

Newenden Parish Council
Upway
Newenden
Cranbrook
Kent TN18 5PL

Ashford Borough Council
Planning and Development Services

by e-mail: planning.policy@ashford.gov.uk

9 August 2016

Dear Sirs,

Newenden Parish Council thanks Ashford Borough Council for the opportunity to comment on the draft local plan, the sustainability appraisal and the CIL charging schedule. In this response, we will only address the local plan, as we do not feel qualified to comment on the two other documents.

First of all, we would like to congratulate all those involved in producing the draft Local Plan on a well written, comprehensive and, in our view, appropriate and sensible set of policies for the period to 2030. We recognise that planning issues necessarily will have greater impact on the urban area and that, as a small rural parish at the very edge of the borough, Newenden's interests can only affect policies to a tiny degree. Nonetheless, we feel that the plan overall does protect the interests of the village (as expressed in our Parish Plan) and we welcome this draft as an improvement on the current planning policies.

Overall, we also welcome the emphasis of the Borough Council on working with Parish Councils to deliver the appropriate outcomes, especially in rural villages with their own local preferences and particular conditions.

We would specifically raise a small number of points, grouped here by subject matter and in the order in which they first appear in the draft (not in order of importance).

Rural employment - para 3.112 - 3.116, policies EMP1 - EMP5, EMP10 and EMP11

We welcome the emphasis placed on the importance of rural employment and business activity. Newenden is home to one of the biggest manufacturers and distributors of landscaping, horticultural and sportsturf products in the South East, as well as an award-winning pub and a major tourist facility for camping and boating on the Rother. In addition, there are several smaller businesses, artisans and artists operating from the village. It is very much in the village's interest to see these able to expand and have the opportunity to increase local employment. (This, of course, also has a bearing on affordable housing, of which more below.)

We note in policy EMP2 that "Proposals for the loss... of existing employment sites... in Tenterden or the villages listed in Policy HOU3 will not be permitted..." We presume this is a typo for HOU4, as there are no villages listed in HOU3.

With regard to EMP4 and EMP5, we are somewhat concerned that the policies may be unnecessarily restrictive in respect of small-scale, artisan or professional services businesses. These may not fulfil the requirement in EMP5 (a) that it be essential they be located in the countryside, but would otherwise comply with the requirements. As Internet communications improve, it becomes more and more feasible for such businesses to be located close to where the

owner/employee lives. This of course has a beneficial impact on the social life of the village, as well as reducing transport-related emissions. Although EMP10 and EMP11 are positive in this respect, they only apply to retail and tourism, and we would be keen to see other types of small businesses being encouraged to establish themselves locally.

Housing - policies HOU2 and HOU4

We are pleased to note the support for local needs and specialist housing, as expressed in HOU2. Newenden hopes to be able to contribute some local needs housing within the foreseeable future, and we look forward to working with you on this. We note your restrictions on cross-market subsidy for affordable housing but would remark that, in the current financial climate, it may be impossible for Housing Associations and other providers to create local needs housing without such subsidies.

With regard to HOU4, we are pleased that you now recognise Newenden as a rural settlement, albeit presumably in a "secondary" role (see para 5.44).

Pedestrian and cycle traffic - policies TRA5 and TRA6

Again, we welcome the promotion of walking and cycling routes, and hope you will extend this promotion to Newenden parish. Because of its location, Newenden serves as an important junction for traffic from and to Hawkhurst and Sandhurst in Tunbridge Wells borough, as well as Northiam in Rother district. Although these areas are not within Ashford's scope, we hope you will not forget about our footpaths and cycle paths.

Environmental matters - policies ENV4 - ENV6

The dark skies are a great pleasure for Newenden, and a significant factor for the attractiveness of the parish both for its inhabitants and for tourist visitors. Indeed, we have historically resisted the introduction of street lighting and similar potential sources of light pollution. We note that the proposed Dark Sky Zone stretches as far as nearby Wittersham, but does not currently include Newenden. Following a meeting of villagers on 13th July, which unanimously supported this suggestion, we would like to formally request being included in the DSZ.

The river Rother plays an important role in the village and we welcome every effort to protect it from inappropriate developments. The village is closely connected to the river, and much of its history is derived from river trade. Consequently, the village is dependent on the dams, sluices and other flood protection with which the river has been managed for at least 700 years. Any development proposal to diminish or remove such protection would put at terminal risk many of our businesses and leisure facilities. We would vigorously oppose any proposal that might result in increased flood risk.

Finally, we note that the mapping of the areas in Newenden that are considered to be at flood risk is different on the Environment Agency website from that on your own website (<http://newmaps.ashford.gov.uk/EXTPlanningMap/default.aspx>). With the flood protection now in place, the mapping on your website is accurate and in accordance with the historical experience in our village.

Yours faithfully

Ake Nilson

Ake Nilson
Chairman, Newenden Parish Council