

Matter 2 – Housing Growth and Residential Windfall Development

Issue 2 – Settlement Hierarchy – Policy SP3

Q2 What methodology has the Council used to determine which settlements fall within each category for the purposes of Appendix E? Is that methodology appropriate and sufficiently robust?

Policy SP3 states :

'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'.

The placement of villages into categories such as "Local Centre" uses the criteria of accessibility, infrastructure provision, level of services available (document HEB03) but ignores environmental sensitivity. This particularly affects the village of St Margaret's which is completely surrounded by protected landscapes. To the East it is bordered by the Heritage Coast with SSSIs and special landscape areas, and on all other sides by the Kent Downs AONB. This environmental consideration has not been included among the criteria for designating suitability as a Local Centre although SP3 clearly states that it should. Of the other villages included in the Local Centre category in the DDC Local Plan none except St Margaret's are enclosed within sensitive landscape areas. National guidance and DDC's own policies in the Local Plan indicate that housing development in such areas should only be approved in "exceptional circumstances". It is difficult to see how a village completely enclosed in landscapes afforded the highest levels of protection can be considered suitable for the large housing development which the Local Centre category implies. For these reasons we maintain that the methodology for categorising settlements is not sufficiently robust and therefore unsound.

In addition to this fundamental objection we can add that there are inaccuracies in the criteria relating to accessibility and service provision in St Margaret's. It is stated the village has an hourly bus service. In early 2023 the bus service to the village was reduced by about 70%. There is now an infrequent service which is unusable for commuting purposes. Discussion with the bus company suggests the service is likely to get worse rather than better in view of the acute financial difficulties at Kent County Council, which subsidises the route.

The assessment by DDC also suggests St Margaret's has three shops. In fact it only has one.