

## Comments

### Tenterden and Rural Sites DPD Regulation 27 - Publication version (30/06/09 to 11/08/09)

Comment by	Mr Brian Lloyd
Comment ID	TPV63
Response Date	31/07/09 12:29
Consultation Point	Policy TRS 9 New employment premises and uses in the Rural settlements ( <a href="#">View</a> )
Status	Submitted
Submission Type	Web
Version	0.3

#### Question 1

**Which part of the DPD does this representation relate to? (Please state clearly, a paragraph number, policy number or Map title)** Policy TRS 9

#### Question 2

To be "sound" a DPD should be JUSTIFIED, EFFECTIVE and consistent with NATIONAL POLICY.

"Justified" means that the document must be:

- 1 founded on a robust and credible evidence base
- 2 the most appropriate strategy when considered against the reasonable alternatives

"Effective" means that the document must be:

- 1 deliverable
- 2 flexible
- 3 able to be monitored

'National Policy'

- 1 In relation to National Planning Guidance. eg PPG or PPS.

**Do you consider this section of the DPD is Sound?** No

#### Question 3

**If your answer to Question 2 is 'No' - Please go to Questions 4 and 5.**

#### Question 4

**Only answer this question if you answered 'No' to Question 2.**

Do you consider the DPD is unsound because it is not: . Justified  
. Consistent with National Policy

#### Question 5

Only answer this Question if you answered Question 4

Please give details of why you consider the DPD is unsound, relating to your answer at Question 4.

CPRE Protect Kent (Ashford Committee) is concerned that there is an inconsistency between Policies TRS 9 and TRS 10. We assume that Policy TRS 9 only applies to those settlements defined in Policy TRS 1. Consequently, any development adjoining (i.e. outside) the defined built-up confines falls in the countryside to which Policy TRS 10 applies. Policy TRS 9, however, seems to give support in principle to any new employment development adjoining these settlements irrespective of the requirements of Policy TRS 10. This, we consider is a significant inconsistency in the usual policy approach to development restraint in the countryside, which is not justified. Policy TRS 9, therefore, needs to be clarified by stating that: a) it applies only to those settlements defined in Policy TRS 1; b) new employment development will be permitted within the defined built-up areas subject to the criteria listed; and c) development outside the defined built-up areas will be considered in accordance with Policy TRS 10.

#### Question 6

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the Examination? Yes

#### Question 7

If you wish to participate at the oral part of the Examination, please outline why you consider this to be necessary

As it stands, Policy TRS 9 is inconsistent with national planning policy and with Policy TRS 10, and as a result could result in significant development in the countryside. Consequently, the policy needs to be considered in detail at the examination. As a long established and respected environmental charity concerned with the protection of the countryside and the rural environment, we have an important contr

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- 2 the most appropriate strategy when considered against the reasonable alternatives

"Effective" means that the document must be:

- 1 deliverable
  - 2 flexible
  - 3 able to be monitored
- 'National Policy'

- 1 In relation to National Planning Guidance. eg PPG or PPS.

**Do you consider this section of the DPD is Sound?** Yes

### Question 3

**If your answer to Question 2 is 'No' - Please go to Questions 4 and 5.**

**If your answer to Question 2 is Yes - please set out your reasons below.**

CPRE Protect Kent (Ashford Committee) supports Policy TRS 10, for the reasons explained in the supporting text.

### Question 4

**Only answer this question if you answered 'No' to Question 2.**

**Do you consider the DPD is unsound because it is not:**

### Question 5

**Only answer this Question if you answered Question 4**

### Question 6

### Question 7

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<b>Comment by</b>	Mr Brian Lloyd
<b>Comment ID</b>	TPV65
<b>Response Date</b>	31/07/09 13:39
<b>Consultation Point</b>	Policy TRS 11 Conversions of rural buildings to non-residential uses ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.3
<b>Question 1</b>	

**Which part of the DPD does this representation relate to? (Please state clearly, a paragraph number, policy number or Map title)** Policy TRS 11

### Question 2

To be "sound" a DPD should be JUSTIFIED, EFFECTIVE and consistent with NATIONAL POLICY.

"Justified" means that the document must be:

- 1 founded on a robust and credible evidence base
- 2 the most appropriate strategy when considered against the reasonable alternatives

"Effective" means that the document must be:

- 1 deliverable
- 2 flexible
- 3 able to be monitored

'National Policy'

- 1 In relation to National Planning Guidance. eg PPG or PPS.

**Do you consider this section of the DPD is Sound?** Yes

### Question 3

**If your answer to Question 2 is 'No' - Please go to Questions 4 and 5.**

**If your answer to Question 2 is Yes - please set out your reasons below.**

CPRE Protect Kent (Ashford Committee) supports Policy TRS 11 for the reasons given in the supporting text.

### Question 4

**Only answer this question if you answered 'No' to Question 2.**

**Do you consider the DPD is unsound because it is not:**

### Question 5

**Only answer this Question if you answered Question 4**

### Question 6

### Question 7

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<b>Comment by</b>	Mr Brian Lloyd
<b>Comment ID</b>	TPV66
<b>Response Date</b>	31/07/09 13:41
<b>Consultation Point</b>	Policy TRS 12 Conversions of rural buildings to tourist-related residential uses ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web

Version 0.3

#### Question 1

**Which part of the DPD does this representation relate to? (Please state clearly, a paragraph number, policy number or Map title)** Policy TRS 12

#### Question 2

To be "sound" a DPD should be JUSTIFIED, EFFECTIVE and consistent with NATIONAL POLICY.

"Justified" means that the document must be:

- 1 founded on a robust and credible evidence base
- 2 the most appropriate strategy when considered against the reasonable alternatives

"Effective" means that the document must be:

- 1 deliverable
  - 2 flexible
  - 3 able to be monitored
- 'National Policy'

- 1 In relation to National Planning Guidance. eg PPG or PPS.

**Do you consider this section of the DPD is Sound?** Yes

#### Question 3

**If your answer to Question 2 is 'No' - Please go to Questions 4 and 5.**

**If your answer to Question 2 is Yes - please set out your reasons below.**

CPRE Protect Kent (Ashford Committee) supports Policy TRS 12 for the reasons given in the supporting text.

#### Question 4

**Only answer this question if you answered 'No' to Question 2.**

**Do you consider the DPD is unsound because it is not:**

#### Question 5

**Only answer this Question if you answered Question 4**

#### Question 6

#### Question 7

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<b>Comment by</b>	Mr Brian Lloyd
<b>Comment ID</b>	TPV67
<b>Response Date</b>	31/07/09 13:59
<b>Consultation Point</b>	Policy TRS 13 Conversions of rural buildings to general residential use ( <a href="#">View</a> )

**Status** Submitted

**Submission Type** Web

**Version** 0.4

### Question 1

**Which part of the DPD does this representation relate to? (Please state clearly, a paragraph number, policy number or Map title)** Policy TRS 13

### Question 2

To be "sound" a DPD should be JUSTIFIED, EFFECTIVE and consistent with NATIONAL POLICY.

"Justified" means that the document must be:

- 1 founded on a robust and credible evidence base
- 2 the most appropriate strategy when considered against the reasonable alternatives

"Effective" means that the document must be:

- 1 deliverable
- 2 flexible
- 3 able to be monitored

'National Policy'

- 1 In relation to National Planning Guidance. eg PPG or PPS.

**Do you consider this section of the DPD is Sound?** No

### Question 3

**If your answer to Question 2 is 'No' - Please go to Questions 4 and 5.**

### Question 4

**Only answer this question if you answered 'No' to Question 2.**

**Do you consider the DPD is unsound because it is not:** . Effective

### Question 5

**Only answer this Question if you answered Question 4**

**Please give details of why you consider the DPD is unsound, relating to your answer at Question 4.**

CPRE Protect Kent (Ashford Committee) generally supports Policy TRS 13, but we are concerned that the presumption in favour of residential conversion within the built-up confines will potentially mean the loss of buildings currently used, or previously used if vacant, that provide a community service or facility or employment use. We consider that the policy should seek to protect these buildings from automatic residential conversion by including a viability test to establish that the buildings cannot be re-used for their existing use. This would most simply be done by providing a cross reference to policies TRS 7 and 16 (though TRS 16 needs to be amended to actually make reference to buildings used to provide services - see our separate representation on this Policy).

### Question 6

**If your representation is seeking a change, do you consider it necessary to participate at the oral part of the Examination?** Yes

#### Question 7

**If you wish to participate at the oral part of the Examination, please outline why you consider this to be necessary**

It is important that buildings currently used, or previously used if vacant, for a community service or facility are retained for that use if at all possible. Such buildings help to make rural communities vibrant and sustainable.

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<b>Comment by</b>	Mr Brian Lloyd
<b>Comment ID</b>	TPV68
<b>Response Date</b>	31/07/09 14:02
<b>Consultation Point</b>	Policy TRS 14 Diversifying existing agricultural businesses ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.3

#### Question 1

**Which part of the DPD does this representation relate to? (Please state clearly, a paragraph number, policy number or Map title)** Policy TRS 14

#### Question 2

To be "sound" a DPD should be JUSTIFIED, EFFECTIVE and consistent with NATIONAL POLICY.

"Justified" means that the document must be:

- 1 founded on a robust and credible evidence base
- 2 the most appropriate strategy when considered against the reasonable alternatives

"Effective" means that the document must be:

- 1 deliverable
- 2 flexible
- 3 able to be monitored

'National Policy'

- 1 In relation to National Planning Guidance. eg PPG or PPS.

**Do you consider this section of the DPD is Sound?** Yes

#### Question 3

**If your answer to Question 2 is 'No' - Please go to Questions 4 and 5.**

**If your answer to Question 2 is Yes - please set out your reasons below.**

CPRE Protect Kent (Ashford Committee) supports Policy TRS 14, which we consider adopts the normal approach towards farm diversification.

#### Question 4

Only answer this question if you answered 'No' to Question 2.

Do you consider the DPD is unsound because it is not:

#### Question 5

Only answer this Question if you answered Question 4

#### Question 6

#### Question 7

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<b>Comment by</b>	Mr Brian Lloyd
<b>Comment ID</b>	TPV69
<b>Response Date</b>	31/07/09 14:06
<b>Consultation Point</b>	Policy TRS 15 Tenterden Primary Shopping Frontages ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.3

#### Question 1

**Which part of the DPD does this representation relate to? (Please state clearly, a paragraph number, policy number or Map title)** Policy TRS 15

#### Question 2

To be "sound" a DPD should be JUSTIFIED, EFFECTIVE and consistent with NATIONAL POLICY.

"Justified" means that the document must be:

- 1 founded on a robust and credible evidence base
- 2 the most appropriate strategy when considered against the reasonable alternatives

"Effective" means that the document must be:

- 1 deliverable
  - 2 flexible
  - 3 able to be monitored
- 'National Policy'

- 1 In relation to National Planning Guidance. eg PPG or PPS.

**Do you consider this section of the DPD is Sound?** Yes

#### Question 3

If your answer to Question 2 is 'No' - Please go to Questions 4 and 5.



**If your answer to Question 2 is Yes - please set out your reasons below.**

CPRE Protect Kent (Ashford Committee) supports Policy TRS 15 for the reasons stated in the supporting text.

#### Question 4

**Only answer this question if you answered 'No' to Question 2.**

**Do you consider the DPD is unsound because it is not:**

#### Question 5

**Only answer this Question if you answered Question 4**

#### Question 6

#### Question 7

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<b>Comment by</b>	Mr Brian Lloyd
<b>Comment ID</b>	TPV70
<b>Response Date</b>	31/07/09 14:23
<b>Consultation Point</b>	Policy TRS 16 Rural shops and services ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.3

#### Question 1

**Which part of the DPD does this representation relate to? (Please state clearly, a paragraph number, policy number or Map title)** Policy TRS 16

#### Question 2

To be "sound" a DPD should be JUSTIFIED, EFFECTIVE and consistent with NATIONAL POLICY.

"Justified" means that the document must be:

- 1 founded on a robust and credible evidence base
- 2 the most appropriate strategy when considered against the reasonable alternatives

"Effective" means that the document must be:

- 1 deliverable
- 2 flexible
- 3 able to be monitored

'National Policy'

- 1 In relation to National Planning Guidance. eg PPG or PPS.

**Do you consider this section of the DPD is Sound?** No

#### Question 3

If your answer to Question 2 is 'No' - Please go to Questions 4 and 5.

#### Question 4

Only answer this question if you answered 'No' to Question 2.

Do you consider the DPD is unsound because it is not:  Effective

#### Question 5

Only answer this Question if you answered Question 4

Please give details of why you consider the DPD is unsound, relating to your answer at Question 4.

Policy TRS 16 is entitled 'rural shops and services', but it concerns itself only with the traditional 'A' Class uses which generally fall under the retail heading. Many rural community services, though, do not fall in these use classes - for example churches, community halls and libraries - which are equally, if not more, vulnerable to proposals for change of use. Therefore, CPRE Protect Kent (Ashford Committee) considers that the Policy needs to recognise the full range of rural services and apply the same viability/marketing test to them as to the identified 'A' use classes. This will make the Policy more effective in protecting all rural services.

#### Question 6

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the Examination?  Yes

#### Question 7

If you wish to participate at the oral part of the Examination, please outline why you consider this to be necessary

The protection of rural shops and services from alternative uses is an important way in which rural communities can remain viable, healthy and sustainable. We consider that there should be a full debate of the appropriate policy approach to secure this.

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<b>Comment by</b>	Mr Brian Lloyd
<b>Comment ID</b>	TPV71
<b>Response Date</b>	31/07/09 14:31
<b>Consultation Point</b>	Policy TRS 17 Landscape Character and Design ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.3

#### Question 1

Which part of the DPD does this representation relate to? (Please state clearly, a paragraph number, policy number or Map title)

## Question 2

To be "sound" a DPD should be JUSTIFIED, EFFECTIVE and consistent with NATIONAL POLICY.

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- 2 the most appropriate strategy when considered against the reasonable alternatives

"Effective" means that the document must be:

- 1 deliverable
- 2 flexible
- 3 able to be monitored

'National Policy'

- 1 In relation to National Planning Guidance. eg PPG or PPS.

**Do you consider this section of the DPD is Sound?** Yes

## Question 3

**If your answer to Question 2 is 'No' - Please go to Questions 4 and 5.**

**If your answer to Question 2 is Yes - please set out your reasons below.**

Whilst it is disappointing that local landscape designations have not been retained we support the landscape character approach proposed. CPRE Protect Kent (Ashford Committee) particularly welcome the proposal to prepare and adopt a landscape character SPD, which should be done as a matter of priority so that it is available when the DPD is adopted.

## Question 4

**Only answer this question if you answered 'No' to Question 2.**

**Do you consider the DPD is unsound because it is not:**

## Question 5

**Only answer this Question if you answered Question 4**

## Question 6

## Question 7

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<b>Comment by</b>	Mr Brian Lloyd
<b>Comment ID</b>	TPV72
<b>Response Date</b>	31/07/09 14:37
<b>Consultation Point</b>	Policy TRS 18 Important rural features ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.3

## Question 1

**Which part of the DPD does this representation relate to? (Please state clearly, a paragraph number, policy number or Map title)** Policy TRS 18

**Question 2**

To be "sound" a DPD should be JUSTIFIED, EFFECTIVE and consistent with NATIONAL POLICY.

"Justified" means that the document must be:

- 1 founded on a robust and credible evidence base
- 2 the most appropriate strategy when considered against the reasonable alternatives

"Effective" means that the document must be:

- 1 deliverable
- 2 flexible
- 3 able to be monitored

'National Policy'

- 1 In relation to National Planning Guidance. eg PPG or PPS.

**Do you consider this section of the DPD is Sound?** No

**Question 3**

**If your answer to Question 2 is 'No' - Please go to Questions 4 and 5.**

**Question 4**

**Only answer this question if you answered 'No' to Question 2.**

**Do you consider the DPD is unsound because it is not:** . Justified  
. Effective

**Question 5**

**Only answer this Question if you answered Question 4**

**Please give details of why you consider the DPD is unsound, relating to your answer at Question 4.**

CPRE Protect Kent (Ashford Committee) generally supports Policy TRS 18, but we consider that it should also include historic parks and gardens which are specific and distinctive features in the rural area. Their omission is not explained, and the policy would be more effective in its general intention if they are included.

**Question 6**

**If your representation is seeking a change, do you consider it necessary to participate at the oral part of the Examination?** No

**Question 7**

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<b>Comment by</b>	Mr Brian Lloyd
<b>Comment ID</b>	TPV73
<b>Response Date</b>	31/07/09 14:44

**Consultation Point** Policy TRS 19 Infrastructure provision to serve the needs of new developments ([View](#))

**Status** Submitted

**Submission Type** Web

**Version** 0.3

#### Question 1

**Which part of the DPD does this representation relate to? (Please state clearly, a paragraph number, policy number or Map title)** Policy TRS 19

#### Question 2

To be "sound" a DPD should be JUSTIFIED, EFFECTIVE and consistent with NATIONAL POLICY.

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- 2 the most appropriate strategy when considered against the reasonable alternatives

"Effective" means that the document must be:

- 1 deliverable
- 2 flexible
- 3 able to be monitored

'National Policy'

- 1 In relation to National Planning Guidance. eg PPG or PPS.

**Do you consider this section of the DPD is Sound?** Yes

#### Question 3

**If your answer to Question 2 is 'No' - Please go to Questions 4 and 5.**

**If your answer to Question 2 is Yes - please set out your reasons below.**

Although the Policy is not specific in the level or type of supporting infrastructure to be provided, CPRE Protect Kent (Ashford Committee) is content that when read together with other policy guidance the Policy is sound.

#### Question 4

**Only answer this question if you answered 'No' to Question 2.**

**Do you consider the DPD is unsound because it is not:**

#### Question 5

**Only answer this Question if you answered Question 4**

#### Question 6

#### Question 7

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**Comment by** Mr Brian Lloyd  
**Comment ID** TPV74  
**Response Date** 31/07/09 14:58  
**Consultation Point** 7 Topic Policies ([View](#))  
**Status** Submitted  
**Submission Type** Web  
**Version** 0.3

#### Question 1

**Which part of the DPD does this representation relate to? (Please state clearly, a paragraph number, policy number or Map title)** Chapter 7

#### Question 2

To be "sound" a DPD should be JUSTIFIED, EFFECTIVE and consistent with NATIONAL POLICY.

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- 2 the most appropriate strategy when considered against the reasonable alternatives

"Effective" means that the document must be:

- 1 deliverable
- 2 flexible
- 3 able to be monitored

'National Policy'

- 1 In relation to National Planning Guidance. eg PPG or PPS.

**Do you consider this section of the DPD is Sound?** No

#### Question 3

**If your answer to Question 2 is 'No' - Please go to Questions 4 and 5.**

#### Question 4

**Only answer this question if you answered 'No' to Question 2.**

**Do you consider the DPD is unsound because it is not:**

.	Justified
.	Consistent with National Policy

#### Question 5

**Only answer this Question if you answered Question 4**

**Please give details of why you consider the DPD is unsound, relating to your answer at Question 4.**

The growth of 'horsiculture' and its associated development and equipment can have a significant impact on the landscape, particularly in areas where such activity is concentrated. No policy guidance on the control of such development is provided in the Core Strategy, or currently in the South East Plan. Paragraph 32 of PPS7 states: "Local planning authorities should set out in LDDs their policies for supporting equine enterprises that maintain environmental quality and countryside character."

Consequently, CPRE Protect Kent (Ashford Committee) considers that a policy should be included in the DPD to comply with PPS7.

#### Question 6

**If your representation is seeking a change, do you consider it necessary to participate at the oral part of the Examination?** Yes

#### Question 7

**If you wish to participate at the oral part of the Examination, please outline why you consider this to be necessary**

We consider that this is an important topic that needs to be addressed in the DPD, and one that should be debated at the examination. As a long established and respected environmental charity concerned with the protection of the countryside and the rural environment, we have an important contribution to make to the debate.

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<b>Comment by</b>	Mr Brian Lloyd
<b>Comment ID</b>	TPV75
<b>Response Date</b>	31/07/09 15:01
<b>Consultation Point</b>	7 Topic Policies ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.3

#### Question 1

**Which part of the DPD does this representation relate to? (Please state clearly, a paragraph number, policy number or Map title)** Chapter 7

#### Question 2

To be "sound" a DPD should be JUSTIFIED, EFFECTIVE and consistent with NATIONAL POLICY.

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- 2 the most appropriate strategy when considered against the reasonable alternatives

"Effective" means that the document must be:

- 1 deliverable
  - 2 flexible
  - 3 able to be monitored
- 'National Policy'

- 1 In relation to National Planning Guidance. eg PPG or PPS.

**Do you consider this section of the DPD is Sound?** No

#### Question 3

If your answer to Question 2 is 'No' - Please go to Questions 4 and 5.

#### Question 4

Only answer this question if you answered 'No' to Question 2.

Do you consider the DPD is unsound because it is not:  Effective

#### Question 5

Only answer this Question if you answered Question 4

Please give details of why you consider the DPD is unsound, relating to your answer at Question 4.

The proliferation of signs and advertisements in the rural area can be very intrusive in the landscape, and many of these are unauthorised. To help address this matter CPRE Protect Kent (Ashford Committee) consider that it would be helpful to have a policy in the DPD that sought to minimise the number of signs and adverts along the roadside, together with a commitment by the Council to remove unauthorised and unnecessary signage.

#### Question 6

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the Examination?  No

#### Question 7

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Comment by	Mr Brian Lloyd
Comment ID	TPV99
Response Date	04/08/09 15:58
Consultation Point	Policy WYE 3 Imperial College, Wye ( <a href="#">View</a> )
Status	Submitted
Submission Type	Web
Version	0.2

#### Question 1

Which part of the DPD does this representation relate to? (Please state clearly, a paragraph number, policy number or Map title) Policy WYE 3

#### Question 2

To be "sound" a DPD should be JUSTIFIED, EFFECTIVE and consistent with NATIONAL POLICY.

"Justified" means that the document must be:

- 1 founded on a robust and credible evidence base
- 2 the most appropriate strategy when considered against the reasonable alternatives

"Effective" means that the document must be:

- 1 deliverable



- 2 flexible
- 3 able to be monitored  
'National Policy'
- 1 In relation to National Planning Guidance. eg PPG or PPS.

**Do you consider this section of the DPD is Sound? Yes**

**Question 3**

**If your answer to Question 2 is 'No' - Please go to Questions 4 and 5.**

**If your answer to Question 2 is Yes - please set out your reasons below.**

CPRE Protect Kent (Ashford District Committee) support the proposed approach towards the Imperial College land and buildings for the reasons explained in the supporting text.

**Question 4**

**Only answer this question if you answered 'No' to Question 2.**

**Do you consider the DPD is unsound because it is not:**

**Question 5**

**Only answer this Question if you answered Question 4**

**Question 6**

**Question 7**