



The countryside charity

Kent

Matter 2 – housing growth and residential windfall development

Issue 2 – settlement hierarchy – policy SP3

Q1 What is the justification for setting out the settlement hierarchy in Appendix E of the Local Plan? To be effective, does the hierarchy need to be set out in policy?

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?

Q3 The Rural Settlement Hierarchy Study states that 2019 survey data was used as a starting point to assess sustainability due to restrictions on survey work caused by the Coronavirus pandemic. Has this work been updated as part of the Plan's preparation?

Q4 After scoring settlements, how did the Council then decide what the relevant thresholds would be for each category? Are the assumptions reasonable and adequately reflect the evidence?

Q5 How did the Council differentiate between Deal (a District Centre) and Sandwich (a Rural Service Centre) in the settlement hierarchy?

At the outset CPRE Kent would like to make it clear that it supports a spatial strategy that allocates development in accordance with the Council's settlement hierarchy, being as it is, an indicator of sustainability.

Using this evidence-based approach, it would be reasonable to expect that development would be focused at higher order settlements. Such that the regional centre of Dover (tier 1) would be allocated most development, followed by the district centre of Deal (tier 2) and the rural service centres of Sandwich and Aylesham (tier 3) before allocating land at the tier 4 settlements, identified as local centres.

With respect to local centres, it is noted that AM123 suggests the order of settlements in Appendix E be adjusted to reflect their actual score rankings – with Ash being ranked above Wingham and Eastry and the two separate villages of Elvington and Eythorne remaining at the bottom of the list.

It is noted that the Council has put forward additional modifications (AM9/AM10) that refers to the strategic allocation of land at Elvington and Eythorne as a means of strengthening their "settlement roles as local centres", rather than as previously stated to create a new local centre.

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This proposed modification would seem to suggest a degree of back-tracking. During the Regulation 19 consultation phase, these two poor-scoring developments were to be elevated out of the larger village category by virtue of the 'benefits' of development. Whereas now the proposed development is being presented as seeking to consolidate a role that they purportedly already fulfil.

We would welcome further explanation as to how the Council has differentiated between the two villages of Elvington and Eythorne as local centres and the larger villages listed in the settlement hierarchy.

Furthermore, it is not particularly clear in the methodology when it's the Parish of Eythorne that's being described, rather than the two individual villages of Elvington and Eythorne and whether the assessment of the provision of services and facilities at Parish level has somehow inadvertently fed into the resultant rankings of the two separate villages of Elvington and Eythorne.

By way of example, the alphabetical review of Parishes in HEB03 (Rural Settlement Hierarchy topic paper – table 5.1) refers to access to facilities for Elvington residents as being in neighbouring Eythorne, even though the walking route referred to is via a narrow footway along Adelaide Road, which does not seemingly allow for two-way pedestrian traffic to pass. Is there evidence that this is a well-used path to school, for instance, or are most journeys made by car?

In addition, Elvington only has a part time Post Office, so frequency/accessibility of services offered will be significantly different compared to residents in other villages with a full time Post Office. It is considered that the scoring for Elvington should be amended to take this into account.

The Council state at paragraph 4.9 of HEB03 (Rural Settlement Hierarchy topic paper) that the data in Table 2 (page 24) will be updated to reflect the changes in bus timetabling locally. Has this been done?

The scores attributed to Elvington (22) and Eythorne (20) raise cause for concern in themselves - when primary school children in Elvington need to travel to Eythorne for class – in that the presence of a school has resulted in a lower score than the village without one. Moreover, the top-ranking larger villages have broadly similar scores (18), reflecting the fact that they have their own primary schools.

On the subject of schools, it's not clear what the justification was for accepting the request of Eythorne Parish Council to include Woodpecker Court School (for children with an Education Health Care Plan) as a primary school for the purposes of the settlement hierarchy – see paragraph 4.7 of HEB03). Although an asset to the community in general, its very specific attendance criteria mean it shouldn't be given weight in terms of the Council's scoring methodology.

If the scorings for both villages were adjusted accordingly, they would be around the 19 mark, confirming that both the villages of Elvington and Eythorne are in fact larger villages and not local centres.

We query what has changed since the 2010 Core Strategy settlement hierarchy that has elevated these two villages from the status of “village” to “local centre” and urge the Inspector to consider a modification to the plan to place both villages of Elvington and Eythorne into a lower tier of the settlement hierarchy.

Matter 2 – housing growth and residential windfall development

Issue 3 – Housing Distribution - Policy SP3

Q1 Having established a settlement hierarchy, what process did the Council follow to determine the distribution of new development? Was this process robust and based on reasonable judgements about where to direct new development?

Q6 How was new housing growth distributed between settlements in the same category? For example, why do some settlements (such as Eythorne and Elvington) have significantly more housing proposed than Kingsdown? Is the Plan justified in considering Eythorne and Elvington together?

As set out in response to Matter 2, Issue 2 above, clearly the Council hasn't followed its own evidence with respect to the settlement hierarchy. Instead, development appears to have been suppressed at the highly sustainable town of Deal (which has no strategic allocations), in favour of lower order, less sustainable settlements.

Not adhering to the evidence of the settlement hierarchy clearly undermines the Council's vision of a "spectacular and sustainable environment" – such that development is being focused in unsustainable locations.

Again, we urge the Inspector to consider a modification to the plan to place both villages of Elvington and Eythorne into a lower tier of the settlement hierarchy and delete the strategic allocation of land in this location.