change over time in response to development coming forward.
- 5.52 This approach has been largely successful in controlling the release of sites for windfall residential development and over time the built up confines have become well established.
- 5.53 Therefore, and for the purposes of this Plan, the built-up confines of a settlement are defined as:
'the limits of continuous and contiguous development forming the existing built up area of the settlement, excluding any curtilage beyond the built footprint of the buildings on the site (e.g garden areas).'
- 5.54 This definition may, however, include sites suitable for 'infilling' which is the completion of an otherwise substantially built-up frontage by the filling of a narrow gap, usually capable of taking one or two dwellings only.
- 5.55 However, some communities have defined a 'village envelope' through the Neighbourhood Plan process, whilst mapping a settlement's built-up confines can also be achieved informally by Parish Councils through undertaking a 'village envelope' exercise working with the Borough Council and the local community. On satisfactory completion of this exercise, the Borough Council will informally endorse the defined village envelope and will treat this as a material planning consideration for the purposes of determining relevant planning applications.

Policy HOU3a - Residential windfall development within settlements

Residential development and infilling of a scale that can be satisfactorily integrated into the existing settlement will be acceptable within the built-up confines of the following settlements:

Ashford, Aldington, Appledore, Appledore Heath, Bethersden, Biddenden, Bilsington, Boughton Lees/Eastwell, Brabourne Lees/Smeeth, Brook, Challock, Charing, Charing Heath, Chilham, Crundale, Egerton, Egerton Forstal, Godmersham, Great Chart, Hamstreet, Hastingleigh, High Halden, Hothfield, Kenardington, Kingsnorth, Little Chart, Mersham, Molash, Newenden, Old Wives Lees, Pluckley, Pluckley Thorne, Pluckley Station, Rolvenden, Rolvenden Layne, Ruckinge, Sevington, Shadoxhurst, Shottenden, Smarden, Stone in Oxney, Tenterden (including St Michaels) Warehorne, Westwell, Wittersham, Woodchurch and Wye.

Providing that the following requirements are met:

- a) **It is of a layout, design and appearance that is appropriate to and is compatible with the character and density of the surrounding area;**
- b) **It would not create a significant adverse impact on the amenity of existing residents;**
- c) **It would not result in significant harm to or the loss of, public or private land that contribute positively to the local character of the area (including residential gardens);**
- d) **It would not result in significant harm to the landscape, heritage assets or biodiversity interests;**
- e) **It is able to be safely accessed from the local road network and the traffic generated can be accommodated on the local and wider road network;**
- f) **It does not need substantial infrastructure or other facilities to support it, or otherwise proposes measures to improve or upgrade such infrastructure;**
- g) **It is capable of having safe lighting and pedestrian access provided without a significant impact on neighbours or on the integrity of the street scene; and,**
- h) **It would not displace an active use such as employment, leisure or community facility.**

Where a proposal is located within, or in the setting of an AONB, it will also need to demonstrate that it is justifiable within the context of their national level of protection and conserves and enhances their natural beauty.

Housing Development Outside Settlements

- 5.56 In addition to residential windfall schemes within settlement confines, new housing outside settlement boundaries may also make a positive contribution to meeting housing needs across the borough. The NPPF is clear in its desire to promote sustainable development in general within the wider context of boosting housing supply, meeting a range of housing needs and using development as a means of improving the quality of a place and / or its setting.
- 5.57 In nearly all cases, isolated or remote sites in the countryside (especially on greenfield sites) will not be sustainable in NPPF terms and para. 55 of the NPPF specifically advises against permitting new dwellings in isolated locations unless it meets one of the specified exception criteria.
- 5.58 However, for proposals that adjoin or are close to existing settlements, it is necessary to consider the relative social, economic and environmental advantages and disadvantages of a scheme as these are the 3 dimensions of ‘sustainable development’ described in para. 7 of the NPPF.
- 5.59 In assessing proposals, the scale of a development will be a major factor to bring into this equation. For larger schemes, the importance of good accessibility to local services and facilities will be of particular importance taking account of the quality and number of such services and the ability to either benefit or be accommodated by such services. The cumulative effects of windfall schemes on local services and facilities having taken account of the impacts from any allocated sites in the area and any other developments with extant planning permission will need to be considered.
- 5.60 Although some reliance on the private car is inevitable in rural locations, the availability of good public transport links, cycling and walking routes can help to reduce that reliance and enable better accessibility to services that may only be available in higher-order rural settlements or Ashford itself. 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.
- 5.61 The impact of a scheme on the character of a settlement or rural area can be harder to quantify and, in essence, relates to the inherent qualities that help to define what makes a place and gives it an identity. This will vary from settlement to settlement taking account of its history and heritage and how it has grown over many years within its landscape setting. For example, larger-scale modern extensions to small rural villages have not traditionally been the means by which those villages have grown, especially those in locations away from the main local highway or public transport network.
- 5.62 A proposal for residential development must also demonstrate that it (and its associated infrastructure) is well designed and sited in a way that can: sit sympathetically within the wider landscape, enhance its immediate setting, be consistent with any prevailing character and built form, including its scale, bulk and the material used does not harm neighbouring uses or the amenity of nearby residents.

Isolated residential development

- 5.66 The NPPF clearly states that new isolated homes in the countryside should be avoided, unless there are special circumstances. Para. 55 of the NPPF lists a number of exceptions to the general rule of restraint and these are replicated in the policy below, alongside proposals for replacement dwellings. In considering applications for the re-use of redundant or disused buildings, proposals will need to demonstrate that the existing buildings have been on site for a number of years and are no longer needed for their current or previous use. Building shall have been appropriately maintained and not allowed to fall into disrepair as a prelude to suggesting an enhancement to the setting of the area.
- 5.67 Proposals for exceptional dwellings under criterion (iv) of policy HOU5 shall be subject to a rigorous and independent assessment of their design quality. The views of the Ashford Design Panel will need to be sought and where necessary, proposals amended to ensure their views are reflected. The architecture of a proposal and how that responds to the landscape character and setting of the site will be fundamental in establishing whether the scheme is genuinely exceptional or not.

Policy HOU5 - Residential windfall development in the countryside

Proposals for residential development adjoining or close to the existing built up confines of the settlements listed in policy HOU3a will be permitted providing that each of the following criteria is met:

- a) **the scale of development proposed is proportionate to the level of service provision currently available in the nearest settlement and commensurate with the ability of those services to absorb the level of development in combination with any planned allocations in this Local Plan and committed development;**
- b) **the site is within easy walking distance of basic day to day services in the nearest settlement;**
- c) **the development is able to be safely accessed from the local road network and the traffic generated can be accommodated on the local and wider road network without adversely affecting the character of the surrounding area;**
- d) **the development is located where it is possible to maximise the use of public transport, cycling and walking to access services;**
- e) **conserve and enhance the natural environment and conserve any heritage assets in the locality;**
- f) **the development (and any associated infrastructure) is of a high quality design and meets the following requirements:-**
 - i) **it sits sympathetically within the wider landscape,**
 - ii) **it preserves or enhances the setting of the nearest settlement,**

cont...

- iii) **it includes an appropriately sized and designed landscape buffer to the open countryside,**
- iv) **it is consistent with local character and built form, including scale, bulk and the materials used,**
- v) **it does not adversely impact on the neighbouring uses or a good standard of amenity for nearby residents,**
- vi) **it would enhance biodiversity interests on the site and / or adjoining area and not adversely effect the integrity of international and national protected sites in line with Policy ENV1.**

Isolated residential development in the countryside will only be permitted if the proposal is for at least one of the following:-

- a) **Accommodation to cater for an essential need for a rural worker to live permanently at or near their place of work in the countryside;**
- b) **Development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets;**
- c) **The re-use of redundant or disused buildings and lead to an enhancement to the immediate setting;**
- d) **A dwelling that is of exceptional quality or innovative design* which should be truly outstanding and innovative, reflect the highest standards of architecture, significantly enhance its immediate setting and be sensitive to the defining characteristics of the local area;**
- e) **A replacement dwelling, in line with policy HOU7 of this Local Plan;**

Where a proposal is located within or in the setting of an AONB, it will also need to demonstrate that it is justifiable within the context of their national level of protection and conserves and enhances their natural beauty.

****These proposals will be required to be referred to the Ashford Design Panel and applications will be expected to respond to the advice provided.***

Self-Build / Custom Build Development

- 5.68 The Council will support the principle of Self and Custom Build development as an opportunity to bring choice to the housing market as well as enabling local people to design and build their own home that will meet their bespoke needs.
- 5.69 The NPPF makes it clear that LPAs should identify and make provision for the housing *'needs of different groups in the community such as people wishing to build their own homes'*. 'Self-build housing' is identified by the Community Infrastructure Levy Regulations as a dwelling built by (or commissioned by) someone to be occupied by them as their sole or main residence for at least three years. Custom-Build homes encompass self-build but tends to be where individuals work with specialist developers to build their home.
- 5.70 This policy will contribute towards the availability of self and custom build plots enabling local residents to deliver high quality homes, as well as supporting the local economy providing work for builders and associated trades.
- 5.71 The establishment of a Right to Build Register and evidence gained from future SHELAAAs and SHMAAs will help inform the level of need for Self Build.
- 5.72 The Council will also support qualifying bodies in taking forward local self and custom build projects through the neighbourhood planning process, subject to the wider planning considerations within the strategic policies of the Local Plan.

Policy HOU6 - Self and Custom Built Development

The Council will support self and custom build development by requiring all sites within and on the edge of the towns of Ashford and Tenterden delivering more than 40 dwellings to supply no less than 5% of dwelling plots for sale to self or custom builders.

In the villages and rural areas sites delivering more than 20 dwellings must supply no less than 5% of dwelling plots for sale to self or custom builder.

The following criteria must be met:

- a) **Where this equates to more than 5 custom build dwellings on a single site a Design Brief should be submitted and agreed with the Council prior to the application being submitted;**
- b) **Where plots have been marketed for sale to self or custom builders for at least 12 months (to the satisfaction of the Council), and have not sold, the plot can return to the developer to be developed and/or sold as open market housing.**
- c) **Development proposals must be of high quality design and demonstrate a positive response to sustainable development.**

Replacement Dwellings in the Countryside

- 5.73 Proposals involving the replacement of existing dwellings in the countryside need careful management in order to protect the character and integrity of the rural landscape of the borough. Given that such forms of development encompass isolated new dwellings, which are an exception to the other policies of restraint, together with the protected status of much of the borough's countryside, design issues are of particular importance when proposals of this kind are considered. Developments in particular will need to ensure that any replacement dwellings sit sympathetically with the existing character and appearance of the local area in order to prevent overbearing and bulky replacement dwellings, whatever their scale or increase in footprint or mass.
- 5.74 Applications will therefore be required to justify the design approach to the replacement dwelling, its proposed scale, bulk and materials, its siting in relation to the surrounding built form, character of the street scene or the position in the landscape, highway access details, the impact on any neighbouring uses and residential amenity and any resultant implications for the extent of residential curtilage. In certain circumstances there may be a need to focus on scale, as a point of principle. These circumstances are likely to manifest themselves particularly in sensitive locations within the borough, such as the Kent Downs and the High Weald AONBs, Conservation Areas or where a dwelling would be clearly prominent in the landscape. Here scale might need to be restricted to respond to these particular sensitivities.
- 5.75 Usually the replacement dwelling will be required to be sited on, or adjacent to the site of the existing dwelling. However, where there is an opportunity to achieve a development with a reduced visual impact on the landscape or a reduced impact on neighbouring uses or occupiers by changing the siting of the dwelling, then this will be encouraged. In such circumstances, where the replacement dwelling is sited differently to the existing, the Council will seek through condition or agreement the demolition of the existing dwelling within 3 months of the occupation of the replacement, in order to prevent two dwellings remaining on site in contravention of policy restricting additional residential development in the open countryside.
- 5.76 Although the ability of the planning system to control larger extensions to properties has been much reduced in recent years, the importance of maintaining a housing stock comprised of a wide choice of properties catering for the needs of different groups in the community, remains enshrined in the NPPF (paragraph 50). To this end, replacement dwellings that are larger than the existing dwelling will usually only be granted planning permission subject to a condition withdrawing permitted development rights for residential extensions, in order to maintain the integrity of the policy's intentions and bring future alterations to the scale and nature of the new property within the control of the planning system.

Policy HOU7 - Replacement dwellings in the countryside

Proposals for a replacement dwelling will be permitted provided that the proposal:

- a) **is replacing an existing individual dwelling that has a lawful residential use; and,**
- b) **complements the surrounding built form and the character and appearance of the area and / or the existing street-scene; and,**
- c) **is sympathetic in terms of its scale, bulk, massing and the materials used; and,**
- d) **can be suitably accessed;**
- e) **does not harm the landscape, the functioning of neighbouring uses or the amenities of nearby residents.**

Where a replacement dwelling is proposed in a Conservation Area or a visually prominent position in the landscape, or within or adjoining an AONB, proposals will be required to address the specific sensitivities that are prevalent in these areas. Particular consideration will be given to the scale and wider impact of a replacement dwelling in these locations.

Where planning approval is given, planning obligations will:

- **remove ‘permitted development’ rights where a replacement dwelling has increased the floorspace of the existing dwelling,**
- **ensure that the existing dwelling is removed within 3 months of the occupation of the replacement dwelling (where an alternative location is proposed).**

Residential Extensions and Standalone Annexes

- 5.77 The enlargement of dwellings to accommodate additional living space is important in ensuring that the existing housing stock is suitable for the current and future residents of the borough. By modernising, adapting or enlarging an existing dwelling its life can be significantly extended, which in turn, contributes to the future sustainable development of the Borough. Small scale extensions and alterations to properties have in recent years often become categorised as 'permitted development' under the provisions of the Town and Country Planning General Permitted Development Order 2015.
- 5.78 Where an extension requires permission, the Council requires that the scale and visual impact of such development is appropriate in relation to both the existing dwelling and the surrounding area and that the living conditions of neighbours are not adversely affected. To this end, alterations and extensions should be designed to complement the scale, massing and materials of the existing building, preserve and features of interest, provide a satisfactory relationship between the old and new fabric and not lead to overlooking, overpowering or overshadowing of neighbouring properties. Therefore, when assessing proposed extensions, account will be taken of the potential impact of the extension on the living conditions of any neighbouring occupiers and on any other adjacent uses, its impact on the character of the existing dwelling and its setting in the landscape, including its contribution to the street scene.

5.79 In AONBs and Conservation Areas, particular attention will be paid to the size and design of extensions. In these protected locations it is more likely that only smaller extensions which clearly present as subordinate to the main dwelling will be acceptable. Applications will need to demonstrate that particular attention has been paid to the design of extensions to the roofspace, which should be kept as simple as possible. Throughout the borough, where very small rural dwellings are proposed for extension, the standard of the existing accommodation will also be taken into account.

Policy HOU8 - Residential Extensions

Proposals for extensions to dwellings will be permitted if each of the following criteria is met:

- a) **the existing dwelling² enjoys a lawful residential use; and**
- b) **the proposed extension would not materially harm any neighbouring uses including the living conditions of adjoining residents; and,**
- c) **the proposed extension is suitable in size, scale and built form to the existing dwelling to which it should be physically linked; and**
- d) **the proposed extension is designed sensitively to avoid harm to the overall character or street scene of the surrounding area and the landscape and the distinct features of the landscape character area in which it is located.**

Annexes

- 5.80 Annexes which are physically linked to the main dwelling will be determined against Policy HOU8 including in schemes where they contain all the facilities essential for independent residential occupation.
- 5.81 For all annexe schemes (attached or standalone) a planning permission is likely to be conditioned to ensure that the annex in question remains used for its intended purpose. This is to avoid an annex becoming an independent and separate residential unit at some point in the future without planning permission, particularly as the 'need' can only ever be for a temporary period (for example the need is lost once a relative dies or requires greater care than can be provided at home)
- 5.82 Standalone annexes will be supported where it can be demonstrated that there is a need for such a facility - for example to provide a home for elderly or infirm relatives unable to live independently, or for staff accommodation and that the standalone annex is sited appropriately and that it has a real and functional relationship between the occupation of the main dwelling and the annexe. It is unlikely that a standalone annex located outside the curtilage of the main dwelling, or without a demonstrable functional relationship with the main dwelling, will be supported in principle.

² The term 'existing dwelling' is defined as the property at the time of the planning application

- 5.83 Annexes within the curtilage of listed buildings or buildings that are a historical asset or are located within a conservation area, which have particular character are likely to be difficult to achieve in terms of satisfactory design. Where these proposals cannot be sited in an acceptable way beyond the curtilage of these buildings, such proposals will not be supported.

Policy HOU9 - Standalone annexes

Proposals for detached annexe accommodation to residential property will be permitted where;

- a) **the existing residential property enjoys a lawful residential use; and**
- b) **the proposed annexe would not materially harm any neighbouring uses; and,**
- c) **the scale and appearance of the proposed annexe is sympathetic and modest in proportion to the principal dwelling and site; and**
- d) **sited to achieve a clear dependency is retained between the annexe and the main building at all times; and**
- e) **the proposed annexe is designed sensitively to complement the existing dwelling and is clearly ancillary and visually subordinate to it in design and massing; and**
- f) **the proposed annexe would not have a harmful visual impact on the overall character of the surrounding area and/or the street scene or be visually intrusive in the landscape in which it is located**

Development of Residential Gardens

- 5.84 Much of the character and attractiveness of the Borough's towns and villages is derived from private garden areas. Residential gardens provide important breaks or gaps in built up frontages and in overall built massing, play an important amenity role by providing private recreational space for residents and providing important wildlife habitats and green networks particularly where the gardens are well established. Biodiversity levels in residential gardens are often cited as being higher than those in agricultural use. The Council is keen to reflect the value it places on such areas in policy.
- 5.85 Para 53 of the NPPF states that Councils should consider providing a policy framework to resist inappropriate development of residential gardens, although such an approach needs to be balanced against the objectives of sustainable development and of encouraging development in the first instance on land that was previously developed. Recent Court rulings have supported the exemption of private residential gardens in built up areas from the definition of previously developed land.
- 5.86 The uncontrolled loss of residential gardens can lead to a piecemeal and inappropriate pattern or style of development being delivered. This can individually or cumulatively erode openness, disrupt wildlife corridors, and harm the living conditions of neighbouring residents.

Policy HOU10 - Development of residential gardens

Development proposals involving the complete or partial redevelopment of residential garden land will be permitted provided the proposed development complies with the Council's external space standards as set out in Policy HOU15 and does not result in significant harm to the character of the area including:

- a) **The surrounding grain and built pattern of development including the prevailing building density, line, frontage width, building orientation, distance from the road, existing plot sizes and visual separation between dwellings;**
- b) **The surrounding built form comprising the scale, massing, height, design and materials of construction of the buildings;**
- c) **The wider landscape and/or the countryside setting;**
- d) **wildlife corridors and biodiversity habitats;**
- e) **The amenity of adjoining residents.**

Houses of Multiple Occupation

- 5.87 Houses in multiple occupation (HMOs) are properties which are occupied by unrelated households that share one or more facilities such as a bathroom or kitchens. HMOs can provide useful accommodation, but in many cases the property was not originally designed for such intensive residential use.
- 5.88 In 2010 government introduced a new use class (C4), which covers small shared houses or flats occupied by between 3 and 6 unrelated individuals who share basic amenities. Planning permission is generally not required for a change of use from a dwelling house (C3) to C4, as it is permitted under the General Permitted Development Order (GPDO). Large houses in multiple occupation (those with more than 6 people sharing) are unclassified by the Use Classes Order, and planning permission is required for a change use of from a C3 or C4 to a large house in multiple occupation.
- 5.89 The Council subsequently approved an Article 4 direction so that planning permission would still be required for a change of use from C3 to C4 in specific wards in Ashford. A loss of control over such changes is considered to harm the sustainability of neighbourhoods within Ashford over the long term. An increase in concentrations of HMOs in an area alters the population mix, impacting on the facilities and services that can be supported, as well as affecting residential amenity and social cohesion; and can give rise to noise, nuisance, more callers, a higher parking requirement and visual deterioration of buildings and gardens. These issues cannot be addressed successfully by neighbourhood management measures alone. In recent years HMOs have encroached into areas traditionally characterised by family housing.
- 5.90 The problems associated with high concentrations of HMOs have been recognised nationally, by residents and organisations, the press and by the government. The study 'Evidence Gathering-Housing in Multiple Occupation And Possible Planning Responses' carried out by Ecotec for the government in 2008 summarise the impacts as including:

- antisocial behaviour, noise and nuisance
- imbalance and unsustainable communities
- negative impacts on physical environment and streetscape
- pressures upon parking provision
- increased crime
- growth in private rented sector at expense of owner-occupier
- pressure upon local community facilities, and
- restructuring of retail, commercial services and recreational facilities to suit the lifestyles of the predominant population.

5.91 In Ashford, the principal impacts have been from noise and disturbance, impact on the environment from neglected gardens, litter, overflowing bins, and pressure on parking due to more people living in an HMO than would generally live in the same size house. The principal areas of concern in Ashford, and where the Article 4 direction has been put in place are:

- South Ashford where there has been a concentration of conversion to HMO of three storey properties in Beaver Ward. Some also have the ground floor garage converted into a separate flat. This has resulted in issues of noise, antisocial behaviour and parking pressures.
- Bushy Royds and Little Burton Farm where there has been increased pressure on parking on street,
- Drummond Grove, Adams Drive, Billington Grove, Rayworth Court and Stroudly Close where there is potential for the above mentioned impacts if additional HMOs are created.

5.92 The following policy sets out the criteria which will be considered when determining applications for new HMOs or when deciding whether to take enforcement action.

Policy HOU11 - Houses in Multiple Occupation

Proposals for Houses in Multiple Occupation (small or large) will only be permitted where the proposed development, taken by itself or in combination with existing HMOs in the vicinity of the site, would not result in an unacceptably harmful impact in respect of any of the following:

- Residential amenity, caused by increased noise and disturbance;**
- Highway safety, caused by insufficient onsite parking provision thereby resulting in an unacceptable increase in on street parking, or**
- Visual amenity, including that from inappropriate or insufficient arrangements for dustbin storage.**

Permissions granted will normally be subject to a condition that restricts the number of occupants allowed to reside at the property as their main residence.

Residential Space Standards

Residential Space Standards (internal)

- 5.93 The Council's supplementary planning document entitled 'Residential Space and Layout' adopted in 2011, provided guidance to support the Core Strategy 2008 Design Quality policy CS9. In part (g), policy CS9 requires flexibility, adaptability and liveability as aspects of the design quality. The Local Plan 2030 provides an opportunity to include detailed requirements concerning these aspects of design quality.
- 5.94 The Government has introduced a set of Nationally Described Space Standards to ensure consistency of approach across the sector and invited Local Planning Authorities to consider including them in their Local Plans. The national space standards cover internal space only and rather than return to a position of having no minimum space standards, the council considers that new developments should meet at least the national standards if design quality, flexibility, adaptability and livability standards are to be maintained.
- 5.95 The national space standards are based upon the areas required to accommodate essential furniture and storage items and the need for the occupants to be able to circulate around them. Good practice would be to exceed these standards where practical in order to provide a good range of accommodation.
- 5.96 The space standards help to ensure that new homes have sufficient space for the number of occupants they are designed to accommodate including storage of functional and personal items. Minimum bedroom sizes, floor to ceiling heights and storage space are included in the standards set out in the policy below.
- 5.96.1 The amount of space for cooking, living and eating is not defined in the new standards. The rooms used for those purposes are important areas for families to interact and usually include areas for play, study and storage as well as the basic functions of each of these areas. Although one large room is sometimes provided to accommodate all of these functions in homes designed for one or two people, this is not usually an appropriate layout for family occupation. At least two separate rooms, rather than one large room, should therefore be provided to accommodate cooking, eating and living in homes suitable for family occupation with three or more bedrooms. Provision of a separate room does not necessarily require any increase to the gross internal floor area.
- 5.97 It may, very occasionally, be necessary to make an exception to development meeting the national minimum standards, for example, in the case of the conversion of historic buildings where it may be desirable to maintain important and distinctive characteristics that contribute to the character of the building. However, without strong justification, proposals which do not comply with the standards are unlikely to be acceptable.

Policy HOU12 - Residential space standards (internal)

All new residential development, including dwellings created through subdivision or conversion, shall comply with the Nationally Described Space Standards set out in the table below

Table 1 Minimum gross internal floor areas and storage (m²)

Number of bedrooms (b)	Number of bedspaces (persons)	1 storey dwellings	2 Storey dwellings	3 storey dwellings	Built- in storage
1b	1p	39 (37) ¹			1.0
	2p	50	58		1.5
2b	3p	61	70		2.0
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	
4b	5p	90	97	103	3
	6p	99	106	112	
	7p	108	115	121	
	8p	117	124	130	
5b	6p	103	110	116	3.5
	7p	112	119	125	
	8p	121	128	134	
6b	7p	116	123	129	4
	8p	125	132	138	

Accessible and Adaptable

Accessibility standards

- 5.98 Local Planning Authorities are required by the NPPF to plan to create safe, accessible environments and promote inclusion and community cohesion, to take account of evidence that demonstrates a clear need for housing for people with specific housing needs and plan to meet this need.
- 5.99 In order to help to fulfil this requirement, all new dwellings created as ‘new build’, should be built to comply with a minimum of ‘level 2’ access (building regulations part M4 (2)). The Council had a good record of ensuring delivery of Lifetime Homes, the standards of which are now broadly reflected in the M4 (2) requirements, and houses built to this standard are designed to meet the needs of occupiers throughout their lifetime. Level 2 accessibility is intended to allow a home to be accessible by providing facilities such as space to manoeuvre a wheelchair, the availability of an entrance level WC with shower drainage and enough space for an entrance level bedspace. Level 2 homes are also built to be adaptable standards

so that additional facilities such as a stair lift or hoists can be easily fitted without major cost and upheaval.

- 5.100 The features of a level 2 accessibility home help to provide a safe, accessible living environment to those with reduced mobility due to accident, illness or age. Homes with this degree of accessibility extend the period of independent living, can reduce the length of a hospital stay and allow people to be cared for in their own home if the need arises. For those with permanent mobility problems, more specialised wheelchair accommodation provides greater freedom for independent living. Larger room sizes are required to enable greater ease for wheelchair dependent occupants.
- 5.101 In early 2017 the Council's Housing Register revealed that 7.5 percent of those requiring accommodation required dwellings built to M4 (3b) standard. For this reason, the provision of homes to this higher standard will be set as the maximum benchmark for the affordable rented element of a development.
- 5.102 In addition parking spaces provided in connection with M4(2) and M4 (3) dwellings may need to be larger to facilitate the increased access requirements, as per the current building regulations.

Policy HOU14 - Accessibility standards

Accessibility in compliance with building regulations part M shall be provided as follows:-

- a) **All 'new build' homes shall be built in compliance with building regulations part M4 (2) as a minimum standard.**
- b) **In 'new build' properties which are affordable, a proportion of wheelchair accessible homes complying with building regulations part M4 (3b) will be required. The number of homes built to M4 (3b) standards will be dependent upon the number of households on the Council's housing waiting list requiring wheelchair accessible homes and the suitability of the location for wheelchair users, and should be provided within the affordable rented element of the scheme, capped at a maximum of 7.5%.**

Private External Open Space

- 5.103 Ashford Borough Council's Residential Space and Layout SPD adopted in 2011 included guidance for providing residents with a private area of external space. The need for private outdoor amenity space as suggested by the Council's SPD was supported at appeal in 2015. The main issues in the appeal were considered to be harm to the character and appearance of the area and the unsatisfactory living conditions of future occupants in relation to the provision of private amenity space.
- 5.104 Outdoor private space is highly valued and it is important for both children and adults to have access to some private or at least, semi-private outdoor space for play and relaxation as well

as more practical requirements. In the case of non flatted developments, this can most easily be provided in the form of a private enclosed garden. The provision of a garden also makes it easier to provide outside covered storage for items such as bicycles, garden tools, garden furniture and outdoor toys.

- 5.105 In the case of flats, balconies or terraces/roof gardens may take the place of a garden. Easily accessible communal areas may be acceptable but lack the element of privacy, which is important for relaxation. Lack of outdoor private space will therefore only be acceptable if there are particular design features which mitigate against this lack of provision.
- 5.106 A private outdoor space is one which is not overlooked from the street or other public place. For a house or ground floor flat a garden with direct access is the best solution. It should accommodate an area for drying washing, for garden furniture and play space as well as planted areas to provide an attractive environment for residents. In order to accommodate these elements in a private garden attached to a house, a minimum area based on the 10m long 'rule of thumb' multiplied by the width of the dwelling provides a helpful starting point. The first 5m of this space should not be overlooked by surrounding properties. Another advantage of the 10m minimum depth is that it imposes a reasonable separation distance between properties where the rear windows face one another. However, where overlooking is not an issue, the standard can be flexible providing it can be adequately demonstrated that alternative solutions provide a sufficient area of usable private outdoor space.
- 5.107 A balcony or terrace on flatted developments can provide space for outdoor relaxation with the benefits of privacy, fresh air, extra living space and growing plants. The size of a balcony or terrace should reflect the number of occupants and in the case of a balcony should be at least 1.5metres in depth in order to accommodate a small table and chairs. The value of a balcony or terrace is partly dependant upon its aspect, privacy and outlook. A balcony close to a heavily trafficked road, with no sunlight and a poor outlook is of little or no value to the occupants. Lack of privacy and exposure to noise and fumes would also deter its use. A balcony should be easily accessible from the dwelling and preferably from a dining or living area.

Policy HOU15 - Private external open space

Unless drawings indicate alternative provision of private useable external open space, new dwellings, whether created as ‘new build’, subdivision or conversion shall be provided with an area of private open space in accordance with the table below:

Minimum sizes for individual private open spaces for flats and houses not overlooked from the road or other public spaces.			
Number of bedspaces	Minimum depth of balconies	Minimum area of private space per flat (balcony, roof garden or ground level patio)	Minimum depth of private garden area (the width will normally be the width of the dwelling)
1-2	1.5m	5m ²	10m
3	1.5m	6m ²	10m
4	1.5m	7m ²	10m
5	1.5m	8m ²	10m
6	1.5m	9m ²	10m

Traveller Accommodation

- 5.108 The need to plan for the housing requirements of the gypsy and traveller population is in line with Government guidance contained in the National Planning Policy Framework (NPPF) and its companion document 'Planning Policy for Traveller Sites'. These documents ensure that everyone, including members of the travelling community has the opportunity of living in a decent home.

Setting a Pitch Target fo Travellers in the Local Plan

- 5.109 The 'Planning Policy for Traveller Sites' (PPTS, August, 2015) sets out the Government's planning policy specifically relating to Travellers and this document has the main overarching aim: *"to ensure fair and equal treatment for Travellers, in a way that facilitates the traditional and nomadic way of life of Travellers while respecting the interests of the settled community"* (paragraph 3)
- 5.111 The 2015 PPTS³ replaced the 2012 PPTS, at the same time redefining the definition of who qualifies as a 'traveller'⁴. Under the new definition travellers who have ceased to travel are now excluded. The new definition defines travellers as: *"Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such"*

Objectively Assessing Local Traveller Need

- 5.113 Therefore, in order to achieve the overarching aim of Government policy the Council commissioned a Gypsy and Traveller Accommodation Assessment (GTAA) in 2013, which provided an Objectively Assessed Pitch Need (OAPN) in the borough. Then following the publication of the new PPTS the Council undertook a piece of work⁵, re-assessing the travelling habits of travellers using the GTAA raw data. This piece of work removed any travellers that no longer travel, to ensure that any future need is consistent with the requirements of the PPTS policy. The following assumptions have therefore been defined:
- 5.114 The GTAA outlined a pitch requirement of 57 pitches for the 15-year period 2013 - 2028. However, following reassessment of the base data a new OAPN requirement of 48 pitches between 2013 and 2028 can be established. As the Local Plan runs to 2030, on a pro rata basis this would result in a OAPN of 54 pitches by 2030.

How many pitches have been provided to date

- 5.115 The Council has a good record of delivering Traveller pitches on appropriate sites and since the GTAA was published 31 pitches have received full planning permission.

³ In accordance with PPTS, Annex 1 (4), the term "travellers" refers to "gypsies and travellers" and "travelling showpeople"

⁴ Ashford Gypsy and Traveller Accommodation Assessment Update Paper – Post PPTS (Aug 2015)

⁵ See ABC update paper (June 2016)

5.116 Using the new OAPN target above, this leaves a residual need to provide at least 23 pitches by 2030.

Achieving the Objectively Assessed Pitch Need (OAPN)

5.117 The council has considered whether all 23 pitches should be provided through site allocations to ensure the OAPN has been achieved from the outset. However, due to the current lack of suitable, available sites, this has not been possible. The Council is proposing to provide 7 pitches through site allocations, see policies S43 and S44.

5.118 Also, due to the substantial number of windfall sites that have been delivered since 2013, the Council considers that the remainder of the OAPN requirement is likely to be achieved via a windfall approach. For example, even a modest continued delivery of 2 windfall pitches per year would mean 30 new pitches over 15 years, more than meeting the required need.

5.119 Therefore, the most pragmatic approach for delivery of the OAPN would be to deliver pitches through a combination of windfalls and allocations. At the same time, to ensure resilience in this approach it is proposed to set out a criteria based policy, requiring the retention of all existing Traveller sites to ensure their continual supply in the market.

Traveller Windfall Policy

5.120 Ashford has a long history of delivering Traveller accommodation, especially through the provision of 'windfalls'. 31 pitches have been provided through this means since the publication of the Borough's GTAA. This Local Plan is allocating two sites to provide 7 pitches. Therefore, within this Local Plan there is a requirement to provide a minimum of 16 pitches through windfall sites in order to meet the OAPN. Because there is a shortfall of sites coming forward it is considered that the strategy of providing some pitches through windfalls maximises the opportunity for new sites to come forward without relying on a single means of provision, for example the allocation of new sites only.

5.121 A specific, clearly worded windfall policy enables the Council to deal with planning applications for Traveller sites on a site by site basis and would allow suitable sites to continue to be permitted provided they meet criteria set out in the policy. To this end, suitable sites, which are well-related to existing and proposed services and facilities and which would not adversely impact on a protected landscape or designated area, that may previously not have been identified have the opportunity to come forward in the plan period.

5.122 The 'windfall' policy below sets out a threshold to provide for additional small sites in the borough. This approach is consistent with the approach set out in the PPTS (Paragraph 10d), which states that in producing Local Plans, Local planning authorities 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'.

5.123 Local evidence, identified from the bi-annual gypsy count⁶ suggests that Travellers in Ashford tend to reside on small sites which accommodate their immediate and extended family. Coupled with the lack of available land identified in the GTAA and the long standing issues managing larger sites, a number of smaller sites spread throughout the district would

⁶ See ABC update paper (June 2016)

be a more effective means of providing sustainable and flexible accommodation to meet the need.

5.124 For example, The Council owned site at Chilmington Green, which has 16 pitches, often has empty and long standing vacant pitches, with Gypsies and Travellers stating themselves that they would rather live with their extended family than on a site which supplies pitches on the open market.

5.124.1 To address the accommodation needs of this group more fully, the Council will prepare a separate Gypsy and Traveller Accommodation DPD, as outlined within the 2017 Local Development Scheme (LDS).

5.125 Finally, the impact of new Traveller accommodation on existing communities and how well proposals can be integrated is an important consideration in the determination of applications for Traveller provision. New applications will need to adhere to the criteria in Policy HOU16 below to ensure that this impact is mitigated.

Policy HOU16 - Traveller Accommodation

Planning permission for new sites to accommodate Gypsy and traveller accommodation or accommodation for travelling showpeople will only be permitted outside of allocated sites if the following criteria are met:

- a) **The Council is satisfied that there is a clearly established need for the site and the proposals cannot be accommodated on an existing available site or allocated site;**
- b) **The site would not accommodate more than 5 pitches or make an existing site exceed 5 pitches in size;**
- c) **The site would provide a good living environment free from the risk of flooding and risks to health through contamination, noise or pollution;**
- d) **Occupation is limited to those meeting the definition of Gypsies and Travellers or Travelling Showpeople in the relevant national planning policy;**
- e) **Local services and facilities - shops, public transport, schools, medical and social services, can be readily accessed from the site;**
- f) **The site is capable of being provided with on-site services such as water supply, sewage disposal and power supply;**
- g) **The form and extent of the accommodation does not adversely affect the visual or other essential qualities of the AONB and its setting, SSSI, Ancient woodland, international, national or local nature reserve or wildlife site, or the key characteristics of a Landscape Character Area;**
- h) **Access to the site which does not endanger highway safety for vehicles and pedestrians can be provided;**
- i) **Proposals incorporate a landscape strategy, which will be required by use of planning conditions, where mitigation of the impact on the landscape is necessary to protect the quality of the surrounding landscape.**

Safeguarding existing traveller sites

- 5.126 It is important to protect existing Traveller sites from being developed for alternative uses whilst there is a need for such sites, as currently demonstrated by the GTAA (Gypsy and Traveller Accommodation Assessment). It is also important to safeguard these sites for future generations of gypsies and travellers. In particular it is important to safeguard the traveling showpeople site in Ashford as there is currently only one site in the Borough and the GTAA has established that no further sites are required at this time.
- 5.127 Therefore, any sites with existing lawful use as a Traveller site should not be lost to an alternative use, unless an alternative replacement site has been identified. Sites that have been granted a personal permission, to be inhabited by a named family, will not be safeguarded under this policy. Any new traveller sites granted planning permission and implemented shall also be safeguarded under provisions of this policy as long as the need for traveller accommodation within the Borough remains.

Policy HOU17 - Safeguarding existing Traveller sites

Existing permanent authorised gypsy and traveller sites and sites for travelling showpeople shall be retained for the accommodation of gypsies and travellers and for travelling showpeople as defined in the relevant National Planning Policy Document.

Any new gypsy and traveller sites granted permanent planning permission shall also be safeguarded under the provisions of this policy.

This policy may not apply if:-

- a) **There is a surplus of available accommodation over and above the required five year supply of sites,or,**
- b) **The site will be replaced by a site of similar proportions in an appropriate location which complies with the criteria listed in policy HOU16, or,**
- c) **A site has been granted a personal permission restricting residency to a named occupier or family.**

Providing a range and mix of dwelling types and sizes

- 5.127.1 The Council's Strategic Housing Market Assessment (SHMA) shows that a range of house types and sizes are required, to meet the Borough's housing need throughout the plan period. Delivering a range of house types and sizes also helps to create and foster sustainable communities, provides resilience to the housing market, increases choice and widens the opportunities for home ownership.
- 5.127.2 Therefore, proposals for ten or more dwellings will be required to provide an appropriate range and mix of dwelling types and sizes. The Council will work with applicants to determine the correct mix to be provided, based on the context of the site, design considerations and local need. Proposals will therefore need to have regard to:
- the Council's relevant and most up to date housing strategies, including the Strategic Housing Market Assessment, the Housing Strategy and any relevant surveys on local housing need,
 - the areas key characteristics and how any proposal will complement the existing built form and/or add variety where necessary,
 - the Council's policy on residential space standards, as expressed under policy HOU12,
 - the Council's guidance on the layout and design aspects of new dwellings, as expressed through the Residential Space and Layout SPD.
- 5.127.3 Proposals for a standalone older persons housing scheme, and flatted proposals will be exempt from providing a range of dwellings types. However, the proposed mix of sizes and tenure (where relevant) of these dwellings will need to be supported by evidence, as set out above.
- 5.127.4 All qualifying proposals are expected to provide an appropriate mix and range of dwelling types. However, should independently verified viability evidence establish that it is not possible to do so – and this position is supported by the Council – then a degree of flexibility could be applied.

Policy HOU18 - Providing a range and mix of dwelling types and sizes

Development proposals of 10 or more dwellings will be required to deliver a range and mix of dwelling types and sizes to meet local needs. The specific range and mix of dwellings to be provided should be informed by proportionate evidence that is robust, up to date and provides an assessment of need.

Development proposals for standalone older persons housing are exempt from this requirement and will be supported in principle where the need has been identified by extensive and robust evidence, and where they can be located in a suitable and sustainable way.

SECTION B - EMPLOYMENT AND THE LOCAL ECONOMY

- 5.128 Providing for employment and the local economy is a critical part of the overall strategy set out in this Local Plan. The strategic approach to employment delivery has been set out in policies SP3 and SP4. The following sections support the approach and includes detailed policies for the consideration of proposals for new employment uses in the towns, villages, and rural areas, as well as those which result in the loss of employment premises.
- 5.129 The development of the town centre is an integral part of the economic strategy of this Plan, as set out in Policy SP5. This section also includes detailed policies in relation to retail, leisure and other town centre uses. The NPPF requires local authorities to define the extent of town centres and primary shopping areas, based upon a clear definition of primary and secondary frontages and to set policies making it clear what uses will be permitted. This section also covers issues in relation to the sequential test for town centre development, as well as supporting and protecting local and village service centres.

New employment uses

- 5.130 The provision of new employment space is critical to the delivery of employment and jobs in the Borough. Policy SP3 sets out the strategic approach to the delivery of employment and identifies the strategic sites which are allocated for employment purposes. Other specific sites for employment development are identified with site policies in this Plan.
- 5.131 There are also other existing employment sites including those identified in the Employment Land Review 2016, which have not been specifically allocated, but which may provide potential for redevelopment, enhancement and reconfiguration. There may also be opportunities for employment development which have not been specifically identified and are not located in existing established employment locations.
- 5.132 It is important that new employment development occurs in locations which provide suitable access to the local road network, and can also be accessed by a range of means of transport. The following policy seeks to support such proposals, provided they are in sustainable locations, create additional employment and do not have any other adverse impacts. It is essential that appropriate provision is made to access the site and that sufficient car parking is provided.
- 5.133 The NPPF makes it clear that planning policies should support economic growth in rural areas and the Council's Rural Economic Assessment 2014 concluded that the current policy approach has been successful in delivering substantial rural employment opportunities. The study indicated that it could be possible to allocate additional sites but that a continuation of the current flexible policy approach that enables the market to determine the optimum location of additional employment space on an ad hoc basis regulated by planning generic policies. Hence, a suite of criteria based policies for new employment space provision, retention of employment space and extension of employment premises, provides a flexible and responsive approach to the delivery of appropriately-scaled employment opportunities in the rural areas.

- 5.134 New employment development should be provided at a scale that is appropriate to the existing settlement, without detriment to its amenity, character or setting. All new development should be of good design as required by Policy SP6.
- 5.135 It is important that the rural road network that supports new development is suitable for the scale and type of vehicle movements associated with new employment proposals. For example, significant numbers of HGV movements are unlikely to be appropriate along quiet rural lanes or in historic environments. Similarly, developments that would generate large amounts of traffic per se may be better suited to more sustainable locations where alternative means of transport may be more readily available.

Policy EMP1 – New employment uses

Provision of new employment premises, and the redevelopment, enhancement and reconfiguration of existing employment premises will be permitted within or adjoining the built-up confines of Ashford, Tenterden and the rural settlements, provided that:

- a) **the character and appearance of the settlement or surrounding landscape is not damaged significantly by the form of development proposed by virtue of its layout, building design and scale, the level or type of activity it generates, and the functional and visual relationship it has with adjoining uses;**
- b) **there would be no significant impact on the amenities of any neighbouring residential occupiers;**
- c) **appropriate provision can be made for parking and access; and**
- d) **any impact upon the local road network can be mitigated. In the rural settlements, it must be demonstrated that the development will not generate a type or amount of traffic that would be inappropriate to the rural road network that serves it.**

Loss or redevelopment of Employment Sites and Premises

- 5.136 The Council acknowledges that the changes that have been made to permitted development rights have meant that some buildings can be converted from a commercial use without the need for planning permission. Nevertheless there is still a requirement to retain, where possible, existing employment generating uses and to maintain the existing policy approach that has been in place for some time.
- 5.137 The NPPF stresses the importance of identifying a range of sites to facilitate a broad range of economic development, including mixed use development. The council believes it is necessary to make specific policy provision for the retention of the existing stock of employment premises in the town to complement the strategy of identifying areas for employment development.
- 5.138 With Ashford already home to approximately 53,700 jobs (BRES 2014), an important aspect of achieving the growth in jobs within the town will be the facilitation of growth in existing companies alongside new investment. The safeguarding of existing employment sites (B1-B8) within the urban area is important to retain a good supply and range of units in size, type and cost to enable local companies to continue to prosper. Smaller sites and units continue to

be the most vulnerable premises to competition from higher value land uses that do not create employment for the area.

- 5.139 The Employment Land Review 2016 includes an assessment of existing employment estates in the Borough.
- 5.140 In a few exceptional circumstances, the continuation of an employment use on a site may be inappropriate by virtue of, for example, an impact on the residential amenity of neighbouring occupiers, or an unsafe vehicular access. However, this judgement should be based upon the impact of a range of potential employment generating uses on the site and not solely that of the previous or most recent operations at the site.
- 5.141 Otherwise, for proposals involving the loss of employment floorspace, either an equivalent amount of floorspace must be provided at a suitable site elsewhere in the Ashford urban area, or it will be necessary for developers to provide robust evidence that the premises have been marketed unsuccessfully for a substantial period of time on reasonable terms. Whilst each proposal will need to be treated on its own merits with the context of the prevailing market conditions, as a guide, appropriate marketing for less than one year is unlikely to be considered sufficient. Evidence should be provided that the terms compare with other similar premises and locations being let or sold for employment uses within the local area. The extent of the marketing carried out will be an important factor in the weight given to the evidence.
- 5.142 In addition to marketing the site, developers will need to have carried out a viability assessment of the redevelopment potential of the site for any other types of suitable employment generating uses. These uses might include, for example, trade counter uses, motor dealerships, education and training facilities, or small scale leisure facilities not suitable for town centre locations. The viability assessment should consider not only the redevelopment of the site in the current market conditions, but also redevelopment of the site within the timescale of this Plan.
- 5.143 Where mixed use redevelopment proposals involving an element of residential development are proposed on an existing employment site, these will only be acceptable if they retain at least the equivalent amount of employment floorspace within the redevelopment scheme as was available on the existing site or otherwise meet one of the criteria in Policy EMP2 below.

Loss or Redevelopment of employment sites and premises in the rural area

- 5.144 Whilst there is a considerable supply of employment space in the rural areas, much of this tends to be in relatively remote locations and opportunities in and around the villages are generally limited. Whilst it is important to retain existing employment sites, a balance may need to be struck between the viability of the existing employment space and the continuing need for employment in the local area.
- 5.145 It is desirable to enable jobs to be provided locally to cater for the needs of residents in the Borough's rural areas and to avoid unsustainable patterns of commuting. Hence, in general, proposals for the loss of existing employment sites in or adjoining the more sustainable rural settlements will not be supported. However, the Council recognises that there may be two circumstances where a different approach can be justified.

- 5.146 As a main objective of the Council's policy is to retain local job opportunities, the replacement of an employment use with new employment space elsewhere that is of the same size or larger may be an acceptable mitigation to the loss of an employment site. However, in order to retain the link between the employment use and local residents, it is likely that only employment uses that are relocated within or adjacent to their existing rural settlement or the nearest rural service centre will be acceptable and only if it can be demonstrated that development of the selected site will not have a detrimental impact on any existing uses, the quality of the landscape or the character of the area. This will also help to deliver a more sustainable form of development by limiting the need to travel longer distances to employment locations.
- 5.147 When considering an application for the loss of an employment site, an assessment will need to be made as to the viability of the existing use or an alternative employment use. In order to demonstrate that a site is no longer viable for an employment use, the application must be supported by robust evidence that the premises have been marketed unsuccessfully for both the existing use and any alternative suitable employment use for a period of at least 6 months on terms that should compare with other similar premises and locations being sold or let for employment purposes. The extent of any marketing carried out and the prevailing market conditions will also be material considerations in the Council's assessment of viability evidence.

Policy EMP2 - Loss or redevelopment of Employment Sites and Premises

In the Ashford urban area:

Proposals for the loss or redevelopment of existing employment sites or premises (outside the town centre) will not be permitted unless at least one of the following criteria applies:

- a) **The site is no longer appropriate for the continuation of the previous or any other employment use in terms of its serious impact on the neighbouring occupiers or environment; or,**
- b) **It has been shown that the unit has remained unlet or for sale for a substantial period for all appropriate types of B class employment uses, despite genuine and sustained attempts to let or sell it on reasonable terms, and furthermore, that it will not be viable to redevelop the site for any appropriate types of alternative employment use within the Plan period; or,**
- c) **The premises are replaced with similar facilities within the existing site or elsewhere in the Ashford urban area, providing at least the overall amount of developable B class employment floorspace that would be lost to redevelopment.**

Within Tenterden and HOU3a listed villages:

Proposals for the loss or redevelopment of existing employment sites or premises in Tenterden or the villages listed in Policy HOU3a will not be permitted, unless;

- a) **they are replaced with the same-sized or larger sites or premises within or adjoining the same rural settlement, or at the nearest rural service centre, or,**
- b) **It has been shown that the unit has remained unlet or for sale for a substantial period for all appropriate types of B class employment uses, despite genuine and sustained attempts to let or sell it on reasonable terms, and furthermore, that it will not be viable to redevelop the site for any appropriate types of alternative employment use within the Plan period.**

Extensions to employment premises in the rural area

5.148 The NPPF indicates that Plans should support the sustainable growth and expansion of all types of business and enterprise in rural areas and in line with the conclusions of the Rural Economic Assessment 2014, the Council will, in principle, encourage and support proposals for extensions to existing employment sites within or adjacent to Tenterden and other rural settlements. Proposals for extensions to existing employment premises in the countryside will particularly need to demonstrate that they would not have a detrimental impact on the character of the landscape. In both cases, extensions to existing employment sites should demonstrate that they will have no individual and cumulative impact on the rural environment, either visually or in terms of traffic and overall activity levels that will be generated.

5.149 In exceptional cases, where a business is located as part of a well-established collection of industrial or business premises, and is accommodated in a converted building whose character would be unacceptably affected by a physical extension, new floorspace may be accommodated in a new freestanding building that is designed and sited so as not to compromise the character of the existing building or group of buildings or wider landscape.

Policy EMP3 - Extensions to Employment Premises in the Rural Area

Proposals to extend existing employment premises in the rural areas will be permitted, provided that the following criteria are met:-

- a) **the development can be integrated sensitively into its context, respecting the character of the landscape, existing historic and or architecturally important buildings and sites of biodiversity value;**
- b) **the proposal does not involve an extension to a previously converted building where that building has character that would be seriously affected;**
- c) **there would be no significant impact on the amenities of any neighbouring residential occupiers; and,**
- d) **it can be demonstrated that the development will not generate a type or amount of traffic that would be inappropriate to the rural road network that serves it.**

Conversion of rural buildings to non-residential uses

5.150 Many agricultural and other rural buildings may no longer be suitable for their original purpose or be surplus to requirements as farming practices change. Both individual and groups of rural buildings can play a valuable role in creating the character of the countryside in a positive way.

5.151 The NPPF supports the conversion of rural buildings to support sustainable growth and expansion of all types of business and enterprise in rural areas. The Council supports this approach in principle as this stock of buildings can provide a useful and viable means of enabling the local rural economy to evolve and diversify without requiring new buildings to be developed in sensitive rural locations. It is acknowledged that recent changes to permitted development rights mean that in some cases the change of use of agricultural buildings does not require planning permission.

5.152 Not all buildings in the rural areas are suitable for conversion because of their design for a particular purpose and / or their condition or location. Buildings must be realistically capable of conversion from their existing state and not require complete or substantial reconstruction. If this issue is in doubt, applicants must be able to produce adequate supporting information, usually a survey report and associated drawings, to illustrate the existing condition of the building.

5.153 Where a rural building is proposed to be converted for employment, non-residential tourism (i.e attractions), leisure or community related purposes, the Council will normally be supportive of such schemes, particularly where they are located adjacent to Tenterden or

another rural settlement. However, for this to be the case, the building to be converted must be of a permanent and substantial construction. It will also be important to consider the specific impacts of the proposal in respect of the proposed use(s). For example, in locations not within or adjacent to existing settlements, the scale and nature of the use proposed in terms of its floorspace and consequential potential trip generation should be limited according to the suitability of the local rural road network that serves the site, taking account of the nature of the vehicle movements that would result. In locations adjacent to settlements, a greater trip generation potential may be acceptable subject to the quality of the surrounding road network and any impacts on local residential amenities.

- 5.154 The Council has adopted supplementary planning guidance on the re-use of agricultural buildings which gives clear guidance on the design of building conversions. This guidance will continue to apply to proposals for conversions to ensure that the integrity and character of the existing building is retained where applicable. When planning permission is granted for a conversion, the Council will also usually remove permitted development rights to extend the building or erect additional buildings within its curtilage. Without this control, the architectural and historic integrity of converted buildings and the rural character of the countryside could be damaged.

Policy EMP4 - Conversions of rural buildings to non-residential uses

Proposals to convert rural buildings to employment, non-residential tourism, leisure or community-related uses will be permitted subject to meeting all of the following criteria:-

- a) **the building does not require complete or substantial reconstruction;**
- b) **the building is of a permanent and substantial construction;**
- c) **the building is to be converted in a way that preserves its integrity and character;**
- d) **it can be demonstrated that the development will not generate a type or amount of traffic that would be inappropriate to the rural road network that serves it; and,**
- e) **the scale and nature of the proposed use would not result in any significant adverse impacts on the character of any settlement or buildings, the surrounding landscape, its biodiversity value or the amenities of local residents.**

New employment premises in the countryside

- 5.155 New employment sites (i.e. not conversions) in the countryside will not be permitted unless exceptional circumstances can be demonstrated to set aside the normal presumption against such developments. Such circumstances may include the functional need for a countryside location, such as the processing of local agricultural products. New employment sites in the countryside will need to have regard to the need to protect countryside sites with specific, landscape, biodiversity or historic qualities.

Policy EMP5 - New employment premises in the countryside

Proposals for employment development on new sites in the countryside will not be permitted unless the following criteria can be met:-

- a) **it is essential to be located in the countryside;**
- b) **development can be integrated sensitively into its context respecting the character of any important existing buildings, the landscape setting and sites of biodiversity value;**
- c) **there would be no significant impact on the amenities of any neighbouring residential occupiers; and,**
- d) **it can be demonstrated that the development will not generate a type or amount of traffic that would be inappropriate to the rural road network that serves it.**

Promoting of Fibre To The Premise (FTTP)

5.156 The e-technology sector is undergoing major changes and the Government - through Broadband Delivery UK⁷ - is supporting investment to:

- provide superfast broadband coverage to 90% of the UK by early 2016 and 95% by December 2017,
- provide access to basic broadband (2Mbps) for all from December 2015,
- explore options to provide superfast coverage to the hardest to reach parts of the UK.

5.157 At the local level, the availability, reliability and speed of broadband provision is now a key consideration for house buyers and many view it as essential as the standard utilities. Similarly, it is also a key concern for the business sector.

5.158 Planning policy can play a role in helping to achieve the transformation in broadband. The NPPF clearly recognises this and supports the delivery of advanced, high quality communications infrastructure and the expansion of high speed broadband where possible.

5.159 Ashford has long been ahead of the national agenda in this regard. In 2008, the Core Strategy took proactive steps to prioritise communications infrastructure by ensuring that duct space was provided for fibre cabling on each new development in the urban area. In the 8 years since this policy approach was developed the fibre network in Ashford has received significant private and public sector investment and the fibre footprint in the Ashford borough has spread significantly. All of Ashford's exchanges are now fibre enabled.

5.160 The policy below builds upon this pioneering approach and challenges the market yet further to require fibre to the premise (FTTP) for all new developments, wherever practical. In doing so, the approach underpins one of the key principles of this Local Plan with regard to the utilisation, enhancement and expansion of existing infrastructure wherever possible.

⁷ The government department charged with delivering superfast broadband

- 5.161 FTTP is recognised by the Government and European Commission as a ‘Next Generation Access (NGA) technology⁸ and have prioritised investment accordingly. While superfast speeds can be achieved on current generation copper networks it is widely accepted that NGA technologies should be prioritised. By seeking FTTP, the Council are aiming to provide a futureproof solution for broadband delivery within the Borough.
- 5.162 Adopting this approach will prevent the need for fibre retrofitting programmes in the future which has significant cost implications and often results in attaching fibre to existing copper networks resulting in a less than optimum solution when compared to new fibre networks being delivered.
- 5.163 In the urban area, where the fibre network now exists, the cost of installing FTTP in new developments is considered to be relatively small particularly during the build phase of the development. Any costs (above BCIS assumptions) must also be balanced with increased sales values that are likely to be achieved on account of fast and reliable broadband speeds being available.
- 5.164 In the rural parts of the borough, there has been significant investment in rural broadband which has resulted in the fibre network stretching further into the rural area than ever before. As in the urban area this creates an opportunity for developments to utilise this asset to deliver FTTP in new developments.
- 5.165 However, the Council recognise that there are more challenges in terms of the viability of provision in the rural area and sometimes the ability to connect to the network is more difficult than in the urban area. With this in mind, the policy below is targeted towards schemes promoting 10 residential units or more and proposals that will deliver reasonably sized, or larger, employment uses.
- 5.166 Schemes that fall below these thresholds will be encouraged to deliver FTTP wherever practical to try to ensure that the Borough’s fibre network is delivered to its maximum capacity.
- 5.167 By implementing this policy approach, the Council is seeking to ensure that future developments remain at the forefront of advances in broadband technology, allowing Ashford to be a market leader and remain a highly attractive location for businesses and residents alike. This aspiration is a central component of the Council’s Five Year Corporate Plan.
- 5.168 However, in order to be consistent with the provisions in the NPPF, the Council recognise that there may be schemes that come forward which cannot fulfil the policy requirements as stipulated below. In such cases, evidence will be needed from the applicant to demonstrate that a departure from policy is justified. Such evidence could include (but is not limited to) issues of viability, the ability to dig the appropriate physical trench and proximity to the nearest breakout point on the fibre network.

⁸ Next Generation Access Networks: wired access networks which consist wholly or in part of optical elements and which are capable of delivering broadband access services with enhanced characteristics (such as higher throughput) as compared to those provided over already existing copper networks.’ Commission Recommendation 2010/572/EU of 20 September 2010 on regulated access to Next Generation Access Networks (NGA)

- 5.169 Where a FTTP solution is not deemed possible (and this position is accepted by the Council) provision of technologies capable of providing speeds in excess of 24Mbps should be delivered wherever practical.

Policy EMP6 - Promotion of Fibre to the Premises (FTTP)

All residential and employment developments within the Ashford urban area, including the site allocations promoted in this Plan which adjoin Ashford, will enable FTTP. In the rural area, all residential developments over 10 dwellings and reasonably sized employment proposals shall enable FTTP.

For schemes under these thresholds the Council's expectation is that provision for FTTP will be achieved, where practical.

Where it can be demonstrated that fibre to the premise is not practical due to special circumstances, then non Next Generation Access technologies that can provide speeds in excess of 24Mbps should be delivered wherever practical.

Retail, Leisure and Tourism

Ashford Town Centre Primary and Secondary Frontages

- 5.172 The NPPF requires local planning authorities to define a network and hierarchy of centres that is resilient to anticipated future economic changes.
- 5.173 The existing hierarchy of centres in Ashford Borough is set out below. It is proposed that through this Plan the existing hierarchy will be supported and maintained.
- 5.174 **Ashford Town Centre** – primary regional centre that serves the Borough's administrative area. As the largest service centre within the Borough it plays a key role as the commercial centre for the town and the surrounding rural area. It attracts visitors from across the Borough and beyond.
- 5.175 **Tenterden Town Centre** – secondary retail centre that offers a smaller range of shops and services to Ashford, but nonetheless attracts visitors from a wider area.
- 5.176 **Wye, Charing and Hamstreet** – village/local service centres, which perform the role of serving the day-to-day service top up shopping and leisure needs for local catchment areas
- 5.177 **Local Centres** – there are a number of other local centres, mainly rural village centres, across Ashford, which generally provide more limited day to day top-up shopping provision.
- 5.178 Ashford Town Centre also fits within a wider retail hierarchy, and faces strong competition from centres outside of the Borough, particularly Folkestone and Canterbury. This reflects the more limited range, choice and overall quality of the town centre's comparison goods offer compared to the competing centres. One of the main challenges for Ashford town centre will

be to maintain and strengthen its market share in the face of competition from out of centre facilities, larger neighbouring centres and the internet.

- 5.179 National Planning Policy requires Local Planning Authorities to define the extent of town centres and primary shopping areas, based upon a clear definition of primary and secondary frontages in designated centres, and to set clear policies that make clear which uses will be permitted in such locations.
- 5.180 The primary and secondary frontages have been defined following an assessment of the characteristics of Ashford Town centre, including an audit of existing uses within the town centre, taking into consideration recent trends and committed and future development proposals.
- 5.181 Ashford is focused around a compact core. The primary shopping street of the town centre is the traditional High Street, where retail uses are focused, and around 80% of existing units are occupied in retail use. The two shopping centres of Park Mall and Country Square shopping centres front directly on to the High Street, to the north and south respectively. These centres are dominated by A1 retail uses, and County Square is the main focus for major national multiples and Class A1 retailers in the town centre.
- 5.182 Secondary areas of Ashford Town Centre, which have a lower proportion of A1 uses, and are dominated more by service uses such as A2 uses, include the western end of New Rents, Bank Street and North Street.
- 5.183 With planning permission being granted for the cinema and restaurants on Elwick Road in the southern part of the town centre, Bank Street will become an important pedestrian route linking the proposed leisure-led scheme and the High Street. In this respect, it is proposed that once this has been developed it will become part of the Primary Shopping Area, as this is shown by an extension to the existing PSA on the map in Policy EMP7.
- 5.184 In the past, frontage policies for Ashford Town Centre have restricted the amount of non-A1 uses within the primary shopping frontages, and the amount of A2 uses within the secondary areas of the Town Centre. With the introduction of more relaxed permitted development rights there is much more flexibility around proposed uses, and planning permission is not required for changes between different class A uses.
- 5.185 Town centres are changing and will no longer be solely supported by traditional retail development, having to expand their offer to wider uses in order to maintain their vitality and viability. Ashford Town Centre is no different. Recent trends show that the proportion of Class A1 within the primary frontage of Ashford Town Centre has fallen, which reflects national trends and a more flexible and pragmatic policy approach to the definition of the primary and secondary shopping frontages is required.
- 5.186 It is therefore not considered necessary to restrict particular percentages of retail uses in certain areas. It is considered that the primary shopping frontages will remain the predominant area for class A uses, and that the secondary frontages will have a broader range of uses.
- 5.187 Residential development plays an important role in the vitality and viability of a town centre, bringing people into the town at different times of the day, increasing footfall and supporting

a more vibrant evening and night time economy. Residential development will therefore be supported in the town centre in suitable locations. However residential development on the ground floor within the Primary Shopping Frontage would be harmful to the economic health of the town centre. Proposals for change of use to residential within this area will therefore be resisted when considering applications for prior approval.

- 5.188 The following policy defines the locations of the primary and secondary shopping frontages in Ashford Town Centre, as well as the Primary Shopping Area, and sets out what uses will be permitted in such locations.

Policy EMP7 - Primary and Secondary Shopping Frontage in Ashford Town Centre

Primary and Secondary Shopping Frontages and the Primary Shopping Area are defined for Ashford Town Centre as set out on the Policies Map.

Within the Primary Shopping Frontages, development falling within Use Classes A1, A2, A3, A4 and A5 will be permitted.

Residential development will not be permitted on the ground floor within the Primary Shopping Frontage.

Within the Secondary Shopping Frontage, proposals for all town centre uses, including residential, will be permitted.

Tenterden Town Centre Primary and Secondary Frontages

- 5.189 Tenterden town centre is characterised by an attractive historic environment, and serves a sizeable rural catchment. Its shopping, leisure and service provision is focused around its historic linear high street, which has approximately 70 retail, leisure and service outlets. Its offer is distinctly different to Ashford and comprises a good mix of independent and specialist businesses trading alongside some high street brands. The good choice of high quality specialist shops in the town reflects its important role as a tourist and visitor destination, as well as serving its local population.
- 5.190 Tenterden also benefits from two food stores, which both help to underpin Tenterden's vitality and viability, by generating linked trips, footfall and expenditure to other shops and businesses in the town centre. It is therefore important for the role, attraction and trading performance of these two key anchor stores to be maintained.
- 5.191 The main shopping area is located along the traditional high street, on both sides of the road. It runs from Bridewell Lane to Recreation Ground Road on the south side of the High Street, and from Station Road to East Cross on the north side.
- 5.192 Previous policies for Tenterden Town Centre, have aimed to maintain a high concentration of A1 uses, by restricting proposals that would result in more than 35% of the length of particular primary frontages becoming non-A1 uses. Whilst the current mix of uses within the

centre makes for a well functioning and vibrant centre, given the recent extensions to permitted development rights, as with Ashford town centre, it is not considered appropriate to restrict uses by such a threshold, and in any event, this would have no practical effect.

- 5.193 No Secondary Shopping Frontage is proposed for Tenterden Town Centre. Due to the particular characteristics of the town centre, the Primary Shopping Frontage already contains the full range of town centre uses.
- 5.194 The following policy defines the locations of the primary shopping frontages in Tenterden Town Centre, as well as the Primary Shopping Area, and sets out what uses will be permitted in these locations.

Policy EMP8 - Primary Shopping Frontage in Tenterden Town Centre

Primary Shopping Frontages and the Primary Shopping Area are defined for Tenterden Town Centre as set out on the Policies Map and extract above.

Within the Primary Shopping Frontage, all town centre uses will be permitted, with the exception of residential, which will not be permitted on the ground floor of any unit.

Sequential Assessment and Impact Test

- 5.195 Both Ashford and Tenterden Town Centres are potentially vulnerable to increasing competition from out-of-centre retailing and the growth of internet shopping. There is a concern that existing retailers in the centres, particularly Ashford, could choose to take space in larger more modern units in out-of-centre locations. The loss of existing major retailers in the town centre would be significantly detrimental to the vitality and viability of the town centre. The provision of additional out-of-centre retail has the potential to have significant negative impacts on the town centres, further reducing the towns' market shares.
- 5.196 Local planning authorities are required by the National Planning Policy Framework (NPPF) to apply a sequential test to planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up to date Local Plan. The NPPF requires proposals for main town centre uses to be located in town centres, or if no suitable sites are available, then in edge of centre locations. Only if no sites are available, should out of centre sites be considered. When considering edge of centre and out of centre proposals, preference should be given to accessible sites that are well connected to the town centre. Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale.
- 5.197 The NPPF requires local plans to set policies for the consideration of proposals which cannot be accommodated in or adjacent to town centres. This policy sets out two key tests, sequential and impact test, which proposals for town centre development, located outside of the Primary Shopping Area (PSA), as defined in Policy EMP7 and EMP8, will need to meet in order to be considered acceptable.
- 5.198 The NPPF defines edge of centre locations as, for retail purposes, a location that is well connected and within 300 metres of the primary shopping area. For all other main town

centres uses, a location within 300 metres of a town centre boundary. For office development, this includes locations outside of the town centre but within 500 metres of a public transport interchange. It states that local circumstances should be taken into account when determining whether a site falls within the definition of edge of centre.

- 5.199 For the avoidance of doubt Policy SP4 does not over-ride the need for development proposals in edge of centre locations to accord with the following policy.
- 5.200 Proposals for development outside of the PSA will be required to demonstrate, by carrying out a Sequential Assessment, that there are no sites located within a more central location that would be suitable for the proposed development. Applicants will be required to demonstrate flexibility in respect of the format and scale of the proposed development.
- 5.201 The National Planning Practice Guidance (PPG) provides advice in setting locally appropriate thresholds for impact assessments. The Retail and Leisure Needs Assessment concludes that impact assessments will be required for proposals for retail, leisure and office development, which are greater than 500 sqm.
- 5.202 The scope of the Sequential Test and Retail Impact Assessments which are required to be submitted in support of planning applications should be discussed and agreed between the applicants and the Council at an early stage in the pre-application process. The level of detail included within the assessments should be proportionate to the scale and type of retail floorspace proposed and shall be determined on a case by case basis. National Planning Practice Guidance sets out detailed requirements for carrying out such assessments.
- 5.203 The following policy sets out the requirements for consideration of applications for retail development which are located outside of identified primary shopping areas, and other main town centre uses that are not proposed in existing town centre boundaries and are not in accordance with other policies within this Local Plan. For the avoidance of doubt, this policy does not apply to small scale retail and service provision, which is permitted in accordance with Policy EMP10 of this Local Plan.

Policy EMP9 - Sequential Assessment and Impact Test

Proposals for retail development which are not located in the Primary Shopping Areas, or for other ‘main town centre uses’ which are not located within the town centre boundaries, of Ashford or Tenterden Town Centres (as defined in Policy SP4, EMP7 and EMP8 and set out on the Policies Map), and are not in accordance with other policies in this plan, will only be permitted if all of the following criteria can be met:

- a) **A sequential assessment has been carried out to demonstrate that no suitable sites are available in more central locations. Preference will be given to sites that are well connected to the town centre**
- b) **The proposal, either by itself, or in combination with other committed development proposals, will not harm significantly the vitality and viability of the relevant centre, or any significant negative impact upon the town centres can be adequately mitigated. Proposals for retail, leisure and office development which are greater than 500 sqm, will be required to carry out an impact assessment.**

Local and Village Centres

- 5.204 Local centres in the towns and villages play an important role in providing for local shopping needs, especially for convenience goods, and other local services. They help reduce the need to travel. They also provide an essential service for those with restricted mobility and are often a focal point for the community.
- 5.205 Within the built-up area of Ashford, there are a number of local centres which provide such services to local residents. Many of the villages in the Borough have shops which serve the village community and in the case of the larger villages, such as Wye and Charing, serve the surrounding smaller villages and hamlets as well.
- 5.206 The Council would like to see as broad a range of local shops and services as possible, including some non-A1 uses such as banks (A2), cafes (A3), take-away restaurants (A5) and public houses (A4). The Council aims to resist the loss of shops and services and to preserve the character of the local centres, especially the retention of key units so that they remain compact centres, although the effects of increased permitted development rights on changes of use should be acknowledged. Where planning permission is required for the change of use or loss of an existing service or facility, this will only be granted where there is alternative provision within reasonable walking distance or the unit is no longer viable for that purpose or an alternative local service. Reasonable walking distance is defined not only by distance, which is considered to be within the region of 800m, but also factors such as the condition of the footpaths and local gradients. In order to demonstrate that the facility is not viable it must be demonstrated that it has remained vacant for a substantial period of time, despite genuine and sustained attempts to occupy it on reasonable terms. What constitutes a 'substantial period of time' and 'reasonable terms' will depend on prevailing market conditions, but as a guide less than six months is likely to be inappropriate and the terms on offer should compare with other similar premises and locations being let or sold for that purpose. The extent of marketing carried out will be an important factor.
- 5.206.1 The Localism Act 2011 introduced the community right to bid, which gives local groups a right to nominate a building or other land for listing by the local authority as an asset of community value. 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. The Council's current list of assets of community value contains mainly public houses and shops located in the villages of the Borough.
- 5.207 Areas of new residential development in Ashford have in the past been required to make provision of local shops to meet the needs of the new community. Where new local centres are required to support new development in this plan, this will be set out in the site policy.
- 5.208 The following policy seeks to maintain and enhance the provision of local centres in the built-up areas of the Borough.

Policy EMP10 - Local and Village Centres

In local centres and villages, planning permission will be granted for additional shopping and service provision, where proposals are of a scale appropriate to the particular centre.

Proposals that result in the loss of shops and services will only be permitted where it can be demonstrated that:

- a) **there is alternative provision for a similar use within reasonable walking distance; or,**
- b) **the unit is no longer viable for that purpose, or an alternative local service, and that it has remained vacant for a substantial period of time, despite genuine and sustained attempts to let it on reasonable terms.**

Tourism

5.209 Tourism is a term covering a wide range of activities, including travel and visits for business, professional and domestic purposes, as well as for holidays and recreation. Tourism helps to create and support employment; generate local income; and also to enhance the image of an area as a place to live, work and invest.

The NPPF requires local planning authorities to plan for tourism development and specifically supports the role of sustainable rural tourism and leisure development that benefit businesses in rural areas, communities and visitors, and which respect the character of the countryside. This should include supporting the provision and expansion of tourist and visitor facilities in appropriate locations.

5.210 Ashford's Corporate Plan (2015- 2020) identifies one of its key priorities is to have a borough that 'recognises the value of tourism and the benefits it brings to our towns, villages and the borough as a whole.

5.211 The council's tourism review revealed that the Ashford Borough in relation to other Kent districts continued to perform well in terms of visitor numbers, spend and tourism related employment.

5.212 Trends in tourism constantly change, but if new tourism development is to have a positive overall impact, it needs to be properly managed and planned for. More 'sustainable tourism' can only be achieved by making sure that new initiatives respect the character of an area and major development is located where there is public transport access. Poorly controlled tourist development can damage the character of the environment that attracts tourists in the first instance.

5.213 Ashford has the benefit of a good accommodation base in terms of range and quality of bed spaces and is ideally located to attract both UK and overseas visitors. The proximity of the Channel Tunnel and the location of the International Station, with its high speed links to the continent and London, means that Ashford is uniquely placed to benefit from an increase in overseas and domestic visitors. The fact that Canterbury, Rochester and major attractions such as Leeds Castle and Sissinghurst Gardens are nearby also mean that Ashford is a natural centre for tourism. Ashford's unspoilt 'Garden of England' countryside with its picturesque villages, large number of listed buildings, its small, but important range of museums, its quality attractions, and cultural heritage assets and the 'honeypot' of Tenterden, add to the appeal. The urban areas of Ashford and Tenterden Towns, as well as the large areas of surrounding countryside make a valuable contribution to the current tourism offer in the Borough, as well as providing for future opportunities to expand and enhance the offer.

The Council is therefore supportive of tourism development, including a range of new tourist accommodation, in appropriate locations, with more major tourism development being promoted in Ashford and Tenterden towns. Rural tourism development is also encouraged in order to take advantage of the Borough's large areas of attractive countryside, where this would not be harmful to the character of the environment that attracts tourists in the first instance.

5.214 There are a number of planned tourism facilities proposed in Ashford Borough, which will continue to improve Ashford's attraction as a tourist destination. For example, planning permission has been granted for an International Model Railway Exhibition Centre, and Chapel Down Winery is planning to open a state of the art brewery and visitor attraction on Victoria Road in Ashford.

5.215 The following policy seeks to retain existing facilities and support the development of new tourism facilities in appropriate locations.

Policy EMP11 -Tourism

The Council will support the retention of existing tourism facilities and encourage sustainable growth of tourism through the provision of a wide variety of new facilities in appropriate locations across the borough.

Proposals for new hotel and B&B development will be permitted in locations that are accessible by a choice of modes of transport and will be particularly encouraged in the Ashford and Tenterden urban areas.

Proposals for conference and exhibition facilities in Ashford town centre, potentially in association with a hotel development, will be supported subject to other Local Plan policies.

SECTION C - TRANSPORT

- 5.216 Ensuring that an effective and sustainable transport network is delivered and maintained in the borough is important in an environmental, economic and social context and is a key objective of this Local Plan. As part of its preparation, the Council have liaised with Highways England, the County Council and bus providers. Continued liaison will be needed throughout the life of the Plan to ensure that a joined up and holistic approach is achieved.
- 5.217 The Council understands that private cars are and will remain an important and necessary part of everyday life in the Borough and this is reflected in car ownership levels - levels which are expected to increase over the next few years and beyond. This is particularly a factor for the Borough given its large and rural nature. Significant traffic movements are also generated by workers, either through commuting to their jobs or travelling as part of their jobs and also by those visiting the town centre to cater for their everyday retail and leisure needs.
- 5.218 The future development levels as set out in the Local Plan will further add to traffic movements on the road network. This will require interventions on the strategic road network to make sure that it has capacity and the overall flow of movements is maintained and also policies to ensure that the range of small local roads and lanes that form much of the Borough's attractive rural character are protected from too much or unsuitable traffic movements. Increased levels of development also necessitate a need to deal with issues of public parking including park and ride.
- 5.219 This overall approach needs to be balanced with one that also encourages alternative modes of travel wherever possible. Public transport in the form of rail and bus travel can significantly reduce carbon emissions and ease congestion on the road network, whereas cycling and walking achieves this aim with the added benefit of promoting a healthier lifestyle.

M20 Junction 10 / 10a

- 5.220 For many years, the availability of junction capacity at this key node on the strategic highway network has been a constraint on delivering the full potential for growth to the south and east of Ashford. The need for additional capacity was highlighted in the South of Ashford Transport Study (SATS) in 1999 with a programme of measures including an interim improvement to Junction 10 and, subsequently, a new 'Junction 10a' forming part of a strategic solution.
- 5.221 The existing M20 Junction 10 was improved in 2007 to provide some additional motorway capacity that has enabled development to be released over the last 10 years but even the upgraded junction does not have sufficient capacity to serve all committed and planned development to the end of this Plan period. Over the last decade, the Council has controlled the release of new developments in this area to ensure that the existing junction does not become at risk of over-capacity with consequent queueing back along the slip roads onto the live motorway.
- 5.222 This constraint has been recognised in the Core Strategy (2008) and the Urban Sites & Infrastructure DPD (2012) and has informed the Council's approach to the allocation and

phasing of development sites but it is accepted that the delivery of new junction capacity is fundamental to the realisation of the Council's growth strategy as set out in this Local Plan.

- 5.223 To this end, Highways England (HE) are currently drawing up an application for a Development Consent Order (DCO) for a new all-movements, grade separated motorway junction site 700 metres east of the existing Junction 10 with a link road back to the existing A2070 Bad Munstereifel Road. At the time of drafting this Plan, it is expected that the DCO will be submitted to the Planning Inspectorate this summer.
- 5.224 Thereafter, HE anticipates the granting of a DCO in Autumn 2017 with a start of construction to follow soon after, leading to a completion date in Spring 2019. Completion of the junction and associated link road will resolve any strategic junction capacity constraints on proposed allocations in this Plan but prior to this time, the management of development releases by the Council will need to continue.
- 5.225 In this respect, the Council proposes a pragmatic response based around a realistic assessment of the risk of the existing Junction 10 interchange becoming severely overloaded. It is accepted that until HE obtain a DCO for the Junction 10a scheme, there is a risk that the scheme may be delayed or even fail. Therefore, up to this point, it would not be prudent for the Council to accept the release of additional development that would add to the existing committed and proposed traffic at the junction.
- 5.226 However, once a DCO is granted, this should enable the works to proceed and construction of the new junction to commence. At this point, the Council considers that the risk of the junction scheme not progressing significantly reduces and should allow a limited amount of additional development to be brought forward. Initially, this will be based on the amount of committed and proposed development assumed to be accommodated by the existing Junction 10 that would not be likely to be occupied by the expected opening date of Junction 10a. It will also take into account the likely traffic generation at junction 10 given the distribution of trips on the strategic network and realistic modal split assumptions contained within individual site Transport Assessments.
- 5.227 This approach shall also take account of the practical likelihood of development being able to be occupied prior to the completion of Junction 10a given the presence of other infrastructure constraints, market conditions and development lead-in times in order that any available capacity is utilised by developers most able to construct and occupy. The Council will impose appropriate Grampian-style conditions on grants of planning permission for relevant sites to ensure development releases are controlled prior to the completion of Junction 10a.

Developer contributions to M20 Junction 10a

- 5.228 The funding package for the Junction 10a scheme includes £16m of 'developer funding' (of a total of c.£80m). In recent years, the Council has levied proportionate developer contributions to a package of transport-related measures in the south Ashford area through Section 106 Agreements based on saved Local Plan SPG6 (Providing the Transport Needs arising from South Ashford Study) which was most recently updated in 2004. This has included an element of funding to be used for the delivery of a future 'Junction 10a' scheme.
- 5.229 The bringing into force of the S106 pooling restrictions in the CIL Regulations in April 2014 now means that the Council cannot use Section 106 Agreements as a mechanism for levying

future developer contributions for Junction 10a, so instead it is proposed that, where new developments meet the qualifying tests in SPG6, contributions based on the SPG6 formula will be levied through a Section 278 Agreement between the developer and HE.

- 5.230 However, once Junction 10a has been completed, the opportunity to levy contributions from new S278 Agreements will cease. At this stage, should further contributions be required to make up the £16m developer funding target, a proportion of CIL receipts from new developments will be utilised for this purpose. This scenario is likely to trigger a formal review of the Council's CIL Charging Schedule.
- 5.231 In order to ensure full funding is in place in advance of delivery of the scheme, the Homes & Communities Agency (HCA) has agreed to forward fund the full £16m developer contribution element on the basis that this is repaid from developer contributions over the Local Plan period.
- 5.232 Several strategic sites allocated in this Local Plan will be expected to make financial contributions to the delivery of the Junction 10a scheme and this is reflected in the site specific policies. The nature of the contribution will be determined by whether planning permission is granted before or after the completion of Junction 10a.

Other strategic projects

M20 Junction 9 / Drovers roundabout

- 5.233 On the western side of Ashford, M20 Junction 9 provides from the motorway network to a number of strategic development sites in the town. Both Junction 9 and the nearby Drovers roundabout that provides into the town centre and to the A20 and A28 were recently upgraded in 2011 through forward funding by the HCA (SEEDA at the time) to create additional capacity to serve the proposed Chilmington urban extension to the south-west and other future development opportunities in this part of the town.
- 5.234 Some Section 106 Agreements have been secured for developer contributions to refund the expenditure on these improvements but there is scope for the proposed allocation at Eureka Park in this Plan to also make a proportionate financial contribution to aid this repayment. The Council will also consider whether any further significant development proposals that would rely on the capacity at Junction 9 and / or the Drovers roundabout should also make a proportionate financial contribution.

Pound Lane Link Road

- 5.235 The broad location of the Pound Lane Link Road is shown on the Policies Map as a new strategic, single-carriageway link road from Pound Lane to the roundabout at the entrance to the Park Farm development. The creation of this link road is critical to the full delivery of the proposed allocation at Court Lodge Farm (policy S3) but will also provide the opportunity for an additional strategic vehicular link for traffic from the Chilmington urban extension (to the west) to the A2070 trunk road and M20 Junction 10/10a.
- 5.236 The delivery of this link road will provide relief from existing and future traffic generation from the Chilmington development on parts of the rural road network (notably Magpie Hall Road) and existing local residential estate roads in the Knights Park and Brisley Farm areas.

- 5.237 The proposed Link road crosses the functional floodplain in parts and full liaison with the Environment Agency will be needed to ensure that full mitigation is delivered as part of the scheme design. The Council owns land in this area and it would be physically feasible to construct the link road on land within the Council's ownership, although this would result in a sub-optimal scheme in terms of highway design and impact on neighbouring residents. Consequently, third party land is ideally required to deliver this scheme recognising that such land has minimal development value given its floodplain status.
- 5.238 The Council, in association with KCC, will seek to acquire the necessary rights to deliver the preferred route of the Link road although the option to use Compulsory Purchase powers if necessary will be entertained. As yet, there is not a fully designed and costed scheme but in principle it is proposed to fund the delivery of the scheme through a combination of site specific Section 106 or 278 Agreements and other public sector funding sources.

A28 dualling and Chart Road improvements

- 5.239 The A28 dualling and Chart Road improvement scheme includes changing the A28 into two lanes of traffic each way between the to be improved 'Tank' and 'Matalan' roundabouts and will also provide for improvements to junctions on to this new strategic corridor. The scheme will cater for the development at Chilmington Green, providing for improved capacity and safety in this area and relieve congestion and journey times.
- 5.240 The business case was approved at the South East Local Enterprise Partnership's board in February 2016 and Local Government Funding of £10.2 million has been approved for release. The remaining £23m funding cost of the scheme is being provided for by Kent County Council and the development consortium for Chilmington Green. The outline design is now complete with minor work being carried out on issues raised through public engagement.

Ring road junction improvements

- 5.241 In response to various current residential and commercial development proposals within the Town Centre area, a series of improvements to the junctions around the former Ring Road are needed. KCC has designed a scheme of highway mitigation which provides confidence over scheme funding and future implementation as local developments that will make proportionate contributions towards the key junctions either side of the Beaver Road Bridge, now benefit from a resolution to planning consent with contributions to be secured via s106 agreements. The highway improvement will facilitate the release of new developments that are fundamental to the growth and development of the town centre and its attractiveness as a location for new investment.

Rail Infrastructure

- 5.241.1 The Council acknowledges the significance of the railway to the borough, and to Ashford town in particular. Rail plays a key role in supporting economic development in the borough, and the High Speed service has been a key driver for employment growth as a result of the 38-minute journey times into London.
- 5.241.2 Ashford International has become a central staging post, with the aforementioned High Speed line and further links through Kent and into Sussex and continental Europe. During

the lifetime of this plan, the busy transport interchange on the northern side of the station will need to be enhanced to provide for the changing needs of the borough, ensuring that an effective and sustainable interchange provides for more integrated journeys, supporting onward bus, cycle and pedestrian connectivity. This should be delivered as part of the suite of works associated with the development of the Commercial Quarter, and with involvement from the Council as landowner of International House.

5.241.3 In addition to Ashford International, there are a further six railway stations within the borough – Appledore, Charing, Chilham, Ham Street, Pluckley and Wye. The priorities for these are to improve cycling facilities and customer information systems, and the provision of waiting shelters. Additionally, in the case of Appledore station, there is an opportunity to enhance pedestrian and cycling routes between the station and the village. Contributions may be sought via Section 106 agreements to contribute towards these improvements.

5.241.4 The key rail-related priorities in the borough at the current time are as follows:

- Ashford International Rail Connectivity Project (Spurs): an EC and SELEP-funded project to upgrade signalling at Ashford International to European Train Control System (ETCS) standard, allowing the continuation of international stopping services at the station.
- Ashford – Hastings Line upgrade: project to deliver an extension of High Speed services to Hastings and Bexhill via Ashford International, to include electrification of the line between Ashford and Ore.
- High Speed Capacity: catering for increasing demand and growth in Ashford town in particular, to include the lengthening of trains and provision of additional services at peak times.

5.241.5 In addition to these, other priorities include the retention of services at frequency at more rural stations to ensure the accessibility and vitality of these villages; provision of renewed rolling stock consisting of more sustainable low emission trains; and the enhancement of station accessibility. While the Council is not responsible for rail services and infrastructure, it will work with relevant service providers and authorities to bring project forward that facilitate sustainable development within the borough.

Policy TRA1 - Strategic Transport Schemes

The Council will seek the implementation of highway and other strategic schemes that will remove serious impediments to growth and/or secure important environmental benefits. These include a new motorway junction (Junction 10a), the Pound Lane link road, the A28 dualling and Chart Road improvements and measures to improve the former Ring Road junctions.

Where development of a site includes part of an identified strategic scheme, land will be reserved for the route of facility as part of the design of the proposal. Proposals which undermine the delivery of a strategic transport scheme will not be supported.

Public Parking Facilities Serving The Town Centre

- 5.242 The availability of publically available car parking has a major influence on the means of transport chosen and is also recognised as being crucial to ensuring new development is successful. The Commercial Quarter (policy S1) in particular envisages a significant amount of new office space which requires adequate parking nearby to ensure commercial terms can be achieved and space can be successfully let, at least in its initial stages.
- 5.243 The Parking Study that supports this Local Plan set out the need for new town centre parking to partly replace existing car parks and partly to cater for additional demand from new development (some of which relates to development that is subject to extant planning approval).
- 5.244 The Study highlighted that that the town centre currently has enough vacant car parking spaces to cater for current and future demand. However, this position was caveated in that not all of these spaces are truly available in practice as many were located on the periphery of the town centre in relatively inaccessible locations and therefore it is questionable how attractive these spaces are for short stay users. Also, a number of vacant spaces are also housed in either car parks that are privately run, meaning the Council has little control over operations, or at Edinburgh Road and Vicarage Lane Car Parks - publically owned car parks which have the potential to be suitable locations for redevelopment in the longer term but which play a key role in supporting the town centre at the current time.
- 5.245 In light of the above, the Study recognised that a flexible approach to parking was needed, one which can best respond to development as it comes forward in a way that caters for both the needs of long stay and short stay users.

Elwick Place

- 5.246 Elwick Place will become a significant new retail and leisure destination in the Town Centre through the delivery of a new multi-screen cinema and hotel and a number of new restaurants. A new public car park that will provide for an additional 280 car parking spaces will also be delivered. Not only will this car park cater for the retail and leisure development at Elwick Place, it will also become a key facility that supports growth in the wider town centre and also provide flexibility in the parking stock.

Multi Storey Car Parks

- 5.247 In Ashford town centre, delivering new multi-storey car parks (MSCPs) has been a long held aspiration of the Council and it remains a valid one. New MSCPs will provide the opportunity to redevelop some of the Town Centre's existing surface level car parks - highly accessible and sustainable brownfield sites - through the decanting of spaces to new MSCPs. In order to be successful, MSCPs generally need to be located in accessible locations near to shops and leisure facilities and in doing so tend to cater for the shorter term parking demand. They also need to be clean, attractive and provide a sense of safety for their users.
- 5.248 In the Ashford Town Centre Area Action Plan (2010), land was allocated to deliver two MSCPs by 2020. These were both required to meet the needs generated by significant levels of planned retail and leisure development, envisaged to come forward by 2020.

- 5.249 This Local Plan is not proposing to deliver such large scale of development in the Town Centre. Nevertheless, MSCP provision is still seen as an important component of meeting parking needs in the longer term to respond to development coming forward.
- 5.250 Although MSCPs tend to best serve short stay users, it is highly likely that they will also partially meet long stay demands, especially as new commercial development starts coming forward in the town centre, until such time that a new park and ride facility is operational which can cater for this demand in a more sustainable way.
- 5.251 Should a MSCP be delivered, the Council may then wish to pursue the redevelopment of some its existing car parking stock in the Town Centre. These proposals will need to demonstrate that there is spare capacity in existing public parking stock serving the town centre, that is currently operational or which will be provided elsewhere as part of the redevelopment.

Future Capacity Options

- 5.252 The Council retains the view that Park and Ride is a component of its longer term parking strategy, particularly to support new office development in the town centre. In light of this, a Park and Ride facility is safeguarded at Chilmington Green through the Chilmington Green Area Action Plan (not superseded by this Local Plan) and will continue to be reserved until it is decided that the facility is no longer required.
- 5.254 In the medium to longer term, it is anticipated that the new office sector in the town centre will thrive and in doing so become a less risky and more desirable investment for the market. In such circumstances, the values secured through the delivery of office accommodation in the town centre will rise substantially and this will result in Park and Ride becoming a more desirable and cost effective option of securing parking space to support new development. In turn this will drive demand and patronage that would financially underpin the operation of a Park & Ride service.

Policy TRA2 - Strategic Public Parking Facilities

The Council will prioritise the delivery of two new multi-storey public car parks, one of which will have an indicative capacity of 300 spaces, and at the other with an indicative capacity of 400 – 600 spaces.

Proposals which would prejudice the ability to deliver these facilities on a viable basis will be refused unless it has been agreed with the Borough Council that the facility is either no longer required or the alternative provision of the same amount of parking spaces can be delivered in a suitable location.

Residential and Non-residential Parking Standards

Residential

- 5.256 The NPPF allows Local Planning Authorities to set their own parking standards, providing that issues of local car ownership levels, accessibility, the nature and type of the development and the desire to reduce carbon emissions are taken into account.
- 5.257 Ashford Borough is a large and diverse borough with extensive rural areas in addition to Ashford town itself which has seen significant expansion over the last decades. A single approach to the provision of car parking is not appropriate for all developments coming forward across the borough during the plan period. This 'zonal' approach to parking standards has been part of the Council's approach for a number of years since the Residential Parking and Design Guidance SPD (2010) was first produced that set out the quantum and design of parking provision in new housing development in the borough.
- 5.258 The approach taken in this SPD has proved useful, robust and clear for all parties and has helped to deliver adequate parking spaces to support development in a way that delivers better quality places and environments which is a key aspiration of the Local Plan. As part of the preparation of this Local Plan the Council have revisited the standards in the SPD and revised them slightly in the 'suburban' and 'rural' areas by promoting slightly higher minimum parking standards for certain types of residential uses. This is considered to better reflect market demand and car ownership levels (now and future trends).
- 5.259 For the town centre area (as identified under policy SP4) - and within the central areas of larger developments - a more significant change is now proposed. Here the Local Plan now advocates a minimum parking standard of 1 space per residential unit. This standard takes account of local circumstances including car ownership data (and future assumptions), historic problems of insufficient parking facilities in central areas and ensures that sufficient parking spaces are delivered to support development in this location.
- 5.260 For the avoidance of doubt, the policy below supersedes the standards set out in the 2010 SPD apart from the standards set out for visitor provision. Here the SPD standards should still be used. In addition, the design and layout guidance contained within the existing SPD remains valid and should be reflected in proposals coming forward.

Non-residential

- 5.261 For non-residential development the Council has, in common with other Local Planning Authorities in Kent, relied on the advice of Kent County Council and the maximum standards contained in KCC SPG4. These standards have generally proved appropriate for this borough. However, local instances of residential areas being used as overflow car parks for adjoining employment uses are of concern. It is therefore considered important that the policies of this Local Plan do not, as far as is possible, cause a repeat of such problems, which are, on the whole, connected with insufficient provision of parking for the operational stages of commercial developments, and the levying of charges on employee parking. In addition, the expansion of Permitted Development Rights for premises in commercial use and the impact of changes of occupiers, with resultant different staffing and operational arrangements, has exacerbated such problems.

- 5.262 To ensure the delivery of maximum parking provision in new non-residential developments in the borough over the Plan period, and to reduce opportunities for commercial developments to deliver fewer spaces than the maximum, Policy TRA3(b) brings forward the standard of SPG4 as the minimum standard for non-residential development in the borough. Controlled Parking Zones are also supported as an option for the Council to address specific problems with overspill commercial car parking into residential areas should these occur.
- 5.263 Both residential and non-residential parking standards are included within the Policy itself to provide clarity.
- 5.264 With all parking standards it is important to allow for flexibility in their application in order to allow for site specific issues to be taken into account. The policy below therefore provides clarification as to circumstances where departures from the proposed standards could be justified.

Policy TRA3 (a) - Parking Standards for Residential Development

Proposals for residential development within the town centre area identified on the Policies Map or within ‘central areas’ of larger developments shall deliver a minimum parking standard of 1 space per residential unit on average. It is expected that all of this provision should be delivered on-site.

Proposals for residential development elsewhere shall achieve the following minimum parking standards:

	<u>Suburban and Rural locations</u>
<u>1-bed dwelling</u>	<u>1 space per unit</u>
<u>2-bed dwelling</u>	<u>2 spaces per unit</u>
<u>3-bed dwelling</u>	<u>2 spaces per unit</u>
<u>4-bed house</u>	<u>3 spaces per unit</u>

Parking to support residential development within the Borough shall follow the design, layout and accessibility guidance contained within the Council’s Residential Parking SPD.

Policy TRA3 (b) - Parking Standards for Non Residential Development

Proposals for non-residential developments within the Borough shall provide parking facilities to the following parking standards:

A1 Food retail up to 1,000m²	1 space per 18m²
A1 Food retail of 1,000 m² and over	1 space per 14m²
A1 Non-food retail	1 space per 25m²
A2 use class	1 space per 20m²
A3 use class	1 space per 6m²*

A4 use class	1 space per 10m2*
A5 use class	1 space per 8m2*
B1 office use (up to 500m2)	1 space per 20m2
B1 office use (up to 2,500m2)	1 space per 25m2
B1 office use (2,500m2 and over)	1 space per 30m2
B1 High tech/ research/light industrial.	1 space per 35m2
B2 use class	1 space per 50m2
B8 Storage and distribution	1 space per 110m2
B8 Wholesale Trade	1 space per 35m2
Hotels	1 space per bedroom

**These use classes are also required to deliver 1 space per 2 staff in addition to the standard set out above.*

All floorspace references in this table refer to gross external floorspace.

In exceptional cases, the Council may require proposals to depart from the standards in policies TRA3 (a) or TRA3 (b) if any of the following apply:-

- a) **A bespoke parking standard is included as part of site specific policy within this Local Plan that seeks to take into account specific local circumstances in that area;**
- b) **In order to take account of specific local circumstances that may require a higher or lower level of parking provision, including as a result of the development site's accessibility to public transport, shops and services, highway safety concerns and local on-street parking problems;**
- c) **Where an operator or potential occupier requires either more or less parking spaces to cater for their specific operational needs, such requirements can be clearly evidenced and where their presence has wider planning benefits,**
- d) **Where the proposed use can reasonably rely on the availability of public off-street car parking spaces that are nearby;**
- e) **To ensure the successful restoration, refurbishment and re-use of listed buildings or buildings affecting the character of a conservation area;**
- f) **To allow the appropriate re-use of the upper floors of buildings in town centres or above shop units;**
- g) **Should independently verified viability evidence demonstrate that achieving the minimum parking standard identified would render the scheme unviable and that there are overriding planning benefits to justify that the development should proceed.**

Where appropriate, the Council will pursue the use of Controlled Parking Zones (CPZs) to support the wider strategy for the management of on-street parking, in line with the approach outlined in this policy.

Bus provision

- 5.265 Providing a frequent, fast and high quality bus service can greatly improve bus patronage and in turn provide a viable service. In the past the Council - in liaison with the County Council and bus operators - has been successful in leveraging funds from the developers to support local bus provision.
- 5.266 In the urban area, the bus service is relatively frequent and efficient, connecting the outskirts of the town with the town centre. However enhancements will be necessary to this network to ensure that it continues to offer a realistic alternative to private car trips where possible. Particular enhancements will be targeted towards key projects in and around Ashford town centre or on the key radial routes into the town centre, as this remains the key destination of the local bus network and where investment should therefore be prioritised.
- 5.267 In the rural area, the bus service is less frequent which reflects both its size and nature but also the difficulties in providing a viable service here. However this provision provides a vital service for many residents in the rural area who do not have access to a car. Therefore, proportionate enhancements should be secured to deliver the most sustainable service possible in this location.
- 5.268 The enhancements needed will be determined in agreement with the County Council and bus operators and will be secured either through S106 contributions, where they relate to more localised projects, or site specific enhancements, or CIL monies where they relate to more strategic enhancements. The scale and timing of any contribution will be agreed between the relevant parties with a view of ensuring that the attractiveness of the bus service is maximised where possible.
- 5.269 The enhancements that will be sought could include the delivery of bus priority measures, the provision of new or alteration/expansion of existing routes and services, contributions towards bus-related infrastructure and operational subsidy for the service in the early years of a development.
- 5.270 The Infrastructure Plan that supports this Local Plan identifies bus priority measures necessary to deliver better access for bus services to the town centre. However, it is recognised that as new schemes come forward over the Plan period, new projects will be identified in order to ensure that a sustainable bus network in the Borough is maintained, as far as is practical. S106 contributions will be secured to help deliver these projects as appropriate.

Policy TRA4 - Promoting the local bus network

The Council, in liaison with the County Council, will seek enhancements to the local bus network in order to meet the additional demands created by new development as it comes forward. These enhancements could include the delivery of bus priority measures, the provision of a new service or the alteration/expansion of an existing service, contributions towards bus-related infrastructure and operational subsidy for the service in the early years of occupation of the development.

Where S106 contributions are sought, their scale and timing shall be agreed by the borough and county council following consultation with relevant bus operators, prior to the granting of planning permission.

Pedestrians

- 5.271 The ease with which people can move in and around places is an important part of promoting non-car based travel and also supporting local shops and services. This can give a place a sense of vibrancy and establish its character. Delivering safe and accessible pedestrian routes within new developments and between new developments and existing facilities is also important for people's wellbeing, their and promoting healthy lifestyles.
- 5.272 More strategic pedestrian routes including the use of existing public rights of way should be retained where possible and the opportunities to deliver better linkages around Ashford and from the periphery to the town centre will be explored.

Policy TRA5 - Planning for Pedestrians

Development proposals shall demonstrate how safe and accessible pedestrian access and movement routes will be delivered and how they will connect to the wider movement network. Opportunities should be proactively taken to connect with and enhance Public Rights of Way whenever possible, encouraging journeys on foot.

Cycling

- 5.273 The Council is committed to increasing cycle usage in the borough as a sustainable means of transport that also contributes to healthier lifestyles. KCC's Rights of Way Improvement Plan, (currently entitled the Countryside and Coastal Access Improvement Plan) assesses the opportunities for pedestrian journeys in Kent provided by local public rights of way (PRoWs), noting the potential of these routes to stimulate journeys on foot as opposed to by the private car, and for leisure, promoting Active Travel. ABC supports this approach and any opportunities to enhance and regularise PRoWs and other pedestrian routes to encourage journeys by foot.
- 5.274 Ashford has a well developed network of cycleways that run through the town that have been delivered over recent years many of which link to the quiet rural lanes around the town and in the rest of the borough that are suitable for cycling. In addition, sections of off-road cycleway have been provided in the rural area, notably at Godmersham to Chilham and in Tenterden. Recent monitoring indicates that the use of the routes for cycling in the Ashford urban area has increased significantly, particularly as a means to access the domestic and international railway stations.
- 5.275 The network has been delivered principally via the following means:
- National Cycle Route 18 has been designated and runs through the urban area and links with the wider county wide strategic cycleway network; and National Cycle Route 17 (the Pilgrims Way Cycle Trail) provides a strategic link to Eureka Park;
 - The green corridor network in the urban area provides a comprehensive, primarily riverside, set of cycleway routes that converge in the town centre and provide a direct access to the railway stations. The long-standing green corridor policy has helped to deliver improvements to the cycleway network through the delivery of specific green corridor projects and via the requirement that developments adjoining the green corridor being required to make a contribution to improvements within the green corridor;

- The Council's Cycling Strategy was approved in 2011 and sets out a series of network improvements projects to be delivered over the lifetime of the Strategy. the Council is committed to reviewing and revising that Strategy;
- New developments have been required to deliver cycleways within the development areas and to make links to the wider network in the town;
- Substantial improved cycle parking provision has been provided at the Ashford domestic railway station

5.275.1 KCC recently consulted on its Rights of Way Improvement Plan, (currently entitled the Countryside and Coastal Access Improvement Plan), which sought to promote journeys by bicycle in Kent along hospitable routes, noting the potential of these routes to stimulate journeys by bicycle as opposed to by the private car, and for leisure uses, promoting Active Travel. ABC supports this approach and any opportunities to enhance and regularise cycle connections.

Policy TRA6 - Provision for Cycling

The Council will seek to improve conditions for cyclists through the following measures:-

- **Promoting and developing a Borough-wide network of cycle routes;**
- **Developments should, where opportunities arise, include safe, convenient and attractively designed cycle routes, including, where possible, connection to the Borough-wide cycle network.**
- **Promoting and providing cycle parking facilities in town centres, at railway stations and at major public buildings, and requiring new development to provide cycle parking facilities in agreement with the Council;**
- **Taking opportunities to consider active travel when designing new routes and establishing connections with existing routes, encouraging journeys by bicycle.**

Cycle Parking shall be provided at a minimum as per the following:

A1	< 1000m² – 1 space per 200m² < 5000m² – 1 space per 400m² > 5000m² – min 12.
A2/B1/B2/B8	Short/Medium Term (collection/delivery/shopping) – 1 space per 1000m² Medium to Long Term (meetings/workplace) – 1 space per 200m²
A3/A4/A5	1 space per 10 seats (min 2 provided)
C1/C2	1 space per 10 beds/units/pitches or 1 space per 5 students
C3	1 space per unit (flats/maisonettes) (it is expected that sufficient accommodation will be provided in any case for houses)
D1	Schools – as per current KCC requirement Medical centres/surgeries – 1 space per 2 consulting/treatment rooms Others – 1 space per 50 seats or 100m²
D2	Leisure & entertainment – 1 space per 300 seats Sports facilities & venues – 1 space per 10 participants/members/staff
<i>Sui generis</i>	Case-by-case basis

Impact on the local road network

5.276 The roads within the Borough can be classified as follows:

- **Primary routes:** These roads form the primary network for the Borough as a whole. All long distance vehicle movements between the main settlements in the Borough and beyond the Borough should be targeted towards these routes as they have the most capacity and have been designed to accommodate proportionately more traffic movements than other routes.
- **Secondary routes:** These roads distribute traffic within residential and commercial areas of the Borough's settlements and include many rural roads which link some of the smaller settlements to the primary network. Much of the borough is made up of these routes which greatly contribute to its attractive and rural character.
- **Local distributors:** These roads distribute traffic within neighbourhoods. They form the link between secondary distributors and access roads.
- **Access roads:** These roads give direct access to buildings and land within neighbourhoods.

5.277 Within the context of the NPPF and its desire to deliver sustainable development, most of the traffic generated by development should be targeted towards the primary and secondary route network in the borough. Other routes should not be subject to inappropriate levels of traffic generation or unsuitable traffic movements.

Policy TRA7 - The Road Network and Development

Developments that would generate significant traffic movements must be well related to the primary and secondary road network and this should have adequate capacity to accommodate the development. New accesses and intensified use of existing accesses onto the primary or secondary road network will not be permitted if a clear risk of road traffic accidents or significant traffic delays would be likely to result.

In rural areas, proposals which would generate levels and types of traffic movements, including heavy goods vehicle traffic, beyond that which the rural roads could reasonably accommodate in terms of capacity and road safety will not be permitted.

Assessing transport needs

5.278 Travel plans, assessments and statements are all ways of assessing and mitigating the negative transport impacts of development in order to ensure that sustainable development is delivered. The Council will seek to promote public transport and other non-car based modes of travel within the borough.

5.279 The Planning Practice Guidance effectively sets out that there is a hierarchy of evidence that is needed to support a planning application, depending on its scale and likely transport impact. Transport Statements should be used where development has a limited transport impact. Transport Assessment should be used where more impact is likely and that mitigation

measures are probably needed. Travel Plans are required when long term management strategies are needed to deal with significant transport impact. For development that has no significant transport impact in that they don't generate significant amounts of movement then no statement, assessment or plan is required.

- 5.280 Where appropriate, the Council will liaise with the relevant transport authorities in relation to what sort of evaluation is needed when a planning application is submitted. Should a proposal fall within a designated neighbourhood plan area then liaison with the relevant neighbourhood body will also take place.

Policy TRA8 - Travel Plans, Assessments and Statements

Planning applications will be supported by either a Transport Statement, or a Transport Assessment depending on the nature and scale of the proposal and the level of significant transport movements generated. Where appropriate, the Council will liaise with the relevant authority in relation to what sort of evidence is required. The recommendations of these studies, including Travel Plans, will be required to be delivered prior to or as part of the development and will be secured through condition or S106 agreement.

The approach to Heavy Goods Vehicles

- 5.281 The Borough lies in a strategic position in the South East of England and the town of Ashford lies at the confluence of key railway routes and the main highway route to the Channel Tunnel and Dover - the busiest ferry port in the UK. This, combined with the increase of more distribution reliant industries means that the movement of lorries will increase over the plan period.
- 5.282 In response the Local Plan provides a policy framework to cater for this increase in movements so they can be suitably planned for, where those issues are relevant to planning and where the Council remain the determining authority for planning applications. Specifically, this Local Plan allocates provision for a doubling in size of the existing overnight lorry park at Waterbrook (Policy S16) to around 600 spaces.
- 5.283 Otherwise, proposals that generate significant HGV parking shall be expected to take into account the location, the nature of the proposed use and the impact on the local road network. Proposals will need to be supported by evidence which can demonstrate that the:
- scheme provides HGV parking to at least meet the number of spaces required as established through the Kent Vehicle Standards SPG (produced by KCC) and reflected in policy TRA9 below or, if greater, the latest physical requirements to accommodate HGVs as average sizes increase, with sufficient spacing for parking, manoeuvring and turning. These should be provided on-site or in any communal HGV parking area. Parking on the public highway will not be regarded as a means of meeting HGV parking standards;

- It is expected that only certain classes of development will give rise to the need for HGV parking, and the provision required for a development is usually based on the floor area, the number of staff, the seating capacity or the number of visitors. However, employment-generating development will still be expected to provide for deliveries. Unless otherwise stated, the floor space to be used in applying the standards is the gross floor area based on the external measurement over each floor of the building with corridors, stairwells, etc. included in the measurement;
- size of the site is large enough to cater for the HGV movements envisaged, including space for loading and unloading and adequate turning circles on site so that the public highway is not needed to serve these functions as this can lead to unnecessary congestion and safety issues;
- movement and operations of any HGVs is limited to suitable times;

5.284 The Council will liaise with the relevant highway authority to ensure that the measures put in place at the planning application stage are adhered to. Where needed, the Council will use its enforcement powers should there be any breach of planning permission.

Policy TRA9 - Planning for HGV movement

Proposals which generate significant heavy goods vehicle (HGV) movements will only be supported where the use is acceptable in planning terms, and:-

- the size and layout of the site is sufficient to accommodate HGV manouevring and parking in a way that does not lead to the public highway being used for either purpose; and,**
- HGV movements are limited to appropriate times of operation given the context of the site.**
- sufficient HGV parking spaces are provided at a level commensurate with use, at not less than the following levels, unless exceptional circumstances dictate a departure from these standards in line with policy TRA3(b) above:**

<u>A3 (Transport cafés)</u>	<u>1 lorry space per 5m²</u>
<u>B1 Business (High Tech/Research/Light Industrial only)</u>	<u>1 space per 200m²</u>
<u>B2 General Industrial</u>	<u>1 space per 200m²</u>
<u>B8 Storage & Distribution, or Wholesale Trade Distribution</u>	<u>1 space per 300m²</u>

SECTION D - THE NATURAL AND BUILT ENVIRONMENT

5.285 This section of the Local Plan 2030 provides the policy framework for the promotion, enhancement and protection of both the natural environment, including its biodiversity and geological interests, landscapes, green corridors, informal open space, water resources and opportunities for harnessing renewable energy, and the built heritage of the Borough, including its wealth of listed buildings, conservation areas and other heritage assets. The section is split into three topic areas; biodiversity and landscape, water and climate change and the historic environment.

Biodiversity and Landscape

5.286 Green infrastructure plays an important role in supporting other policy areas of this Plan. By helping to create high quality environments which are attractive to businesses and investors it can drive economic growth and regeneration, deliver quality of life benefits and enhanced opportunities for recreation, social interaction and play in new and existing residential areas. Well-designed and managed green infrastructure can reinforce and enhance local landscape character, assist in halting the decline in biodiversity and mitigate the impact of climate change. In England, green infrastructure issues are dealt with through a combination of the planning system and legislation (European and national⁹).

5.287 The conserving and enhancing of the natural environment is one of the 'core planning principles' of the NPPF (para 17). It encourages (para 109) the protection and enhancement of valued landscapes, geological conservation interests and soils. It also seeks to minimise the impact on biodiversity and encourages net gains in biodiversity through the establishment of coherent ecological networks wherever possible.

5.288 Formal open spaces (such as sports pitches) also contribute to the wider 'green' offer within the Borough and are covered in the community infrastructure section of this Plan.

Water and Climate Change

5.289 The NPPF expects a pro-active approach against climate change and states that adapting to, and mitigating against, the effects of climate change are core planning principles.

5.290 The NPPF identifies expectations to improve energy efficiency in new development in terms of decentralised energy and sustainable design, and ways of increasing the use and supply of renewable and low carbon energy. It stresses the importance of addressing longer term factors such as flood risk, water supply and changes to biodiversity and landscape.

5.291 This section of the Local Plan includes policies which will contribute to mitigating and adapting to climate change, including through dealing with flood risk and water resources,

⁹ Birds and Habitats Directives and Ramsar Convention (EU) / Water Framework Directive (EU) / Wildlife and Countryside Act 1981 / Countryside and Rights of Way Act 2000 / Natural Environment and Rural Communities Act 2006 / Climate Change Act 2008 / The Conservation of Habitats and Species Regulations 2010 / Flood and Water Management Act 2010 / Localism Act 2011

requiring new development to incorporate sustainable design and mitigation measures, and promoting the use and development of renewable energy.

The Historic Environment

- 5.292 Ashford Borough has a rich and varied heritage, with evidence of human settlement dating back to the Neolithic period. More recently, the long distance drovers and pilgrimage routes of the early medieval times, the Royal Military Canal of the Napoleonic period and the high speed national and international railway heritage of the 19th and 20th centuries, are evidence of the key role that the location of the Borough, at the convergence of strategic communication routes, has played in shaping its identity. The character and appearance of the Borough has also been strongly influenced by agriculture and by its rural setting, with a rich heritage of attractive villages, the market towns of Ashford and Tenterden, as well as distinctive oast houses, historic houses and gardens, many fine parish churches, water and windmills.
- 5.293 The Borough is home to over 2,300 listed buildings, the highest number among local authorities in Kent, and a significantly higher number of Grade I and Grade II* buildings than in other Kent districts. In addition the Borough has 43 Conservation Areas, 42 Scheduled Monuments and 6 Registered Parks and Gardens of Special Historic Interest, as well as a number of areas of known archaeological potential. Such buildings and areas of architectural and historic interest make a valuable contribution not only to the built and natural landscape but also to the leisure, education, tourism and economic vitality of the Borough and provide welcome opportunities for place-making and for guiding and stimulating regeneration.

Biodiversity and Landscape

Biodiversity

- 5.295 Ashford Borough enjoys an attractively diverse natural environment, and a green infrastructure network which supports significant areas of biodiversity interest and which delivers a wide range of environmental and quality of life benefits for local communities. It comprises a wide variety of landscapes and different geologies which extend from the North Downs to the Romney Marsh, with the Greensand Ridge, the Stour river valleys and extensive areas of the Weald in between. A significant proportion of the Borough is comprised of parts of two Areas of Outstanding Natural Beauty (AONBs), the Kent Downs and the High Weald, which have the highest status of protection in relation to landscape and scenic beauty.
- 5.296 The Borough is home to two designated sites of international significance for biodiversity, the Wye and Crundale Downs Special Area of Conservation (SAC) and the Dungeness, Romney Marsh and Rye Bay Ramsar site which extends into an area in the south-eastern corner of the Borough between Appledore and Hamstreet. A small part of the recently extended Dungeness, Romney Marsh and Rye Bay Special Protection Area (SPA) borders the borough boundary in the vicinity of Stone in Oxney. Under European legislation, the Council has a duty to ensure these sites are maintained in favourable conservation conditions and that they are afforded the greatest level of protection.
- 5.296.1 Where likely significant effects cannot be excluded, then an appropriate assessment prepared in accordance with the Habitats Regulations will be required. Where adverse effects

on the site cannot be ruled out, and no alternative solutions can be identified, then the project can only then proceed if there are imperative reasons of over-riding public interest and if the necessary compensatory measures can be secured.

- 5.297 Nationally designated sites in the Borough include two National Nature Reserves, at Hamstreet Woods and Wye and Crundale Downs, and 13 Sites of Special Scientific Interest (SSSI), comprising 57 SSSI units, which are of national importance on account of their biological or geological interest. These sites are legally protected by the National Parks and Access to the Countryside Act 1949 and the Wildlife and Countryside Act 1981 (as amended). These sites are therefore afforded a high level of protection in this Plan.
- 5.298 The Borough is also home to 83 Local Wildlife Sites (LWS), formerly known as Sites of Nature Conservation Interest, identification of which is overseen by the Kent Nature Partnership. In addition, there are 3 Local Nature Reserves, the Ashford Green Corridor, Hothfield Common and Poulton Wood, Aldington. These sites are important elements of the borough's biodiversity assets and contribute to the promotion, preservation, restoration and re-creation of ecological networks. The Council therefore expects that they will be protected and enhanced in new development that arises during the lifetime of this Plan. All the national and locally important biodiversity sites are listed in Appendix 4 of this Plan.
- 5.299 Recent years have seen a recognition that the planning system should, in addition to the protection of individual sites and species, move towards a more integrated landscape scale approach to improving biodiversity. In this regard, this Local Plan supports the aims and objectives of the Kent Biodiversity Strategy as they relate specifically to the Biodiversity Opportunity Areas (BOAs) of this Borough, to ensure that the priority habitats and species of each BOA are protected and enhanced in new development. Ashford Borough encompasses parts of 8 of Kent's BOAs, a reflection of its particularly diverse natural environment. A map of these BOAs can be located in Chapter 7 of this Local Plan.
- 5.300 These BOAs, together with the international, national and locally designated sites listed above and in Appendix 4, in addition to the Green Corridors and other natural spaces such as woodlands and open spaces, form the strategic Green Infrastructure Network of the Borough.
- 5.301 Alongside the conservation of existing habitats and species, the enhancement and integration of appropriate biodiversity into new developments can aid both the environmental sustainability of the scheme and deliver places which are more attractive in which to both live and work. Biodiversity measures may include the provision of open watercourse drainage systems, planting of native hedgerows, trees and woodland and the provision of bat and owl boxes and underpasses for mammals. These can provide important stepping stones for wildlife and ecosystems, as well as contributing to coherent ecological networks which can help to combat a decline in biodiversity.
- 5.302 In designating appropriate areas for development, the Local Plan has ensured that areas of international and national importance for their quality of biodiversity and landscape will not be directly adversely affected. The council will expect, and will work to ensure that all new development coming forward in the Borough will conserve or enhance local biodiversity and that unacceptable, harmful impacts on biodiversity and the natural environment will be avoided. Where this cannot be achieved to the satisfaction of the Local Planning Authority then appropriate mitigation measures will be required to be implemented.

Policy ENV1 - Biodiversity

Proposals that conserve or enhance biodiversity will be supported. Opportunities to incorporate and enhance biodiversity should be identified. In particular, development should take opportunities to help connect and improve the wider ecological networks.

Proposals should safeguard features of nature conservation interest and should include measures to retain, protect and enhance habitats, including BAP (Priority) habitats, and networks of ecological interest, including ancient woodland, water features, ditches, dykes and hedgerows, as corridors and stepping stones for wildlife.

Development that will have an adverse effect on the integrity of European protected Sites, including the Wye and Crundale Special Area of Conservation and the Dungeness, Romney Marsh and Rye Bay Ramsar and SPA sites, alone or in combination with other plans or projects, will not be permitted. Any proposal capable of affecting designated interest features of European sites should be subject to Habitats Regulations Assessment screening.

Development that will have an adverse effect on nationally designated sites, including the borough's Sites of Special Scientific Interest and National Nature Reserves, will not be permitted unless the benefits, in terms of other objectives including overriding public interest, clearly outweigh the impacts on the special features of the site and broader nature conservation interests and there is no alternative acceptable solution.

Development should avoid significant harm to locally identified biodiversity assets, including Local Wildlife Sites, Local Nature Reserves and the Ashford Green Corridor as well as priority and locally important habitats and protected species. The protection and enhancement of the Ashford Green Corridor is one of the key objectives of the Plan and therefore all proposals coming forward within or adjoining the Ashford Green Corridor should comply with Policy ENV2 in the first instance.

Where harm to biodiversity assets cannot be avoided, appropriate mitigation will be required in line with a timetable to be agreed with the Local Authority. Normally any mitigation measures will be required to be delivered on-site, unless special circumstances dictate that an off-site model is more appropriate. A financial contribution - in lieu of mitigation - will only be considered in very exceptional circumstances.

Opportunities for the management, restoration and creation of habitats in line with the opportunities identified for the Biodiversity Opportunity Areas (BOAs) and targets set out in the Kent Biodiversity Strategy will be supported.

Green Corridor

- 5.303 The Green Corridor designation has been central to Ashford's planning strategy and approach to green infrastructure since it was adopted in the 1994 Local Plan. It comprises a connected network of largely green open areas that are predominantly located alongside the Great and East Stour rivers, the Aylesford Stream, and other watercourses which flow through Ashford's urban area. These riverside areas are largely undeveloped, due to being within the flood plain, and provide a unique opportunity for improving the quality of the urban environment. Visually, the Green Corridor provides welcome breaks in the built up areas from the Town Centre and through the urban areas of Kennington, Willesborough, Kingsnorth, Singleton and South Ashford into the countryside beyond.
- 5.304 In addition to the rivers and riversides, the Green Corridor includes woodlands, orchards, ponds, lakes, nature reserves, meadows, play, leisure and recreation spaces. It is a core element of Ashford's Green Infrastructure and offers multi-functional uses which create a number of environmental and quality of life benefits to the local community.
- 5.305 The Corridor promotes health and wellbeing, with a variety of open spaces both for active sports, gentle recreation and relaxation, and children's play. There is an excellent network of footpaths and cycleways throughout, including national cycle route 18, which are not just for recreational purposes but make a crucial contribution to day to day travel and transportation needs of commuting residents as most link to the town and train station. These movement networks provide a safe, traffic-free route and also reduce pollution.
- 5.306 As much of the Green Corridor is located within the flood zone it also acts as flood plain and water storage which prevents flooding, as well as being an important habitat for biodiversity. All along the green corridor highly valuable habitats for wildlife are found, providing an important network for the movement of wildlife through the urban areas, between designated nature sites and out towards the countryside. The Green Corridor falls within the Mid Kent Greensand and Gault Biodiversity Opportunity Area (BOA). Much of the Green Corridor is also designated as Local Nature Reserve (LNR) and includes a number of Local Wildlife Sites (LWS).
- 5.307 Protection and enhancement of the Green Corridor is a key objective of this Local Plan. New development on land within the corridor will be strictly controlled to ensure that it retains the aspects that create the functional networks and other health, well-being and amenity benefits detailed above, and which will assist in delivering the targets for the Mid Kent Greensand and Gault BOA set out in the Kent Environment Strategy. Proposals within the Green Corridor that are directly related to, or ancillary to, the existing principal use of that section will be permitted, for example, where they enhance or improve an existing recreation, amenity or leisure use.
- 5.308 Development proposals that do not directly relate to the existing principal use but that would enhance the Green Corridor in other ways will be considered favourably, particularly if they are on brownfield land, are in accordance with a site specific policy in this Local Plan, or have been identified as a key project or opportunity area in the Green Corridor Action Plan. Proposals within the Green Corridor that create overriding planning benefits will be considered on their own merits.

- 5.309 The Green Corridor Action Plan 2016, which supports this Local Plan provides a detailed description of the value of each area of the current Green Corridor Network and identifies new areas for extension to the designation and proposes opportunity areas to be considered in the future for extensions (see Policies Map). The action plan outlines future enhancement projects and recommended maintenance, and provides information on priorities and estimated costs of the enhancements. Development proposals on land within and adjoining the Green Corridor should provide evidence that the development proposals have considered the Action Plan. Early liaison with key stakeholders such as the Environment Agency (where development is in close proximity to the rivers), Kent Stour Countryside Project (KSCP), who manage many of the Green Corridor projects and coordinate local volunteers, and other relevant local nature or transport groups/organisations is recommended for all proposals within or adjoining the corridor.
- 5.310 All development proposals on land within or adjoining the Green Corridor designation must demonstrate that the proposal would not harm the overall environment, biodiversity value, visual amenity, movement networks or existing functions of the Green Corridor. All proposals must make a positive contribution to the Green Corridor in respect of its environment, biodiversity, visual amenity, movement networks or functioning and development on sites adjoining the corridor must also take into account its impacts on the setting.

Policy ENV2 - The Ashford Green Corridor

The protection and enhancement of Ashford's Green Corridor is a key objective.

Development proposals within the identified Corridor designation (and proposed extensions) will be permitted, providing that it is compatible with, or ancillary to, their principal open space use or other existing uses within them, and it can be demonstrated that the proposal would not harm the overall environment, biodiversity, visual amenity, movement networks or functioning of the Green Corridor.

Other forms of development proposals, including those relating to an existing use within the Green Corridor will not be permitted, unless it would be in accordance with a site specific policy in this Local Plan; or where it relates to a) the redevelopment of a suitable brownfield site or b) delivers overriding benefits, and in either scenario, that it can be demonstrated that there would be no significant harm to the overall environment, biodiversity, visual amenity, movement networks or functioning of the Green Corridor.

Development proposals on land adjoining the Green Corridor shall provide suitable access and links to the existing networks of the adjoining Green Corridor wherever possible; and make a positive contribution to the Green Corridor in respect of its environment, biodiversity, visual amenity, movement networks or functioning and its setting.

Development proposals must take into consideration the appraisals, projects and management recommendations set out for the specific areas in the Ashford Green Corridor Action Plan, including the identified proposed extension areas to the designation.

Landscape Character

- 5.311 Ashford Borough enjoys a rich variety of landscapes from the North Downs to the Romney Marsh with the Greensand Ridge, the Stour river valleys and extensive areas of the High Weald and Low Weald between. These provide important recreational resources for both residents and visitors, as well as forming the attractive setting for the towns and villages that make the Borough a special place to live.

Areas of Outstanding Natural Beauty

- 5.312 Large parts of the Borough lie within two Areas of Outstanding Natural Beauty, the Kent Downs AONB and the High Weald AONB. The distinctive landscapes of these AONBs play an important role in defining the overall character of the Borough. The Council has a statutory duty under the Countryside and Rights of Way Act (2000) to conserve and enhance the natural beauty of these designated landscapes. The NPPF requires that great weight (paragraph 115) is given to the conserving of the landscape and scenic beauty of AONBs and so, in accordance with paragraph 116 of the NPPF, major developments in these designated areas will not be permitted except in exceptional circumstances and where it can be demonstrated that they are in the public interest. All proposals within the AONBs must take account of the landscape character areas and policies of the appropriate AONB Management Plan and other relevant AONB Guidance.

Landscape Character Assessments

- 5.313 Where development is considered appropriate in principle it will be required to be designed in a way which complements the particular type of landscape in which it is located. Key characteristics and features that shape landscape character include :

Landform, topography and natural patterns of drainage - the way in which development fits within the landscape can be determined by its relationship with the natural topography of the area. Particular landform features that contribute to the character of the landscape in that area (and their setting) should be protected. Views into and from a site will be a relevant factor in assessing the impact of a proposal. Developments should be planned around natural patterns of drainage and minimise the need to divert or block these.

The pattern and composition of trees and woodlands - trees and woodlands often constitute valuable features in a landscape by giving it definition and legibility. These features should normally be retained and protected. Similarly, the nature of the woodland may be a relevant factor in assessing the impact of a development on the character of the landscape.

The type and composition of wildlife habitats - the presence of wildlife itself within a landscape area can often contribute towards its attractiveness and its character by giving it activity and vibrancy. The identification and protection of habitat should be part of development proposals.

The pattern and composition of field boundaries - the size and definition of field boundaries may be a significant factor in giving a landscape its character. Development proposals should retain existing hedgerows and maintain the prevailing pattern of field

boundaries and where appropriate the council shall seek the repair or replanting of damaged field boundaries.

The pattern and distribution of settlements, roads and footpaths - The form and pattern of built development within the landscape provides the contrast with the natural countryside which together creates the overall character of the area. This may have evolved over many years or may be more recent but in either case, should be considered as a relevant factor in assessing the impact of development proposals.

The presence and pattern of historic landscape features - heritage landscape features are likely to play an important role in defining the character of the landscape. These features and their setting should be protected from new development that would adversely affect their integrity or views to or from them.

The setting, scale, layout, design and detailing of vernacular buildings and other traditional man-made features - the landscape character can also be defined in part by the local character of individual or groups of buildings. Where such buildings play an important role in the identification of landscape character, new development should take account of their scale, design and detailing.

Setting of the AONB

5.313.1 Ashford benefits from two Areas of Outstanding Natural Beauty (AONBs) within its area – the Kent Downs and the High Weald. AONBs are designated by the Government for the purpose of ensuring that the special qualities of our finest landscapes are conserved and enhanced. In planning policy terms they have an equivalent status to National Parks, and are to be given the highest level of landscape protection. Section 82 of The Countryside and Rights of Way Act 2000 confirms that the primary purpose of AONB designation is to conserve and enhance the natural beauty of the area.

5.313.2 Where appropriate, local authorities are required to take into consideration the setting of an AONB when determining planning applications, in accordance with duties under Section 85 of the 2000 CROW Act. Section 85 places a statutory duty on all relevant authorities requiring them to have regard to the statutory purpose of AONBs when coming to decisions or carrying out their activities relating to, or affecting land within these areas.

Although the NPPF does not specifically refer to setting in the context of AONBs, the Planning Practice Guidance explains the legal duties of local planning authorities in relation to AONBs as per the above. Paragraph: 003 Reference ID: 8-003-20140306 adds:

“The duty is relevant in considering development proposals that are situated outside National Park or Area of Outstanding Natural Beauty boundaries, but which might have an impact on the setting of, and implementation of, the statutory purposes of these protected areas.”

5.313.3 The Kent Downs and High Weald AONBs have precise geographical borders based on an assemblage of unique landscape character. 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. In some cases

the setting area will be compact and close to the AONB boundary, perhaps because of natural or human made barriers or because of the nature of the proposed change.

5.313.4 Generally speaking, the settings of AONBs within the borough are of a high scenic quality, are of importance for rarity, tranquillity, representativeness and variety of local landscapes, and are unspoilt by large-scale intrusive development. Their characters are common with the AONBs, including topographic and visual unity, with a clear sense of place, and usually aspects of historical, wildlife and/or architectural conservation interest.

5.313.5 Scale, height, siting, use, materials and design are factors that will determine whether a development affects the natural beauty and special qualities of the AONB. Compatibility with surroundings, movement, reflectivity and colour are important in considering impact on setting. Generally, the further away a development is from the AONB boundary, the less the impact on this designation.

5.313.6 Within the setting of the AONBs, priority will be given over other planning considerations to the conservation or enhancement of natural beauty, including landscape, wildlife and geological features, while recognising that landscape considerations carry less weight than within these designations. At the same time, due regard will be had to the economic and social well-being of the area.

5.314 The landscape character of the Borough has been extensively analysed in work carried out in two Landscape Studies. The findings of these Studies, which together define 44 Landscape Character Areas (LCAs) across the Borough outside of the two AONBs and the Ashford and Tenterden Urban Areas, are brought together and set out in detail in the Landscape Character SPD (2011). This document sets out clearly the key characteristics of each LCA. All proposals coming forward should have regard to this SPD, and to the guidance on landscape characteristics that it provides, so as to ensure that new development does not compromise or damage landscape character but instead contributes towards enhancing the character of the LCA in which the site is located.

5.315 Development proposals near to the boundary of a LCA should take account of any relevant landscape features or characteristics of the adjacent LCA in addition to that in which it is situated, in order to ensure that there would be no adverse impacts on the character of that area.

Policy ENV3a - Landscape Character and Design

All proposals for development in the borough shall demonstrate particular regard to the following landscape characteristics, proportionately, according to the landscape significance of the site:

- a) **Landform, topography and natural patterns of drainage;**
- b) **The pattern and composition of trees and woodlands;**
- c) **The type and composition of wildlife habitats;**
- d) **The pattern and composition of field boundaries;**
- e) **The pattern and distribution of settlements, roads and footpaths;**
- f) **The presence and pattern of historic landscape features;**
- g) **The setting, scale, layout, design and detailing of vernacular buildings and other traditional man made features;**
- h) **Any relevant guidance given in the Landscape Character SPD;**
- i) **Existing features that are important to the local landscape character shall be retained and incorporated into the proposed development;**
- j) **Any non-designated, locally-identified, significant landscape features justified in a Parish Plan or equivalent document.**

ENV3b – Landscape Character and Design in the AONBs

The Kent Downs and High Weald AONBs should be conserved, and where appropriate enhanced or restored, in accordance with their landscape significance. Major development proposals within the AONBs will only be permitted in exceptional circumstances and where they are in the public interest.

Other proposals within and affecting the AONBs will be permitted under the following circumstances:

- **The location, form, scale, materials and design would conserve and enhance the character of the landscape.**
- **The development would enhance the special qualities, distinctive character and tranquillity of the AONB.**
- **The development conforms with the relevant AONB management plan and any associated guidance.**
- **The development demonstrates particular regard to those characteristics outlined in Policy ENV3a, proportionate to the high landscape significance of the AONB.**

Dark Skies

- 5.316 Paragraph 125 of the NPPF identifies the importance of minimising the impact of light pollution, stating *'by encouraging good design, planning policies and decisions should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation'*.
- 5.317 This is of particular relevance to Ashford Borough as the rural areas in the southern part of the borough currently enjoy some of the darkest skies in the south east region, unaffected as yet by the effects of external lighting often brought on by development. The area around Woodchurch in particular, to the east of Tenterden, has been measured by global satellites as comprising one of the only areas in the county with no light detected. It therefore provides important opportunities for stargazing activity and meets the criteria for an 'intrinsically dark landscape' as described by the NPPF. This opportunity is currently being pursued by the Council, in partnership with the relevant Parish Councils and in close consultation with the Astronomical Society (a key and highly active part of the local voluntary sector within the Borough) to secure the designation of this area as a Dark Sky Zone.
- 5.318 In addition, much of the Kent Downs and High Weald AONBs currently enjoy low levels of light pollution, an important aspect of their landscape character and tranquility and one which it is therefore important to seek to conserve and enhance.
- 5.319 In all areas of the Borough, obtrusive external lighting can result in harm to residential amenity and to the diurnal rhythms of biodiversity. Light control is therefore a key planning consideration in all development proposals, with particular attention required to this aspect of development in the zones of darkest skies and existing low district brightness, as set out in the Ashford Dark Skies SPD (2014). In such zones, lighting should be the minimum needed for security or working purposes and should minimise the potential obtrusive light from glare or light trespass. Lighting proposals that would significantly affect areas of nature conservation importance, including National Nature Reserves, SSSIs and Local Wildlife Sites will only be permitted in exceptional circumstances.

Policy ENV4 – Light Pollution and Promoting Dark Skies

All proposals will be expected to comply with the guidance and requirements set out in the Council’s Dark Skies SPD (2014).

Proposals where external lighting is required should include a full lighting scheme that provides information about layout and beam orientation, a schedule of the light equipment proposed including luminaire type, mounting height, aiming angles and lumen unit levels. Proposals will be permitted provided that the lighting proposed is the minimum appropriate for its purpose, is designed such that lighting is directed downwards, with a beam angle below 70 degrees and that no significant adverse effects individually or cumulatively will result to the character of the area, the residential amenity of local residents, the safety of vehicle users and pedestrians or the diurnal rhythms of the Borough’s biodiversity assets.

Within the area proposed to be designated as a ‘dark sky zone’, proposals will only be permitted where they adhere to the above requirements and where they can demonstrate that there will be no significant adverse effects on the visibility of the night sky or its intrinsically dark landscapes.

Protecting Important Rural Features

- 5.320 In addition to the many and varied elements that constitute landscape character, there are a number of specific features that are worthy of protection in their own right. Ancient and semi-natural woodlands are often not just important landscape features but provide a range of habitat and biodiversity value not found in other forms of woodland. The NPPF (paragraph 118) advises against the loss or deterioration of ancient woodland and aged or veteran trees, unless the need for and benefits of the development in that location clearly outweigh the loss. The protection of such important features of the Borough’s landscapes which have long contributed to the quality and variety of the countryside here is an important objective that requires specific policy coverage.
- 5.321 The river corridors and tributaries that permeate the rural areas of the Borough also play an important role in defining the appearance and function of many parts of the Ashford countryside, including several villages. These corridors are important for floodwater storage and conveyance and safeguarded water quality and can play a variety of roles from recreational routes to wildlife habitats and therefore are considered worthy of protection from inappropriate development.
- 5.322 The Borough’s rural lanes provide the means to travel around the countryside but are also distinctive features in their own right that have played a role in shaping the overall character and appearance of the countryside of this Borough over many centuries. Some rural lanes may have a particular landscape, nature conservation or historic importance and their character and appearance should be protected. Similarly, the public rights of way network (including bridleways) often reflects a legacy of the Borough’s strong history of routeways and provides a mosaic of opportunities across the borough for walking, equestrianism and recreation in the countryside. It is important that this network is retained and, if possible, enhanced through working with the County Council to deliver its Right of Way Improvement

Plan, (currently entitled the Countryside Access Improvement Plan) and the creation of clear, attractive connections to (or through) new developments.

Policy ENV5 – Protecting important rural features

All development in the rural areas of the Borough shall protect and, where possible, enhance the following features:

- a) **ancient woodland and semi-natural woodland;**
- b) **river corridors and tributaries;**
- c) **rural lanes which have a landscape, nature conservation or historic importance; and**
- d) **public rights of way.**

Water and Climate Change

Development and Flood Risk

- 5.323 Ashford is at particular risk from fluvial flooding, as five main rivers converge in the town – the Great Stour, East Stour, Aylesford Stream, Whitewater Dyke and Ruckinge Dyke. Two flood storage reservoirs upstream of Ashford, one at Aldington on the East Stour, the other at Hothfield on the Great Stour currently protect Ashford town from fluvial flooding. These reservoirs were recently tested between December 2013 and February 2014 with the wettest winter since 1910. The region received 258% of long term average rainfall with high peak flows in local rivers. The reservoirs neared full capacity but prevented widespread flooding in Ashford¹⁰.
- 5.324 Flooding remains a critical issue for Ashford given the topography of the surrounding area and the geology which is predominantly Chalk, with outcrops of Gault Clay and Lower Greensands. The rivers are highly responsive to flows which increase rapidly after heavy rain and fall quickly in drier spells giving them ‘flashy’ characteristics. Whilst the Ashford urban area has had significant investment in flood alleviation in recent years, there are some areas of the town still considered to be at risk of flooding by the Environment Agency, notably in South Ashford. It is therefore essential that development does not increase this risk. New development presents an important opportunity to ‘build-in’ additional local capacity in terms of flood mitigation. Adaptations to new development can contribute towards combating the effects of climate change over the next 100 years.
- 5.325 The NPPF and accompanying Planning Practice Guidance makes it clear the importance of accounting for flood risk within Local Plans to protect people and property from flooding. The Environment Agency has identified areas at risk of flooding from rivers and the sea for the Ashford Borough, available from the Flood Mapping pages of the Agency’s website¹¹. These areas are defined into four categories as follows, Zone 1 (low probability of flooding),

¹⁰ Information supplied by the Environment Agency.

¹¹ What’s in your Back Yard, Environment Agency: <http://apps.environment-agency.gov.uk/wiyby/37837.aspx>

Zone 2 (medium probability), Zone 3a (high probability) and Zone 3b (functional floodplain). These flood zones are indicative of the potential undefended floodplain.

- 5.326 In allocating new areas of development, the Local Plan has generally avoided areas with a high probability of flood risk and the functional floodplain. All future proposals should preferably be located in Flood Zone 1, as locating development in Flood Zone 1 means that future development is not reliant on costly fluvial flood defences that may become unsustainable in future due to climate change. It should be noted, that runoff from development within Flood Zone 1 has the potential to cause an increase in the probability of flooding if not mitigated. Therefore, any development which causes an additional flood risk by virtue of increasing runoff would need to be suitably mitigated or it will be considered unacceptable.
- 5.327 However, for other reasons of sustainability and regeneration and where there are no reasonable alternative available sites, the Council may give consideration to the vulnerability of land uses in considering development in higher flood risk areas. In these circumstances, developments will need to meet the ‘exceptions test’ as specified within the NPPF. It will be important to establish the ‘actual’ risk of flooding, which takes account of the protection afforded by any flood defences present, and the ‘residual’ risk should that level of protection fail, as set out within the Ashford SFRA. The development must demonstrate that any additional flood risk has been adequately mitigated either on or off site.
- 5.328 Site-specific flood risk assessments (FRAs) should be submitted alongside development proposals in accordance with the Planning Practice Guidance. FRAs should be appropriate to the scale and nature of proposed development taking account of flood risk and future climate change.
- 5.329 The functional floodplain is *‘land where water has to flow or be stored in times of flood’* and will have the highest protection against development. Only water compatible developments or essential infrastructure will be allowed in these areas where they have passed both exception tests. In any event, development must avoid flood storage areas or restricting water flows. The Ashford Green Corridor is made up of open spaces and recreational areas alongside the rivers that flow through Ashford, much of which is within the functional floodplain. These areas will be protected and enhanced for flood storage and their amenity value.
- 5.330 In line with government guidance, the Council commissioned the Ashford Strategic Flood Risk Assessment (2014) which assessed the extent and nature of flood risk across the Borough and the implications for land use planning, taking account of the anticipated impacts of climate change. The Strategic Flood Risk Assessment has been updated in 2017 to take account of the revised climate change allowances, published in 2016. In addition, Kent County Council, as Lead Local Flood Authority prepared the Ashford Stage 1 Surface Water Management Plan. These documents together with the Environment Agency’s maps should be used to support the consideration of all planning applications.
- 5.331 Applicants will need to demonstrate that their proposal accords with both the NPPF and Local Plan policies in relation to flood risk. The appropriate responsible bodies should be consulted, as required, during the initial design process, including the Environment Agency, Internal Drainage Boards, Southern Water and Kent County Council.

Policy ENV6 – Flood Risk

Proposals for new development should contribute to an overall flood risk reduction.

The sequential test and exception tests established by the National Planning Policy Framework will be strictly adhered to across the Borough, with new development preferably being located in Flood Zone 1.

Development will only be permitted where it would not be at an unacceptable risk of flooding itself, and, there would be no increase to flood risk elsewhere.

In exceptional circumstances, where the tests above cannot be met, essential transport or utility infrastructure, or other development on brownfield sites may be allowed if:

the development is designed to be compatible with potential flood conditions, and,

- a) there are no alternative sites in a lower flood risk zone, and**
- b) suitable flood protection and mitigation measures are incorporated into the development appropriate to the nature and scale of risk, and**
- c) comprehensive management and maintenance plans are in place for its effective operation during the lifetime of the development (taking account of climate change allowances), and**
- d) adoption arrangements are secured (where applicable) with the relevant public authority or statutory undertaker, and**
- e) the development would make a significant contribution to the overall sustainable development objectives of the Local Plan, such that the wider sustainability benefits of the development outweigh the flood risk, and**
- f) it can be demonstrated to the satisfaction of the Council and the Environment Agency that adequate resistance and resilience measures have been put in place to avoid any increase in flooding either on site or elsewhere.**

A site-specific Flood Risk Assessment (FRA), endorsed by the Environment Agency, appropriate to the scale and nature of the development and the risks involved will be required inline with Planning Practice Guidance and in particular where the Strategic Flood Risk Assessment or Surface Water Management Plan, indicates there are records of historic flooding or other sources of flooding.

In all cases, development that would harm the effectiveness of existing flood defences or prejudice their maintenance or management will not be permitted.

Water Resources and Efficiency

- 5.334 Water is a finite resource essential for human health and wellbeing as well as the natural environment and needs to be managed. Water resources are managed by the Environment Agency in England who implement a licensing strategy for the abstraction of water for various purposes, including public water supplies, industry and agriculture. Once abstracted from the environment responsibility passes over to the water undertakers who have a statutory duty to supply drinking water.

- 5.335 South East Water (SEW) supplies the Ashford Borough with potable water. Currently, household demand for water is a high proportion of the current effective rainfall which is available to meet demand, and as such the whole of SEW's supply area is currently classified as 'an area of serious water stress'¹².
- 5.336 Public concern about water supply remains high. SEW forecast data shows that if the company 'do nothing' there will be insufficient water to meet future demand across their supply area. The SEW Water Resource Management Plan (WRMP) (2015-2040) uses a twin-track approach to managing this supply demand deficit through demand management and water resource development and, without both components of this approach in place new development may be restricted in future. However, SEW have confirmed that following sensitivity testing on housing numbers their WRMP programme will fully satisfy the growth in demands within their supply area proposed within the Ashford Local Plan.
- 5.337 Demand management measures include a long-term strategy to reduce water use focused on changing customer behaviour. The WRMP has a target to reduce per capita consumption of water across their supply area to 149 litres per person per day (l/p/d) by 2040. This is a reduction against the current baseline of 166 l/p/d and highlights the need for sustained water efficiency improvements. However, there is still a need for the optional requirements for water efficiency on new build. South East Water's 'Water Efficiency Strategy' makes it clear that the standards for new homes are a significant part of the company's planning for water efficiency; that new homes provide the best opportunity for providing best practice water efficiency in the most cost-effective ways; and that SEW depends on the commitment of the Borough Council to help it meet its targets. The only way, therefore, that overall water efficiency can be improved is for the optional requirement to be sought.
- 5.338 A range of new water resource infrastructure is being proposed to increase capacity within the WRMP some located within the Ashford Borough or adjoining local authority area. This includes a new groundwater source at Maytham Farm, Rolvenden with plans to replace non-operational works with a new treatment works (in 2020), and a new reservoir at Broad Oak near Canterbury (in 2033).
- 5.339 There is a need for local authorities, developers and water companies to work closely together to deliver the efficiencies necessary to meet the identified water supply targets set out within the SEW WRMP (2015-2040).
- 5.340 The Government updated Building Regulations Part G in 2015, introducing an 'optional' requirement of 110 l/p/day for new residential development, which should be implemented through local policy where there is a clearly evidenced need. The evidence, outlined in detail in the supporting Water Cycle Study, clearly justifies the need for more stringent water efficiency targets for new residential development in the Borough.

Policy ENV7 – Water Efficiency

All new residential development must achieve as a minimum the optional requirement set through Building Regulations for water efficiency that requires an estimated water use of no more than 110 litres per person per day.

¹² Environment Agency, Water Stress Classification (July 2013).

Water Quality, Supply and Treatment

- 5.341.1 The Council considers it critical that adequate water supply and wastewater treatment facilities are in place to serve development. Significant engagement has taken place with the relevant service providers in relation to the provision of both water supply and wastewater infrastructure in the Borough, and it is confirmed that there is sufficient capacity for planned development up to 2030. However, planning for the period beyond 2030 will begin prior to the end of this plan period, and it is possible that preliminary works to ensure continued capacity, in liaison with the service providers, will be required in order to accommodate new development post-2030.
- 5.341.2 With regard to wastewater infrastructure, significant recent investment in strategic infrastructure has taken place, including at the wastewater treatment works and to the trunk sewers in the borough. Should the need for further investment arise, it can be planned and funded through the water industry's five-yearly price review process. The Council considers it necessary to ensure that development does not go ahead before any required improvements to the strategic infrastructure are made and the Council will need to be satisfied when granting permission for major development that there is sufficient capacity at the wastewater treatment works, or that the capacity will be provided, in time to serve the new development.
- 5.341.3 With regard to the sewerage system (network of sewers and associated facilities that convey wastewater to the treatment works for treatment), developers will be required to work in collaboration with the service provider to ensure that the infrastructure is delivered in parallel with development. New residential and commercial development will be permitted only if sufficient capacity is either available, or can be provided in time to serve it. Where there is insufficient capacity in the sewerage network, developments will be required to provide a connection to the sewerage system at the nearest point of adequate capacity.
- 5.342 The majority of Ashford's water supply comes from large underground chalk and greensand aquifers that need regular replenishment over sustained periods. These aquifers are currently over abstracted and over licensed and there is a 'presumption against' further consumptive abstraction¹³. As well as being an important source of drinking water, groundwater provides rivers with their base-flow which if not maintained can be detrimental to river water quality. DEFRA are proposing changes to water abstraction licensing exemptions in England which will bring in New Authorisations into the licensing system in 2016 to better manage water at catchment level. Demand management measures such as water efficiency and the use of sustainable drainage to retain groundwater supplies are essential for the long-term resilience of water supplies in the Ashford.
- 5.343 The Water Framework Directive (WFD) is the legal framework established to protect and restore clean water throughout Europe. A key target of the WFD is to achieve 'good' status by 2021 or 2027. Aylesford Stream on the East Stour was previously the only waterbody within East Kent achieving 'Good' WFD status but the latest cycle (2) shows that it is no longer meeting WFD objectives. Whilst pollution from wastewater has a significant impact on water quality other impacts such as road runoff, rural discharge from farming practices

¹³ Stour Abstraction Licensing Strategy (2013) Environment Agency

and low rainfall combined with widespread water abstraction and physical modifications are also contributing to poor water quality.

- 5.344 New development must ensure that there are no direct or indirect adverse effects on the quality of water supplies. Appropriate mitigation measures need to be put in place to minimise the impact of increased urbanisation on the water environment. Without such measures, there will be a significant risk of groundwater pollution and flooding.

Policy ENV8 - Water Quality, Supply and Treatment

Major proposals for new development must be able to demonstrate that there are, or will be, adequate water supply and wastewater treatment facilities in place to serve the whole development, or where development is being carried out in phases, the whole of the phase for which approval is being sought. Improvements in these facilities, the timing of their provision and funding sources will be key to the delivery of development.

All development proposals must provide a connection to the sewerage system at the nearest point of adequate capacity, as advised by the service provider, and ensure future access to the existing sewerage systems for maintenance and upsizing purposes.

Schemes that would be likely to result in a reduction in the quality or quantity of groundwater resources will not be permitted. The Council will support, in principle, infrastructure proposals designed to increase water supply and wastewater treatment capacity subject to there being no significant adverse environmental impacts and the minimisation of those that may remain.

Sustainable Drainage Systems (SuDS)

- 5.346 Water supply, flood risk and water quality have all been identified as critical constraints to the sustainable growth of Ashford. Ashford's water environment needs to be managed carefully and the multi-benefits of implementing SuDS within local developments can not be overstated.
- 5.347 SuDS can make a real difference to flood risk by managing the quantity of surface water run-off from development, they can also moderate flow rates and prevent sudden water level rises following heavy rain. SuDS can significantly reduce harm to valuable water resources by retaining water within the local hydrological system as well as protecting water resources from pollution by filtering run-off. SuDS can form an integral part of both soft or hard landscaping and can contribute to the quality of green space for the benefit of amenity, recreation and wildlife. SuDS may also allow new development in areas where existing drainage systems are close to capacity, thereby enabling development within existing urban areas.
- 5.348 The Flood and Water Management Act 2010 introduced the concept of flood risk management into law and sets out the intention for SuDS in all new development. The NPPF requires LPAs to minimise vulnerability and provide resilience to the impacts of climate change, and requires all new developments in areas at risk of flooding to give 'priority to the

use of sustainable drainage systems¹⁴. The Government have recently made changes to the NPPF making it clear that they expect SuDS to be provided in all new major development wherever it is appropriate¹⁵. DEFRA have published ‘non-statutory technical standards for sustainable drainage systems¹⁶’ which provides guidance on minimum standards of design, maintenance and operation of SuDS systems and sits alongside the Planning Practice Guidance. These documents together with the Ashford Stage 1 Surface Water Management Plan¹⁷ provide information and guidance in formulating planning proposals.

- 5.349 The Ashford Integrated Water Management Study¹⁸ identified that SuDS with restricted discharges would be integral to managing flood risk as Ashford grows.
- 5.350 SuDS are designed to control surface water run off close to where it falls and mimic natural drainage as closely as possible. SuDS also provide opportunities (in line with NPPF) to:
- reduce the causes and impacts of flooding;
 - remove pollutants from urban run-off at source;
 - combine water management with green space with benefits for amenity, recreation and wildlife.
- 5.351 In April 2015 KCC as Lead Local Flood Authority for Kent become a statutory consultee as per national requirements following a parliamentary statement in December 2014. Kent County Council have an adopted “Drainage and Planning Policy Statement” which should inform development of drainage schemes. There are also situations where consultation with the Environment Agency will be necessary in relation fluvial flood risk, water quality, biodiversity and groundwater protection, which may impact measures proposed for surface water management.
- 5.352 A recent discharge rates assessment based on the latest flood modelling for Ashford confirms the potential to reduce flood risk in Ashford through development appropriately managing and ultimately reducing site runoff rates through new development will assist in ensuring that the floodplain extents within Ashford do not increase even in light of expected changes in rainfall intensity as a result of predicted climate change.
- 5.353 The findings of the Discharge Rates Assessment demonstrated that the current Ashford Borough Council SuDS SPD policy (CS20) standard of 4 l/s/ha is difficult to achieve when applying to small site developments. The infrastructure required to store the quantity of water needed to achieve this discharge rate would not be feasible within smaller sites, as long term storage requires large areas of land.
- 5.354 The Assessment also recommended that discharge requirements should be based on site-specific conditions and monitoring (if available). By undertaking site-specific studies, a detailed analysis of what SuDS could be implemented into the site could also be achieved.
- 5.355 Finally, it was also recommended that the Council should consider a higher discharge rate than 4 l/s/ha to apply borough wide if the site is brownfield. This study has outlined that the

¹⁴ National Planning Policy Framework (2012), DCLG, Paragraph 103.

¹⁵ Written Ministerial Statement, DCLG (December 2014) HCWS161.

¹⁶ Non-statutory technical standards for sustainable drainage systems, Defra, March 2015.

¹⁷ KCC, Ashford Stage 1 Surface Water Management Plan (October 2013).

¹⁸ Ashford Integrated Water Management Study (2005), Ashford’s Future / Environment Agency

majority of the allocated sites would be capable of accommodating drainage infrastructure that would be able to discharge to half-capacity within 24 hours, based on a discharge rate of 5 l/s/ha.

- 5.356 In light of the recommendations of this report, the SPD is to be updated to reflect recent changes in local and national policies with respect to the requirements for discharge runoff rates throughout the borough and recent government changes on SuDS. These changes will seek to continue the reduction in flood risk through development across the borough, targeting larger sites where multifaceted benefits can be obtained by the introduction of appropriate SuDS and discharge rate reduction. The discharge rates will also be simplified to be more aligned with current guidance / established best practice wherever possible to ensure a robust reasoning behind the policy document. Moreover, discharge rates will be more site specific and should mimic the current drainage regime for a site, whilst also reducing the peak discharges from the critical storms. The ultimate aim of the policy is to improve flood risk management in the Borough through future development.
- 5.357 The existing Sustainable Drainage SPD (2010) rates remain in place until such time that an updated Sustainable Drainage SPD is released, unless alternative discharge rates are agreed by the Council in consultation with KCC as Lead Local Flood Authority.
- 5.358 The updated Sustainable Drainage SPD is anticipated to recommend the following discharge rates based upon the Discharge Rates Assessment:
- **Greenfield** – Discharge rates for undeveloped sites should discharge at a maximum of 5l/s/ha, or 10% below current greenfield rates for the existing 1:100 storm event, whichever is lower. There must be no increase in discharge rate from less severe rainfall events, with evidence submitted to demonstrate this principle.
 - **Previously Developed** – Discharge rates for previously developed sites must meet at a minimum a reduction of 10% of existing runoff rates where this existing discharge rate can be established or 10.26l/s/ha where this cannot be established; but must endeavour to achieve 5 l/s/ha or seek to achieve 50% reduction from existing runoff rates for the site (where this can be established).
- 5.359 The above proposals set out the continuation of reducing runoff rates within the Borough through development.
- 5.360 Within the Ashford Borough the requirement for the inclusion of SuDS within major development has been extended beyond that set out within the NPPF, and also includes minor developments. Permitted developments are also encouraged to integrate SuDS into development.
- 5.361 Developers will normally be expected to make provision for SuDS on-site where it is practical to do so. As an exception, where SuDS cannot be achieved on developments in the Ashford urban area, developers will be required to make suitable in-lieu financial contributions through Section 106 Agreements. Consideration should also be given to ‘strategic SuDS’ where a limited number of attenuation and treatment areas are needed downstream in areas of significant planned development.
- 5.362 The Council expects SuDS to form an integral part of the development design process. This is because successful SuDS require a range of discharge or infiltration techniques that need to

be designed in a sequential order. Whilst primarily used to attenuate runoff, early consideration of SuDS provides the opportunity to design-in other benefits which will deliver more sustainable developments. Whilst it is acknowledged that some sites can be more challenging than others, SuDS can be applied to any site. For the reasons set out above, the Council advocates the use of masterplanning in SuDS. Useful guidance on how to successfully integrate SuDS through the masterplanning process has been developed by KCC in Water.People.Place¹⁹. Kent County Council as Lead Local Flood Authority and statutory consultee has also produced a Drainage and Planning Policy Statement which should be referred to in the consideration of planning applications²⁰

Policy ENV9 - Sustainable Drainage

All development should include appropriate sustainable drainage systems (SuDS) for the disposal of surface water, in order to avoid any increase in flood risk or adverse impact on water quality, and to mimic the drainage from the pre-developed site. Any SuDS scheme should be compliant with the adopted Sustainable Drainage SPD and any subsequent revisions.

SuDS features should always be the preferred option and provided onsite wherever practicable. In the Ashford urban area if this cannot be achieved, then more strategic forms of SuDS may be appropriate. In such circumstances, developers will need to contribute towards the costs of provision via Section 106 Agreements.

All development proposals will be required to:

- a) **Ensure all new developments are designed to reduce the risk of flooding, and maximise environmental gain, such as: water quality, water resources, biodiversity, landscape and recreational open space;**
- b) **Ensure that all new developments are designed to mitigate and adapt to the effects of climate change;**
- c) **Lower runoff flow rates, reducing the impact of urbanisation on flooding;**
- d) **Protect or enhance water quality. Incorporating appropriate pollution control measures, to ensure there are no adverse impacts on the water quality of receiving waters, both during construction and in operation;**
- e) **Be sympathetic to the environmental setting and the needs of the local community;**
- f) **Incorporate a SuDS scheme that is coherent with the surrounding landscape and/or townscape;**
- g) **Provide a habitat for wildlife in urban watercourses; and encourage natural groundwater recharge (where appropriate);**
- h) **Demonstrate that opportunities have been taken to integrate sustainable drainage with biodiversity enhancements through appropriately designed surface water systems, as well as contribute to amenity and open spaces;**
- i) **Demonstrate that the first 5mm of any rainfall event can be accommodated and disposed of on-site;**
- j) **Demonstrate that clear arrangements have been established for the operation and maintenance of the SuDS component for the lifetime of the development.**

¹⁹ Water.People.Places can be found at: <http://www.kent.gov.uk/waste-planning-and-land/flooding-and-drainage/sustainable-drainage-systems>

²⁰ KCC, Drainage and Planning Policy Statement, (September 2015).

Renewable Energy

- 5.370 The NPPF (Para. 97) recognises the responsibility on all communities to contribute to energy generation from renewable and low carbon sources. LPAs are required to have a positive strategy to promote energy from renewable and low carbon sources as it helps ensure a secure more sustainable supply of energy that reduces carbon emissions minimising the impact of climate change.
- 5.371 There is an array of technology available which is classified as renewable and low carbon technology, some of which are now commonplace within Ashford developments. The more familiar types used include solar thermal and photovoltaics panels, ground or air source heat pumps and, to a lesser extent, combined heat and power, wind turbines and small scale hydro. These technologies should be located onsite or in close proximity to the end user.
- 5.372 National policy requires LPAs to *‘design their policies to maximise renewable and low carbon energy development while ensuring that adverse impacts are addressed satisfactorily, including cumulative landscape and visual impacts’*.
- 5.373 It is recognised that any planning decision needs to balance the impacts of renewables provision against the benefits of the proposal and planning practice guidance makes it quite clear that renewable energy does not automatically override environmental protection.
- 5.374 This is significant for the Ashford Borough which has large areas designated as AONB and is predominantly rural in character. Proposals which have an adverse impact on the landscape character, distinctive landform, special characteristics and qualities of the AONB or its setting would need to be opposed unless their impacts can be successfully mitigated. Local topography will be an important factor when considering whether there could be any damaging effect on the landscape. The use of Landscape Character Assessments and Landscape and Visual Impact Assessments will be useful in this context and their outcomes should inform any future proposal.
- 5.375 In helping increase the use and supply of renewable and low carbon energy, the NPPF (para. 97) requires Local Plans to *‘identify opportunities where development can draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers’*. Decentralised energy relates to local renewable energy and can encompass a wide range of technologies. Renewable and low carbon energy includes heating and cooling as well as the generation of electricity.
- 5.376 Co-locating potential heat customers provides the opportunity to utilise district heat networks subject to appropriate heat demand. If supported by Combined Heat and Power (CHP), district heat networks can provide a highly efficient means of supplying energy. The government recognises this, hence the promotion through national policy. Policy CG19 of the Chilmington Green AAP promotes this form of technology for the first phase as the scale and mix of uses, including a primary school and retail units have the potential to make such a scheme viable. There are also stand alone CHP schemes located at the International Station and Tesco’s at Park Farm²¹.

²¹ There may be other CHPs within the Borough, but these are logged with the CHPQA Programme.

5.377 The issues associated with implementing such a heat network are intrinsically complex including capacity and heat distribution issues as well as the cost of bringing forward such infrastructure. Imposing such a requirement has the potential to add a significant burden to development infrastructure costs. Aside from the Chilmington Green development, no policy intervention approach is proposed for district heat networks, instead leaving it to the market to bring forward suitable proposals.

Biomass

5.377.1 Significant government attention has been directed towards the potential for biomass as fuel in order to respond to climate change, biodiversity enhancement, sustainable development and energy security. The UK Renewable Energy Strategy (2009, and brought forward under the current government) commits the UK to contribute to the overall European renewable energy target and to generate 15% of our energy needs from renewable sources by 2020. The UK Bioenergy Strategy (2012) outlines the country's approach to securing the benefits of this source. It indicates that sustainably sourced biomass could contribute around 8-11% to the UK's primary energy demand by 2020. The Council recognises the potential for biomass fuel, and particular woodfuel, in providing a sustainable source of energy.

5.377.2 The Community Energy Strategy (2014) outlined the government's approach to encouraging the development of community energy in the UK. This includes the generation of community heat from sustainable woodfuel from unmanaged woodlands. This was complemented by the Timber Standards for Heat & Electricity (2014), which advised on the parameters for the management of woods for woodfuel. The Council is supportive of community innovations in renewable energy that can contribute to any or all of the following outcomes: carbon reduction; green jobs; biodiversity improvements; competitively-priced fuel; energy security; reducing waste; supporting sustainable forestry.

Standalone Renewable and Low Carbon Energy Generation

5.378 PV Panels or solar technology relating to an individual building is often permitted development provided it's not in a designated area, is not of an unusual design or will not be installed on a listed building. The Council have established Renewable Energy Planning Guidance Notes that have been approved by Cabinet. The guidance notes have been prepared to assist applicants in bringing forward domestic and medium scale solar PV arrays, as well as large scale solar PV arrays, such as solar farms.

5.379 Following concerns by local communities into the insufficient weight given to the environment with regard to landscape, heritage and local amenity in relation to wind farms. The government issued a statement (6 June 2013) expecting local plans to include policies to ensure the adverse impact from wind farms, including cumulative landscape and visual impact are addressed satisfactorily.

5.380 The government intends to amend legislation so that LPAs will handle all planning applications for onshore wind energy development. Kent Downs AONB JAC have produced a Renewable Energy Position Statement (Updated June 2011) in which it states that due to the high sensitivity of the Kent Downs AONB it considers that large scale commercial wind turbine developments will be unacceptable. The statement also considers it extremely unlikely that any location can be found in or within the setting of the AONB where field-scale solar PV arrays, such as solar farms does not have a significant adverse effect on the

landscape. National policy guidance also highlights the need to focus large scale solar farm on previously developed land and non agricultural land and as a last resort low grade agricultural land. This greatly limits the availability of potential sites within the Borough.

- 5.381 The following policy sets out how proposals for renewable and low carbon energy generation will be considered.

Policy ENV10 - Renewable and Low Carbon Energy

Planning permission for proposals to generate energy from renewable and low carbon sources will be permitted provided that:

- a) **The development, either individually or cumulatively does not result in significant adverse impacts on the landscape, natural assets or historic assets (including their setting);**
- b) **The scale and design of renewable energy provision is compatible with the character and appearance of the area, having special regard to nationally recognised designations and their setting, such as AONBs, Conservation Areas and Listed Buildings.**
- c) **The development does not generate an unacceptable level of traffic or loss of amenity to nearby residents (visual impact, noise, disturbance, shadow flicker, odour).**
- d) **Provision is made for the decommissioning of the infrastructure once operation has ceased, including the restoration of the site to its previous use;**
- e) **Evidence is provided to demonstrate effective engagement with the local community and local authority.**

A Sustainability Assessment should be submitted alongside any planning application illustrating the social, environmental and economic benefits of the proposal against this criterion and any mitigation measures necessary.

Sustainable Design and Construction

- 5.383 The NPPF (paragraph 94) requires LPAs to have a proactive strategy to mitigate and adapt to climate change within their Local Plans. This will include policies aimed at reducing greenhouse gas emissions and promoting the delivery of highly efficient buildings both in terms of energy and water use.
- 5.384 Carbon dioxide emissions account for the majority of greenhouse gas emissions in the UK (82% in 2013). It is estimated that 37% of carbon dioxide emissions are emitted from the energy sector, 25% from transport, 17% from the residential sector and 16% from the commercial sector²².
- 5.385 Previous Local Plan policy and supplementary planning documents have required new residential development, through the implementation of EcoHomes and the Code for

²² DECC, 2013 UK Greenhouse Gas Emissions (27th March 2014).

Sustainable Homes, to reduce energy emissions. Both of these have been recently been superseded by changes to Building Regulations that have come into force for new dwellings. Building Regulations now take into account all regulated emissions, i.e. arising from heating, water heating, fixed lighting and ventilation. The Council is therefore relying upon Building Regulations to reduce energy emissions from new housing development in the future.

- 5.386 With regards to non-residential and commercial sectors of development, which also account for a significant proportion of carbon emissions, government's recent reforms have not been introduced for this sector, although it is expected that a similar framework will be adopted by the government in the future. Previous Local Plan policy in the relation to setting sustainability standards for non-residential development has focused on the use of BREEAM standards. Given the uncertainty about when national requirements may come into place, and the significant proportion of carbon emissions, that this sector accounts for, it is considered necessary to require new development to achieve BREEAM 'Very Good' standard.
- 5.387 As set out in previous parts of this chapter, water resource is also a major issue for the Borough. The policy therefore requires new development to achieve specific improvements in terms of water consumption.

Policy ENV11 - Sustainable Design and Construction - Non-residential

All major non-residential development will achieve BREEAM 'Very Good' standard, with at least a 40% improvement in water consumption against the baseline performance of the building (Wat1, 3 credits), unless demonstrated not to be practicable.

Air Quality

- 5.389 The National Planning Policy Framework (NPPF) states that the planning system should contribute to and enhance the natural and local environment. It should prevent both new and existing development from contributing to or being put at unacceptable risk of pollution including air pollution. Consideration must be given to the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas.
- 5.390 Ashford Borough generally has very good air quality. There are currently no areas within the Borough where the air quality fails to meet the required standards, and there are no designated Air Quality Management Areas (AQMAs). Should an AQMA be declared in the lifetime of the plan, further development will be permitted in and around that area only if acceptable measures to offset or mitigate any potential impacts have been agreed as part of the proposal. In that case, an air quality assessment will be required if the proposal is likely to have a significant effect, which takes account of existing background levels of air pollutants, the cumulative effects of development on individual sites, as well as a feasibility assessment for mitigation measures to ensure air quality objectives are not exceeded.

- 5.391 Planning is an effective tool to improve air quality. It can be used to locate development to reduce emissions overall, and reduce the direct impacts of new development, through policy requirements. As set out in the Strategic Policies of this Plan, proposed development allocations have been located to, where possible, minimise the need to travel, therefore reducing emissions from road traffic. The transport section of this Plan includes policies which promote the use of sustainable modes of transport, with the aim of reducing the use of the car.
- 5.392 Ashford Borough Council is a member of the Kent and Medway Air Quality Partnership where data and information about air quality throughout Kent is pooled and shared. The partnership has produced guidance which sets out the requirements for the consideration of air quality in proposals for new development. National guidance has been produced by Environmental Protection UK and the Institute of Air Quality Management.
- 5.393 The overall outcome of an air quality assessment is to determine whether the development will have a significant impact on air quality and/or whether the existing air quality environment is acceptable for the proposed development.
- 5.394 The types of development that are likely to require an air quality assessment are identified in the Kent and Medway Air Quality Partnerships Technical Planning Guide.
- 5.395 The following policy sets out the requirements for development proposals to consider air quality and ensure potential negative impacts upon air quality are ameliorated.

Policy ENV12 - Air Quality

All major development proposals should promote a shift to the use of sustainable low emission transport to minimise the impact of vehicle emissions on air quality. Development should be located where it is accessible to support the use of public transport, walking and cycling.

Development proposals that might lead to a significant deterioration in air quality or national air quality objectives being exceeded, either by itself, or in combination with other committed development, will require the submission of an Air Quality Assessment to be carried out in accordance with the relevant guidance. This should address:-

- a) **The cumulative effect of further emissions;**
- b) **The proposed measures of mitigation through good design and offsetting measures that would prevent the National Air Quality Objectives being exceeded or reduce the extent of the air quality deterioration.**

Proposals which will result in National Air Quality Objectives being exceeded will not be permitted.

The Historic Environment

Conservation and Enhancement of Heritage Assets

- 5.396 One of the core principles of the NPPF is that planning should conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations. Heritage assets are defined in the NPPF as "*a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration planning decisions, because of its heritage interest. Heritage assets include designated heritage assets and assets identified by the local planning authority (including local listing)*". Significance is defined, in this context, as the value of a heritage asset to this and future generations because of its heritage interest. That interest may be historic, archaeological, architectural or artistic. Significance derives not only from a heritage asset's physical presence, but also from its setting. Evidence of the breadth of heritage assets in the Borough is contained in the National Historic List for England and the Historic Environment Record (HER) held by Kent County Council for the county.

The Ashford Heritage Strategy

- 5.397 The Ashford Heritage Strategy (2017), prepared by the Council, sets out a positive strategy for the conservation and enjoyment of the Borough's rich historic environment, assessing the significance of its broad portfolio of heritage assets, the contribution they make to the environment of the Borough and their potential to contribute to the delivery of other sustainable development objectives of the Local Plan. Given the high number of listed buildings and other designated places and structures in the Borough, the Strategy categorises all historic assets under a series of themes selected to reflect the broad heritage and historical fabric of Ashford - Prehistory, Farming and Farmsteads, Routeways, Historic Houses and Gardens, Ecclesiastical, Industry and Commerce, Invasion and Defence and the Railway. This is an approach adopted by other heritage strategies and endorsed by Kent County Council. These themes are not meant to be a definitive list, or to be read in any other way than as a tool for facilitating the assessment of the significance of the large numbers of the Borough's heritage assets and the contribution they make to the environment.
- 5.398 The NPPF (paragraph 128) advises that local planning authorities should require applicants to describe the significance of any heritage asset affected by proposals including any contribution made by their setting, and the Heritage Strategy provides a useful resource to assist in this regard.

Listed Buildings

- 5.399 Ashford Borough is home to a significant number of listed buildings, statutorily recognised as being of particular special architectural or historic interest. They are a valuable and irreplaceable resource for the Borough and the NPPF advises they should be conserved in a manner appropriate to their significance (paragraph 126). As well as being of heritage value in themselves, Listed Buildings often make an important contribution to the character of a wider area and help to deliver positive benefits to the cultural, economic and environmental offer of the Borough. To this end, the Council will support proposals which put such buildings to viable use consistent with their conservation.

Local Listing

5.400 Many buildings or structures in the Borough which do not currently meet national criteria for statutory listing nevertheless often have local historical importance and may be worthy of protection and conservation in their own right. Local lists play an important role in celebrating non-designated heritage that is particularly valued by communities. The process of preparing a local heritage list allows local people, in partnership with the Council, to identify local heritage that they would wish to see recognised and protected. Such local lists once agreed by the local planning authority as having heritage significance, will merit consideration in planning matters, with the planning authority taking a balanced judgement having regard to the scale of any harm or loss and the significance of the heritage asset itself. Ashford does not currently have a Local List and the council will therefore prepare SPD setting out guidance and recommended methodology on Historic England's Guiding Principles for Local Heritage Listing in order to support local groups wishing to prepare Local Heritage Lists.

Policy ENV13 - Conservation and Enhancement of Heritage Assets

Proposals which protect, conserve and enhance the heritage assets of the Borough, sustaining and enhancing their significance and the contribution they make to local character and distinctiveness, will be supported. Proposals that make sensitive use of heritage assets through regeneration, particularly where these bring redundant or under-used buildings and areas into appropriate and viable use consistent with their conservation, will be encouraged.

Development will not be permitted where it will cause loss or substantial harm to the significance of heritage assets or their settings unless it can be demonstrated that substantial public benefits will be delivered that outweigh the harm or loss.

All applications which will affect a heritage asset or its setting should be supported by a description of the asset's historic, architectural or archaeological significance with an appropriate level of detail relating to the asset and the likely impact of the proposals on its significance.

Conservation Areas

5.401 Conservation Areas contain some of the best townscapes in the Borough along with attractive areas of landscape which provide their settings. Their designation demonstrates that they have "special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance". (Planning (Listed Buildings and Conservation Areas) Act 1990) The Council has a statutory duty to pay special attention to the desirability of preserving or enhancing the character and appearance of the Borough's 43 Conservation Areas and as part of this duty has an ongoing programme of updating and preparing Appraisals for each of the Conservation Areas as heritage assets in their own right.

5.402 Conservation Area Appraisals have recently been undertaken for Ashford Town Centre, Kingsnorth and Woodchurch. These Appraisals examine the key elements that contribute to the special architectural or historic interest of each Area in addition to a spatial analysis of the

area including a description of interrelationships of spaces and key views and vistas, and landmarks and an assessment of architectural details, building materials and the contribution of the public realm, local green spaces, parks, gardens and trees (public and private) to the setting of the Conservation Area. They also briefly record the general condition of the area and identify negative features that should be improved or enhanced, suggest potential boundary changes and identify pressures and problems such as traffic, inappropriate advertising, vacancy and disrepair of buildings that detract from the setting and character of the Area. The Council will continue to review the Conservation Areas across the Borough and where appropriate will amend or create new Conservation Areas in accordance with guidance provided by Historic England.

- 5.403 The variety of building styles dating from different periods frequently adds character and interest to Conservation Areas. Innovative design can be appropriate, provided that it is of highest quality and is sensitive to the context of the site and its setting within the Conservation Area. Therefore, development proposals coming forward within Conservation Areas should have regard to the layout and grain of buildings, streets and spaces and should reflect and enhance local distinctiveness through the retention of building lines, and attention to boundary treatments, open spaces and footpaths. It is also important that new development takes particular account of the impact on the setting of Conservation Areas and important views into and out of the Area.

Policy ENV14 - Conservation Areas

Development or redevelopment within Conservation Areas will be permitted provided such proposals preserve or enhance the character and appearance of the Area.

Proposals should fulfill each of the following:

- a) **the scale and detailed design of all new development and alterations should respect the historical and architectural character, proportion and massing, including roofscapes, of the area, the relationship between buildings, the spaces between them and with their setting;**
- b) **the materials proposed should be appropriate to the locality and in sympathy with the existing buildings;**
- c) **buildings and streets of townscape character, trees, open spaces, walls, fences or any other features should be retained where they contribute positively to the character and appearance of the area;**
- d) **the development should not generate levels of traffic, parking or other environmental problems which would damage the character or appearance of the area; and**
- e) **the use should be appropriate.**

Proposals for inappropriate demolition, alteration or extension of buildings in Conservation Areas or which could prejudice important views into or out of a Conservation Area, will be resisted where such proposals would be detrimental to their character or setting.

Archaeology

- 5.404 There are 42 Scheduled Monuments in Ashford Borough. These are identified in the Heritage Strategy. In addition, areas of known archaeological potential, arising largely from evidence uncovered during new developments, and from the Kent Historic Towns Surveys of 2003 - 2004 (undertaken across the county by Historic England and KCC and including seven towns and villages in the Borough), have been identified by Kent County Council. Further information about these areas is contained in the Ashford Heritage Strategy. In these areas, there is a reasonable possibility that archaeological remains exist and therefore the potential impact of any proposed development on archaeological remains will need to be considered. In certain cases, developers may be required to provide detailed information on the nature and quality of any archaeological remains on the site before a planning application is determined. Large scale development proposals affecting sites outside but adjoining areas of known archaeological potential may also be required to submit archaeological surveys.
- 5.405 Should a significant archaeological find occur unexpectedly during development, the Council will seek specialist advice and encourage appropriate action, including recording, preservation in situ (the preferred option) limited or full excavation. In some cases approved schemes may need to be amended to avoid excessive damage to archaeological remains.

Policy ENV15 - Archaeology

The archaeological and historic integrity of Scheduled Monuments and other important archaeological sites, together with their settings, will be protected and where possible enhanced. Development which would adversely affect such designated heritage assets will not be permitted.

Planning applications, on sites where there is, or is the known potential for, an archaeological heritage asset, should include an appropriate desk based assessment of the asset. In addition, where important or potentially significant archaeological heritage assets may exist, developers will be required to arrange for field evaluations to be carried out in advance of the determination of planning applications.

Where the case for development affecting a heritage asset of archaeological interest is accepted, the archaeological remains should be preserved in situ as the preferred approach. Where this is not possible or justified, appropriate provision for preservation by record may be an acceptable alternative. Any archaeological recording should be by an approved archaeological body and take place in accordance with a specification and programme of work to be submitted to and approved by the Borough Council in advance of development commencing.

SECTION E - COMMUNITY FACILITIES

Meeting the needs of the community

- 5.406 The provision of good quality community infrastructure and services designed around people and their cultural, leisure, health, learning, social and wellbeing needs is fundamental to the creation of strong, vibrant, healthy and sustainable communities. As Ashford grows and the demand for new or enhanced community infrastructure increases, there is a need to apply strategic policies to ensure appropriate and sustainable provision that supports this demand. This will mean that some community facilities and services may be locally based and aimed at meeting the needs of the local residents in that particular area, whilst others may be more strategic and will need to be delivered in larger facilities and spaces which serve the wider town or Borough.
- 5.407 This section provides the policy framework for the delivery of facilities that provide social and community leisure space, recreation and sports, arts and creative industry spaces, public open spaces, children's play, educational and learning such as schools and libraries; health services, places of worship, space for the voluntary and community sector, and youth and children's services. Such spaces and services involve a mix of agencies, professions and services and require the coordinated actions of a number of stakeholders, including the voluntary sector, to successfully deliver, manage and maintain.
- 5.408 It has been proved that community infrastructure that offers a range of services at one site, or 'Hub', helps to establish a focal and active point that benefits the area and community life. It also enables land to be better used with toilets and kitchens as well as parking and green space shared by a number of users. In general, such a model of provision is also more viable to maintain.
- 5.409 The longstanding commitment by this Council to the delivery of new infrastructure that embraces the 'hub' approach has and continues to result in good quality and well placed community and social facilities in the Borough. Such existing and programmed provision provides a useful framework upon which to build, in order to meet the needs generated by the additional level of population growth which will arise over the Local Plan period.
- 5.410 To this end the Council's approach will be to continue to work with developers and providers and community groups to ensure the provision of community infrastructure in the right locations and at the right time. The Council recognise that - in practice - it will need to adopt a pragmatic approach as large amounts of community provision is subject to planning approval, but has not actually been implemented yet - something which the Council cannot control. Therefore, contributions from new developments may be needed to expand or enhance infrastructure that is already being planned or is in the early stages of being implemented. This may also involve monies to secure the early delivery of such infrastructure where it is appropriate to do so. Adopting this approach ensures that provisions are in place that will support the communities as they develop - a key planning objective of this Local Plan.

Retention of Existing Facilities

- 5.411 Retaining existing facilities wherever practical is the most sustainable way of enhancing and expanding provision. This position is supported by the NPPF which recognises the importance of community and social facilities and requires that LPAs guard against the unnecessary loss of this valued provision, particularly where this would reduce the community's ability to meet its day to day needs.
- 5.412 The Council therefore aims to protect social and community infrastructure and to guard against unnecessary loss unless there are strong reasons why this is no longer viable or where provision is replicated nearby.

The Arts and Creative Industries

- 5.413 Participation in arts and creative pursuits increases personal well-being and helps to build healthy communities; it enhances people's skills, unlocks potential and stimulates learning and enterprise.
- 5.414 Enhancing the local arts scene and working with the creative industries has been a particular focus of the Council's work in recent years and is a priority of the Corporate Plan. An Arts and Creative Industry Strategy is emerging which supports the 'Grow the Arts in Ashford', the Council's adopted Art Strategy. These strategies are committed to nurturing and supporting the arts and help form evidence to this Local Plan and its supporting Infrastructure Delivery Plan.
- 5.415 Ashford's offer has been enhanced recently through the development of a new arts and performance space at St Mary's Church (in the centre of town) which attracts regionally and nationally significant touring artists and is developing a local audience. The establishment of the internationally renowned Jasmin Vardimon Dance Company has also elevated Ashford's position as an emerging key destination for the arts. The draft Strategy acknowledges that while Ashford enjoys these facilities, and also enjoys a wider programme of cultural opportunities such events across the Borough, including local festivals, there is a marked lack of spaces such as galleries, multi-use art facilities, theatre and production and rehearsal spaces.
- 5.416 The following strategic arts spaces are identified in the draft Strategy to meet the current deficit and provide a wide range of creative activities and opportunities as Ashford grows:
- Revelations St Mary's: as Ashford's occupancy increases this venue will be a significant space to meet the demands of the local audience and a key strategic centre for presenting a high quality arts programme that enhances the economy of the town centre;
 - Rehearsal and production centre: a large space for touring companies and local community groups to create and show work and smaller spaces for educational sessions. This will aim to drive innovation in the arts and the provision of excellent arts experiences;
 - Making and exhibiting workspaces: a space (or collection of spaces) where creative designers can co-locate, make and present their work in a gallery and offer associated spaces for the community to engage in the arts and crafts;
 - Arts use in community hubs: helping to ensure urban and rural community hubs cater for arts and are well equipped and design to support a range of creative activity.

- 5.417 The Council expects that these projects will largely be funded by way of CIL receipts. S106 contributions will however be used where local community buildings/ indoor sports buildings are required, as stipulated through various site allocations in this Local Plan. These buildings will be required to be designed in a way that allows for a variety of users, including art and creative industries.
- 5.418 Overall proposals that would significantly improve Ashford's arts scene and encourage creative industries by virtue of their quality, cultural diversity, distinctiveness and economic impact should be supported.
- 5.419 New public art will also be encouraged as a result of developments throughout the town and key developments will be expected to contribute to such provision as part of ensuring a higher quality and more distinctive urban environment. This is further explored under policy SP6 'Promoting High Quality Design'.

The Voluntary Sector

- 5.420 Over recent years the voluntary and community sector (VCS) has become increasingly involved in managing many community facilities and delivering public services. The VCS in the Borough is vibrant and diverse comprising in the region of 850 organisations providing a wide range of services and has been shown to bring considerable advantages and benefits deriving from its value-driven motivation and focus on social needs.
- 5.421 Given the wide nature of the sector, it is accepted that projects which are needed to allow the voluntary sector to continue to play a role in meeting the communities needs will come forward over the lifetime of this plan. Where these projects can be costed and shown to be deliverable, the Council will seek proportionate developer contributions or the delivery of space/ provision on site. It is likely such provision will be focused in and around Ashford Town Centre, but is not limited to this boundary.

The Education Sector

- 5.422 The requirements identified in this Local Plan have been based with ongoing discussions with Kent County Council.
- 5.423 The residential developments proposed in this Local Plan will create a requirement for additional school places and thus for existing primary and secondary schools to be expanded and for new schools to be built. Wider demographic trends also affect the need for school places. The Council's longstanding approach has been to require developer contributions on behalf of the education authority where new primary and secondary schools or extensions to existing ones are needed to cater for the influx of new children from housing development. The contribution sought is based on 'pupil product figures' provided by Kent County Council for the number of primary and secondary school children likely to arise from each new housing development.
- 5.424 Broadly, this approach will continue, with the Council consulting the local education authority to determine where an education contribution should be sought. In most circumstances the Borough Council will only seek contributions from the larger schemes, in light of the S106 pooling restrictions. CIL receipts are also likely to be required.

5.425 In some parts of the Borough the number of additional school children will create the need for new schools to be built, as reflected in the site allocations that accompany this Local Plan. The specification required will be determined through negotiation between the County Council, the Borough Council and the developer.

The Health Sector

5.426 The NPPF acknowledges the link between planning and healthy communities and states that the planning system should support strategies to improve health and well being, promote healthy communities and include strategic policies that will deliver the provision of health facilities. It encourages policies that will facilitate social interaction and healthy inclusive communities.

5.427 The Ashford Health and Wellbeing Board, comprised of health professionals, local government officers and patient representatives, was established in 2013. The board offers a fresh look at the way the health and wellbeing of Ashford's residents is observed and measured. It also has an influence over the commissioning decisions made across public health and social care in the borough. It looks at improving the health and wellbeing of the people living in Ashford through joined up commissioning across the National Health Service, social care, borough council, public health and other services that are directly related to health and wellbeing.

5.428 Health issues are addressed in policies across this Plan, including those on design, transport, economic development, employment skills and training and provision of cultural and local services. Proposals for new health facilities in sustainable locations will generally be supported.

Community Leisure Buildings

5.429 The Council has a long established tradition of delivering 'multi-purpose community leisure buildings' which fulfill the needs of emerging and established communities. Recent provision takes into account the scale of the development, the nature of the place being delivered, and the proximity of nearby facilities and its offer. This Local Plan adopts this robust approach, supported by the Council's, and partners experience, of what kind of facilities are deliverable and viable over the longer term particularly in response to some of the larger site allocations being proposed.

5.430 In addition, where indoor sporting facilities are proposed, they should generally provide space for a mixed use of community activity as part of their delivery to make the most efficient use of these buildings and also help with their on-going viability.

Policy COM1 - Meeting the Community's Needs

Infrastructure and facilities required to meet the needs generated by new development, including sports, arts, community (including youth) and voluntary sector space, education and health provision, open space and play areas shall be provided as the community is established.

Infrastructure or facilities designed to meet localised needs should normally be provided on-site. Other needs will be delivered in liaison with the relevant stakeholders and service providers to ensure that the provision is supplied in a way that meets their requirements and supports sustainability.

Development monies will be secured via S106 where provision relates to a localised need or as identified through the site allocations in this Local Plan. Otherwise, CIL receipts will be used to deliver strategic provision.

Where the need for developments to contribute to, or provide, particular infrastructure or facilities is dependent on their size, floorspace, traffic generation or any other attribute or impact exceeding a specified threshold and any site is brought forward as two or more separate schemes of which one or more falls below the relevant threshold, the Council will seek from each scheme a proportionate contribution of the level of provision so as to match in total the requirement that would apply if the site came forward as a whole.

In the Borough as a whole, the loss of existing community infrastructure will be resisted unless sufficient evidence has been submitted to demonstrate that they are no longer required or are obsolete and that suitable replacement provision is being provided or is located nearby.

Sport, Recreation and Play

- 5.431 Recreation, sport, open space and play areas can enrich the quality of our lives and contribute towards healthy living. The Borough currently enjoys a wide range of such space and this provision will be added to when current planning applications are implemented, most notably Chilmington Green which will deliver significant recreational and leisure areas.
- 5.432 The following total quanta of recreational, play, sport and open space are required to meet the needs of the new development proposed in this Local Plan that do not already have planning permission (circa 7,000 new dwellings). 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. The figures do not take into account the role which could be played by provision at schools. This provision should be treated as supplementary as in most cases it tends to have limited public access at key times.

Table 4 - Total Spatial Target for play, open space and sports	
Informal space	33.6ha
Children's play	8.4ha
Strategic Parks	5.04ha
Allotment provision	3.36ha
Sports halls (1 badminton hall or equivalent)	6
3G Artificial Pitch	1
Football Pitches	8 adult, 7 junior, 2 mini
Hockey 2G pitch	1 adult
Rugby	2 senior pitches
Cricket square and outfield	1

5.433 These figures are a 'target' as not all residential development coming forward will be required to deliver a proportion of these provisions. For example, some development will be excluded on viability grounds such as most proposals coming forward in the town centre, and a number of developments will fall below the threshold that trigger a requirement for provision. However, this is somewhat countered as CIL receipts can be used to deliver recreation, sport, play and open space, where it is strategic in nature. This type of provision effectively meets a need for all new developments in the Borough. Therefore the identification of a target figure is considered to be a robust starting point for the policy below.

5.434 In order to determine the quantum and type of provision required for each qualifying proposal, applicants will be expected to use the Sports England Calculator and the relevant standards in the Green Spaces and Water Environment SPD. Aside from informal space – which will normally be delivered on site and form part of the wider landscaping/ SUDs strategy, incidental space around buildings, discussions with the Council shall then take place as to what exact provision will be sort from any S106 monies to be collected, using the projects identified within the supporting Infrastructure Delivery Plan schedule as the starting point. The Sports England Calculator may also identify additional off-site requirements that need to be considered as well. Where appropriate, these will be added to the Infrastructure Delivery Plan as they are identified.

The Hub Approach

5.435 The Local Plan seeks to deliver a community hub model and the strategies emerging for recreation, sports, open space and play all recommend the same model. The sport and recreational hubs are identified on Strategic Diagram 2 which supports this Local Plan. They are:

5.436 **Discovery Park:** a new, major open space and recreational area that is proposed to include a number of sports pitches (including the provision for 3G pitches), a large scale indoor sports building, strategic play space and managed outdoor recreational space. The majority of Discovery Park will come forward in response to development at Chilmington Green and the area is protected as part of the Chilmington Green Area Action Plan, the provisions of which fall outside the scope of this Local Plan. However, an extension to Discovery Park is proposed to come forward as part of the Court Lodge development (policy S3).

- 5.437 **Conningbrook Park:** a new large water based recreational resource and facilities at Conningbrook Lakes and significant indoor sports provision in the form of the existing Julie Rose Stadium. Complementary provision in the form of strategic play space and informal space will also be provided here.
- 5.438 **Ashford Town Centre:** a key location for indoor sports provision within the Borough. The Stour Centre is the principal indoor sports facility within the borough and caters for a range of sports, including swimming, badminton, squash, netball and football. In addition the Town Centre is also home to green spaces in the form of Victoria Park, Memorial Gardens and the Green Corridor. The Town Centre will continue to be a key recreational and sporting hub over the plan period.
- 5.439 **Finberry/ Park Farm:** a community and leisure hub adjacent to the planned primary school that compliments the facilities planned at Bridgefield Park. This Hub aims to deliver a 3G state of the art sports pitch which will be supported by a multi-use play area, a community building with indoor sports courts and changing facilities.
- 5.440 **Kingsnorth Recreation Centre:** already a well established urban hub for the area and town. This could support an increase in the recreational and outdoor space offer located here.
- 5.441 **Sandyhurst Lane:** another site already offering social, community and sports provision (comprising two full size grass football pitches and one rugby pitch supported by a pavilion comprising four team and one officials changing room, bar and large function room). New provision is proposed which could include improved sports pitches, informal and natural green space and potentially allotment space.
- 5.442 **Spearpoint:** a busy football hub already existing on this site and contains six grass pitches, a newly built pavilion and tennis courts. The courts are currently in poor condition. The aspiration is to refurbish the tennis courts and provide a major new play area. Further leisure development on this site could also be considered.
- 5.443 **Pitchside/Courtside:** Pitchside and Courtside are adjacent dual use sites in South Ashford on the campus of John Wallis Academy. Pitchside consists of a full size 3G pitch and two full size grass football pitches for community use. In addition the Academy grass playing field has a junior pitch, full size football pitch and full size rugby pitch which are available for occasional community use as demand dictates. Pitchside is supported by a 4 changing room pavilion. Courtside comprises six hard courts supported by a two changing room pavilion with meeting room and office. The primary use of the courts is for netball with tennis the main secondary use. This provides a key mixed use sports hub and has the potential to be extending and upgraded.

Local Provision

- 5.444 Not all of the provision of recreation, sport, open space and play areas will serve a wider catchment or play a strategic role. There are a number of local areas which fulfil a key role in meeting the everyday communities needs. These areas include Bridgefield Park, South Willesborough (Bulleid Place/Swan Centre), Singleton (Cuckoo Park/ Singleton Environment Centre), and Repton Park and Community Centre. These offer multi-use community space for local residents, children's play and informal recreational open space. Hythe Road Recreation ground should be up-graded to provide a much needed quality open space for informal

recreation including multi-use games area. When new development comes forward, there will remain a need to deliver provision at a local scale, to directly serve the community in which it is located.

The approach in the rural area

- 5.445 The spatial approach in the rural area has to be a different one to the strategic hub approach above, given the dispersed nature of the settlement pattern. Here the Council has a strong track record of working with Parish Councils to ensure the delivery and maintenance of small scale provision across the rural settlements of the Borough.
- 5.446 In the rural areas it is important that the provision is linked where possible to public transport routes in order to work to avoid social exclusion, to ensure facilities are as accessible as possible to the widest catchment of users and thereby maximize the viability and vitality of the facilities themselves.
- 5.447 The Council will continue to liaise with the Parish Councils to determine the optimum level of provision possible in the rural areas.

Policy COM2 - Recreation, Sport, Play and Open Spaces

As a target, the Council shall seek to deliver the quantum of provision as new recreation, sport, play and open space provision by 2030 as set out in table 4 of this Local Plan.

Proposals will utilise the Sports England Calculator and comply with the standards set out within the Green Spaces and Water SPD, where practical.

Informal green space will normally be provided on site in line with the guidance and provisions contained within the Green Spaces and Water Environment SPD.

In Ashford, the provision of children's play, strategic parks, allotments, sports facilities shall be concentrated on key allocated sites within this Local Plan or at the sports and recreation hubs identified above. Proposals which undermine the ability of a hub to play a role in delivering this provision shall not be supported.

Provision that meets a localised need shall normally be required to be delivered on-site in a way that supports the local community as it comes forward.

In the rural area, provision should normally be delivered in a way that helps maintain, enhance and potentially expand existing provision at the settlement where development is proposed, or at the nearest settlement.

Exceptions to the approach outlined above could be justified, should the following circumstances arise in that:

- a) **there is suitable open/ green space provision nearby and this provision can be accessed by green routes,**
- b) **there is suitable sports provision nearby and this provision is accessible and the facility is able to and has the capacity to be used by the public at key times and this access can be secured over the long term at determination of the application,**
- c) **delivering such provision would render a scheme unviable,**
- d) **not delivering the required provision is supported by the Council or in agreement with the Parish Council.**

In line with the provision within the NPPF, existing open space, sports and recreational buildings and land should not redeveloped or used for other purposes, unless:

- **An assessment has been undertaken which clearly shows the provision is surplus to requirements, or**
- **Any loss would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location,**
- **The development is for an alternative sport and recreational provision, the needs for which clearly outweigh the loss.**

Allotments

- 5.448 Allotment gardening is an increasingly popular leisure activity and allotments themselves are an important feature in both urban and rural communities, providing wildlife and species rich habitats and attractive areas of green space in otherwise residential areas.
- 5.449 Allotments also make an important contribution to the planning and promotion of healthy communities, with the benefits of such safe, attractive and functional green areas including not only the direct provision of places for physical activity, but also the psychological and social benefits that arise from engaging with nature and opportunities for informal social interaction. Given their role in the well-being of communities and the difficulties in finding new open spaces within existing built up areas, the development of existing allotment land will only be supported in exceptional circumstances.
- 5.450 Demand for allotments owned by the Council is kept under review, with additional provision being made where necessary. Over the lifetime of this Local Plan the need for additional allotment provision is 3.36ha, the strategy for which will be identified in the emerging Open Space Strategy.
- 5.451 Allotment provision should be provided in a way that is well related to residential properties, sit sympathetically in the landscape and enjoy suitable vehicular access arrangements. In addition, the Public Green Spaces and Water Environment SPD establishes a number of design principles relating to allotment provision which should also be applied to all new allotment sites coming forward during the lifetime of this Plan.

Policy COM3 - Allotments

The provision of new allotments will be supported provided they follow the design principles established within the Public Green Spaces and Water Environment SPD.

Proposals for the redevelopment of existing allotment land will only be permitted where the allotment site is significantly under-used and suitable alternative provision for allotment holders is available nearby, where the site is not needed to rectify any local shortages in informal open space, and where the proposed development would not lead to the loss of an important undeveloped area which plays a significant role in the character of the local environment.

Cemeteries

- 5.452 The yearly mortality rate in this Borough has remained broadly constant over the last ten years despite an increase in population. This is due to people living longer, however a continued increase in life spans is unlikely over the medium term and so it has been assumed that the future mortality rate will increase in line with Ashford's population growth, which grew at a rate of 1.2% per annum between 2001 and 2011. Based on an average annual year on year future population increase of 1.2% per annum burial space within the Council's Cemeteries is likely to be exhausted in the early twenty twenties.

Policy COM4 - Cemetery Provision

Proposals for the expansion or creation of new cemeteries in the Borough will be supported providing that the land is suitable for such use, there are no adverse impacts on the water table, the provision and any facilities would sit sympathetically on the landscape so as to not adversely impact any wider views and suitable access onto the local road network can be achieved.

SECTION F - IMPLEMENTATION

Funding and Delivery of Infrastructure

- 5.453 This Plan is supported by an Infrastructure Delivery Plan which is an iterative document that sets out the infrastructure that is required to be delivered to support the planned development up to 2030. It has been informed by discussion with key providers and identifies (where known) how and when this infrastructure might be delivered and to what extent new development is directly reliant on its delivery as a means of prioritising the required infrastructure.
- 5.454 Over the last 20 years or so, the Council has successfully managed to fund new infrastructure of many types and forms through Section 106 Agreements. This infrastructure has helped to ensure that new developments are properly served by the services and facilities that support everyday life and that these facilities are delivered at the right time to meet new demand.
- 5.455 The introduction of the CIL Regulations in April 2015 now limits the scope of Section 106 Agreements and their ability to act as a pool for developer contributions towards strategic infrastructure, although they still have a role in the provision of site specific facilities. As a consequence the Council proposes to introduce a Community Infrastructure Levy Charging Schedule alongside this Local Plan. This has been tailored to take account of the general policy requirements contained within this Plan and reflects the viability position at the time of drafting. It is likely that the CIL Charging Schedule will need to be reviewed on a regular basis to reflect changing market conditions.
- 5.456 Nevertheless, the Council still considers that Section 106 Agreements can provide a more certain means of delivering specific infrastructure and services than the use of CIL receipts. This has benefits for developers, residents and service providers and allows for more transparency about what will be delivered and when. Consequently, the Council will continue to work with service providers to identify specific projects which meet additional demand arising from the policies of this Plan, allowing for a maximum of five S106 Agreements to provide proportionate contributions to those projects, in preference to assuming funding will arise from CIL in due course.
- 5.457 The Council also intends to publish a generic development contributions SPD that will provide greater clarity on what level of financial contributions will be sought from the development schemes to deliver the infrastructure that is required.
- 5.458 Clearly, it is not possible to foresee all potential needs arising from development proposals (including windfalls), and so these will need to be assessed at the time against relevant policies in this Plan. Where specific requirements are known at this stage, these have been identified through the site allocation policies.

Policy IMP1 - Infrastructure Provision

The Council will continue to work with relevant service providers to identify and deliver the infrastructure that is needed to support the development set out in this Plan.

All developments shall make provision to meet the additional requirements for infrastructure arising from the development, either through Section 106 Agreements and / or Community Infrastructure Levy contributions.

Deferred Financial Contributions

- 5.459 Although this Plan is based on a whole plan viability approach to show that it is realistically able to be delivered, the Council understands the need to remain flexible - a key requirement of the NPPF.
- 5.460 In reality, the wider economy and the property market are likely to experience a number of different cycles through the lifespan of the Local Plan. Changes in demand, development values, and build costs will all have a bearing as can Government policy – for example, the support given to funding to secure development and infrastructure. Individual sites may incur unforeseen abnormal costs in their redevelopment or require specific infrastructure requirements that mean that, on occasion, additional costs need to be carried.
- 5.461 The starting point for this Plan is that development proposals can meet all of their respective policy and infrastructure requirements in full and be delivered in a timely way to ensure needs are met as a scheme comes forward. The Council has in the past adopted a flexible approach in relation to affordable housing and the provision of other infrastructure contributions. Given that this Plan has been subject to much more stringent viability testing than previous ones, and the policies in it have been framed from this evidence, it is expected that the number of applications where viability issues are identified should significantly reduce.
- 5.462 However it is recognised, that in some cases a shortfall in the contributions towards infrastructure requirements and affordable housing provision, as set out in this plan may be justified on viability grounds. In such cases, the council will work with the relevant service providers to determine the most appropriate balance of infrastructure provision that should be delivered so that the impact on residents who need the infrastructure is kept to the minimal possible.
- 5.463 Where site specific viability evidence can robustly demonstrate that the required developer contributions cannot be met, the council has adopted a system of ‘deferred contributions’. Using this approach, the Council may agree that some normal Section 106 financial contributions can be foregone on the proviso that, should sales values increase beyond an agreed benchmark in future, some or all of the previously under-funded contributions will be made up. This approach provides the council and developers with important flexibility to allow development to proceed in changing market conditions over the course of the Plan period and has successfully been applied in the last few years. Where development risk is highest and market demand uncertain – for example, in new or untested sectors of the housing market such as private rented sector apartment complexes in the town centre - the

Council may seek independent advice and decide to waive the ‘deferred contributions’ approach to help de-risk schemes and improve prospects of their delivery.

Policy IMP2 - Deferred Contributions

Development proposals shall achieve all of the policy and infrastructure requirements set out in this Local Plan in a way that ensures provision comes forward when it is required to support the needs generated by the development.

Proposals which do not fulfil this objective should not be permitted unless it is supported by extensive viability evidence that establishes why any deficit is deemed necessary to make the scheme viable and that there are wider planning benefits for the development to go ahead.

Any viability evidence that is provided to support an application must be done so in a transparent way and will be rigorously tested by independent advisors, paid for by the applicant. For larger schemes, where a proposals is to be phased over time, or where the opportunity exists to do so, the applicant will agree with the Council a programme or method of re-evaluating the viability of the scheme, to capture changes in circumstances.

Where a deficit has been deemed acceptable, the Council will require the applicant to agree a deferred contributions approach, to claw back as much of any deficit as possible, should market conditions improve significantly.

Enforcement

- 5.464 The Council’s approach to enforcement is clear. It is the responsibility of individuals and businesses to comply with the law. The Council will do all it can to help advise and treat people fairly but those who flout the system deliberately and/or repeatedly and cause serious harm can expect the strongest possible response. The range of actions open to the Council and severity of penalties are often dictated by central government but, within these limits, the Council will always aim to act in way which deters others from non-compliance.
- 5.465 Residents understandably put great value on the quality of life and local environment that they enjoy – in the Borough’s countryside, towns and villages. When development takes place without permission and causes significant impacts on people’s lives, residents of the Borough understandably expect that action should be taken.
- 5.466 The Council has agreed ‘Local Enforcement Plan’ (as advised by the NPPF) which sets out how the Council can and will respond. Government advice encourages councils to try to resolve issues by negotiation as this is very often the quickest and most effective way to resolve problems. It is also the best way to use resources. Taking formal action, assuming it succeeds, can be a much longer process than people imagine and consumes a lot of staff time.

5.467 However, where negotiation fails, or individuals deliberately or persistently ignore the rules and carry out development that seriously impacts on the wider community, then there should be no doubt that the Council will take formal action whenever possible.

Policy IMP3 - Planning Enforcement

In line with the provisions in the NPPF, the Council have agreed a ‘Local Enforcement Plan’. Provisions within this plan will be enacted by the Council and where negotiations fail, or where individuals deliberately or persistently ignore the rules and carry out development that seriously impact on the wider community then the Council will take formal action wherever possible

Governance of public community space and facilities

5.468 Development proposed within this Local Plan will deliver a variety of what can broadly be termed public community space and facilities which – in this context - includes open space, indoor and outdoor sports provision, community buildings, venues for art and the voluntary sector, SuDS features and areas around these features and, potentially, the verges next to footpaths and roads.

5.469 How this provision is delivered and maintained has a direct impact on the quality of a place. In the past, the Council has generally been successful in securing and managing, with our partners, community space and facilities from developers. This has greatly improved the quality of life for the Borough’s residents and ensures that Ashford remains an attractive place to live, work and visit – a key objective of the Council as referenced in its Corporate Plan.

5.470 Although expanding such provision to cater for the new development proposed in this Local Plan clearly delivers many sound planning benefits, it does also create operational and financial challenges for the Council given the pressures on Council budgets. The same is true of our public sector partners. This pressure is unlikely to be eased, certainly in the short to medium term and in fact is likely to be increased, meaning a dynamic and innovative solution needs to be applied to ensure that both the right level of provision is secured to meet need, and that it is managed to a high standard so that the quality place aspirations are sustained.

5.471 With such public sector financial constraint, there is a real potential that the quality of community space and facilities is undermined through a lack of resources, particularly if it relies on the public sector adopting and taking full responsibility for the long term stewardship. Furthermore, such a total adoption role provides very limited opportunities and incentives for local communities to have – and maintain – a stake in their area and help develop a positive sense of place.

5.472 The Council’s preferred position in recent times has been to not adopt new community space and facilities that come forward in response to development proposals. This remains the case.

5.473 Instead, the Council favours stewardship models as a means of ensuring ongoing management of community space and facilities. Such models take various forms, including

community management companies, charitable trusts; Parish Council led models, community development trusts, community interest companies, and co-operative or community benefit societies.

- 5.474 The exact form of model will be dependent on local circumstances, the stewardship functions transferred, the extent and type of assets to be managed and the types of financial arrangements needed. Developers will be expected to endow new stewardship bodies with both assets and cash where practical, the latter of which should be at a level at least equivalent to a ten year commuted payment period.
- 5.475 The Council accepts that these sorts of models may only be suitable where there is a sufficient scale of development to create a natural community focus or where there is sufficient scale of on-site community space and facilities to manage. In certain circumstances, smaller schemes could also adopt such an approach, particularly if there is sufficient space and facilities nearby which could be taken on by a joint governance arrangement.
- 5.476 Where a proposal is not suitable to deliver the community based model envisaged above on account of its lack of size or facilities being delivered and / or its proximity to other developments does not allow for a more holistic approach, then a private management company solution might be considered acceptable.
- 5.477 Where this is the case, proposals will need to demonstrate that the private management company proposed will:
- be run in a way that ensures residents have and retain a key governance role,
 - maintain openness and transparency,
 - be focused on the local development and the maintenance of the environment in the longer term with surpluses reinvested for such purpose,
 - provide a quality service at a reasonable cost over the longer term,
 - allow for residents to take control in the longer term should this be their ambition.
- 5.478 In certain circumstances, such as the adoption of community space and facilities that will form provision within a strategic hub (see policy COM2) or where the Council currently plays a governance role and want to retain this role, then the Council could be the adopting body. In these circumstances, financial contributions will be required towards the management of community space and facilities, for not less than a ten year period.
- 5.479 Given the importance of the issue of governance, all schemes that will deliver substantial levels of community space and facilities will be required to produce a governance strategy that will set out the specifications and details of the facilities to be delivered and how these will be managed and maintained over time. For larger schemes, this will also need to set out how the early governance arrangements will work in practice given that community space and facilities might be delivered before a community is fully established.

Policy IMP4 - Governance of Public Community Space and Facilities

Proposals that will deliver substantial community space and facilities are required to be supported by a governance strategy which will need to be agreed with the Council. This strategy will need to set out what facilities are to be delivered and by when, and how they will be managed over time to an acceptable standard.

Proposals which adopt a community stewardship model of governance will be supported.

Should a private management company model be promoted, then it will need to be established and run in a way that is affordable, gives the residents a key governance role and is focused towards the management of the facilities to be delivered by the development.

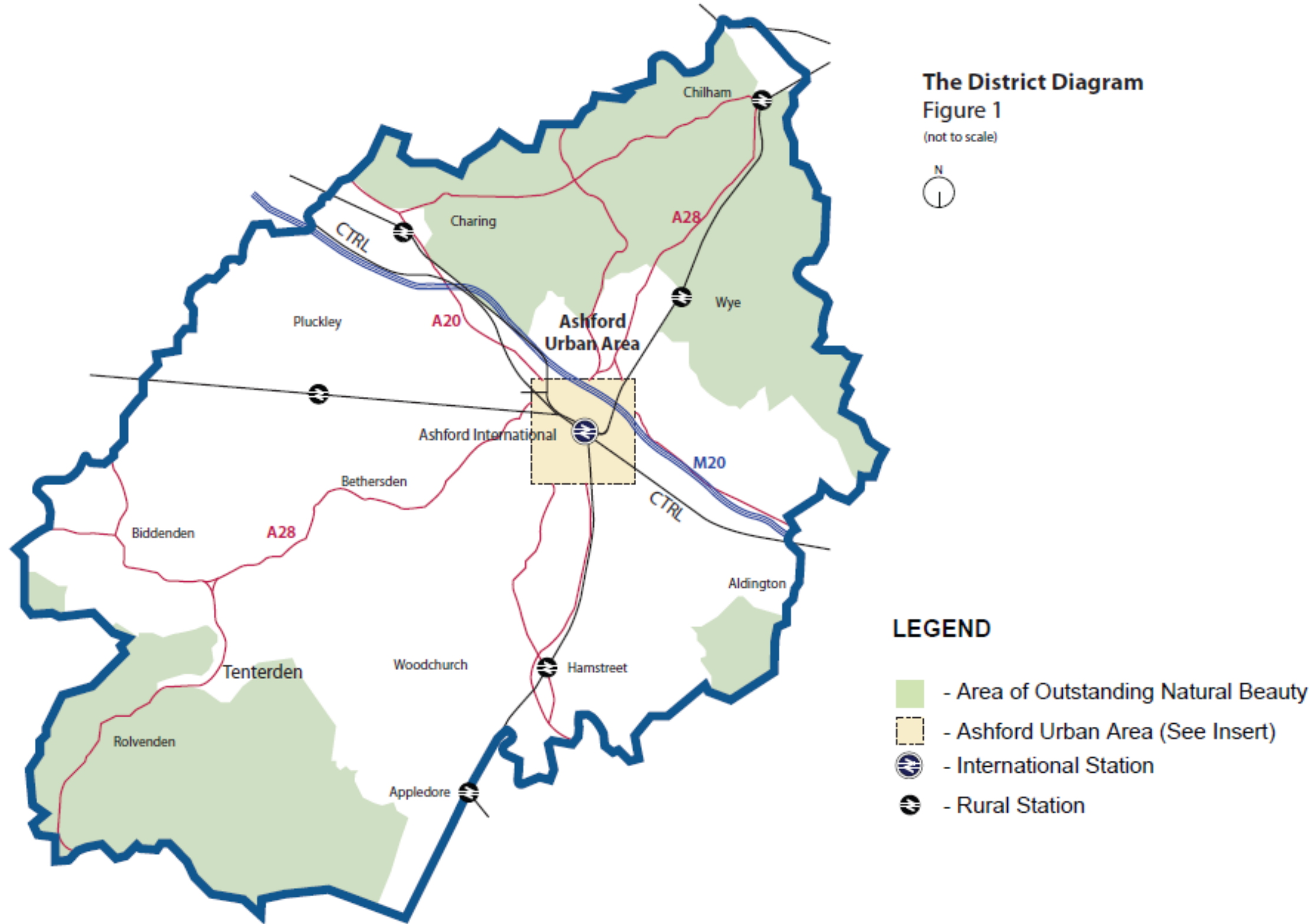
Where the Council takes on an adoption role, financial contributions will be secured from the developer towards the maintenance of facilities for at least a ten year period.

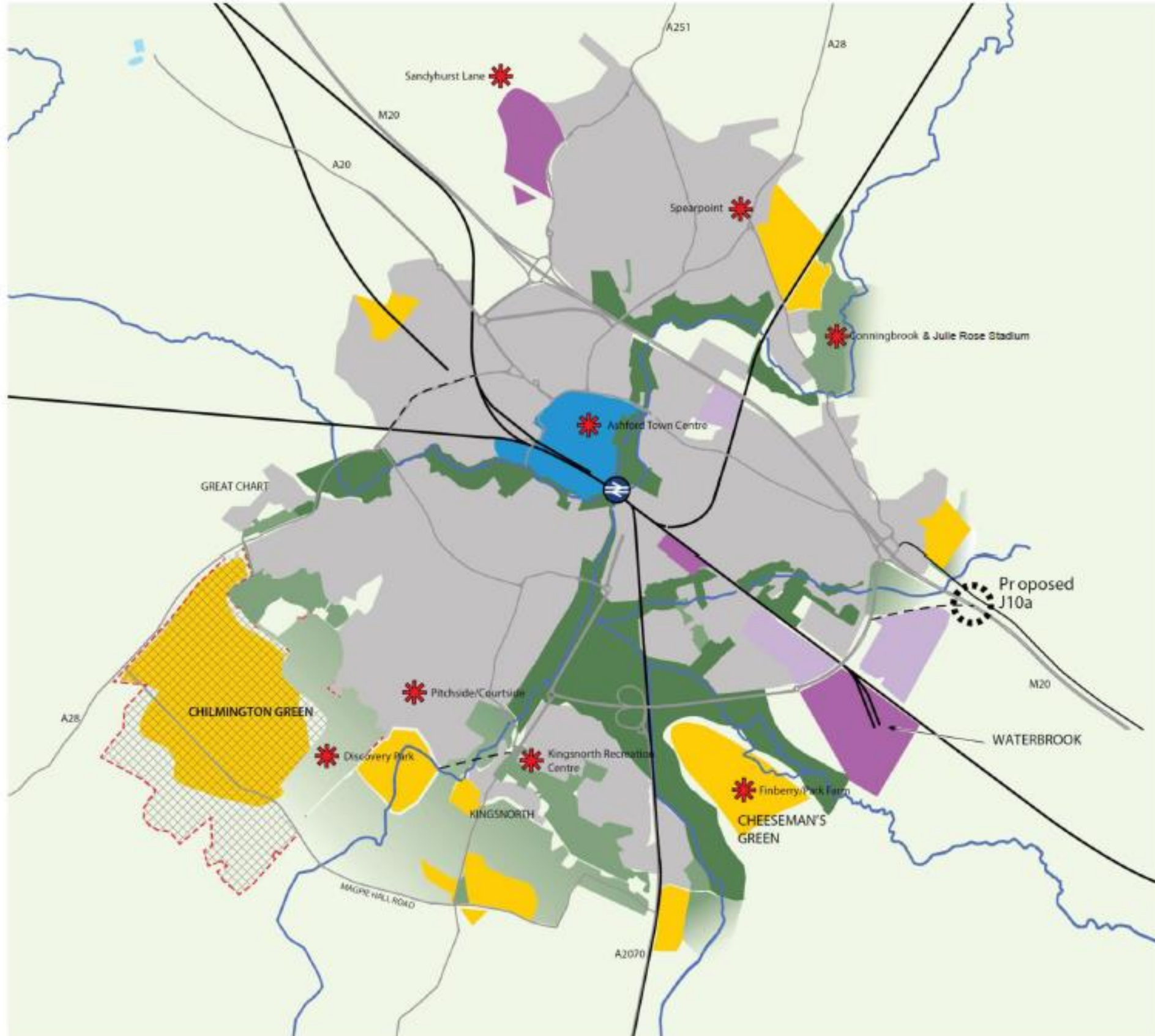
CHAPTER 6 - MONITORING AND REVIEW

- 6.1 It is essential that the policies in this Local Plan are monitored so that early action can be taken to overcome any barriers to delivery of the Plan's objectives and policies. This is particularly important where there are key pieces of infrastructure that need to be delivered in a timely manner to enable development to proceed. Monitoring is also important to enable communities and interested parties to be aware of progress and ensure that the overall development plan strategy is being delivered.
- 6.2 The Borough Council produces an annual Authority Monitoring Report (AMR) which sets out the overall performance of planning policies set out in the various DPDs that have been prepared previously - each DPD has a set of Key Indicators that are used to monitor overall progress and are reported on within the AMR. The AMR also provides up-to-date information on the implementation of any neighbourhood plans that are in progress or have been made.
- 6.3 The Council's view is that there needs to be a consolidation of the various indicators that have been previously used into a set that can be easily interpreted and reflect the current Local Plan and accompanying Sustainability Appraisal Objectives. Therefore a revised list of Monitoring Indicators relevant to the policies within this Local Plan has been prepared and can be located at Appendix 6.
- 6.4 These revised indicators, grouped by topic area, are based on the following objectives:
- To check the effectiveness of policy and whether it is delivering sustainable development;
 - To check the timely delivery of key infrastructure
 - To assess the extent to which policies are being implemented and whether development targets are being met;
 - Where policies are not being implemented then explain why
 - To identify policies that may require early review.
- 6.5 The Council recognises that the Local Plan is a long-term strategy, and intends to formally review the plan by 2025, as set out in the introduction of this document. It is not proposed to undertake short-term formal reviews of the Local Plan unless it is clear from the monitoring reporting that key elements of the strategy are not being delivered.

CHAPTER 7 - POLICIES MAP WEBLINK & EXTRACTS

- 7.1 The full interactive Local Plan 2030 policies map can be found at the following link:
<http://www.ashford.gov.uk/local-plan-2030>.
- 7.2 A set of diagrams and maps showing the borough boundary and reflecting a number of the key policies within this plan are located in this chapter.





Ashford Urban Area

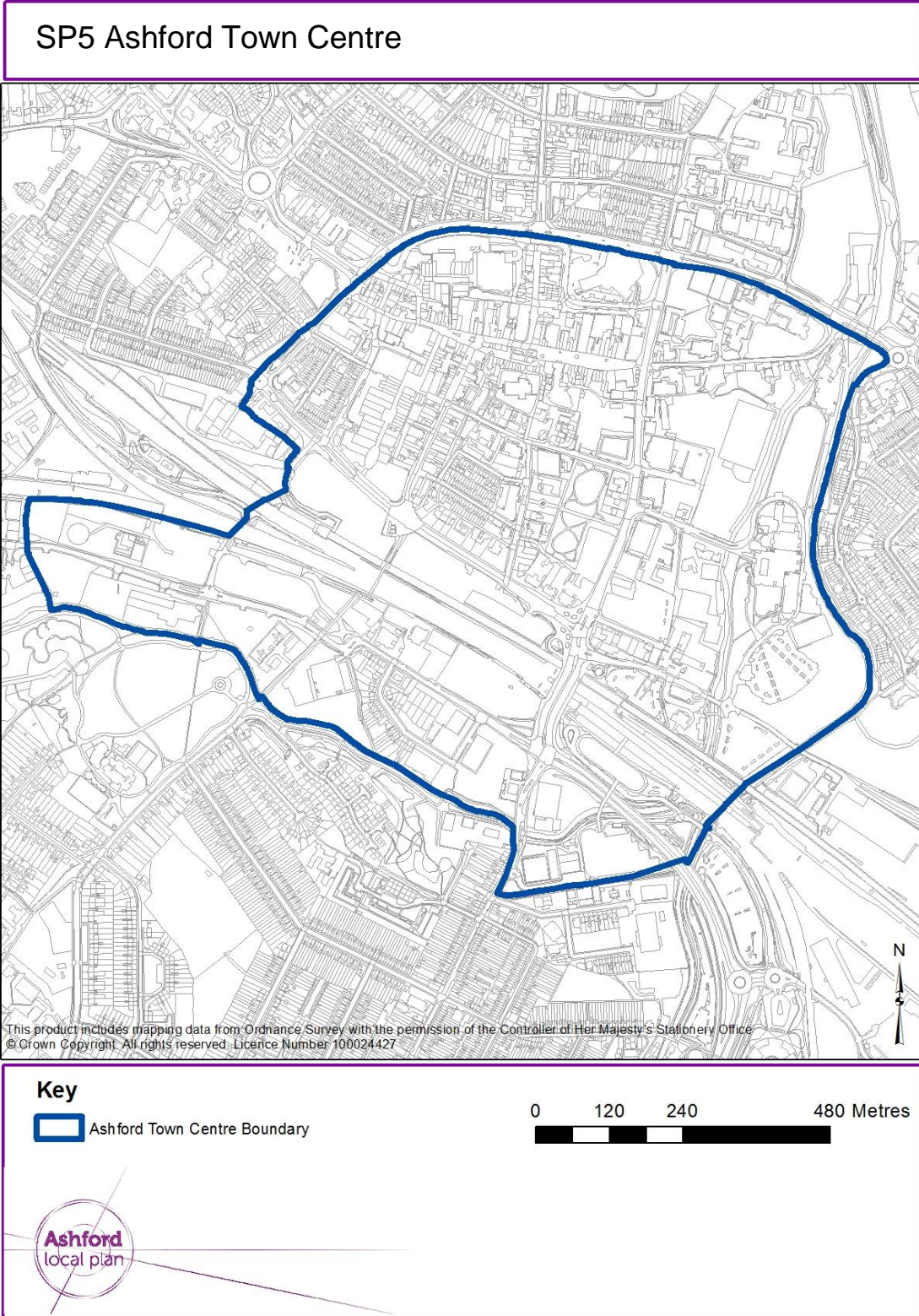
(not to scale)



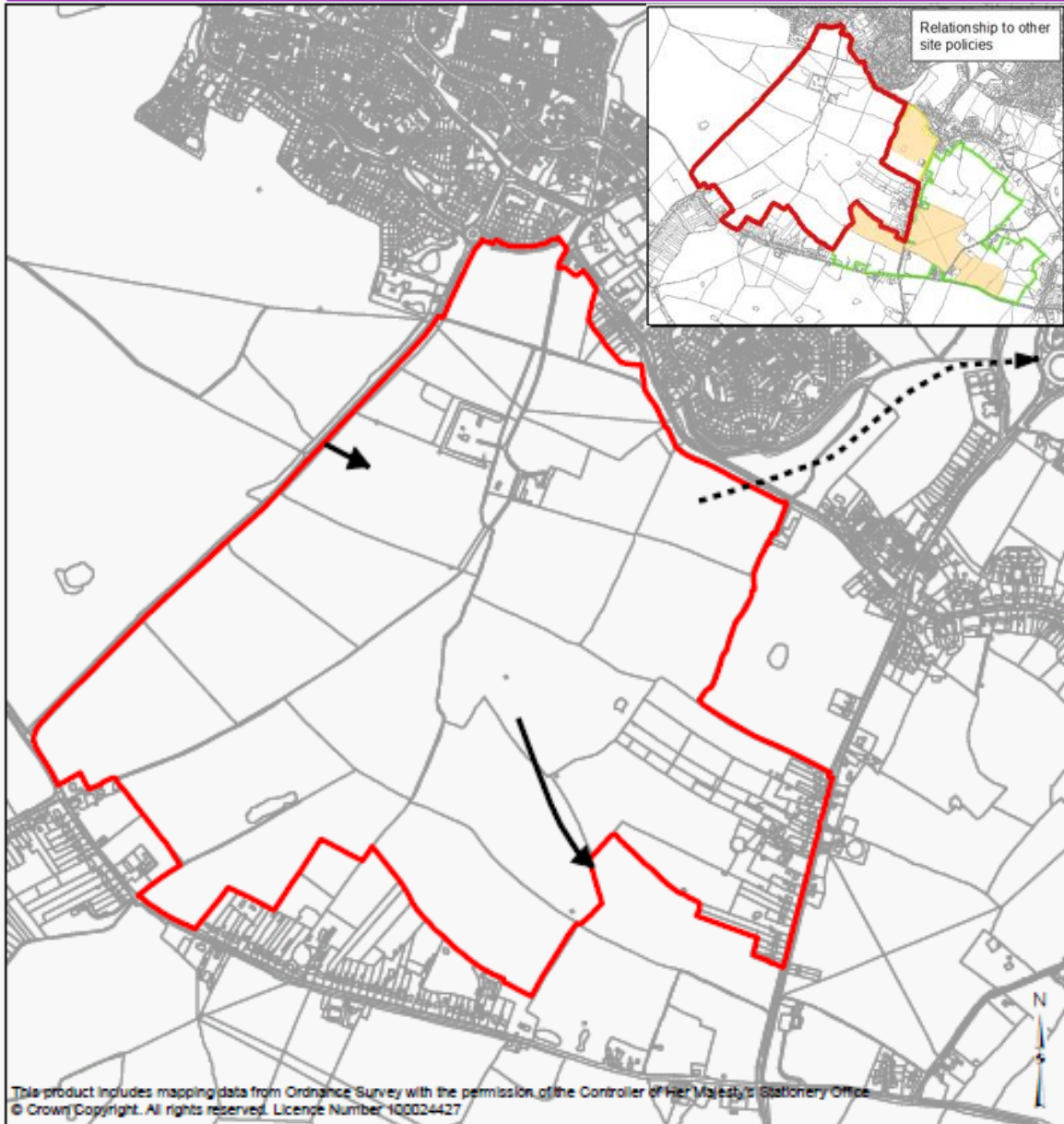
LEGEND

- - Town centre
- - Primarily employment development areas
- - Primarily residential development areas
- ▼ - Possible direction of development post 2030
- - Mixed use development areas
- ▼ - Possible direction of development post 2030
- Proposed highway schemes
- ★ - Sports & Recreation Hub
- - Green Corridor
- - Green Corridor Expansion
- - Green Corridor Potential future additions
- Subject to Chilmington Green AAP Policies
- ⊕ - International and Domestic Station

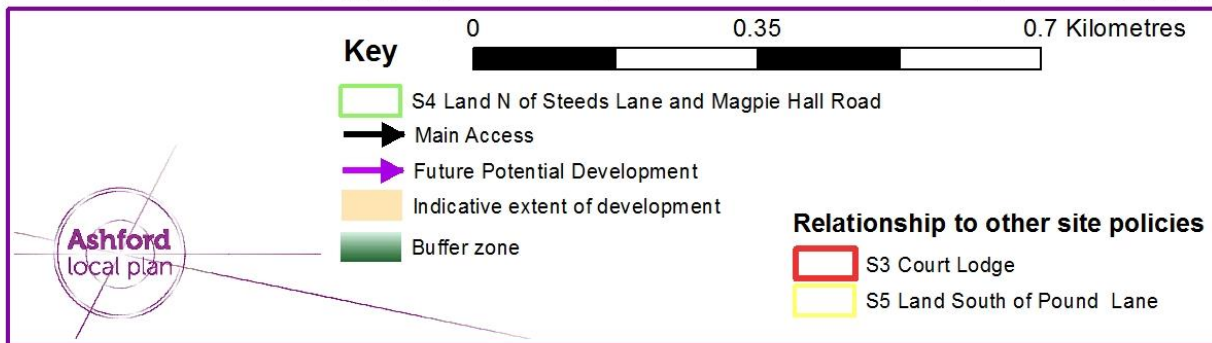
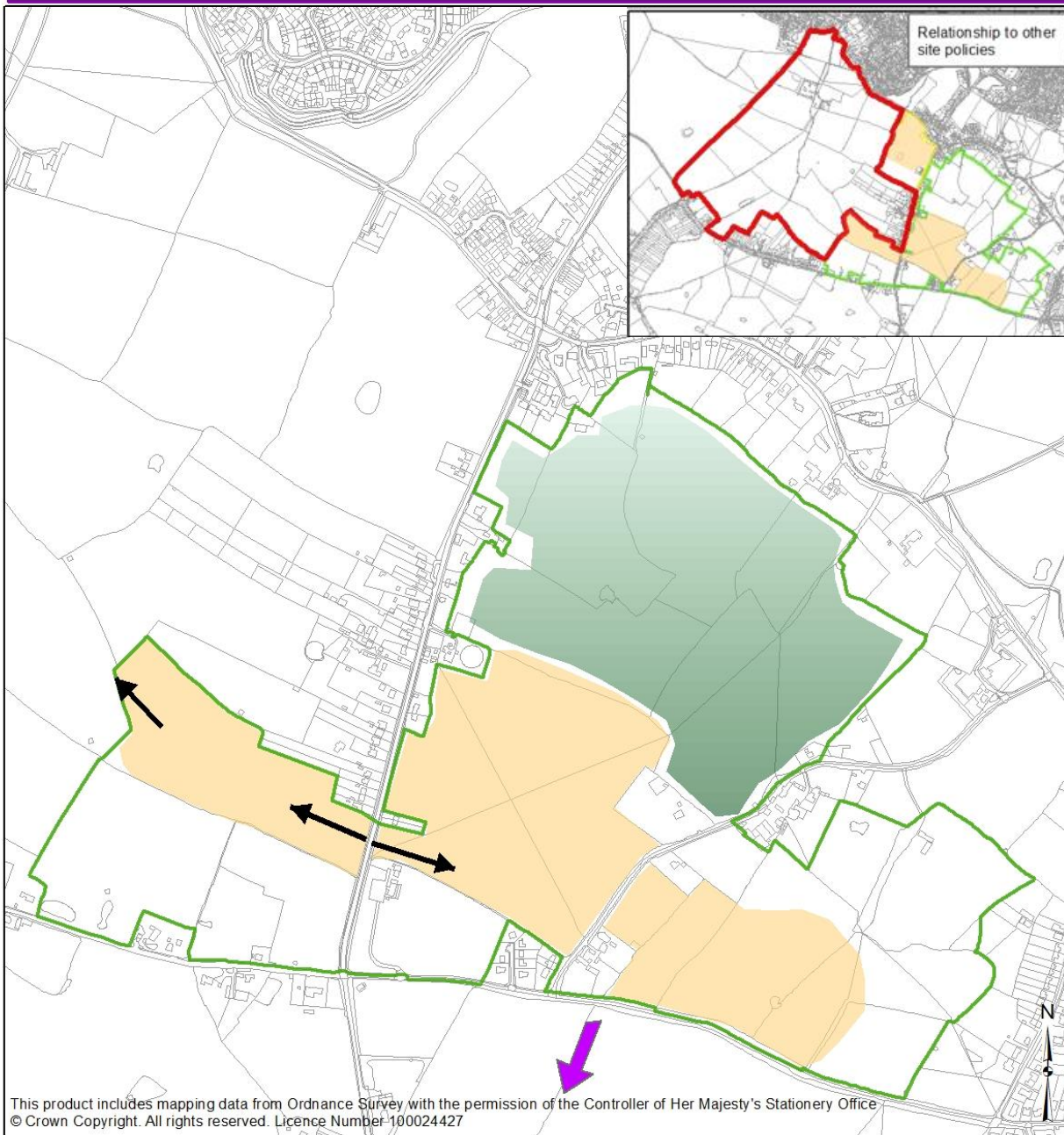
Topic and Site Policy Detailed Maps



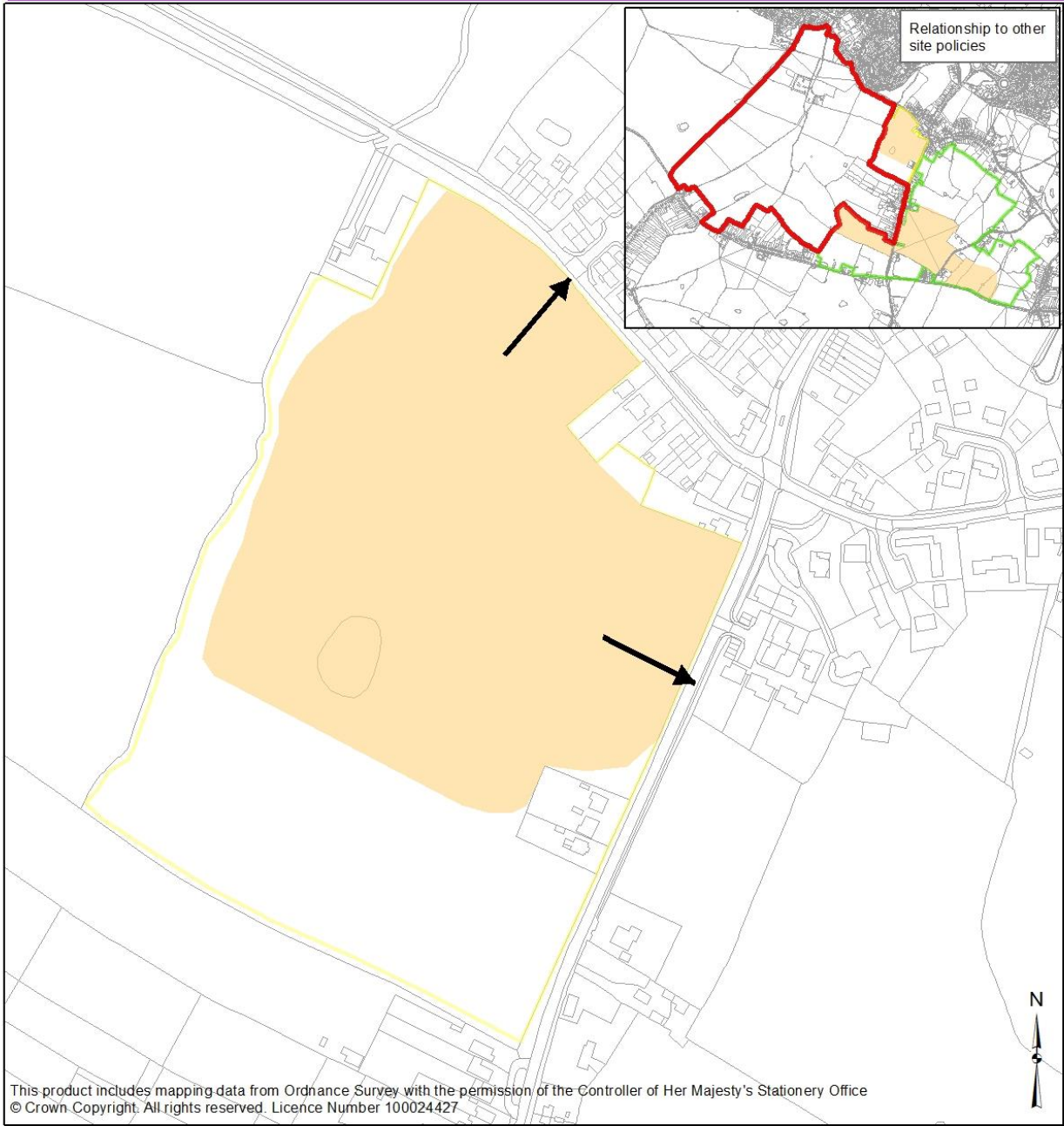
S3 Court Lodge



S4 Land N of Steeds Lane and Magpie Hall Road



S5 Land south of Pound Lane



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Key

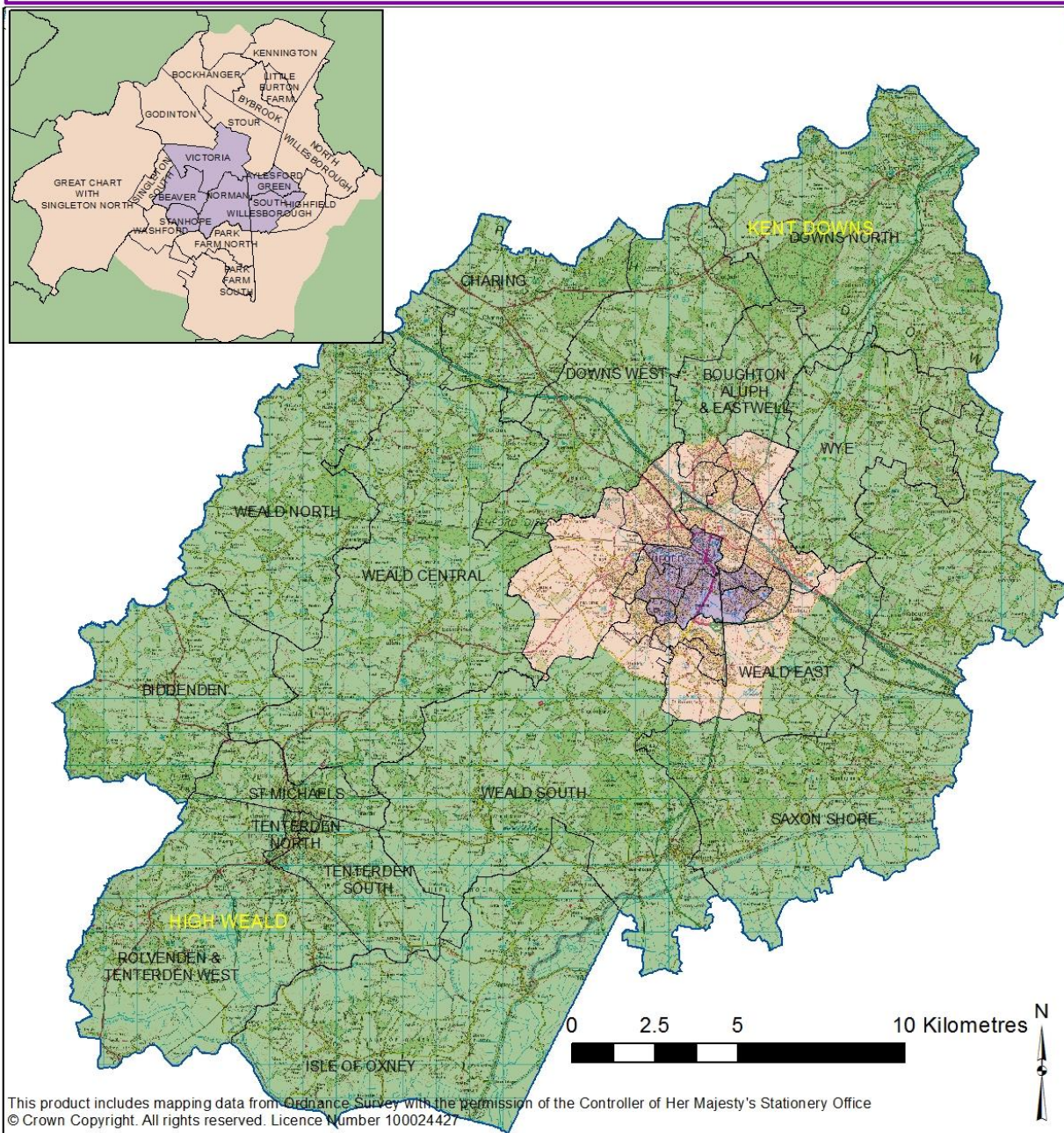
- S5 Land South of Pound Lane
- Main Access
- Indicative extent of development

0 0.125 0.25 Kilometres

Relationship to other site policies





- S3 Court Lodge
- S4 Land N of Steeds Lane and Magpie Hall Road

Affordable Housing Viability Areas



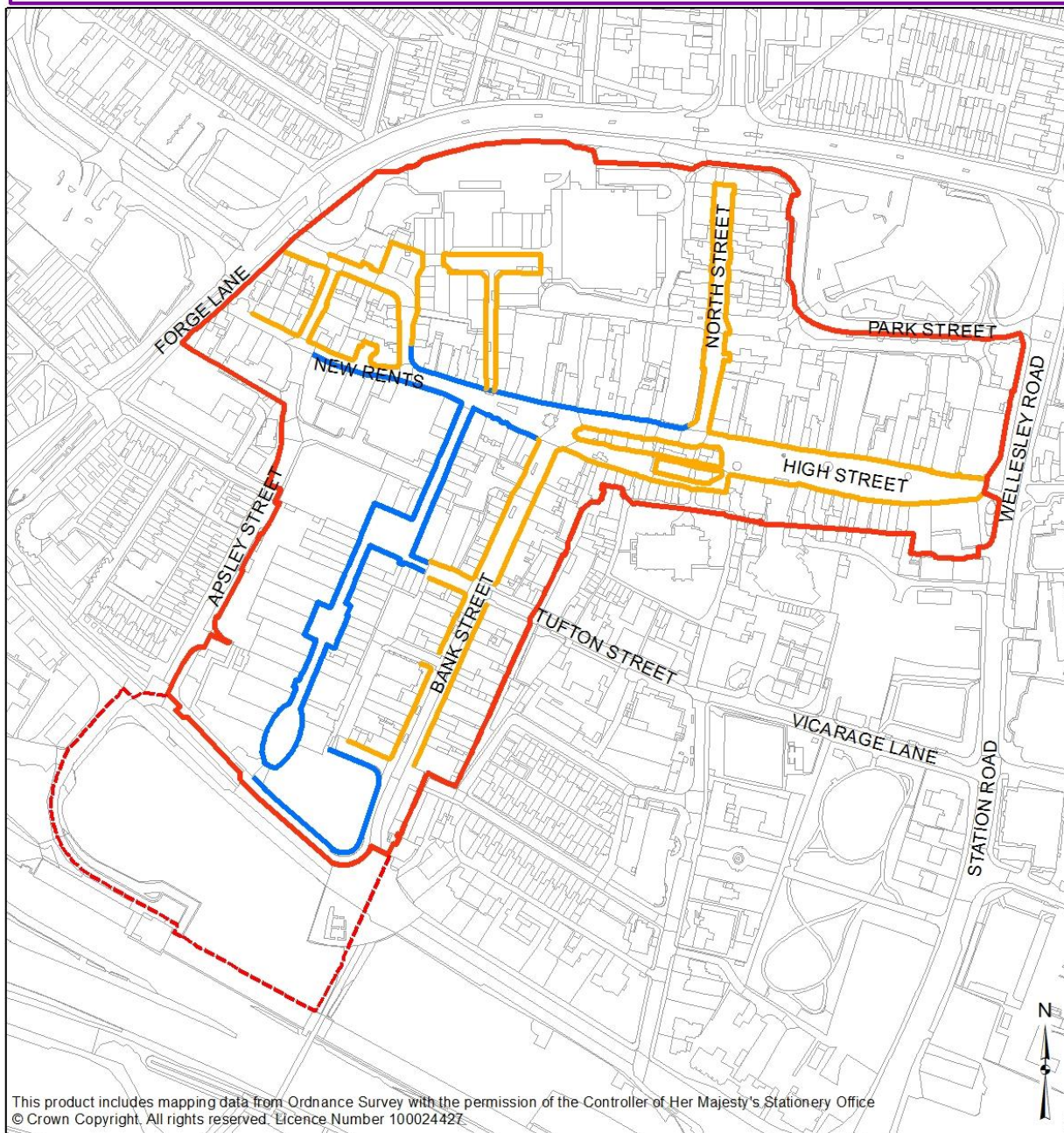
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Key

-  Ward Boundaries
-  Zone A
-  Zone B
-  Zone C

Ashford
local plan

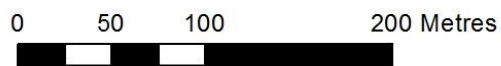
EMP7 Shopping Frontages in Ashford Town Centre



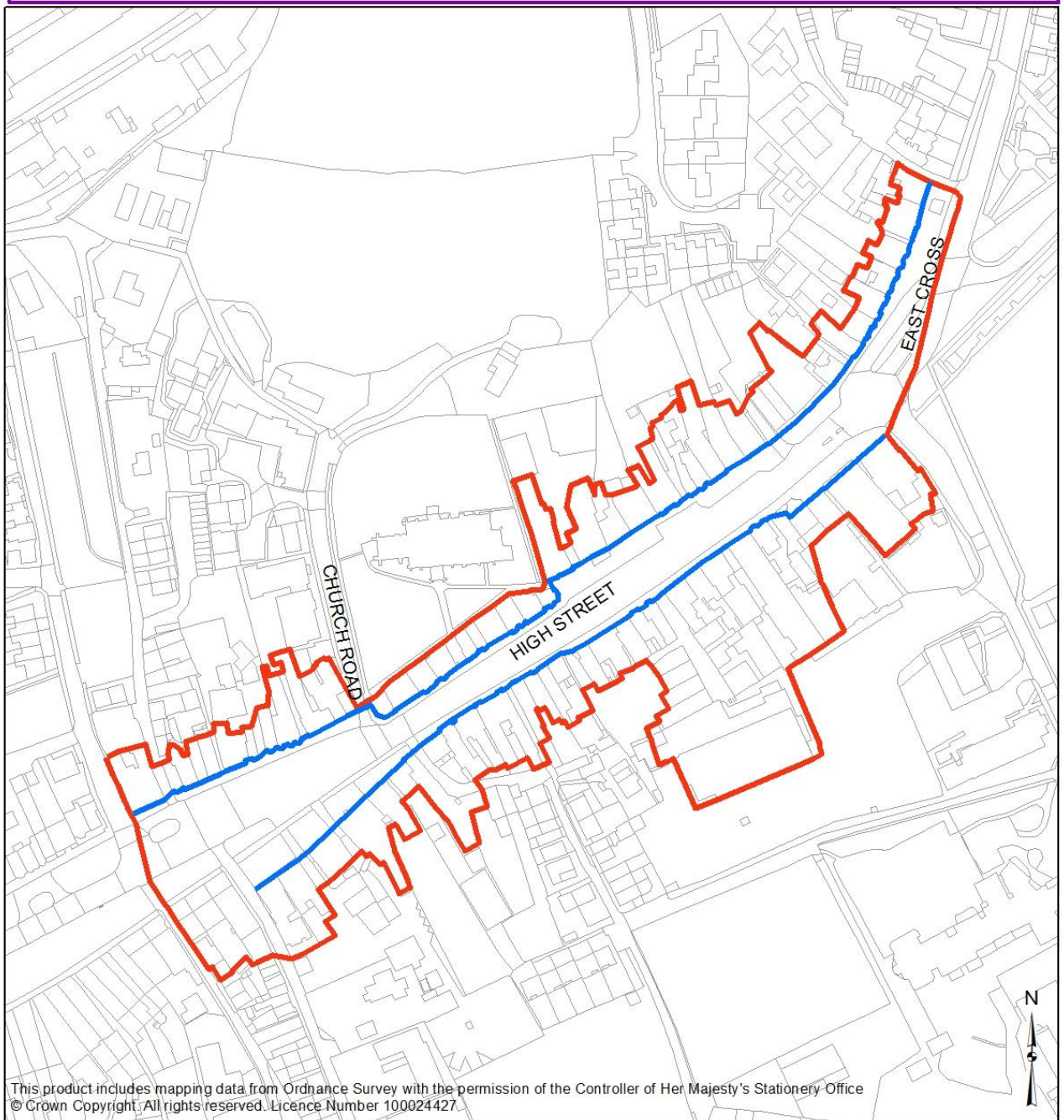
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Key

- Primary Shopping Area
- - - Extension to Primary Shopping Area
- Primary Frontage
- Secondary Frontage



EMP8 Primary Shopping Frontage in Tenterden Town centre



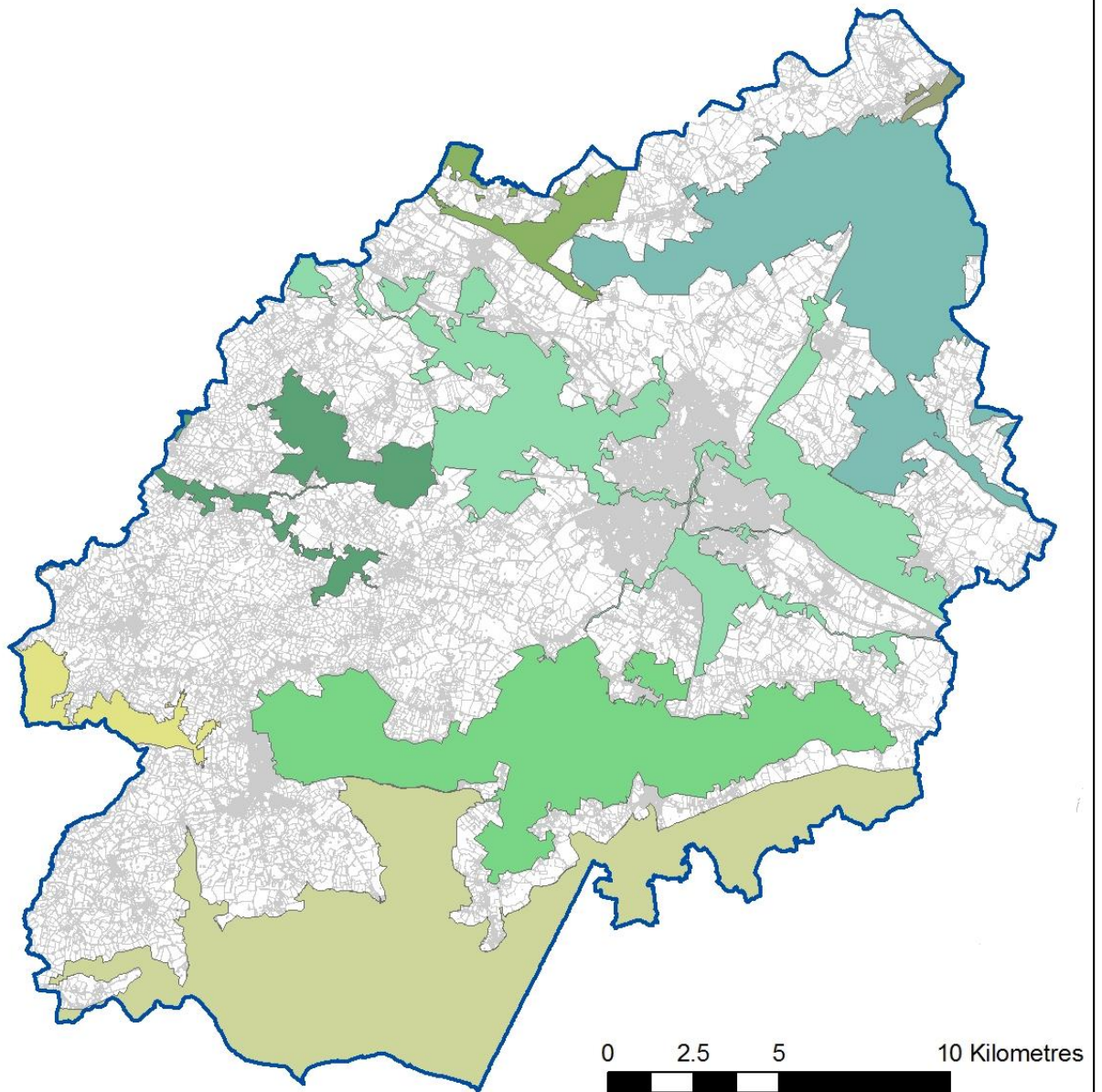
Key

- Primary Shopping Area
- Primary Frontage

0 30 60 120 Metres










Ashford
local plan

Ashford Biodiversity Opportunity Areas 2015



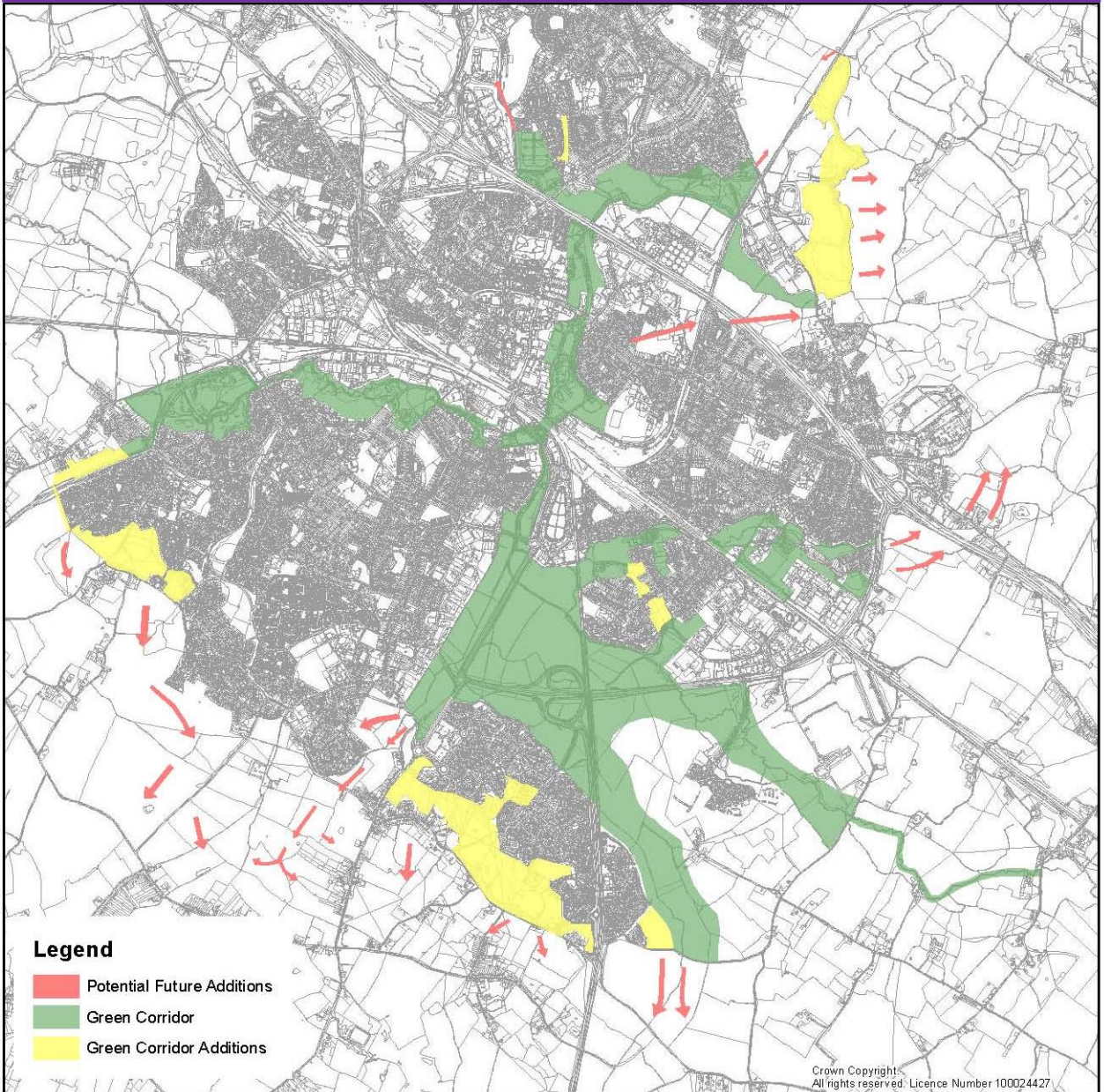
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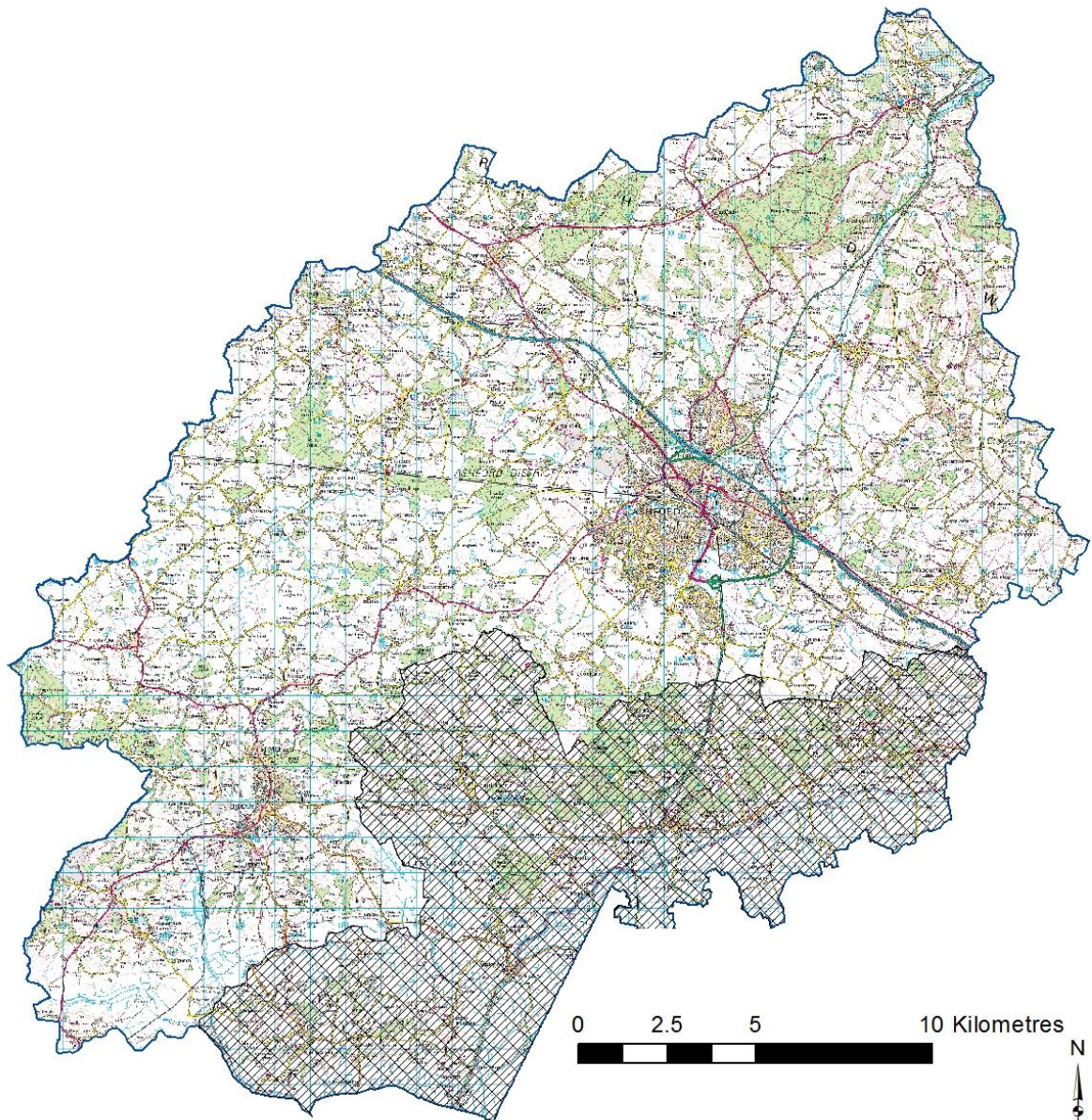
- | | |
|--|--|
|  Ashford Borough Boundary |  Medway & Low Weald Grassland & Wetland |
|  High Weald |  Mid Kent Downs Woods & Scarp |
|  Low Weald Woodland |  Mid Kent Greensand & Gault |
|  Lower Stour Wetlands |  Romney Marshes |
| |  The Blean |

Ashford
local plan

Ashford Green Corridor Map



Proposed Dark Sky Zone



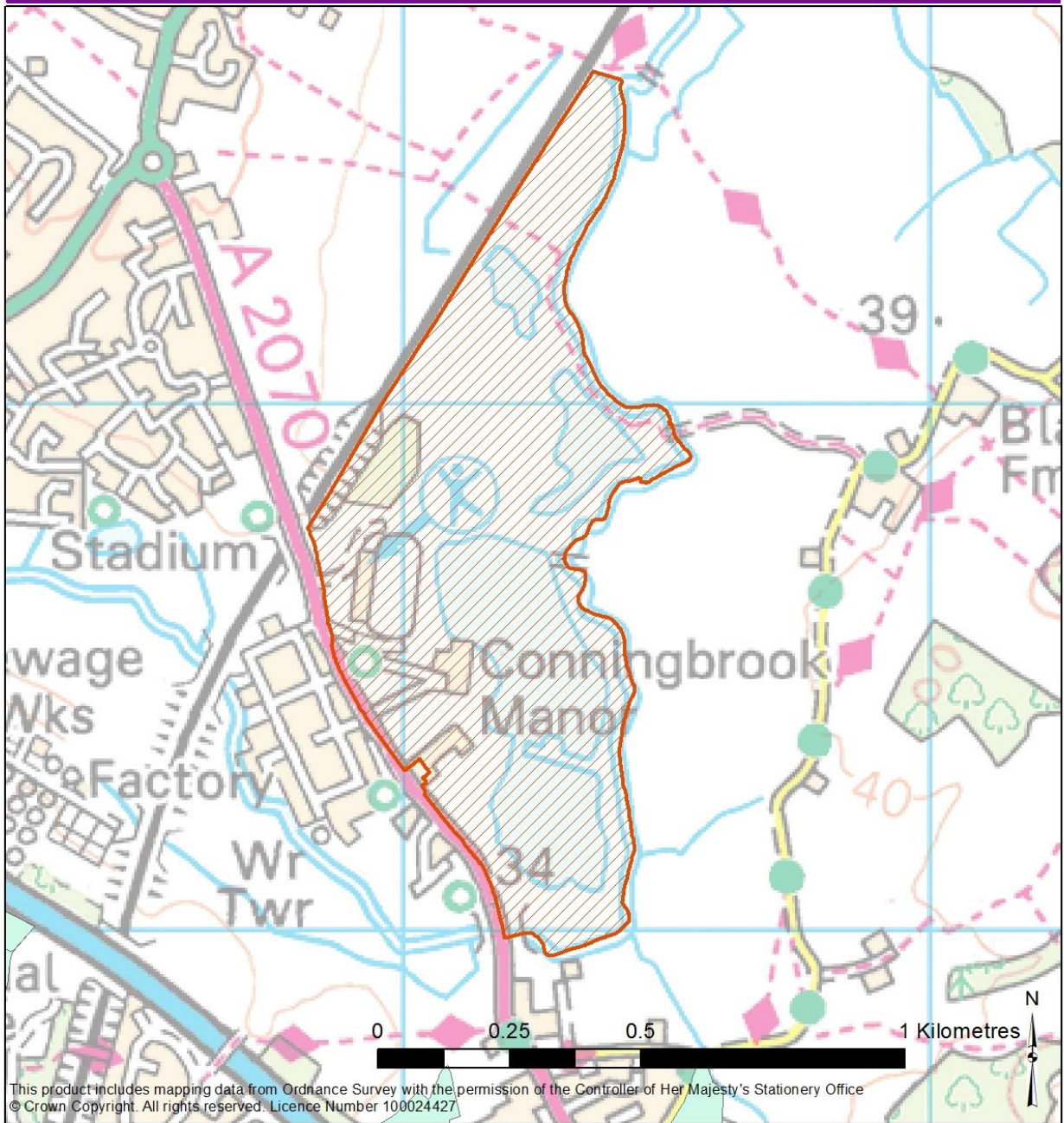
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Key

 Proposed Dark Sky Zone

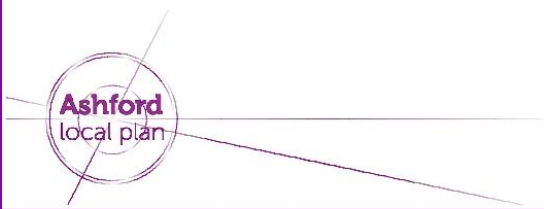


Conningbrook Strategic Park



Key

 Conningbrook Strategic Park



GLOSSARY AND ABBREVIATIONS

Air Quality Management Areas: Areas designated by local authorities because they are not likely to achieve national air quality objectives by the relevant deadlines.

Article 4 direction: A direction which withdraws automatic planning permission granted by the General Permitted Development Order.

Climate change adaptation: Adjustments to natural or human systems in response to actual or expected climatic factors or their effects, including from changes in rainfall and rising temperatures, which moderate harm or exploit beneficial opportunities.

Climate change mitigation: Action to reduce the impact of human activity on the climate system, primarily through reducing greenhouse gas emissions

Community Infrastructure Levy: A levy allowing local authorities to raise funds from owners or developers of land undertaking new building projects in their area.

Designated heritage asset: A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation.

Development Management: Development Management is the process by which planning applications are determined.

Development Plan: This includes adopted Local Plans and neighbourhood plans and is defined in Section 38 of the Planning and Compulsory Purchase Act 2004.

DPD: Development Plan Document. These are policy documents on a specific topic or cover a specific area that make up part of the current Development Plan. For Ashford these are the Ashford Core Strategy (2008), Ashford Town Centre Area Action Plan (2010), the Tenterden and Rural Sites Development Plan Document (2010), the Urban Sites and Infrastructure Plan (2012) and the Chilmington Green Area Action Plan (2014). These can be found on the Council's website <http://www.ashford.gov.uk/development-plan-documents>

Economic development: Development, including those within the B Use Classes, public and community uses and main town centre uses (but excluding housing development).

Ecological networks: These link sites of biodiversity importance.

European site: This includes candidate Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation and Special Protection Areas, and is defined in regulation 8 of the Conservation of Habitats and Species Regulations 2010.

Geodiversity: The range of rocks, minerals, fossils, soils and landforms.

Green infrastructure: A network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.

Heritage Asset: A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing).

Historic environment: All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora.

HMOs: Houses in Multiple Occupation: Housing which is occupied by 3 or more unrelated individuals sharing basic amenities.

HRA: Habitats Regulations Assessment. The Conservation of Habitats and Species Regulations 2010 transposes EU Directive 92/43/EEC on the conservation of natural habitats of wild flora and fauna into UK national law. The Regulations provide for the designation and protection of 'European sites', the protection of 'European protected species', and the adaptation of planning and other controls for the protection of European Sites. Assessments for significant effects on habitats must be carried out and mitigation measure identified.

International, national and locally designated sites of importance for biodiversity: All international sites (Special Areas of Conservation, Special Protection Areas, and Ramsar sites), national sites (Sites of Special Scientific Interest) and locally designated sites including Local Wildlife Sites (see Appendix 4 for list)

Local Enterprise Partnership: A body, designated by the Secretary of State for Communities and Local Government, established for the purpose of creating or improving the conditions for economic growth in an area.

Localism Act: The Localism Act was introduced in 2011. Its aim was to devolve powers from central government into the hands of individuals, communities and councils.

Main town centre uses: Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

National Planning Policy Framework. National planning policy (NPPF): This is the Government's statement of planning policy with which all Local Plan's must be in conformity. Where a local plan is silent on an issue planning decisions will be made in accordance with national policy. This document came into force in March 2012 and replaces the planning policy statements and planning practice guidance notes (PPS' and PPGs). <http://planningguidance.communities.gov.uk/>

National Planning Practice Guidance (PPG): Supporting guidance to the NPPF. Guidance can be updated and is available to view under: <http://planningguidance.communities.gov.uk/>

Neighbourhood plans: A plan prepared by a Parish Council or Neighbourhood Forum for a particular neighbourhood area (made under the Planning and Compulsory Purchase Act 2004).

Open space: All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.

Plan Period: The period covered by policies in the Local Plan (up to 2030).

Planning condition: A condition imposed on a grant of planning permission (in accordance with the Town and Country Planning Act 1990) or a condition included in a Local Development Order or Neighbourhood Development Order.

Planning obligation: A legally enforceable obligation entered into under section 106 of the Town and Country Planning Act 1990 to mitigate the impacts of a development proposal.

Pollution: Anything that affects the quality of land, air, water or soils, which might lead to an adverse impact on human health, the natural environment or general amenity. Pollution can arise from a range of emissions, including smoke, fumes, gases, dust, steam, odour, noise and light.

Previously developed land: Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time.

Primary shopping area: Defined area where retail development is concentrated (generally comprising the primary and those secondary frontages which are adjoining and closely related to the primary shopping frontage).

Primary and secondary frontages: Primary frontages are likely to include a high proportion of retail uses which may include food, drinks, clothing and household goods. Secondary frontages provide greater opportunities for a diversity of uses such as restaurants, cinemas and businesses.

Priority habitats and species: Species and Habitats of Principle Importance included in the England Biodiversity List published by the Secretary of State under section 41 of the Natural Environment and Rural Communities Act 2006.

Ramsar sites: Wetlands of international importance, designated under the 1971 Ramsar Convention.

Regional Spatial Strategy: The South East England Regional Planning Body and the South East Plan 2009 have been revoked under the Localism Act 2011.

Renewable and low carbon energy: Includes energy for heating and cooling as well as generating electricity. Renewable energy covers those energy flows that occur naturally and repeatedly in the environment – from the wind, the fall of water, the movement of the oceans, from the sun and also from biomass and deep geothermal heat. Low carbon technologies are those that can help reduce emissions (compared to conventional use of fossil fuels).

Rural exception sites: Small sites used for affordable housing in perpetuity where sites would not normally be used for housing. Rural exception sites seek to address the needs of the local community by accommodating qualifying households.

Site of Special Scientific Interest (SSSI): Sites designated by Natural England under the Wildlife and Countryside Act 1981.

Special Areas of Conservation (SAC): Areas given special protection under the European Union’s Habitats Directive, which is transposed into UK law by the Habitats and Conservation of Species Regulations 2010.

Special Protection Areas (SPA): Areas which have been identified as being of international importance for the breeding, feeding, wintering or the migration of rare and vulnerable species of birds found within European Union countries. They are European designated sites, classified under the Birds Directive.

Wildlife corridor: Areas of habitat connecting wildlife populations.

Windfall sites: Sites which have not been specifically identified as available in the Local Plan process. They normally comprise previously-developed sites that have unexpectedly become available.

APPENDICES

Appendix 1 - Schedule of policies to be superseded/deleted

These currently adopted policies will be deleted/superseded on adoption of the Local Plan 2030:

Policy Number	Policy Title/Purpose
GP10	Conserving and Enhancing Tenterden's Special Character
GP12	Protecting the Countryside and Managing Change
EN7	Shop Front
EN9	Setting and Entrances to Towns and Villages
EN10	Development on the Edge of Existing Settlements
EN11	Merging of Distinct Settlements
EN12	Private Areas of Open Space
EN13	Green Corridors
EN14	Land Adjoining the Green Corridors
EN16	Development in Conservation Areas
EN23	Sites of Archaeological Importance
EN27	Landscape Conservation
EN28	Historic Parks and Gardens
EN30	Nature Conservation Sites
EN31	Important Habitats
EN32	Important Trees and Woodlands
S13	Cheeseman's Green
S17	Park Farm, Kingsnorth
S20	Singleton
S21	Great Chart Playing Fields and Cricket Barracks
S22	Land at Former Rowcroft and Templar Barracks
S34	William Harvey Hospital
S36	Klondyke Works
HG3	Design in Village
HG5	Sites not on the Proposals Map
HG9	Extensions to Dwelling in the Countryside
HG10	Residential annexes
HG12	Extensions to caravans or mobile homes
HG16	Protection of existing housing
ET3	Ashford 'Employment Core'
ET4	Business Parks
ET7	'Bad Neighbour' developments
ET9	Re-use of Industrial Building for Leisure
RE4	B1 uses within Residential Curtilages
RE12	Annexes to Agricultural Dwellings for Retired or Semi-Retired Farmers
RE14	Removal of Agricultural Occupancy Conditions
RE15	Location of Agricultural Services
SH1	Proposals in Ashford and Tenterden town Centre
SH2	New Retail Schemes in out of Centre Locations

Policy Number	Policy Title/Purpose
SH3	Primary Frontage in Ashford Town Centre
SH4	A2 Retail uses in Bank Street, Ashford
SH6	Local and Village Centre and Individual Shops
SH11	Garden Centre
SH16	Pubs
TP6	Cycle Parking
TP10	Park and Ride
TP20	Roadside Facilities
LE5	Equipped Public Open Space
LE6	Off-Site Provision of Public Open Space
LE7	Play Facilities
LE8	Leisure Facilities
LE9	Maintenance of Open Spaces
LE10	Loss of Leisure Facilities
LE11	Loss of Public Open Spaces
LE12	Loss of Playing Fields
LE13	Leisure Building on Public Open Space
LE16	Allotments
CF6	Standard of Construction of Sewerage Systems
CF7	Main Drainage in Village
CF8	Renewable Energy
CF9	Waste Recycling
CF10	Satellite Dishes
CF12	Free Standing Telecommunications Masts
CF14	Overhead Electricity Lines
CF19	New Health Care Centres
CF20	Nurseries and Crèches
CF21	School Requirements for new Housing Development
CS1	Guiding Principles
CS2	The Borough Wide Strategy
CS3	Ashford Town Centre
CS4	Ashford Urban Area
CS5	Ashford Urban Extensions
CS6	The Rural Settlement Hierarchy
CS7	The Economy and Employment Development
CS8	Infrastructure Contributions
CS9	Design Quality
CS10	Sustainable Design and Construction
CS11	Biodiversity and Geological Conservation
CS12	Affordable Housing
CS13	Range of Dwelling Types and Sizes
CS14	Gypsies and Travellers
CS15	Transport
CS16	Retail
CS17	Tourism
CS18	Meeting the Community's Needs
CS18a	Strategic Recreational Open Spaces

Policy Number	Policy Title/Purpose
CS19	Development and Flood Risk
CS20	Sustainable Drainage
CS21	Water Supply and Treatment
TC1	Guiding Principles for Town Centre development
TC2	The Town Centre Core
TC3	Elwick Place
TC4	Park Mall
TC5	Vicarage Lane Car Park
TC6	Corner of Elwick Road and Station Road
TC7	Ashford Library
TC8	Godington Way Industrial Estate
TC9	The Commercial Quarter
TC10	The Southern Expansion Quarter
TC11	Victoria Way East
TC12	Former Powergen North
TC13	Victoria Way South
TC14	Gasworks Lane
TC15	The Internationals Station Quarter
TC16	Former B&Q Site, Beaver Road
TC17	The Civic Centre
TC18	The Residential Transition Quarter
TC19	New Station South
TC20	New Station North
TC21	Multi-Storey Car Parks
TC22	Office, Retail and Leisure Parking Standards
TC23	Residential Parking Standards
TC24	Cycles Parking Standards
TC25	Commuted Parking
TC26	Green Corridors in the Town Centre
TC27	Open Space, Recreation, Sport and Play Facilities
TENT1	Tenterden Southern Extension
CHAR1	Land South of Arthur Baker Playing Fields
CHAR2	Land South of Maidstone Road
HAM1	Land North of Lancaster Close
HAM2	Land at Parker Farm
WYE1	Wye Court Farm, Land off Churchfield Way
WYE2	Land at Luckley Field, Wye
WYE3	Imperial College, Wye
ALD1	Land South and West of Quarry Wood
BETH1a	Land at Mill Road
BETH2	Land rear of The George Public House
BID1	Land at Sandeman Way
CHIL1	Former Chilham Sawmill Site
ROLV1	Rolvenden Football Ground, Tenterden Road
WOOD1	Land between 82-120 Front Road, Woodchurch
TRS1	Minor Residential Development or Infilling
TRS2	New Residential Development Elsewhere

Policy Number	Policy Title/Purpose
TRS3	Replacement Dwelling in the Countryside
TRS4	Exception Sites for Local Needs Housing
TRS5	Exception Sites for Specialist Housing Schemes
TRS6	Exception Sites for Community Facilities
TRS7	Retention of Existing Employment Sites & Premises
TRS8	Extension to Employment Premises
TRS9	New Employment Premises and Uses in the Rural Settlements
TRS10	New Employment Premises in the Countryside
TRS11	Conversions of Rural Buildings to Non-Residential Uses
TRS12	Conversion of Rural Buildings to Tourist-Related Residential Uses
TRS13	Conversion of Rural Buildings to General Residential Uses
TRS14	Diversifying Existing Agricultural Businesses
TRS15	Tenterden Primary Shopping Frontages
TRS16	Rural Shops and Services
TRS17	Landscape Character & Design
TRS18	Important Rural Features
TRS19	Infrastructure Provision to Serve the Needs of New Developments
U0	Presumption in Favour of Sustainable Development
U1	Land off Abby Way, Willesborough Lees
U2	Newtown Works
U3	Land at Chart Industrial Estate
U4	Lower Queens Road
U5	Land at Blackwall Road, Willesborough Lees
U6a	Former Ashford South Primary School
U6b	K College, Jemmett Road
U7	Leacon Road
U8	Warren Park and Ride
U9	Maidstone Road
U10	Former Ashford Hospital
U11	Bishop's Green, Singleton
U12	Associate House, Queens Road
U13	Mabledon Avenue
U14	Land at Willesborough Lees
U15	Henwod
U16	Orbital Park
U17	Eureka Business Park
U18	Warren Lane
U19	Sevington
U20	Loss or Redevelopment of Employment Sites
U21	Green Corridors
U22	Conningbrook Strategic Park
U23	Landscape Character and Design
U24	Infrastructure Provision to Serve the Needs of New Development

Appendix 2 - Local Plan 2030 evidence base documents

Doc Ref	Doc Title	Content
SD02	Sustainability Appraisal (SA) and Strategic Environment Assessment (SEA) of the Ashford Borough Local Plan to 2030	In line with relevant EU and UK legislation, these documents review the policy framework against economic, social and environmental factors to ensure that they contribute towards the aims of sustainable development.
SD09	Viability Study - Local Plan and CIL Viability Report (2016) Viability Study Update (2017)	Evidence which assess the cost implications on the development industry, stemming from the policy framework contained within the Local Plan. It has been prepared in consultation with the development industry and other key stakeholders and follows the relevant regulations and guidance.
SD10	Ashford Borough Infrastructure Delivery Plan (IDP) 2016	Sets out the infrastructure that will be needed up to 2030 in order to support the growth envisaged in the Local Plan. The IDP is supported by a Infrastructure Delivery Schedule which separates this provision into various themes and provides an indication of when the provision is needed, who is the lead body to deliver it, what it will broadly cost and what the likely funding gap is.
SD11	Habitat Regulation Assessment and Appropriate Assessment (2017)	The Conservation of Habitats and Species Regulations 2010 transposes EU Directive 92/43/EEC on the conservation of natural habitats of wild flora and fauna into UK national law. The Regulations provide for the designation and protection of 'European sites', the protection of 'European protected species', and the adaptation of planning and other controls for the protection of European Sites. Assessments for significant effects on habitats must be carried out and mitigation measure identified.
SD12	Ashford Strategic Housing and Employment Land Availability Assessment (SHELAA) 2016/17	A Strategic Housing Land Availability Assessment (SHLAA) is a requirement of the National Planning Policy Framework (NPPF) which requires LPA's to: <i>'prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period.'</i>
SD13	Ashford Strategic Housing Market Assessment (SHMA) 2014 and updates	The purpose of the SHMA is to develop a robust understanding of housing market dynamics, to provide an assessment of future needs for both market and affordable housing and the housing requirements of different groups within the population.

Doc Ref	Doc Title	Content
TBD01	Kingsnorth Strategic Link Road Ashford – Feasibility Study (2016)	A report undertaken by Amey, commissioned by ABC through KCC, which provides design support in respect of the proposed Court Lodge Link Road as identified in the Local Plan.
TBD02	Traffic Impact Assessment – Summary Report (2016)	Amey have been commissioned by Kent County Council (KCC), in partnership with Ashford Borough Council (ABC), to assess the impact of major Local Plan allocation sites to the north of Ashford town centre. This report aims to assess the impact of two sites (Kennington East and Eureka) on the local highway network.
TBD03	Ashford Town Centre Parking Review (2014)	Ashford Borough Council (ABC) appointed Peter Brett Associates to provide a review and update of the existing parking strategy to establish potential capacity and future demands arising from development envisaged in the Local Plan.
TBD04	Ashford Cycling Strategy (2015)	Sustrans have been contracted to survey every town in England for the Department for Transport to provide cycle data. The cycling strategy builds upon this evidence and sets out a strategy for cycling in the town of Ashford.
TBD05	Feasibility Report A20 Development Sites – Access Assessment (2017)	Amey were commissioned by Kent County Council to undertake a feasibility study in respect of the suitability of 3 potential A20 allocation sites in terms of access (both vehicular and pedestrian).
TBD06	AMEY – Strategic Network Report (2017)	Amey were commissioned by Ashford Borough Council to undertake Strategic Network Report in 2017
TBD07	Junction 10a Report (2017)	Report issued by the Secretary of State with regards to the funding and timings on Junction 10a. December 2017
EBD01	Ashford Borough Council and Wye with Hinxhill Parish Council – Rural Economic Assessment (2014)	The purpose of the study is to assess the likely growth of the rural economy to 2030 and to identify locations within the rural area of Ashford Borough that are capable and suitable for accommodating jobs and industry to support the growth of the local economy.
EBD02	Ashford Employment Land Review: Site Assessments (2016)	Commissioned by the Council and carried out by Nathaniel Lichfield and Partners in 2016. Provides a review of current provision and forecasts future demands in terms of employment land needs, by sector.

Doc Ref	Doc Title	Content
EBD03	Ashford Retail Leisure Needs Assessment (2015)	Assessment which advises on the level of retail / leisure development that is required based on the current provision and market share and how this could change as a result planned growth up to 2030.
EBD04	Ashford Strategic Employment Options Report (2012)	Ashford Borough Council commissioned a Strategic Employment Options Report to consider future demand for employment land to 2030. The report has been prepared by a consultancy team, comprising GL Hearn (GLH), Cambridge Econometrics (CE) and SQW.
NBD01	Ashford Strategic Flood Risk Assessment (SFRA) (2014) and updates	An SFRA is a planning tool that assists councils in their selection and development of sustainable site allocations away from vulnerable flood risk areas. The SFRA will assist the council to make the spatial planning decisions required to inform the forthcoming Local Plan for the period up to 2030.
NBD02	Green Corridor Action Plan 2017	The Green Corridor is a network of largely green open areas made up of recreation space and other green and blue spaces alongside the Great and East Stour rivers flowing through Ashford. The production of this 2017 Plan reviews and updates the position from the original 2000 Green Corridor Action Plan. This includes agreeing extensions to the current Green Corridor network and establishing proposed improvements within the plan. This is to fit alongside the Ashford Local Plan and is an Appendix to the Ashford Open Space Strategy up to 2030.
NBD03	Adopted Heritage Strategy 2017	The Heritage Strategy sets out the council's aims and objectives to safeguard Ashford's historical assets and develop the borough's cultural offer for the enjoyment of Ashford's residents and visitors, with the aim of strengthening the local heritage offer and supporting the tourism potential that heritage can provide.
NBD04	Landscape and Visual Appraisal 2017	Preliminary Landscape and Visual Appraisal for 4 Potential Housing Allocation Sites, A20 Corridor and Land off Pluckley Road, Charing, undertaken by Land Management Services Ltd
NBD05	Water Cycle Study 2016	This water cycle topic paper provides a high-level review of existing water cycle processes and supporting infrastructure to ensure the level of proposed development envisaged within the Local Plan does not have a detrimental effect on the water environment within the Ashford Borough.
CBD01	Ashford Draft Cultural Strategy (2015)	The strategy looks at the existing art and cultural industry provision within the borough but with a specific focus on the town of Ashford. It then looks at

Doc Ref	Doc Title	Content
		opportunities for the industry to expand and what the future demands might be for a variety of space as a result of development coming forward over the Plan period.
CBD02	Ashford Borough Playing Pitch Strategy (2017)	Reviews and audits all outdoors sports pitches and indoor facilities in the borough. The Strategy then sets out how this provision could be expanded and managed up to 2030, in a sustainable way. The Strategy is Sports England compliant in that it follows their guidance and has had input from various national governing bodies for sports (including football, rugby, hockey and cricket).
CBD03	Ashford Draft Tourism Strategy (2013-2014)	This review places at its heart the needs of our local tourism businesses and organisations. It seeks to establish how the Council can best support and develop these key partners. The Council is committed to economic growth, job creation and improving the infrastructure that supports and encourages a thriving tourism economy through an ever-improving visitor offer and experience.
CBD04	Open Space Strategy 2017	<p>The Open Space Strategy has been produced to detail how Ashford Borough Council, in partnership with a range of organisations, plans to protect, enhance and provide public open spaces to 2030.</p> <p>The strategy was undertaken in 2017, and provides a number of key strategic recommendations which are reflected within the Local Plan.</p>
GBD16	Gypsy, Traveller and Travelling Showpeople Accommodation Assessment and Update Paper (2014 and 2016)	ABC commissioned Salford Housing and Urban Studies Unit (SHUSU) at the University of Salford to produce an updated Gypsy and Traveller Accommodation Needs Assessment, establishing the needs of Gypsies, Travellers and Travelling Showpeople. This report presents the projection of permanent and transit requirements for the period 2012-2028. ABC produced an update to this work in 2016.

A number of additional documents will also be available as supporting documents to the Local Plan and the full library is available to view here:

<https://www.ashford.gov.uk/planning-and-building-control/planning-policy/new-local-plan-to-2030/local-plan-2030-evidence-base/>

Appendix 3 - List of housing site allocations

Maps of these designations can be found on the Local Plan 2030 Online Policies Map:
<http://www.ashford.gov.uk/local-plan-2030>.

No.	Site name	Number of units
S1	Commercial Quarter, Ashford Town Centre	159
S2	Land NE of Willesborough Road, Kennington	700
S3	Court Lodge, Kingsnorth	950
S4	Land north of Steeds Lane and Magpie Hall Road, Kingsnorth	400
S5	Land South of Pound Lane, Kingsnorth	150
S6 & S7	Former Klondyke & Newtown Works Phase 2	350
S8	Lower Queens Road, Ashford	40
S9	Kennard Way - Henwood	25
S10	Gasworks Lane, Ashford	150
S11	Leacon Road, Ashford	100
S12	K College, Jemmett Road	160
S13	Former Ashford South Primary School	110
S14	Park Farm South East	325
S15	Finberry North West	300
S16	Waterbrook	350
S17	Willesborough Lees	200
S19	Conningbrook Residential Phase 2	170
S20	Eureka Park	375
S24	Tenterden Southern Extension Phase B	225
S26	The Street, Appledore	20
S27	North Street, Biddenden	45
S28	Northdown Service Station, Maidstone Road, Charing	20
S29	Land South of Arthur Baker Playing Field, Charing	35
S30	Land on New Road, Egerton	15
S31	Land north of St. Mary's Close, Hamstreet	80
S32	Land at Parker Farm, Hamstreet	10
S33	Land at Hope House, High Halden	35
S34	Land East of Coach Drive, Hothfield	40
S35	Land adjacent to the Village Hall, Mersham	10
S36	Land rear of Kings Head PH, Shadoxhurst	25
S37	Land adjacent to Village Hall, Smarden	25
S38	Land South of Church Road, Smeeth	35
S40	Land at Front Rd, Woodchurch	8
S45	Land South of Brockmans Lane, Bridgefield	100
S46	Chart Road, Ashford	25
S47	Land east of Hothfield Mill, A20	75
S48	Rear of Holiday Inn, A20	150

S49	Land north of Tutt Hill, A20	75
S51	Land north of Church View, Aldington	10
S52	Land South of Goldwell Court, Aldington	20
S53	Nats Lane, Brook	10
S54	Land at Clockhouse, Challock	15
S55	Land Adjacent to Poppyfields, Charing	180
S56	Branch Road, Chilham	10
S57	Warehorne Road, Hamstreet	50
S58	Stevenson Bros - A28, High Halden	50
S59	Land at Old Rectory Close, Mersham	15
S60	Pope House Farm, Tenterden (St. Michael's)/ High Halden	50
S61	Land between Lloyds Green and Jubilee Fields, Wittersham	40
S62	Land off Appledore Road, Woodchurch	30
	TOTAL	6,567*

**This does not Include assumed contribution from Neighbourhood Plans, or extant previous allocations/permissions as detailed within the Housing Trajectory.*

Appendix 4 - Nationally and locally protected biodiversity designations

Maps of these designations can be found on the Local Plan 2030 Online Policies Map: <http://www.ashford.gov.uk/local-plan-2030>.

INTERNATIONALLY PROTECTED SITES

- Wye and Crundale Special Area Conservation (SAC)
- Dungeness, Romney Marsh and Rye Bay RAMSAR

NATIONALLY PROTECTED SITES

National Nature Reserves (NNR) at:

- Hamstreet Woods
- Wye and Crundale Downs

Sites of Special Scientific Interest (SSSI) at :

- | | |
|---------------------------------------|------------|
| • Alex Farm Pastures | TQ 968 369 |
| • River Beult | TQ 865 425 |
| • Charing Beech Hangers | TQ 979 484 |
| • Down Bank | TR 083 522 |
| • Dungeness, Romney Marsh and Rye Bay | TQ 950 290 |
| • Ham Street Woods | TQ 996 352 |
| • Hart Hill | TQ 943 506 |
| • Hatch Park | TR 063 410 |
| • Hoads Wood | TQ 953 426 |
| • Hothfield Common | TQ 969 458 |
| • Orlestone Forest | TQ 982 350 |
| • Park Wood, Chilham | TR 043 526 |
| • Wye and Crundale Downs | TR 080 470 |

LOCAL WILDLIFE SITES (LWS)²³

- Hemsted Forest
- Sandpit Wood, etc. Clapper Hill
- Woods, Meadows and Ponds, High Halden
- Knock Wood, etc. Tenterden
- Ashenden Gill, etc. Tenterden
- Heronden Woods and Pasture, Tenterden
- Friezingham Dykes and Newmill Channel, etc. Tenterden

²³ The Kent Nature Partnership (KNP) oversee the selection of Local Wildlife Sites.

- Rother Levels and adjacent Woods, Wittersham
- Halden Place Orchard, Nr. Rolvenden
- Stone Cliff, Isle of Oxney
- Comb Wood, etc. Wittersham
- Spuckles Wood, etc. Stalisfield Green
- Hunts Wood, etc. Kenardington
- Harlakenden Wood, Shadoxhurst
- Valley west of Tong Green
- Bilsington Woods and Pasture
- Blean Woods, South
- Aldington Sandpit
- South Willesborough Dykes
- Park Wood, etc. Nr. Kenardington
- Shadoxhurst Woods and Pasture
- Aldington Woods
- River Great Stour, etc. Godinton
- Hothfield Lake, etc.
- Ashford Warren, etc.
- Royal Military Canal
- Great Stour, etc. Ashford to Fordwich
- Little Chart Mill Ponds, Woods, etc.
- Woods and Pasture, extra to Hoads Wood SSSI
- March Wood, etc. Hothfield
- Weald Cottage Meadow, etc. Bethersden
- Dering Wood, etc. Pluckley
- Pasture and Orchard, Pluckley
- Ponds and Pasture around Smarden
- Tylden Strict Baptist Chapel Yard
- River Sherway adj. Ponds and Pasture, Headcorn
- Foxden Wood, etc. Egerton
- Pasture, Pemples Cross
- Charing Hill Chalk Pit, etc.
- Longbeech Wood, Charing
- Challock Forest, King's Wood
- Denge Wood complex
- Woods and Pasture, Mill Pond, near St. Michaels
- Willesborough Lees and Flowergarden Wood, etc.
- Naccolt Pit
- Woods, etc. Brabourne
- Pasture, etc. Bulltown Corner, extra to SSSI
- Kingsmill Down Pasture, Hastingleigh
- Huntstreet Woods and Pasture
- Bybrook Nature Reserve
- Orlestone Forest
- Lord's Wood, etc. Stone-in-Oxney
- Meadow near Maltman's Hill, Smarden
- Wanden Meadows, etc. Egerton Forstal
- Woods and Meadows near Shadoxhurst
- Jarvis Farm Meadows and Pond, near Woodchurch
- Tile Lodge Wood, etc. Eastwell

- Winchcombe Down (south), extra to SSSI
- Challock Churchyard, near Challock Manor
- Woods, Pasture and Ponds, Bromley Green
- Burnt Mill Pond, etc. Charing Heath - extra to SSSI
- Orlestone Pastures and Woods
- Dering Meadows, Maltman's Hill
- Rolvenden Churchyard
- Lenham Heath and Chilston Park
- Hothfield Common Field
- Hurst Wood, Charing Heath
- Cork Farm Apple Orchard, Old Wives Lees

LOCAL NATURE RESERVES

- Ashford Green Corridor
- Hothfield Common
- Poulton Wood, Aldington

BIODIVERSITY OPPORTUNITY AREAS

Parts of the following Biodiversity Opportunity Areas (BOAs) fall within this Borough (see Chapter 7 for map)

- East Kent Woodlands & Downs
- High Weald
- Lower Stour Wetlands
- Low Weald Woodland
- Mid Kent Greensand & Gault
- Mid Kent Downs Woods & Scarp
- Medway & Low Weald Grassland & Wetland
- Romney Marshes
- The Blean

Appendix 5 – Housing Trajectory

Ashford Local Plan 2030 - Housing Trajectory (Submission - December 2017)	17/18	18/19	19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	TOTAL
TOWN CENTRE SITES														
Former Powergen				222	189	189	60							660
Elwick Road Phase 2					100	100								200
Victoria Way East							115		100					215
Gasworks Lane (S10)												75	75	150
Commercial Quarter (TC9 and S1)						79	80							159
CHILMINGTON GREEN		50	150	200	200	200	200	200	250	250	250	250	300	2500
URBAN SITES														
Existing Allocations - Under construction														
Finberry (LP 2000)*	120	120	120	120	120	100	102							802
Repton Park (LP 2000)	113	100	100	81										394
Godinton Way (TC8)	52													52
Blackwall Road (U5)	25													25
Existing allocations - Not started														
Abbey Way (U1)			20											20
Lower Queens Road (U4 and S8)							40							40
Former Ashford South Primary School (U6a and S13)					50	60								110
K College, Jemmett Road (U6b and S12)		50	50	60										160
Leacon Road (U7 and S11)			50	50										100
Land at Butt Field Road, Singleton (U11)		14												14
Willesborough Lees (U14 and S17)		40	60	60	60									220
Conningbrook Phase 1 (U22)		50	50	50	75	75								300
Former Klondyke & Newtown Works Phase 2 (S6 and S7)						50	50	50	50	50	50	50	50	350
New Urban Site allocations														
Land NE of Willesborough Road, Kennington (S2)			25	50	75	75	75	80	80	80	80	80	80	700
Court Lodge, Kingsnorth (S3)				50	90	90	90	90	100	110	110	110	110	950
Land north of Steeds Lane and Magpie Hall Road (S4)				50	60	60	60	60	55	55				400
Land South of Pound Lane, Kingsnorth (S5)			50	50	50									150
Kennard Way - Henwood (S9)			25											25
Park Farm South East (S14)			50	80	80	80	35							325
Finberry North West (S15)									75	75	75	75		300
Waterbrook (S16)			20	50	50	50	50	50	50	30				350
Conningbrook Residential Phase 2 (S19)							70	50	50					170
Eureka Park (S20)			50	80	80	80	50	35						375
Land South of Brockmans Lane, Bridgefield (S45)						50	50							100
Chart Road (S46)					25									25
A20 CORRIDOR SITES (New allocations)														
Land east of Hothfield Mill (S47)			25	50										75
Rear of Holiday Inn (S48)					50	50	50							150
Land north of Tutt Hill (S49)				25	50									75
RURAL SITES														
Existing Allocations - Under construction														
ALD1 - Aldington, Calleywell Lane	12													12
TENT1A - Tenterden Southern Extension Phase A	80	80	80	10										250
WYE1 - Wye, Land at Kelston	17													17
Existing allocations & sites - Not Started														
CHAR1 - Land South of Arthur Baker Playing Field, Charing (S29)		35												35
HAM2 - Land at Parker Farm, Hamstreet (S32)		10												10
ROLV1- Rolvenden Football Ground, Rolvenden	20	20												40
TENT1B - Tenterden Southern Extension Phase B (S24)					70	80	75							225
WOOD1 - Land at Front Rd, Woodchurch (S40)		8												8
WYE2 - Land at Lucky Field, Wye		25												25
Major Windfall - Tenterden, Tilden Gill**		40	40	20										100
New Rural Site Allocations														
Aldington - Land north of Church View (S51)		10												10
Aldington - Land South of Goldwell Court (S52)			10	10										20
Appledore - The Street (S26)			20											20
Biddenden - North Street (S27)		20	25											45
Brook - Nats Lane (S53)		10												10
Challock - Land at Clockhouse (S54)		15												15
Charing - Northdown Service Station, Maidstone Road (S28)			20											20
Charing - Land Adjacent to Poppyfields (S55)			30	75	75									180
Chilham - Branch Road (S56)		10												10
Egerton - Land on New Road (S30)		15												15
Hamstreet - Land north of St. Mary's Close (S31)			25	25	30									80
Hamstreet - Warehome Road (S57)			25	25										50
High Halden - Land at Hope House (S33)			35											35
High Halden - Stevenson Bros. A28 (S58)			25	25										50
Hothfield - Land East of Coach Drive (S34)		20	20											40
Mersham - Land at Old Rectory Close (S59)			15											15
Mersham - Land adjacent to Village Hall (S35)		10												10
Shadoxhurst - Land rear of Kings Head PH (S36)		25												25
Swarden - Land adjacent to Village Hall (S37)		25												25
Smeeth - Land South of Church Road (S38)			20	15										35
Tenterden (St. Michaels) - Pope House Farm (S60)		25	25											50
Wittersham - Land between Lloyds Green and Jubilee Fields (S61)			20	20										40
Woodchurch - Land off Appledore Road (S62)			15	15										30
NEIGHBOURHOOD PLANS														
WYE3, Former Imperial College				25	25									50
Bethersden Neighbourhood Plan area			20	14										34
Pluckley Neighbourhood Plan area		25	8											33
Rolvenden Neighbourhood Plan area			20	10	10									40
WINDFALLS (NON ALLOCATED SITES)														
Windfalls - Small sites (Under 10 dwellings) - not started***		78	78	77										233
Windfalls - Small sites (Under 10 dwellings) - under construction	109													109
Windfalls - Major sites (10 dwellings or above) - not started***		72	72	72										216
Windfalls - Major sites (10 dwellings or above) - under construction	91													91
Projected Future windfalls (Based on assumption from past delivery)					150	100	100	100	100	100	100	100	100	950
ANNUAL TOTAL	639	1002	1493	1766	1764	1568	1352	715	910	750	665	740	585	13949
CUMULATIVE TOTAL	639	1641	3134	4900	6664	8232	9584	10299	11209	11959	12624	13364	13949	

LP 2000 = Ashford Borough Local Plan 2000 Site policy *Reduced to take account of 90 live/work units not being built. **Not counted in major windfall figures below. ***Extant permissions not started have been reduced by 25% for assumed non delivery

Appendix 6 - Monitoring Framework

Housing Indicators

Indicator Objective	Local Plan Policies	Indicators	Target	Data Source
Net Housing Growth	SP1 (a) – Strategic Objectives SP1 (f) – Strategic Objectives SP2 – The Strategic Approach to Housing Delivery	i. Net annual dwelling completions ii. Cumulative net additional dwelling completions over the plan period iii. Total extant permissions <ul style="list-style-type: none"> • Under construction • Not Started 	Total Requirement 2011-2030: 16,120 2017-2030: 12,943	Annual Housing Information Audit (HIA)
Location of new housing growth	SP2 – The Strategic Approach to Housing Delivery HOU3a– Residential windfall development within settlements HOU5 – Residential windfall development in the countryside SP5 – Ashford Town centre	Net annual dwelling completions by area: <ol style="list-style-type: none"> i. Ashford Town Centre ii. Ashford Urban Area iii. Urban extensions iv. Tenterden v. Rural Settlements vi. Countryside 	SP2 – Table 1	Annual Housing Information Audit (HIA)
Allocation Vs Windfall Delivery	SP2 – The Strategic Approach to Housing Delivery HOU3a – Residential windfall development within settlements	Net Annual dwelling completions on: <ol style="list-style-type: none"> i. Allocated sites ii. Chilmington Green iii. Windfall Sites – Total <ol style="list-style-type: none"> a. Prior Approval – Office to Residential b. Prior Approval – Agricultural to Residential 	As set by the Housing Trajectory	Annual Housing Information Audit (HIA)
Affordable Housing	HOU1 – Affordable Housing	Net annual affordable housing completions on major sites* by tenure and area: <ol style="list-style-type: none"> i. Ashford Town ii. Ashford Hinterlands iii. Rest of Borough 	As set by Table in Policy HOU1	Annual Housing Information Audit (HIA)

Indicator Objective	Local Plan Policies	Indicators	Target	Data Source
Custom and Self Build	HOU6 – Self and custom build development SP1 (f) – Strategic Objectives	<ul style="list-style-type: none"> i. % of custom and self build plots provided on sites over 40 dwellings in Ashford and Tenterden ii. % of custom and self build plots provided on sites over 20 dwellings in villages and rural areas iii. Plots returned unsold (annual) iv. Annual borough dwelling completions of custom/ self build dwellings v. Cumulative borough completions of custom/ self build in plan period 	<ul style="list-style-type: none"> Edge of Ashford and Tenterden sites of 40 or more dwellings: 5% Villages and rural areas sites of 20 or more dwellings: 5% No target Borough Target: as required by up to date self build register 	<ul style="list-style-type: none"> Annual Housing Information Audit (HIA) Self Build Register (ABC)
Specialist Housing	SP1 (f) – Strategic Objectives HOU2 – Local Needs/ Specialist Housing HOU18 - Providing a range and mix of dwellings types and sizes	<ul style="list-style-type: none"> Net annual additional dwellings by housing type: <ul style="list-style-type: none"> i. Local Needs ii. Specialist Housing iii. Older Person Housing (C2 uses) iv. Exclusive Homes 	No Target	Annual Housing Information Audit (HIA)
Land Use	SP1 (a) – Strategic Objectives	Percentage of net annual dwellings built on Brownfield Land	No Target	Annual Housing Information Audit (HIA)
Housing Range & Mix	HOU18 - Providing a range and mix of dwellings types and sizes SP1 (f) – Strategic Objectives	<ul style="list-style-type: none"> Net annual dwelling completions by bedroom size: <ul style="list-style-type: none"> i. Studio & 1 bed, ii. 2 bed, iii. 3 bed, iv. 4 bed v. 5 bed or more. <p style="text-align: center;"><i>Will be split into Town Centre, Urban and Rural</i></p>	To provide a range identified by most up to date SHMA or equivalent housing need data	Annual Housing Information Audit (HIA)
Accessibility and Space Standards	HOU12 – Residential Space Standards (Internal)	% of Net annual dwelling completions meeting the following standards:	100%	Annual Housing

Indicator Objective	Local Plan Policies	Indicators	Target	Data Source
Travellers Pitches	HOU15 – Private external open space HOU18 - Providing a range and mix of dwellings types and sizes SP1 (c, f) – Strategic Objectives	i. Internal Space Standards ii. External Space Standards iii. Accessibility Standards	Accessibility: 100% on major developments of 10 or more only	Information Audit (HIA)
	HOU16 – Traveller Accommodation HOU17 – Safeguarding existing traveller sites SP1 (f) – Strategic Objectives	i. Total annual permanent pitch increase ii. Extensions to existing sites iii. Annual Temporary Pitches granted permission iv. Annual loss of pitches v. Baseline borough pitches	Meet need identified 5 year supply need in most up to date GTAA <i>No net loss if 5 year supply not achieved</i>	Annual Housing Information Audit (HIA) Gypsy and Traveller Needs Assessment (GTAA)
Design Quality	SP6 – Promoting High Quality Design SP1 (c) – Strategic Objectives	Percentage of applications refused on design grounds and Success of Design Quality policy at appeal	No Target	Annual Housing Information Audit (ABC)
HMOs	HOU11 – Houses in Multiple Occupation	Permissions granted for HMO properties by Ward	No Target	Annual Housing Information Audit (ABC)

**Major residential developments are those of 10 dwellings or more or over 0.5ha*

Economic Indicators

Indicator Objective	Local Plan Policy	Indicator	Target	Source
Employment Floorspace	SP1 (g) – Strategic Objectives SP3 – Strategic Approach to Economic Development EMP1 – New Employment Uses EMP2 – Loss or redevelopment of employment sites and premises EMP5 – New employment premises in the countryside	Annual increase of employment floorspace (m2), borough- wide. Gross and net totals by use class: i. B1a ii. B1b iii. B1c iv. B2 v. B8 vi. B1-B8 (unable to split) vii. Total Gain viii. Total Loss ix. Net Total <i>Will also be recorded by area: Ashford Town Centre, Urban, and Rural settlement and countryside.</i>	66 hectares gain between 2014 and 2030 (Borough-wide) Minimal gain in countryside (EMP5)	Annual Commercial Information Audit (CIA) – ABC
Retail and Leisure floorspace	SP1 (g) – Strategic Objectives SP4 – Delivery of Retail and Leisure Needs SP5 – Ashford Town Centre	Annual change of Retail and Leisure (Use classes A1, A2, A3, A4, A5, D2 & Sui Generis) floorspace (m2) by area; Ashford Town Centre; Tenterden Town Centre; local/village centres, and Rest of Borough.	Need contained within Tables 2 and 3 of the Local Plan	Annual Commercial Information Audit (CIA) – ABC
Fibre to Premises	EMP6 – Promotion of Fibre to the Premises (FTTP) SP1 (d) – Strategic Objectives	% of new development enabling FTTP; residential and employment	All development within urban area. All major* developments within the rural area	ABC
Shopping frontages	SP4 – Delivery of Retail and Leisure Needs EMP7 – Primary and Secondary shopping frontage in Ashford Town centre EMP8 – Primary shopping frontage in Tenterden Town Centre	% of shop frontages in Ashford and Tenterden which are A use class (retail)	Primary Shopping Frontages – 100%	Shop front survey (ABC)

Indicator Objective	Local Plan Policy	Indicator	Target	Source
Local and Village Centres	SP4 – Delivery of Retail and Leisure Needs EMP10 – Local and Village Centres	Gains and losses of shops and services within local and village centres.	No loss of shops and services	Annual Commercial Information Audit (CIA) – ABC

Transport Indicators

Indicator Objective	Local Plan Policy	Indicator	Target	Source
Strategic Schemes	TRA1 – Strategic Transport Schemes SP1 (d) – Strategic Objectives	Implementation of strategic schemes which include: <ul style="list-style-type: none"> i. M20 Junction 10a ii. Pound Lane Link Road iii. A28 dualling/Chart Rd improvements iv. Former ring road junctions 	Within plan period	ABC
Town Centre Parking	TRA2 – Strategic Public Parking Facilities	Total gains and losses of public parking spaces serving Ashford Town Centre: <ul style="list-style-type: none"> • Long-Stay • Short-Stay 	Gains within plan period	ABC
Residential Parking Standards	TRA3(a) Parking standards for Residential development	% of residential development applications meeting the standards set out in TRA3(a)	100%	HIA - ABC
Parking Standards for non-residential Sustainable Travel	TRA3(b) Parking Standards for non-residential development TRA4 – Promoting the Local Bus Network TRA5 – Planning for Pedestrians TRA6 – Provision for cycling SP1 (e) – Strategic Objectives	% of non-residential development applications meeting the standards set out in TRA3(b) Enhancements to bus networks provided from new development Enhancements to cycle and pedestrian routes and cycle parking provision	100% No Target	Annual Commercial Information Audit (CIA) KCC Highways

Indicator Objective	Local Plan Policy	Indicator	Target	Source
Local Road network	TRA7 – The road network and development TRA8 – Travel plans, assessments and statements TRA9 – Planning for HGV movement SP1 (e) – Strategic Objectives	Developments permitted against highway authority advice	0%	KCC Highways

Natural and Built Environment Indicators

Indicator Objective	Local Plan Policy	Indicator	Target	Source
Biodiversity	ENV1 – Biodiversity SP1 (b) – Strategic Objectives	i. Condition of the 57 SSSI's ii. Condition of the Biodiversity Opportunity Areas' (BOA's) iii. Condition of Nature Reserves and Local Wildlife Sites	No decline	Natural England – Condition of SSSI report Kent BAP – BOA reports Kent Nature Partnership - State of Kent Wildlife Report and Kent Habitat Survey
Green Corridor	ENV2 – The Ashford Green Corridor SP1 (b) – Strategic Objectives	i. Development permitted within Green Corridor Designation areas ii. Development proposals contributing to projects identified within the Green Corridor Action Plan	Not permitted unless policy criteria applies	ABC - HIA and CIA
Dark Skies	ENV4 – Light Pollution and Promoting Dark Skies	External lighting levels on new developments comply with standards in policy and guidance.	100%	ABC - HIA
Rural Features	ENV5 – Protecting important rural features	i. Loss or gain to Ancient woodland or semi-natural woodland	No net loss	Kent Nature Partnership - The 2012

Indicator Objective	Local Plan Policy	Indicator	Target	Source	
Flood Risk	SP1 (b) – Strategic Objectives	ii.	Loss or gain to River corridors and tributaries	Kent Habitat Survey and Data Environment Agency – Our Stour Data report KCC Highway and PROW Teams	
		iii.	Loss or enhancement to rural lanes and/or PROWs		
Water resources	ENV6 – Flood risk	% of planning applications granted on Flood Zones 2 or 3 against Environment Agency Advice	0%	HIA	
SUDS	ENV7 – Water Efficiency	i.	% of new residential development meeting the requirements of water efficiency regulations - 110 litres per person per day	i. 100% ii. 0% iii. 100%	Building Regulation data , HIA and CIA
	ENV8 – Water Quality, Supply and Treatment	ii.	% of major* development proposals not providing adequate water supply and connections to wastewater treatment facilities		
	ENV11 – Sustainable Design and Construction – non-residential	iii.	% of non-resi major applications meeting 40% improvement in water consumption against baseline performance		
Energy	ENV9 – Sustainable Drainage	Compliance of all development proposals with SuDS Policy, SPD and subsequent revisions	100%	HIA	
BREEAM	ENV10 – Renewable and low carbon energy	New development which generates energy from renewable and low carbon sources	No Target	ABC	
	ENV11 – Sustainable Design and	% of Major non-resi development achieving BREEAM ‘Very good’ standard	100%	Building Regulation Data	

Indicator Objective	Local Plan Policy	Indicator	Target	Source
Air Quality	construction – non-residential SP1 (c) – Strategic Objectives			
	ENV12 – Air Quality	% of proposals permitted which result in National Air Quality Objectives being exceeded	0%	DEFRA Statistics https://uk-air.defra.gov.uk/
Agricultural Land	SP1 (a) – Strategic Objectives	Amount of high quality agricultural land (Grade 1& 2) lost to development (ha) Major* sites only	No Target	Kent Landscape Information system (K-LIS); Natural England; Agricultural Land Classification (ALC)
	National Policy			

Community, Leisure and Tourism Indicators

Indicator Objective	Local Plan Policy	Indicator	Target	Source
Tourism	EMP11 – Tourism	Loss and gain of tourism facilities. Loss and gain of hotel and B&B development	Borough wide retention and gains in urban areas.	Annual Commercial Information Audit (CIA) – ABC
Community	COM1 – Meeting the community’s needs COM3 – Allotments COM4 – Cemetery Provision SP1 (d) – Strategic Objectives	Amount of existing public leisure, cultural, school and adult education, youth, health, public service, allotments, cemetery provision and community facilities lost (unless satisfactory replacement facilities are provided) and gained as a result of new development <i>Split between Town Centre, Urban and rural.</i>	No Target	HIA CIA ABC - Amount of developer contributions and commuted payments received and spent
Play, Open Space & Sports	COM2 – Recreation, sport, play and open spaces SP1 (d) – Strategic Objectives	Amount of existing public play, open space and sports provision lost (unless satisfactory replacement facilities are	Table 4 – Spatial target for play, open space and sports	Amount of developer contributions and commuted

Indicator Objective	Local Plan Policy	Indicator	Target	Source
		<p>provided) and gained as a result of new development</p> <p><i>Split between Town Centre, Urban and rural.</i></p>		<p>payments received and spent</p>

Ashford Borough Council

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 Appendix 2 of the Plan. An addendum to that report will be published separately and can be located at the end of this document.

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 and proposes alternative wording amending the the paragraph is amended 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 be set out in a Housing Background Document 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 normal 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 Background Document 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 & 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 (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

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

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 & 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.

The Council is engaging with Shepway District Council over the emerging plans for Otterpool Garden Town. It is to be noted, however, that this is at an early stage, and does not as yet feature in any adopted or emerging local plan.

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	725 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, 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 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
1014 Patricia Vernon	1023 Katrina Jenkins
1045 Weald of Kent Protection Society	985 Julian Cheese

842 Morghew 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" I 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
421 Hothfield Parish Council (Batt)	878 Rachel Heron

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 site allocation ignores community value, heritage and local village amenity. There is a limitation on existing utilities networks; drainage and water and no mobile phone access in most areas within the village. There has been removal of open space, no retail space or GP 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

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 - Roads/Traffic

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 Ashford Borough 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 & 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
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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:

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)	

Summary of Representations – Main Issues

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 – 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

Appendix 2 - Response to Main Changes Representations

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 & 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 contrary to the NPPF.

Response: *Disagree that the policy is too restrictive and 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, unserved and inherently unsustainable form of development, and therefore it is unsound. The removal of some settlements from the policy is proposed (see above) 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 – 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. 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
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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

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 PC in addition to Community group

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:

4 Nick Lester-Davis	1054 Weald of Kent Protection Society (Peta Grant)
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Summary of Representations – Main Issues

Issue - Increased costs

4 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

MCLP/4 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 & 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)	

Summary of Representations – Main Issues

Issue – Maintenance

893 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 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 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.

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 unsound 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 over 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 this 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 new 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 & 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 and 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
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837 Prescott Business Park	
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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 Ruckinge 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.*

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

Heritage 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 Condition ‘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’. 761states 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 – 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 & 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 & 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.*

The Council is engaging with Shepway District Council over the emerging plans for Otterpool Garden Town. It is to be noted, however, that this is at an early stage, and does not as yet feature in any adopted or emerging local plan.

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

Appendix 2 - Response to Main Changes Representations

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

Appendix 2 - Response to Main Changes Representations

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 0.6 hectares 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 [Speringbrook 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 of 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 & 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 & 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 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 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 2 - 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	WC94 – 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?
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Appendix 2 - Response to Main Changes Representations

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
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

Appendix 2 - Response to Main Changes Representations

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
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

Addendum to Responses to Regulation 19 representations – July 2017 Report

Nov 2017



Responses to representations made to Appendix 2 of the Ashford Local Plan Regulation 19 Version were inadvertently omitted from the Responses to Regulation 19 Representations July 2017 Report.

Responses are set out below.

APPENDIX 2 – EVIDENCE BASE

Representations have been received from the following consultees:

266	Graham Lilley	267	Graham Lilley	545	Historic England
570	Julian Green	1142	Simon Weston	1253	Ron Savill
1360	Camilla Ketchen	1713	Jane Marriott	1720	Jane Marriott
1768	Doug Marriott	1770	Doug Marriott	2860	Wheler Foundation
1941	Carol Ann Vant	2049	Alan Rogers	2059	Chris Foley and Family
2077	Thomas Bates & Son Ltd	2109	Susie Boyd	2111	Susie Boyd
2178	James Ransley	2262	Persimmon/Barton Wilmore	2729	Peter Finnes
2166	Shadoxhurst Parish Council	1633	Westwell Parish Council	1641	Michael Briest

Summary of Representations – Main Issues

Issue - Sustainability Appraisal Report

Sites SS54 and SS7 (Smeeth Site allocation S38) 266, 267 feel that this site is unsuitable because of the relationship to the village, ecological impact, loss of open fields, flood risk, dependent upon the development of an adjacent site for access. Suggest that development would result in overdevelopment of the site, would result in infill, it would result in increased vehicular movements in a problematic area and around the pedestrian and vehicular entrance to the playing fields.

Response please see responses to S38 on page 201-203 on the July 2017 response to representations document. No SA change needed.

Site WC33 (Land at Forge Hill, Bethersden) 1253, 1142, 570 feel that the site is not suitable for development because it does not comply with policy SP1. It was previously deemed as unsuitable for development, it would adversely impact character of the conservation area and the setting of a listed building and adversely impact on important vistas. It would detract from the open character of the village, would result in increased

traffic, noise and air pollution, loss of open space and there is insufficient capacity in the sewage infrastructure of the village.

Response *The comments made against site WC33 are noted, however the site has not been selected for inclusion in the Local Plan as a site allocation, and no full Sustainability site Appraisal has been undertaken by ABC. As part of the updated SHELAA 2017 the site is listed as being assessed for suitability by 'Neighbourhood Plan decision'. As the Neighbourhood Plan group in Bethersden are beyond Regulation 14 Stage of their plan, it is appropriate to leave detailed site assessment work to them. However, national regulations require the Local Planning Authority to list all 'Available' land which is submitted to them in their Housing and Employment Land Availability Assessment (SHELAA). The site has been promoted through the Local Plan process and is available and therefore the site must remain in the SHELAA document as an 'available' site.*

Site DW7 (Site allocation S44 – Watery lane, Westwell) 1633 points out that Westwell Parish Council was not consulted before site DW7 was included in the Draft Local Plan. Feels the site description in the SA (that it cannot be seen from Watery Lane) is incorrect. The site is correctly described as being in the Kent Downs AONB and close to the motorway . It is not close to the CTRL nor is it "sandwiched between" the motorway and the railway. The railway is some way away on the other side of Sunnybridge farm; to the south is the Maidstone line of 1864 and not the CTRL. As the Maidstone line is the boundary of the AONB it would cause an adverse landscape impact. The site is incorrectly described in respect to its relation to Ashford and services. The access to the A20 is 1km along a winding rural road with no footway, but traffic speeds in excess of 40mph. These access conditions do not meet sustainability criteria for development. The IMD refers to Hothfield which is the neighbouring parish over 1km away. The DW7 site is in Westwell parish which is not in a Lower Super output area and is strongly cohesive and supportive.

The statements under Objective 2 in the SA : Landscape are wrong. Under Objective 6 : Access and Social Inclusion the SA states that the site is closer to services than it is. The nearest primary schools are either at Charing, or Repton Park: both over 4km away. There are not 3 schools within 3km as stated in the SA. It may be that the survey assumed Hothfield school was available : it is no longer a primary school. Footpath access is overstated: there is a footpath within 400 m, but that has been truncated and not realigned so goes only a short distance into a field. It has been difficult to acoustically screen the site from motorway traffic.

1641, 1633 state that route 17 listed under 8.2 runs through Westwell village but is a mountain bike leisure route along the pilgrims way in either direction and not an alternative for everyday travel. The site has no public transport, the road has no pavement and the road is used by tarmac. There are no shops near and no school in Westwell. Development would adversely impact on the AONB.

Site DW8 (Site allocation S44 – Watery lane, Westwell) 1641, 1633 - the site description in the SA is wrong. The site as submitted suggests that it is an integral extension of the DW7 site. That is not correct. Site incorrectly described as adjacent to CTRL but it is the Maidstone line. The distances to services are much greater than stated. The cumulative visual impact of this site and DW7 would be significant as this site would be on higher

ground in the open landscape and will therefore have an adverse impact on the AONB. SA implies a new access onto Watery Lane down a steep bank, this would be opposed by Highways. Route 17 is only a leisure mountain biking route in this area, buses are more than 400 metres away, along a rural road with no footway. Providing acoustic screening could be problematic. The site has no water supply nor sewerage services.

Response See updated SA sheets for DW7 and DW8 in SA addendum Nov 2017.

Sites DN1 and DN30 (Sites in Chilham) 1720, 1768, 1770, 1713 these sites are still marked as "remain in survey for housing" in Appendix 1 of the SHELAA. The sites were considered as not suitable for development and should therefore be marked as filtered at Part 2. Sites is unsuitable for development for old or young in view of narrow lanes, no footpath, lack of services in the old wives Lees.

2049 points out that in the Erratum to Appendix 4 of the SA/SEA this sites is now clearly listed as being unsuitable for development. The reasons given, including narrow roads, AONB, poor services, proximity to a listed building etc, are completely valid. Does not believe that there is a GP surgery held in Old Wives Lees Village Hall (item 6.3), nor that there is an hourly bus service from the village (item 8.3). These comments simply endorse the conclusion that the site in unsuitable for development.

Response The updated 2017 SHELAA, removes both sites DN1 and DN30 in Part 2 of the Assessment process as being unsuitable for development and they no longer 'Remain in survey for housing'. The Sustainability Appraisals of the two sites, contained within the August 2016 Erratum of the Sustainability Appraisal Appendix 4, also conclude that the sites are not suitable for allocation.

Sites WS17 and WS21 (Sites in Shadoxhurst) 1941 feels that the selection of WS21 in preference to WS17 is unjustified by the evidence. Mentions delivery of facilities, proximity to play area, access to footpath, TPO's, loss of mature trees, condition of the field. Had the Objective Criteria in Appendix 3d been applied to both WS21 and WS17 with equal objectivity and fairness, both sites would have been equally suitable for residential development and for inclusion in the Local Plan. WS17 has a lesser flood risk and this should have made it the preferred option. However consider that it could be argued that there is justification for including both sites.

2729 feels that the whole survey requires review and revalidation. Many items cannot be resolved without detailed studies. The site is at risk of flooding. The site is unsuitable for SUDS due to low permeability. The size of the site is wrong. Scoring on services in wrong. It is not close to shops and the current developer application includes no shop, facilities or services and the proposal for 25 houses leaves no room for community hall, shop, GP Surgery, etc in this space. Development would result in the loss of green corridor and forms part of a BOA. The site also connects through land to the south with the Biodiversity Opportunity Area of the 'Low Weald Woodland' (BOA). Archaeology and heritage assessments are wrong. 40m to the North are houses and the CA is less than 600m; data requires review and correction. Public accessibility is currently limited by lack of regular maintenance. The two footpaths that cross the site are to be diverted in the current plan and

will seriously inconvenience many users. Concern that during construction vehicles will park on the pavement.

Response Please see responses to S36 on page 192 - 196 of the July 2017 response to representations document.

Site NW1 (Willesborough Lees Park) 2178 proposes a revised SA and increased scoring for Site NW1, promoting the site for allocation.

Response No changes are proposed to the SA scoring or assessment for site NW1. The SA has been scored using the same methodology and criteria as all sites and as set out in the site assessment proforma. In particular the location of the Great Stour LWS on the north eastern boundary and the fact that the Ashford Green Corridor strategic open space covers half the site is reflected in the scoring, as is the location of approximately a third of the site in flood Zone 2/3. It is noted that many of the constraints to this site are contained within only one part of the site, but the site appraisal must be undertaken on the whole site as it is submitted.

The landowner of the site (who is not the consultee of Rep 2178), has not objected to the Sustainability Appraisal or pursued this site as an 'omission' site to the draft Local Plan.

It should also be noted that the overall 'score' on the sustainability appraisal process is not the only determining factor for site allocation selection, and the more detailed 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 - Infrastructure Delivery Plan 2166 considers the Infrastructure Delivery Plan is unsound. Whilst the key elements of Infrastructure are identified, the borough-wide needs and actions are given variable attention and in several key aspects not addressed at any practical level. Both the construction phase and long-term roads capability needs to recognise the impact on the broader community impacted by short-term and permanent traffic loadings / movements. The Telecommunications Plan needs to recognise the limitations of existing fixed & mobile networks and jointly work with providers to develop the necessary capabilities forward for Ashford 2030. This is not identified, nothing appears to be anticipated. British Telecom is not mentioned as a consultee. Annex 2 Infrastructure Delivery Schedule" makes no reference to Telecomms. Communications Infrastructure is not specifically addressed as a component of the Plan and as such cross-references are limited

Response The evolution of the IDP included wide ranging discussions with infrastructure providers, including the highways authority. They were aware of the proposed distribution of housing development across the borough and this informed their response to consultation. Various projects were identified as a means to mitigate the impact of the proposed development, as reflected in the Infrastructure Delivery Schedule. In addition to these strategic improvements, on-site improvements will also be needed when development comes forward and these will be determined through detailed discussions with KCC.

With regards telecommunications provision, the various mobile phone operators were contacted as part of the IDP process, see appendix 5 of the IDP. However no specific projects were identified by these providers, suggesting that existing infrastructure provision is sufficient to meet future demand over the plan period (up to 2030) or that they intend to improve the existing provision without the need for money from development – at this stage. Should this situation change, and projects be identified by the providers, they will be reported in any review of the infrastructure delivery schedule which is intended to be updated at least annually.

Issue – Transport 2166 - Villages in the southern hinterland of the Borough, notably Shadoxhurst, Kingsnorth, Bethersden, Woodchurch and Hamstreet are ignored in the Traffic Impact Assessment but will be impacted not only by their own designated developments but by the parallel major Chilmington programme. Any work to construct Junction 10A and all the road infrastructure work at Chilmington, Sevington, Court Lodge, Kingsnorth, etc will also have a major impact on travel to and from, and indeed through, South Ashford as drivers try and avoid bottlenecks. It is imperative that specific impact assessments of Chilmington are undertaken and published addressing the key routes around the southern quadrant and its key component roads.

Response Please see responses to Policy TRA7 on page 279 -280 of the July 2017 response to representations report.

Issue - Housing Evidence Base 2262 feels that despite the revocation of the SEP not aware of any specific assessment which demonstrates why it is not appropriate for Ashford Town to continue in its role as a growth area, especially given the aims of the NPPF, to 'significantly' boost the supply of housing. Asserts that the Borough Council has significantly under-delivered. Consider the housing requirement of 14,680 dwellings to be an absolute minimum. This will secure flexibility (NPPF, para 21) to ensure housing requirements are met and to contribute to boosting the supply of housing (NPPF, para 47).

Suggests that the assessment of housing need takes no account of the impact of planned interventions strategies and policies or follows the methodology set out in PPG 2a-014:20. Adjustment to the rates for 25-34 year olds is wrong. The adjustment to household formation rates does not fully address the issue of household suppression. More recent evidence directs that the OAN of 727 dwellings per annum should be increased. The housing and job targets in the emerging Local Plan are not in balance; It does not take into account the DCLG 2014 household projections which indicates a requirement for 835 dwellings per annum (the Local Plan currently proposes 773). There is no evidence to suggest that the SHMA has taken into account the effects of proposed Policy HOU1 that there is no affordable housing requirement in Ashford Town if the proposals are for flatted developments.

Response Please see responses to SP2 on pages 18 – 49 of the July 2017 response to representations report.

General

2166 objects to lack of reference in EMP6 to the supply or requirements for existing users and the lack of apparent provision for S106 or other CIL contribution to the fixed & mobile capabilities, notably broadband and landline capabilities, for either new or existing users.

Response please see response to Policy EMP6 pages 262 -264 of the July 2017 response to representations report.

2860 expresses concern about the way different scenarios are assessed against the Sustainability Appraisal objectives, the over reliance on an out of date Strategic Housing and Employment Land Availability Assessment (SHELAA) and the fact that the scoring system considers only urban and not rural areas. If the SA does indeed rely on the SHELAA, then a further call for sites should have been completed.

Response SA scoring applies the same way to all sites, urban and rural. The SHELAA was updated in 2017 and new sites which were presented during the consultation have been included within it. The sites submitted in conjunction with this representation have been assessed alongside all other sites submitted at this stage.

545 did not comment but provided generic guidance on incorporating heritage into SAs.

2166 states that found it extremely difficult to comment on the Plan.

Response noted.

Support 2077 supports SHELAA with regard to finding land at Rook Toll suitable and available for development.

Response Noted.



Schedule of Minor Amendments to the Local Plan 2030

All of the minor amendments listed below have already been included within the Local Plan 2030 Submission version (December 2017) following the ‘Main Changes’ consultation, and are set out here in the interests of transparency.

Explanation of the Minor Amendment is provided in italics. Changes to text are also expressed either in the conventional form of ~~strike through~~ for deletions and underlining for additions of text.

The page numbers, paragraph numbering and Policy references refer to the Regulation 19 Version of the Local Plan 2030 or ‘Main Change’ section and cross reference the new page/paragraph number in the Submission Version.

MA NO	Page/Policy/Para and section or MC ref of Reg 19 documents	Page/Para of Submission Version	Reason /Related Rep No.	Minor Amendment (MA)																								
1	Whole Document & Schedule of Policies			<p><i>Paragraphs numbers:</i> Please note that paragraph numbering is consistent with the 2016 version of the plan, and any subsequent inserted paragraphs are shown in italics with temporary references. These will be standardised following adoption.</p> <p><i>Site Policy Maps:</i> These have been standardised throughout the document.</p> <p><i>Policy references:</i> Where policy references have been amended or deleted following Regulation 19 consultation stages, these are now explained within the Schedule of Policies (Chapter 1)</p>																								
2	Page 11 Vision para 3.10	3.10 Page 12	Rep MCLP 865,694, 771, 697, 113	<p><i>Amend paragraph as follows:</i></p> <p>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. <u>Development within all the rural settlements must conserve and enhance the historic centres and heritage and natural assets.</u></p>																								
3	Housing Windfalls section of MC4	Paragraph 3.25.4 Page 18	Factual update	Based on these factors it is assumed that an additional 900 <u>950</u> units will be delivered from windfall sites between 2021 and 2030, at an annual rate of 100 dwellings per year, well below the historic trends for windfall completions. This is in addition to the 680 <u>749</u> housing windfalls that currently have planning permission.																								
4	Housing Target section of MC4 - Table 1	Page 18	Factual update	<p><i>Amend Table 1 - The overall housing profile as follows:</i></p> <table border="1"> <tbody> <tr> <td>Objectively Assessed Need</td> <td>15,675</td> </tr> <tr> <td>Future Proofing</td> <td>442</td> </tr> <tr> <td>The Housing Target (2011-2030)</td> <td>16,120</td> </tr> <tr> <td>Delivered since 2011</td> <td>3,177</td> </tr> <tr> <td>Residual Requirement</td> <td>12,943</td> </tr> <tr> <td>Extant commitments (previously allocated sites – some with permission)</td> <td>2,870 <u>3,001</u></td> </tr> <tr> <td>Extant windfalls*</td> <td>649 <u>749</u></td> </tr> <tr> <td>Chilmington Green</td> <td>2,500</td> </tr> <tr> <td>Future Windfalls</td> <td>900 <u>950</u></td> </tr> <tr> <td>Proposed Allocations**</td> <td>7110 <u>6,749</u></td> </tr> <tr> <td>TOTAL</td> <td>14,029 13,949</td> </tr> <tr> <td>Contingency buffer</td> <td>1,086 <u>1,006</u></td> </tr> </tbody> </table>	Objectively Assessed Need	15,675	Future Proofing	442	The Housing Target (2011-2030)	16,120	Delivered since 2011	3,177	Residual Requirement	12,943	Extant commitments (previously allocated sites – some with permission)	2,870 <u>3,001</u>	Extant windfalls*	649 <u>749</u>	Chilmington Green	2,500	Future Windfalls	900 <u>950</u>	Proposed Allocations**	7110 <u>6,749</u>	TOTAL	14,029 13,949	Contingency buffer	1,086 <u>1,006</u>
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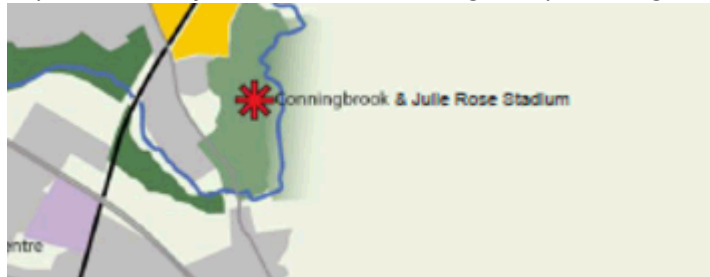
5	The Borough Profile section of MC4 and Policy SP2	3.34.2 Page 23	Factual update	<p><i>Amend paragraph 3.34.2 and Policy SP2 as follows:</i></p> <p>These characteristics are clearly evidenced in the accompanying Sustainability Appraisal to this Plan and are reflected in the Plan’s distribution strategy which identifies new housing land allocations to deliver around 5,865 <u>5,139</u> dwellings in and around Ashford and 1,245 <u>1,610</u> dwellings in the rural parts of the Borough.</p> <p>...With this in mind, in addition to existing commitments, new land allocations to deliver 5,865 <u>5,139</u> dwellings are proposed.</p> <p>Development in the rural areas will be of a scale that is consistent with the relevant settlement’s accessibility, infrastructure provision, level of services available, suitability of sites and environmental sensitivity. With this in mind, in addition to existing commitments, new land allocations to deliver 1,245 <u>1,610</u> dwellings are proposed...</p>
6	Urban housing market section of MC4	3.35.4 Page 24	Factual update	<p><i>Correction.</i></p> <p>[...] until such time as Junction 10a is in place (due to be completed in mid 2019 <u>2020</u>)</p>
7	Page 36 paragraph 3.160 Design Process	3.160 Page 41	Rep MCLP 1037	<p><i>Amend paragraph as follows:</i></p> <p>“local design guidance including <u>adopted neighbourhood plans</u>, the Kent Design Guide, development briefs [...]”</p>
8	Policy S1, Pg43, para 4.8 Commercial Quarter	4.8 Page 50	Factual update	<p><i>Amend paragraph as follows:</i></p> <p>As the development progresses the remaining uses on the site – the Kent Woolgrowers and the Royal Mail –, <u>Royal Mail - who currently remain on the site -</u> have previously indicated that they will seek to relocate, creating space for a further series of phased developments.</p>
9	Page 52 paragraph 4.43 Court Lodge	4.43 Page 60	Rep MCLP 26, 334, 991	<p><i>Amend paragraph as follows:</i></p> <p>The masterplan for the site will establish a minimum of 4 phases for the development. The initial phases shall include the delivery of the enabling works to the floodplain and the establishment of the ecological reserve areas to allow translocation of protected species. <u>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.</u></p>
10	Page 55 paragraph 4.46 Land north of Steeds Lane and Magpie Hall Road	4.46 Page 63	Rep MCLP 26	<p><i>Amend paragraph as follows:</i></p> <p>This site is proposed for residential development with an indicative capacity of 400 dwellings, although a final site capacity should be determined following a detailed and comprehensive site masterplanning exercise that should inform any planning permission for development on the site. <u>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.</u></p>
11	Page 61 paragraph 4.62 Land South of Pound Lane	4.62 Page 68	Rep MCLP 736	<p><i>Amend paragraph as follows:</i></p> <p>[...]Development of this site will need to take account of the strategic context provided by the nearby Court Lodge Farm and Steeds lane/Magpie Hall Road proposed allocations and, in particular, the key objective of avoiding coalescence of development areas. <u>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.</u></p>
12	Paragraph 4.134 Former K College, Jemmett Road	4.134 Page 92	Rep MCLP 785 Admin correction	<p><i>Amend final sentence of paragraph 4.134 to read:</i></p> <p>“[...] with recommendations from Kent Highway Services <u>Kent County Council Highways and Transportation.</u>”</p>
13	Page 119 paragraph 4.265 Tenterden Southern Extension Phase B	4.265 Page 130	Rep MCLP 583	<p><i>Amend as follows:</i></p> <p>“..joining the existing woodland to the east (<u>including Local Wildlife Site AS05</u>), and effectively [...]”</p>

14	Page 124 Para 4.283 Appledore - The Street	4.283 Page 135	Correction	<i>Amend paragraph as follows:</i> The Proposed Dungeness, Romney Marsh and Rye Bay Ramsar Site will lies immediately to the north east of the village along the Royal Military Canal. [...] Development that will have an adverse effect on the integrity of the proposed Ramsar site will not be permitted.
15	Page 125 Policy S26 Appledore, The Street	Page 136	Rep MCLP 473 And clarification	<i>Amend Policy S26 criterion d) and insert f) as follows:</i> d) provide an Environmental Impact Assessment Study to address any potential adverse impacts of the proposals on the biodiversity of the Dungeness, Romney Marsh and Rye Bay Ramsar and SPA sites and how they can be avoided or <u>adequately</u> mitigated; f) Provide a connection to the nearest point of adequate capacity in the sewerage network in collaboration with the service provider.
16	Page 133 Policy S30 Egerton - Land on New Road	Page 145	Rep MCLP 795	<i>Amend criteria d. as follows:</i> “[...] connections to existing rural routes, <u>including the Greensand Way, facilitating access between</u> connections to the countryside, Harmers Way and local services;”
17	Page 136 Policy S31 Hamstreet - Land North of St. Mary's Close	Page 148	Rep MCLP 115 , 998	<i>Amend Policy criterion k) as follows:</i> k) provide an Environmental Impact Assessment Study to address any potential adverse impacts of the proposals on the biodiversity of the Dungeness, Romney Marsh and Rye Bay Ramsar and SPA sites and how they can be avoided or <u>adequately</u> mitigated;
18	Page 138 Policy S32 Hamstreet - Land at Parker Farm	Page 150	Rep MCLP 116	<i>Amend Policy criterion g) as follows:</i> g) provide an Environmental Impact Assessment Study to address any potential adverse impacts of the proposals on the biodiversity of the Dungeness, Romney Marsh and Rye Bay Ramsar and SPA sites and how they can be avoided or <u>adequately</u> mitigated;
19	Supporting paragraphs to S47 in MC90 Land east of Hothfield Mill, A20	Pages 181-182 Paragraphs 4.433 and 4.434	Rep MCLP 488, 121, 580, 844, 719	<i>Amend fourth paragraph of supporting text:</i> A railway line and the M20 directly to the north of the site disconnects it from the wider countryside and the North <u>Kent</u> Downs AONB. <i>Add additional paragraph after fourth paragraph :</i> <u>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.</u>
20	Policy S47 – MC90 Land east of Hothfield Mill, A20	Page 183	Rep MCLP 488 121, 580, 844, 719	<i>Amend criterion c) as follows:</i> [...] in accordance with recommendations from Kent Highway Services <u>Kent County Council Highways and Transportation</u> <i>Amend criterion d) as follows:</i> d) Provide appropriate landscaping on the eastern built boundary, <u>additional woodland planting to the northern boundary of the developable area</u> and retain and improve existing screening around the site boundaries; <i>Add new criterion as follows:</i> <u>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.</u>

21	Policy S48 – MC91 Rear of Holiday Inn, A20	Page 186	Rep MCLP 476	<i>Amend policy to add:</i> j) Provide future access to the existing sewerage infrastructure for maintenance and upsizing purposes.
22	Policy S49 – MC92 Land north of Tutt Hill, A20	Page 187	Rep MCLP 1	<i>Amend first paragraph of supporting text:</i> “The site is bounded by the A20 in <u>to the east west</u> , the M20 to the north and the Ashford – Maidstone High Speed 1 railway line forms the north eastern boundary of the site. and <u>To the south east lie</u> the rear of <u>the</u> properties that front onto Westwell Lane.’
23	Policy S50 – MC93 Land at Caldecott, Smeeth	n/a	Rep MCLP 1009	Site Policy S50 – Land at Caldecott, Smeeth is deleted
24	Supporting paragraphs to Policy S53 – MC96 Nats Lane, Brook	Page 195 Para 4.478	Rep MCLP 490	<i>Amend first sentence of second paragraph :</i> The site is located within the North Kent Downs Area of Outstanding Natural Beauty and has views of the surrounding countryside.
25	Policy S53 – MC96 Nats Lane, Brook	Page 196	consistency	<i>Amend policy criterion as follows:</i> f) provide an Environmental Impact Assessment Study to address any potential adverse impacts of the proposals on the biodiversity of Wye and Crundale SAC and SSSI sites and how they can be avoided or <u>adequately</u> mitigated;
26	Policy S54 – MC97 Land at Clockhouse, Challock	Page 198	Rep MCLP 125	<i>Amend criterion a):</i> a) be designed and laid out in such a way as to preserve <u>conserve and enhance</u> the character of the AONB and [..]
27	Supporting paragraphs to S55 – MC98 Land Adjacent to Poppyfields, Charing	Page 199 Para 4.489	Rep MCLP 492	<i>Amend last sentence of second paragraph:</i> The alignment of the A20 is the boundary of the North Kent Downs AONB. <i>Add additional text to the end of second paragraph of supporting text:</i> <u>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.</u>
28	Policy S55 – MC98 Land Adjacent to Poppyfields, Charing	Page 201	Rep MCLP 492, 482	<i>Amend final sentence of criterion a)</i> [..] The development <u>should be comprised of a mix of dwelling types a maximum of two storeys in height, and</u> should take account of the residential amenity of neighbouring occupiers; <i>Add criterion:</i> h) Provide future access to the existing sewerage infrastructure for maintenance and upsizing purposes.
29	Supporting paragraphs to Policy S56	Page 203 Paragraph 4.499	Rep MCLP 493	<i>Amend paragraph as follows:</i> 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 <u>with additional trees</u> to enhance the screening and lessen the visibility of the new development from the south, where the site is visible from the busy A28.
30	Policy S56 – MC99 Branch Road, Chilham	Page 204	Rep MCLP 127, 493, 874 Correction	<i>Amend criterion e):</i> 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 <u>is preserved conserved and enhanced</u> and the development is well screened from the wider area;

31	Policy S57 – MC100 Warehorne Road, Hamstreet	Page 207	Rep MCLP 483, 128	<p><i>Amend policy criterion j) as follows:</i> j) provide an Environmental Impact Assessment Study to address any potential adverse impacts of the proposals on the biodiversity of the Dungeness, Romney Marsh and Rye Bay Ramsar and SPA sites and how they can be avoided or <u>adequately</u> mitigated;</p> <p><i>And new criterion as follows:</i> <u>k) Provide future access to the existing sewerage infrastructure for maintenance and upsizing purposes.</u></p>
32	Policy S58 – MC101 Stevenson Bros - A28, High Halden	Page 210	Rep MCLP 644, 825	<p><i>Amend policy criterion b) as follows:</i></p> <p>b. Include a comprehensive landscaping scheme that seeks to make provision for the retention and enhancement of existing natural features within the site. <u>This should include the retention and integration of the existing on-site ponds.</u> In addition, proposed new landscaping should provide generous soft landscaping along the western edge of the site in order to lessen its visual impact;</p> <p><i>Add new criterion as follows:</i></p> <p><u>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.</u></p>
33	Policy S61 – MC104 Land between Lloyds Green and Jubilee Fields, Wittersham	Page 219	Rep MCLP 129, 484	<p><i>Amend policy criterion b) as follows:</i></p> <p>b) be designed and laid out in such a way as to <u>conserve and enhance</u> protect the character and setting of the AONB [..]</p> <p><i>And new criterion as follows:</i> <u>h) Provide future access to the existing sewerage infrastructure for maintenance and upsizing purposes.</u></p>
34	Policy S62 – MC105 Land off Appledore Road, Woodchurch	Page 221	Rep MCLP 1152, 829, 485	<p><i>Amend paragraph and Policy criterion b) as follows:</i></p> <p>Access must be provided from Bridge Close, as shown <u>indicatively</u> on the policies map.</p> <p>b) Provide primary vehicle access from Bridge Close, as shown <u>indicatively</u> on the policies map;</p> <p><i>Add new criterion as follows:</i></p> <p><u>f) Provide future access to the existing sewerage infrastructure for maintenance and upsizing purposes</u></p>
35	Page 165 paragraph 5.4 Affordable Housing	Page 222	Rep MCLP 974	<p><i>Amend paragraphs 5.4, 5.5 and 5.6 as follows :</i></p> <p>5.4 Affordable housing for the purposes of this policy includes affordable/social rent and affordable home ownership products which includes starter homes, <u>rent to buy</u> and shared ownership products, as set out in the Housing White Paper 2017.</p> <p><i>Amend second sentence of paragraph 5.5:</i> Within this requirement, the policy also seeks a minimum requirement for shared ownership <u>and rent to buy products</u> specifically, reflecting the requirement to meet local needs in the borough, balanced with what development can afford to deliver.</p> <p><i>Add the following sentence to the end of paragraph 5.6</i> <u>These areas are shown on Map 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.</u></p>

36	Page 171 paragraph 5.39 Residential Windfall Development within Settlements	Page 228	Rep MCLP 913	<i>Amend first sentence of para. 5.39 :</i> In line with the NPPF and supporting PPG, it is important that suitable re development opportunities for housing within the built up confines of particular settlements are allowed to come forward.
37	Page 172 paragraph 5.44 Residential Windfall Development within Settlements	Page 229	Rep MCLP 1173, 1067, 866, 431, 55	<i>Amend final sentence :</i> Within these settlements, appropriate smaller scale development is acceptable in principle <u>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.</u>
38	Page 175 paragraph 5.60 Housing Development Outside Settlements	Page 232	Rep MCLP 717, 721	<i>Amend final sentence of paragraph:</i> 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, <u>although the specific local context may mean a higher or lower distance would be a more appropriate guide.</u>
39	Page 183 Policy HOU11 Parag 5.87 Houses of Multiple Occupation	Page 240	Admin	5.87 Houses in multiple occupation (HMOs) are properties which area occupied by unrelated households that share one or more facilities such as bathrooms or kitchens. <u>HMOs can provide useful accommodation, but in many cases the property was not originally designed for such intensive residential use.</u> HMOs are an example where a high degree of sharing facilities is typical, where living arrangements, being more intense than single family occupation.
40	Page 190 Policy HOU16 Traveller Accommodation Footnotes	Pages 246 & 247	Admin	<i>Amend footnote references:</i> Footnote ⁸⁷ See ABC update paper (June 2016) 5yr Land Supply Position Statement on Traveller Sites Footnote ⁸⁸ See 5yr Land Supply Position Statement on Traveller Sites
41	new MC61 paragraph below 5.206 Local and Village Centres	Page 265 Para 5.206.1	Rep MCLP 1060	<i>Amend second sentence :</i> This allows <u>town and parish councils</u> and local community groups a fairer chance to make a bid to buy the asset on the open market.
42	Page 221 Cycling Paragraph 5.273	Page 279	Rep MCLP 803	<i>Amend second sentence:</i> KCC's <u>Rights of Way Improvement Plan, (currently entitled the Countryside and Coastal Access Improvement Plan)</u> , assesses [...]
43	Page 221 Cycling	Page 280 Paragraph 5.275.1	Rep MCLP 804	<i>Amend second sentence:</i> KCC recently consulted on its Active Travel Plan <u>Rights of Way Improvement Plan, (currently entitled the Countryside and Coastal Access Improvement Plan)</u> , which sought to [...]
44	Page 232 (after 5.313) Setting of the AONB	Page 291 Paragraph 5.313.1	Rep MCLP 667 and 479	<i>Amend second sentence of first new paragraph under setting of the AONBs:</i> In planning policy terms they often have an equivalent status to National Parks and are to be given the highest level of landscape protection.
45	Page 232 Policy ENV3b Landscape Character and Design in the AONBs	Page 293	Rep MCLP 669 and 506	<i>Amend wording of Policy ENV3b as follows:</i> Other proposals within and immediately adjoining affecting the AONBs will be permitted under the following circumstances:[...]

46	Page 234 paragraph 5.322 Protecting Important Rural Features	Page 295	Rep MCLP 808	<p><i>Amend final sentence:</i></p> <p>It is important that this network is retained and, if possible, enhanced through working with the County Council to deliver its <u>Rights of Way Improvement Plan, (currently entitled the Countryside and Coastal Access Improvement Plan)</u> and the creation of clear, attractive connections to (or through) new developments.</p>
47	Page 255 Policy COM1 Parag 5.424 The Education Sector	Page 316	Admin	<p><i>Amend as follows:</i></p> <p>5.424 Broadly, this approach will continue, with the Council consulting the local education authority to determine where an education contribution should be sought. In most circumstances the Borough Council will only seek contributions from the larger schemes, in light of the S106 pooling restrictions and this is reflected in site allocation policies in this Local Plan. CIL receipts are also likely to be required.</p>
48	Page 257 Paragraph 5.432 Sport, Recreation and Play	Page 318	Rep MCLP 367	<p><i>Amend second sentence of paragraph 5.432 :</i></p> <p>These figures are derived from <u>evidence including the emerging Ashford Borough Playing Pitch Strategy</u>, alongside standards set out in the current Green Spaces and Water Environment SPD.</p>
49	Page 272; Policies Maps	Pages 332 & 334	Factual update	<p><i>Rename Chapter 7 to: POLICIES MAP WEBLINK & EXTRACTS and include new paragraph 7.1:</i></p> <p>The full interactive Local Plan 2030 policies map can be found at the following link: http://www.ashford.gov.uk/local-plan-2030.</p> <p><i>Replace the Ashford Urban Area Strategic map to recognise Conningbrook & Julie Rose Stadium as a sports and recreation hub (as shown below)</i></p> 
50	Appendix 2 – Evidence Base	Page 354 - List of Background Documents	Factual update	<p><i>Title has been amended to List of Background Documents. This list has also been updated to reflect additional supporting documents and library references.</i></p>
51	Page 295 Appendix 3 – List of housing site policies	Page 358	Factual update	<p><i>This list has been updated to reflect the deletion of Site Policy S50 – Caldecott, Smeeth and insertion of footnote:</i></p> <p><i><u>*This does not Include assumed contribution from Neighbourhood Plans, or extant previous allocations/permissions as detailed within the Housing Trajectory.</u></i></p>
52	Appendix 4 – Green Infrastructure Assets	Page 360	Factual update	<p><i>Title amended to: Appendix 4 - Nationally and locally protected biodiversity designations</i></p>
53	Appendix 5 – Housing Trajectory	Page 363	Rep MCLP 895 and factual updates	<p><i>Amended to reflect factual updates and removal of Policy S50. (see next page)</i></p>

Ashford Borough Council – Local Plan 2030 Submission (Dec 2017) – Schedule of Minor Amendments

Explanation of the Minor Amendment is provided in italics. Changes to text are expressed either in the conventional form of ~~struckthrough~~ for deletions and underlining for additions of text. **Policy wording is shown in bold.**



Ashford Local Plan 2030 - Housing Trajectory (Submission - December 2017)	17/18	18/19	19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	TOTAL
TOWN CENTRE SITES														
Former Powergen				222	189	189	60							660
Elwick Road Phase 2					100	100								200
Victoria Way East							115		100					215
Gasworks Lane (S10)												75	75	150
Commercial Quarter (TC9 and S1)						79	80							159
CHILMINGTON GREEN		50	150	200	200	200	200	200	250	250	250	250	300	2500
URBAN SITES														
Existing Allocations - Under construction														
Finberry (LP 2000)*	120	120	120	120	120	100	102							802
Repton Park (LP 2000)	113	100	100	81										394
Godinton Way (TC8)	52													52
Blackwall Road (U5)	25													25
Existing allocations - Not started														
Abbey Way (U1)			20											20
Lower Queens Road (U4 and S8)							40							40
Former Ashford South Primary School (U6a and S13)					50	60								110
K College, Jemmett Road (U6b and S12)		50	50	60										160
Leacon Road (U7 and S11)			50	50										100
Land at Butt Field Road, Singleton (U11)		14												14
Willesborough Lees (U14 and S17)		40	60	60	60									220
Conningbrook Phase 1 (U22)		50	50	50	75	75								300
Former Klondyke & Newtown Works Phase 2 (S6 and S7)						50	50	50	50	50	50	50	50	350
New Urban Site allocations														
Land NE of Willesborough Road, Kennington (S2)			25	50	75	75	75	80	80	80	80	80	80	700
Court Lodge, Kingsnorth (S3)				50	90	90	90	90	100	110	110	110	110	950
Land north of Steeds Lane and Magpie Hall Road (S4)				50	60	60	60	60	55	55				400
Land South of Pound Lane, Kingsnorth (S5)			50	50	50									150
Kennard Way - Henwood (S9)			25											25
Park Farm South East (S14)			50	80	80	80	35							325
Finberry North West (S15)									75	75	75	75	75	300
Waterbrook (S16)			20	50	50	50	50	50	50	30				350
Conningbrook Residential Phase 2 (S19)							70	50	50					170
Eureka Park (S20)			50	80	80	80	50	35						375
Land South of Brockmans Lane, Bridgefield (S45)						50	50							100
Chart Road (S46)					25									25
A20 CORRIDOR SITES (New allocations)														
Land east of Hothfield Mill (S47)			25	50										75
Rear of Holiday Inn (S48)					50	50	50							150
Land north of Tutt Hill (S49)				25	50									75
RURAL SITES														
Existing Allocations - Under construction														
ALD1 - Aldington, Calleywell Lane	12													12
TENT1A - Tenterden Southern Extension Phase A	80	80	80	10										250
WYE1 - Wye, Land at Kelston	17													17
Existing allocations & sites - Not Started														
CHAR1 - Land South of Arthur Baker Playing Field, Charing (S29)		35												35
HAM2 - Land at Parker Farm, Hamstreet (S32)		10												10
ROLV1- Rolvenden Football Ground, Rolvenden	20	20												40
TENT1B - Tenterden Southern Extension Phase B (S24)					70	80	75							225
WOOD1 - Land at Front Rd, Woodchurch (S40)		8												8
WYE2 - Land at Lucky Field, Wye		25												25
Major Windfall - Tenterden, Tilden Gill**		40	40	20										100
New Rural Site Allocations														
Aldington - Land north of Church View (S51)		10												10
Aldington - Land South of Goldwell Court (S52)			10	10										20
Appledore - The Street (S26)			20											20
Biddenden - North Street (S27)		20	25											45
Brook - Nats Lane (S53)		10												10
Challock - Land at Clockhouse (S54)		15												15
Charing - Northdown Service Station, Maidstone Road (S28)			20											20
Charing - Land Adjacent to Poppyfields (S55)			30	75	75									180
Chilham - Branch Road (S56)		10												10
Egerton - Land on New Road (S30)		15												15
Hamstreet - Land north of St. Mary's Close (S31)			25	25	30									80
Hamstreet - Warehome Road (S57)			25	25										50
High Halden - Land at Hope House (S33)			35											35
High Halden - Stevenson Bros. A28 (S58)			25	25										50
Hothfield - Land East of Coach Drive (S34)		20	20											40
Mersham - Land at Old Rectory Close (S59)			15											15
Mersham - Land adjacent to Village Hall (S35)		10												10
Shadoxhurst - Land rear of Kings Head PH (S36)		25												25
Smarden - Land adjacent to Village Hall (S37)		25												25
Smeeth - Land South of Church Road (S38)			20	15										35
Tenterden (St. Michaels) - Pope House Farm (S60)		25	25											50
Wittersham - Land between Lloyds Green and Jubilee Fields (S61)			20	20										40
Woodchurch - Land off Appledore Road (S62)			15	15										30
NEIGHBOURHOOD PLANS														
WYE3, Former Imperial College				25	25									50
Bethersden Neighbourhood Plan area			20	14										34
Pluckley Neighbourhood Plan area		25	8											33
Rolvenden Neighbourhood Plan area			20	10	10									40
WINDFALLS (NON ALLOCATED SITES)														
Windfalls - Small sites (Under 10 dwellings) - not started***		78	78	77										233
Windfalls - Small sites (Under 10 dwellings) - under construction	109													109
Windfalls - Major sites (10 dwellings or above) - not started***		72	72	72										216
Windfalls - Major sites (10 dwellings or above) - under construction	91					8								91
Projected Future windfalls (Based on assumption from past delivery)					150	100	100	100	100	100	100	100	100	950
ANNUAL TOTAL	639	1002	1493	1766	1764	1568	1352	715	910	750	665	740	585	13949
CUMULATIVE TOTAL	639	1641	3134	4900	6664	8232	9584	10299	11209	11959	12624	13364	13949	

LP 2000 = Ashford Borough Local Plan 2000 Site policy *Reduced to take account of 90 live/work units not being built. **Not counted in major windfall figures below. ***Extant permissions not started have been reduced by 25% for assumed non delivery

Equality Impact Assessment

1. An Equality Impact Assessment (EIA) is a document that summarises how the council has had due regard to the public sector equality duty (Equality Act 2010) in its decision-making. Although there is no legal duty to produce an EIA, the Council must have **due regard** to the equality duty and an EIA is recognised as the best method of fulfilling that duty. It can assist the Council in making a judgment as to whether a policy or other decision will have unintended negative consequences for certain people and help maximise the positive impacts of policy change. An EIA can lead to one of four consequences:

- (a) No major change – the policy or other decision is robust with no potential for discrimination or adverse impact. Opportunities to promote equality have been taken;
- (b) Adjust the policy or decision to remove barriers or better promote equality as identified in the EIA;
- (c) Continue the policy – if the EIA identifies potential for adverse impact, set out compelling justification for continuing;
- (d) Stop and remove the policy where actual or potential unlawful discrimination is identified.

Public sector equality duty

2. The Equality Act 2010 places a duty on the council, when exercising public functions, to have due regard to the need to:
- (a) Eliminate discrimination, harassment and victimisation;
 - (b) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - (c) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it (ie tackling prejudice and promoting understanding between people from different groups).

3. These are known as the three aims of the general equality duty.

Protected characteristics

4. The Equality Act 2010 sets out nine protected characteristics for the purpose of the equality duty:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership*
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

*For marriage and civil partnership, only the first aim of the duty applies in relation to employment.

Due regard

5. Having 'due regard' is about using good equality information and analysis at the right time as part of decision-making procedures.
6. To 'have due regard' means 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.
7. How much regard is 'due' will depend on the circumstances. The greater the

potential impact, the higher the regard required by the duty. Examples of functions and decisions likely to engage the duty include: policy decisions, budget decisions, public appointments, service provision, statutory discretion, decisions on individuals, employing staff and procurement of goods and services.

8. In terms of timing:

- Having 'due regard' should be considered at the inception of any decision or proposed policy or service development or change.
- Due regard should be considered throughout development of a decision. Notes shall be taken and kept on file as to how due regard has been had to the equality duty in research, meetings, project teams, consultations etc.
- The completion of the EIA is a way of effectively summarising this and it should inform final decision-making.

Case law principles

9. A number of principles have been established by the courts in relation to the equality duty and due regard:

- Decision-makers in public authorities must be aware of their duty to have 'due regard' to the equality duty and so EIA's must be attached to any relevant committee reports.
- Due regard is fulfilled before and at the time a particular policy is under consideration as well as at the time a decision is taken. Due regard involves a conscious approach and state of mind.
- A public authority cannot satisfy the duty by justifying a decision after it has been taken.
- The duty must be exercised in substance, with rigour and with an open mind in such a way that it influences the final decision.
- The duty is a non-delegable one. The duty will always remain the responsibility of the public authority.
- The duty is a continuing one so that it needs to be considered not only when a

policy, for example, is being developed and agreed but also when it is implemented.

- It is good practice for those exercising public functions to keep an accurate record showing that they have actually considered the general duty and pondered relevant questions. Proper record keeping encourages transparency and will discipline those carrying out the relevant function to undertake the duty conscientiously.
- A public authority will need to consider whether it has sufficient information to assess the effects of the policy, or the way a function is being carried out, on the aims set out in the general equality duty.
- A public authority cannot avoid complying with the duty by claiming that it does not have enough resources to do so.

The Equality and Human Rights Commission has produced helpful guidance on "Meeting the Equality Duty in Policy and Decision-Making" (October 2014). It is available on the following link and report authors should read and follow this when developing or reporting on proposals for policy or service development or change and other decisions likely to engage the equality duty. [Equality Duty in decision-making](#)

Lead officer:	Simon Cole
Decision maker:	Cabinet
Decision: <ul style="list-style-type: none"> • Policy, project, service, contract • Review, change, new, stop 	<p>Approve the schedule of responses to the public consultation on the proposed 'Main Changes' to the Regulation 19 draft Local Plan to 2030 (published in July 2017), attached as Appendix 2 to the cabinet report;</p> <p>Agree the proposed further minor amendments to the Regulation 19 version of the Local Plan to 2030 set out in Appendix 3;</p> <p>Recommend to Full Council to authorise the Head of Planning to submit the Local Plan to 2030 attached as Appendix 1 to this report (as amended by the further minor amendments in Appendix 3) to the Secretary of State for independent public examination;</p> <p>Grant delegated authority to the Head of Planning to:</p> <ul style="list-style-type: none"> a. make any further modifications he considers necessary or desirable before or during the examination, b. ask the Inspector to recommend modifications to the draft Local Plan under Section 20 (7C) of the Planning and Compulsory Purchase Act 2004, if such modifications are considered necessary to make the Plan sound, c. take any action he deems necessary to progress the draft Local Plan through the examination process.
Date of decision: The date when the final decision is made. The EIA must be complete before this point and inform the final decision.	7 th December 2017
Summary of the proposed decision: <ul style="list-style-type: none"> • Aims and objectives • Key actions • Expected outcomes • Who will be affected and how? • How many people will be affected? 	<p>The new Local Plan to 2030 will replace the adopted Core Strategy 2008 and the other geographically based Development Plan Documents that form part of the Borough's current development plan, except for the Chilmington Green AAP.</p> <p>A draft version was subject to public consultation in summer 2016 and a series of proposed main changes to the draft Plan were consulted upon for 8 weeks this summer.</p> <p>The Cabinet is now asked to approve the final submission version of the Local Plan to 2030 and recommend that the Full Council approves the submission of the Plan for public examination.</p>
Information and research: <ul style="list-style-type: none"> • Outline the information and research that has informed the decision. 	The information and research that has informed Local Plan decisions has been extracted from a vast number of different documents. Evidence base documents such as the SHMA, SHELAA and SAs, as well as various strategy and review

<ul style="list-style-type: none"> • Include sources and key findings. 	<p>documents have all influenced the development of the Local Plan to some extent.</p>
<p>Consultation:</p> <ul style="list-style-type: none"> • What specific consultation has occurred on this decision? • What were the results of the consultation? • Did the consultation analysis reveal any difference in views across the protected characteristics? • What conclusions can be drawn from the analysis on how the decision will affect people with different protected characteristics? 	<p>An initial Regulation 19 consultation took place during the summer of 2016 and a total of 2866 representations were made. Following consultation and a number of contextual changes including the Government's publication of the Housing White Paper, a series of revisions to the 2016 version of the draft Local Plan were proposed.</p> <p>Subsequently, a further Regulation 19 'Main Changes' consultation took place during the summer of 2017. All of the main changes to the Plan were detailed within Appendix 1 and Appendix 2 documents and a total of 1178 representations were received.</p> <p>A separate background document is available which lists the representations made and the Council's proposed response.</p> <p>The difference in views of those with protected characteristics was not analysed as part of the response to representations process.</p> <p>The approval of the decision will have no differential impact on people with different protected characteristics.</p>

Assess the relevance of the decision to people with different protected characteristics and assess the impact of the decision on people with different protected characteristics.

When assessing relevance and impact, make it clear who the assessment applies to within the protected characteristic category. For example, a decision may have high relevance for young people but low relevance for older people; it may have a positive impact on women but a neutral impact on men.

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

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

Mitigating negative impact: Where any negative impact has been identified, outline the measures taken to mitigate against it.	N/A
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Is the decision relevant to the aims of the equality duty?	
Guidance on the aims can be found in the EHRC's Essential Guide , alongside fuller PSED Technical Guidance .	
Aim	Yes / No / N/A
1) Eliminate discrimination, harassment and victimisation	N/A
2) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it	N/A
3) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it	N/A

Conclusion: <ul style="list-style-type: none"> Consider how due regard has been had to the equality duty, from start to finish. There should be no unlawful discrimination 	Due regard has been made to the equality duty from start to finish of the Ashford Local Plan 2030.
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<p>arising from the decision (see guidance above).</p> <ul style="list-style-type: none"> • Advise on whether the proposal meets the aims of the equality duty or whether adjustments have been made or need to be made or whether any residual impacts are justified. • How will monitoring of the policy, procedure or decision and its implementation be undertaken and reported? 	<p>There will be no unlawful discrimination arising from the decision.</p> <p>The proposal meets the aims of the equality duty as all sections of the community, including those with protected characteristics, have the opportunity to comment on the draft Local Plan during public consultations. The planning department is committed to ensuring that everyone is able to comment on plans that may have an impact on them, which is reiterated in the Statement of Community Involvement (SCI).</p> <p>Monitoring of the policies, procedures and decisions and their implementation will be reported in the annual Authority Monitoring Report.</p>
<p>EIA completion date:</p>	<p>27/11/2017</p>