

Worth Neighbourhood Development Plan:

Consultation Statement

Community Engagement & Participation



Neighbourhood Planning Regulations 2012

Part 5 s15 Neighbourhood Development Plan Proposal Consultation Statement

To: Dover District Council (Local Planning Authority)

By: Worth Parish Council the Qualifying Body for the Worth Neighbourhood Plan Area

Title: Worth Neighbourhood Development Plan Consultation Statement

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1. Introduction

Worth Neighbourhood Development Plan

1.1 The Worth Neighbourhood Development Plan (The Plan) has been prepared by Worth Parish Council, 'The Qualifying Body' under the Localism Act 2011.

1.2 The Neighbourhood Development Plan has been brought forward under the Neighbourhood Planning Regulations 2012. Part 5 s14 requires that a qualifying body carries out a public consultation for a minimum period of six weeks on the draft Plan before finalising it. Part 5 s15(2) requires that a plan proposal submitted to the Local Planning Authority must include a Consultation Statement which:

- a) contains details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
- b) explains how they were consulted;
- c) summarises the main issues and concerns raised by the persons consulted;
- d) describes how these issues and concerns have been considered and, where relevant, addressed in the proposed Neighbourhood Development Plan.

Consultation Philosophy

1.3 The aims of the Consultation process have been to:

- front-load consultations so that The Plan was informed by the views of residents and other stakeholders from the outset;
- ensure consultation took place at critical points in the process before decisions were taken;
- engage the community using events and communications to households;
- ensure the results of consultations were fed back to residents as soon as possible after the consultation event.

1.4 The Community and Statutory Consultees have been engaged and informed throughout the preparation of the Worth Neighbourhood Development Plan. Hence, there has been a much greater level of consultation than the legislation requires.

Preparation of the Pre-Submission Draft Plan

1.5 Details of the consultations and events, undertaken to inform the Pre-Submission Draft Plan are available in the Document Library. These are summarised in Section 2, Page 3. It is not the intention to replicate the full details here.

Consultation on the Pre-Submission Draft Plan (Regulation s14 Consultation)

1.6 The persons, bodies and how they were consulted is available in Section 3, Page 5 & Appendix 1. The main issues and concerns raised and how these have been considered and addressed in the Submission Version of The Plan are in Section 3, Page 5. A copy of all consultation feedback and the response from Worth Parish Council is available in Appendix 2.

2. Preparation of the Draft Plan

- 2.1** The Pre-Submission Draft Plan was prepared from an Evidence Base, itself prepared following extensive public consultation. This included; early consultations to build a profile of the Community and explore their aspirations, consultations on the Neighbourhood Area and an Interim Consultation on the Issues, Evidence Base and proposed Decision Making Framework with a Sustainability Criteria Checklist.

Building The Evidence Base

- 2.2** The Evidence Base and ultimately the Pre-Submission Draft Neighbourhood Development Plan were informed by data derived from desktop studies and from Community Input. The Community Input involved:

- a. A General and Development Survey (Ref 24) originally carried out to inform the preparation of a Parish Plan. This was undertaken from October 2009 to April 2010 and completed by 66% of households in what eventually was designated as the Neighbourhood Area. The survey was followed by an Exhibition, attended by 120 residents, held on the 24th of April 2010. The survey provided information on the Community Profile (Ref 26) and the level of Housing Development both required and supported by the community (Ref 27).
- b. A 'Site Allocation' Survey (Ref 28) provided evidence of both where and how much development the community supported. It was undertaken from April 2010 to November 2011 and completed by 77% of households. It was reported on at an open Parish Council meeting (Ref 32) and a flier (Ref 33) was distributed to all households. The Site Allocation Survey informed the Parish Council response to the DDC Local Development Framework Interim Consultation (Ref 34).
- c. A NDP Exhibition (Ref 36), attended by 102 residents was held on December the 3rd 2011. This supported a NDP Survey (Ref 35) returned by 68% of households, and introduced the Neighbourhood Development Plan concept. The survey was designed to build an understanding of which areas for development and protection from development the community most supported (Ref 39). The survey also ascertained how the community prioritised expenditure on facilities and services.

- 2.3** An Affordable Housing Survey was carried out in October 2012 on behalf of Worth Parish Council by Action for Communities in Rural Kent (Ref 49-51).

Neighbourhood Area Consultations

- 2.4** Dover District Council held a consultation of statutory and invited consultees on behalf of the Parish Council in March 2012 (Ref 13-18) to obtain feedback on the proposed Neighbourhood Area and what issues the Neighbourhood Development Plan should address. The Consultee list (Ref 13) included: Natural England; The Environment Agency; English Heritage; Service Providers; Kent County Council;

Neighbouring Parish Councils and District Councils. All feedback and the Worth Parish Council response is available in Ref 21.

2.5 Worth Parish Council made a formal application (Ref 3), to Dover District Council on the 2nd of August 2012, to designate the Western part of the Parish as a Neighbourhood Area. DDC ran a consultation on the application for six weeks from the 4th October 2012. The application was advertised on the DDC website and Residents were alerted to the application by a Newsletter delivered to every household in the Parish (Ref 4) and by a poster on the Parish Council notice board. Statutory bodies were informed directly by the District Council. The nine respondents included Natural England, The Environment Agency and Kent County Council. Details are available on the Dover District Council website (Ref 5). No issues were raised about the proposed Neighbourhood Area.

2.6 The Neighbourhood Area was approved by Dover District Council at a Cabinet Meeting on the 7th of January 2013. The approval was advertised on their website by DDC and the approval notice (Ref 5c) was displayed on the Parish Council notice board and website. Residents were alerted to the approval by the January 2013 Parish Council Newsletter (Ref 41).

The Interim Community Consultation

2.7 The Evidence Base (Ref 9), the Issues faced by the Community (Ref 8), a proposed Decision Making Framework and a Sustainability Checklist (Ref 10) were prepared using data from the earlier consultations, desktop studies and input from independent experts. A four week Interim Public Consultation (Pre-Regulation Part 5 s14) was carried out in November/December 2012 on these documents and advertised by a flier delivered to every household. This flier (Ref 6) included the Issues, Decision Making & Sustainability Checklist, but not the Evidence Base. It was accompanied by a response form (Ref 7). All documents were made available on the Parish Council website and residents were asked to provide feedback using the response form, by writing to the Parish Council Clerk or by using an online form. The survey was accompanied by an Exhibition of all documents in Worth Village Hall on Saturday the 1st of December 2012. This was attended by 56 residents.

2.8 The Survey asked:

a) Issues

Q1a Have we identified the right issues?

Q1b Are there other issues the Neighbourhood Development Plan should address?

b) Evidence Base (EB)

Q2a Is the Evidence Base fair and comprehensive?

Q2b Has the Evidence Base properly taken account of the communities views?

Q2c Is there anything missing from the Evidence Base?

c) Decision Making Framework (DMF)

Q3a Is the Decision Making Framework fair and comprehensive?

Q3b Does the Decision Making Framework include the things that are important to you?

- Q3c Is there anything missing from the Decision Making Framework?
- d) Sustainability
 Q4 The Sustainability Checklist will be used to assess the options, your input is invited
- e) Additionally
 Q5 Additional Comments

2.9 There were nineteen responses. Thirteen were supportive, with either no additional suggestions, or suggestions for small changes. Two responses complained the language was too technical and one respondent argued Worth should be a hamlet (which would be contrary to the DDC Core Strategy). Three responses were predominantly critical, or raised questions about the validity of the Evidence Base.

2.10 All feedback and the Parish Council response is available in Ref 11. The changes to the documents arising from the consultation are available in Ref 12. The availability of these documents was advertised in the January 2013 Parish Council Newsletter (delivered to every household) (Ref 41) and made available on the Parish Council website.

2.11 Residents were kept up to date with the continuing preparation of the Neighbourhood Development Plan through the Parish Council Newsletter (Ref 41)

3. The Pre-Submission Consultation

The Neighbourhood Planning Regulations 2012, Part 5 s14, Regulation Consultation

Persons and Bodies who were Consulted

3.1 The formal Pre-Submission Consultation, required by the Regulations (Part 5, s14), of the Draft Neighbourhood Development Plan was held for just over six weeks from Monday the 8th April until Wednesday the 22nd May 2013. The consultation documentation included: The Pre-Submission Neighbourhood Development Plan (NDP); An accompanying Annex; and a Sustainability Review. These and a Document Library were made available on the Parish Council website (www.worthparishcouncil.org.uk). Copies of The Plan, The Annex and Sustainability Review were also made available in Deal and Sandwich Public Libraries.

3.2 The Pre-Submission Consultation strategy involved leaflet distribution, an Exhibition and direct letters or emails to engage as wide a cross-section of, Residents, Stakeholders and Statutory Bodies as possible throughout the process.

Residents

3.3 A flier (Ref D) was delivered to every household in the Neighbourhood Area between the 4th - 5th April 2013 about the Pre-Submission Consultation, including the dates of the consultation and a non technical summary of the Plans Proposals and next steps. It included a response form with details of how to make representations using the form; by writing to the Parish Council Clerk or by using the online form. It gave details of the web site and where hard copies of the documentation could be inspected (the Deal and Sandwich Public Libraries or from

any Parish Councillor). It advertised the Exhibition to be held on the 27th April 2013 from 10.00-16.00h in Worth Village Hall. The Leaflet was posted on the Parish Council Notice Board. A further flier (Ref E) was distributed to all households in the week preceding the Exhibition. It reminded residents of the Exhibition and that this was their best chance to influence the Neighbourhood Development Plan.

3.4 The Exhibition included A3 sized posters of The Pre-Submission Neighbourhood Development Plan displayed on tables. All Pre-Submission documents and the Document Library were made available on two computers.

3.5 Seventy six residents attended the Exhibition. Apologies were conveyed by others. The informal feedback to Councillors was very positive.

Local Stakeholders

3.6 Local Stakeholders (Farmers, Landowners, Business Owners, Local Organisations and anyone deemed to be potentially directly impacted by The Plan proposals) were contacted by email if possible, or by letter between the 4th & 7th of April 2013. For an example email and letter see Ref H. A list of all those contacted and how they were contacted is available in Appendix 1, Pages 17-19.

Statutory Bodies

3.7 A consultee list was agreed with Dover District Council. Consultees were contacted by email if possible, or by letter between the 4th and 7th of April 2013. An example email and letter is available in Ref H. A list of those contacted, and how they were contacted, is available in the Appendix 1 Page 12

Independent Feedback

3.8 External, expert opinion and advice was sought during the consultation phase.

Consultation Responses

3.9 11 Major bodies, 56 National or Regional businesses/organisations, 46 Local Stakeholders and 298 households were contacted directly about the Pre-Submission Consultation by email, letter or flier.

3.10 9 of the Major Bodies, 5 of the National/Regional businesses/organisations, 3 Local Stakeholders and 11 Residents responded to the Consultation.

3.11 Comments from Dover District Council were generally supportive and offered a number of suggested changes, most of which were accepted. Comments from the National or Regional Businesses/Organisations were generally supportive, with some constructive criticism. Comments from the local businesses, organisations and landowners were generally supportive.

3.12 The majority of residents are very enthusiastic and supportive towards the Neighbourhood Development Plan. Thanks were expressed to Parish Councillors by many individuals at the Exhibition. Only two predominantly negative replies to the Consultation were received.

Main Issues, Concerns and their Consideration

3.13 Appendix 2, Pages 20-84 contain responses to the Consultation and the Parish Council consideration of these. Dover District Council Planning Officers were consulted before the Parish Council formed a position. The main issues raised, how the issues and concerns have been considered and, where relevant, addressed in the proposed Neighbourhood Development Plan are shown below.

Table 1 - Consultation Response Summary

Page, Diagram and Figure numbers refer to the Worth Neighbourhood Development Plan.

Consultation Response	The Parish Council Position
<u>Generally</u>	
<p>1. Separate feedback from external experts and District Council Officers suggested there needed to be greater justification of the choices and that the benefits of the choices needed to be spelt out in The Plan rather than being in the Annex or left to be inferred from the Community Objectives.</p>	<p>The justification for and benefits of the Policies, particularly WDP 01 & WDP 03 have been made much more transparent in The Plan (Pages 34 - 35, 40, 41-42 & 44).</p>
<p>2a. One resident felt strongly that those producing the proposals should put their names to the work.</p> <p>2b. The same resident felt Councillors should have declared their interests while working on The Plan.</p>	<p>Names of Parish Councillors are on the notice board, the Parish Council website etc. For completeness, the names of Working Party members have been added to Section 4, Page 11 of this document.</p> <p>The Pre-Submission material (Ref 52) contained Councillor declarations of interest.</p>
<u>Community Objectives</u>	
<p>The Community Objectives were well received by residents and there were many positive comments about them at the Exhibition</p>	
<p>3. The District Council suggested it should be made clear that the Community Objectives will not be Examined.</p>	<p>The following has been added to The Plan: 1.3, Page 2 & 2.1, Page 9 - A Vision for the Area is expressed through 14 Community Objectives. The Area Portrait informs and the Vision helps drive the Development Plan. The Community Objectives are aspirational, they are not Policies. They are not intended to be subject to Examination or to form part of the Statutory Planning Policy Framework.</p>
<p>4. It was felt by two Statutory Consultees (The District Council & Kent County Council) that the historic assets of the area were underplayed.</p>	<p>The title of the section has been changed to Heritage Assets. The Built Heritage section has been expanded and sections on Archeology, Landscape, Development and a Catalogue of Heritage Assets added to Pages 23-26.</p>

Consultation Response	The Parish Council Position
<p>5. One Local Stakeholder expressed concern that a 'kick-about' area was a half measure</p>	<p>The identified need is for a 'kick about' area not a full size soccer pitch or other facilities.</p>
<p><u>Residential Allocation</u></p> <p>The proposed development of the Bisley Nursery site received universal approval at the Exhibition. There are no written comments asking for any substantive change to the proposal.</p>	
<p><u>Housing Allocation & Policy WDP 01</u></p> <p>Changes were suggested to the wording of Policy WDP 01 by the District Council, CPRE, Southern Water and Hobbs Parker acting as the Landowners Agent. These changes did not always align.</p>	
<p>6. The District Council suggested a commentary on why the Housing Density is not in conformity with Core Strategy Policy CP4 was needed.</p>	<p>A commentary on why the Housing Density is not in conformity with Core Strategy Policy CP4 was added (3.17b, Pages 36-37) and reference made to the Sustainability Appraisal.</p>
<p>7. The District Council suggested wording changes to strengthen and clarify Policy WDP 01.</p>	<p>The wording changes suggested by the District Council to strengthen and clarify the policy and to avoid possible conflicts with national and local policy when planning applications are being considered were accepted with one exception. The Policy (Page 39) retained the requirement to demolish the house Bisley Nursery and it was clarified that this was to allow integration of the Open Space and the housing development into the existing Village and not just to improve sight lines.</p>
<p>8. CPRE suggested changes to the wording of Policy WDP 01, including its recasting to reflect the different areas (A), (B), (C).</p>	<p>Many changes suggested by CPRE were superceded by those from the District Council. A better explanation of areas (A), (B) & (C) was added to Diagram 1, Page 38 & text (3.17, page 36).</p>
<p>9. Hobbs Parker (acting for the landowner of Bisley Nursery) suggested changes to the Implementation and Phasing Plan (10. of Policy WDP 01) and raised concerns over the nature of the mitigation strategy (9.) to address any impact on the Thanet Coast and Sandwich Bay Ramsar/SPA/SAC.</p>	<p>The Implementation and Phasing Plan was removed from the Policy and added, in a less rigid format to the text (3.21, Page 40). DDC are developing a district wide mitigation strategy to alleviate the potential impact of housing development on the Thanet Coast & Sandwich Bay SPA. This is based on a small financial contribution. Policy wording retained.</p>
<p>10. The District Council suggested a note to the policy on the mix of houses (e.g. two, three, or four bedrooms).</p>	<p>A note was added on Page 39</p>
<p>11. Natural England did not consider that impact on designated sites in Policy WDP 01 (and elsewhere) should be left until the application stage</p>	<p>Dover District Council have completed a Habitat Screening Report which has been approved by Natural England and will be submitted along with The Plan.</p>

Consultation Response	The Parish Council Position
12. One Local Stakeholder questioned the viability of the site.	The Landowner and their agent do not share the respondents concern.
13. One Local Stakeholder and one resident felt that one of the potential sites (D10) had been unfairly dismissed and that the advantages of the site had not been clearly communicated to residents.	Correspondence between the Parish Council and the owner of site D10 is available (Ref 46). The Parish Council believe the Consultation process has been open and transparent and that potential sites have been treated equally.
<u>WDP 02</u>	
14. The District Council suggested wording changes to Policy WDP 02.	These were accepted (Page 40)
<u>Maps & Diagrams:</u> Changes were suggested to the maps and figures associated with Policy WDP 01 by the District Council, CPRE and by Hobbs Parker. These did not always align.	
15. The District Council suggested amending Figure 4 to show the site (Bisley Nursery) within the context of the village (listed buildings, conservation area etc).	Figure 4 (now Figure 2, Page 36) was amended to show all Heritage Assets.
16. Hobbs Parker (acting for the landowner) suggested the retention of Figure 5 and did not support adding Settlement Confines to Proposal Map 1.	See 19 & 17 below
17. The District Council expressed concern that Proposal Map 1 may be confusing when read with the Summary Diagram and the Dover Districts Proposals Map The District Council & CPRE suggested incorporating new Settlement Confines on Proposal Map 1 and CPRE suggested including an explanation of Areas A, B & C on the Map.	Proposal Map 1 was renamed Diagram 1 (Page 38). In addition The Summary Map was simplified by removing the Community Objectives and renamed The Plan Proposal Map (Page 47). The current and proposed Settlement Confines were added to Diagram 1 as requested by The District Council & CPRE.
18. The District Council suggested the proposed village hall should not be illustrated on the plan as it will not be developed within the timescale of the NDP	The Village Hall indicator was removed (Diagram 1, Page 38).
19. The District Council recommended removing Figure 5 or moving it to an Annex. Hobbs Parker (acting for the landowner) suggested the retention of Figure 5.	Figure 5 was moved to the Annex, Page 32 and renamed Figure 2.

Consultation Response	The Parish Council Position
<u>Local Green Space</u>	
The Areas proposed as Local Green Spaces were well received at the Exhibition and there are only two written responses questioning them.	
20. One resident felt that only the area to the North West of the Village (Area 1) deserved protection while the area in the middle and to the south of the Village (Area 2) did not.	The Parish Council believe the process of identifying the areas for designation as local green spaces to be open and transparent, and the designation of both Areas 1 & 2 to be fully justified.
<p>21. One Stakeholder felt that designation should be based on perception. They felt Area 1 to the North West of the Village should be expanded to include all land up to Coventon Lane (e.g. all of P2) and that Area 2 should be reduced in size. They also felt sites D10 & D12 and with the three properties in Area 2 should be excluded from the Local Green Space.</p> <p>22. The inclusion of a property fronting Jubilee Road in Area 2 was questioned by one further resident.</p>	It is agreed the two houses and their gardens, which includes potential Development area D12 south, identified as a possible additional site for housing if required during the Plan period (Annex 4.34, Page 32), should not be included in Area 1. There is no justification for removing the house in the middle of Area 1. Potential development site D10 is not one of the potential sites being considered if more housing were required during the Plan period and there is no justification for excluding it from an area to be protected. Following discussion with District Council Officers it was agreed a small area at the western end of P2 closest to the A258 would score very similarly to P1 in the Sustainability Appraisal and it was included in Area 1 (Diagram 2, Page 43)
23. Southern Water suggested adding exceptions for essential infrastructure to Policy WDP 03 and the District Council suggested changes to the wording of the policy.	A Policy Note was added allowing for essential infrastructure, where it can be demonstrated there is no reasonable alternative site and the benefit of the development outweighs harm (Page 43).
24. CPRE requested mention be made of DDC Core strategy DM 25 on Open Space.	A sentence on DM 25 was added (3.25, Page 41).
<u>Employment</u>	
There were no written comments (positive or negative) received from residents on the proposed Employment Policies WDP 04 & WDP 05.	
25. Natural England made the same comments about European sites as against Policy WDP 01.	As per 9.
26. The District Council suggested some wording changes to the Policies WDP 04 & WDP 05	The small changes to the Policy wording were accepted (Pages 45 & 46).
27. CPRE requested the addition of a map to WDP 04 showing the location of the site.	A map has been added (Diagram 3, Page 45).

4. Decision Making Body

Worth Parish Council

4.1 Worth Parish Council, with members elected following a contested election in May 2011, was the decision making body for all aspects of the Worth Neighbourhood Development Plan. In a small community, almost inevitably, most Councillors had some declarable interest in some decision making. To allow the greatest representation, Councillors with declarable interests (Ref 52) were formally granted dispensation to take part in all decisions (Ref 53). Not all Councillors exercised their dispensation rights in all decisions.

The Working Group

4.2 Worth Parish Council set up a formal working group (the Worth Parish Plan Working Group) in February 2011. The Group's remit was to collect the necessary information and draft a Parish Plan. Public membership was invited by advertising and when formed the Group initially consisted of four Parish Councillors and two members of the public. This composition later changed to five Parish Councillors (Cllrs Caroline Austin, Stephen Acourt, Michele Parnell, Steve Stobie and Alan Stobie) and one member of the public (Ken Bates, Neighbourhood Watch Co-ordinator) in May 2011. In September 2011 the Parish Council expanded the Working Groups remit to include a Neighbourhood Development Plan. Occasionally, other members of the public lent the Working Group help with logistics, e.g. survey delivery, information gathering and dispersal.

4.3 The Working Group met formally on a monthly, or as required basis. It had no decision making powers. There was a standing Parish/Neighbourhood Plan item on the monthly Parish Council agenda to consider a report from the Working Group and their meeting documents. Where appropriate, the report included options, proposals and draft documents.

4.4 Business & Landowners wishing to discuss any aspect of The Plan were invited to contact the Council during the NDP Area Application Consultation and the Working Group held early meetings at landowners' requests.

4.5 Initial survey work was carried out by a Survey Steering Committee consisting of four Parish Councillors (Cllr's Caroline Austin, Liz Duncan, Michele Parnell & Steve Stobie) and up to eight members of the Public (Ian Austin, Ken Bates, Pat Franklin, John Mills, Chris Harris, Jill Ransome, David Ross & Alan Stobie).

5. Conclusions

5.1 This Consultation Statement, the accompanying Appendices and the previous responses (Ref 11 & 21) together with Reference Documents are considered to comply with part 5, s15(2) of the 2012 Neighbourhood Planning Regulations.

Appendix 1: List of Organisations, Businesses and Individuals Consulted

All Consultees were contacted by email where one is shown. If only an address is shown they were contacted by letter.

Organisation	Contact name	Address*	e-mail address	Comment
Statutory Consultees				
Dover District Council	Mike Ebbs	Forward Planning	Mike.Ebbs@doover.gov.uk	Yes
Statutory Consultees: Major Consultees				
Coal Authority	Miss R Bust	Chief Planner/Principal Manager, The Coal Authority, 200 Lichfield Lane, Berry Hill, Mansfield, NG18 4RG	planningconsultation@coal.gov.uk	Yes
CPRE Kent	Mr B Lloyd	Senior Planner, 3 Evegat Park Barn, Station Road, Smeeth, Ashford, TN25 6SX	brian.lloyd@cprekent.org.uk	Yes
English Heritage	Mr A Byrne	Historic Areas & Planning Adviser, English Heritage, Eastgate Court, 195-205 High Street, Guildford GU1 3EH	Alan.Byrne@english-heritage.org.uk	No
Environment Agency	Ms J Wilson	Environment Agency, Orchard House, Endeavour Park, London Road, Addington, ME19 5SH	jennifer.wilson@environment-agency.gov.uk	Yes
KCC	Liz Shier	Strategy and Planning Division (E&R), Invicta House, County Hall, Maidstone, ME14 1XX	Liz.Shier@kent.gov.uk; Paul.Campion@kent.gov.uk; Tim.Martin@kent.gov.uk	Yes
Kent Highway Services	Mr R White	Kent Highway Services, Local Transportation & Development, Ashford Depot, Henwood Industrial Estate, Javelin Way, Ashford TN24 8DH	Bob.White@kent.gov.uk	Yes
Kent Wildlife Trust	Miss D Salmon	Conservation Officer Policy and Planning, Kent Wildlife Trust, Tyland Barn, Sandling, Maidstone, ME14 3BD	debbie.salmon@kentwildlife.org.uk	Yes
Natural England	Consultation Service	Natural England, Hornbeam House, Electra Way, Crewe Business Park, Crewe, CW1 6GJ	consultations@naturalengland.org.uk	Yes
RSPB	Ms F Bouri	Conservation Officer, 2nd Floor, Frederick House, 42 Frederick Place, Brighton, BN1 4EA	fay.bouri@rspb.org.uk	No
English Rural	Alison Thompson	English Rural	Alison.Thompson@englishrural.org.uk	Yes

Organisation	Contact name	Address*	e-mail address	Comment
Statutory Consultees: National/Regional				
Action with Communities in Rural Kent			info@ruralkent.org.uk	No
British Deaf Association		British Deaf Association	paulr@bda.org.uk	No
British Wind Energy Association	Ms G Grimes	Planning Advisor, British Wind Energy Association, Renewable Energy House, 1 Aztec Row, Berners Road, London, N1 0PW	g.grimes@renewable-uk.com	No
Civil Aviation Authority	S Doherty	Head of Strategy and Standards, Aerodrome Standards, Civil Aviation Authority, Aviation House, Gatwick Airport South, West Sussex, RH15 0UYR	aerodromes@caa.co.uk	Yes
Community Action South East Kent		Community Action South East Kent	ashford@casekent.org.uk	No
Defence Estates (Safeguarding)		Safeguarding, Defence Estates, Blakemore Drive, Sutton Coldfield, B75 7RL		No
Department for Culture, Media and Sport		Department for Culture, Media and Sport, 2-4 Cockspur Street, London, SW1Y 5DH		No
Diocese of Canterbury (Property Team)	Philip Bell	Director of Property Services	pbell@propcant.org	No
Directorate of Airspace Policy		Directorate of Airspace Policy, K6 Gate 3, CAA House, 45-59 Kingsway, London, WC2B 6TE		No
DoverDistrict Carers			support@carers-dover.org.uk	No
East Kent Hospitals	Mr K Bourn	Head of Strategic Estates, Eastern and Coastal Kent NHS Primary Care Trust, Kent and Canterbury Hospital, Ethelbert Road, Canterbury, CT1 3NG	keith.bourn@nhs.net	No
Eastern and Coastal Kent NHS Primary Care Trust	Ms J Fox	Directorate of Strategy Development and Capital Planning East Kent Hospitals, Protea House, New Bridge, Marine Parade, Dover, CT17 9HQ	jo.fox@eastcoastkent.nhs.uk	No
Hi Kent Association for Deaf and Hearing Impaired Persons			enquiries@hikent.org.uk	No
Highways Agency	Kevin Bown	Network Manager, The Highways Agency, Federated House, London Road, Dorking, RH4 1SZ	kevin.bown@highways.gsi.gov.uk	Yes

Organisation	Contact name	Address*	e-mail address	Comment
Statutory Consultees: National/Regional				
Homes and Communities Agency	Naisha Polaine	Homes and Communities Agency, 81 Station Road, Ashford, TN23 1PP	naish.polaine@hca.gsi.gov.uk; Niamh.Matthews@hca.gsx.gov.uk	No
Homestart			office@home-startdoverdistrict.org.uk	No
Infratil Airports Europe Ltd	Anne Mackenzie		amackenzie@infratilairports.com	No
Kent Ambulance NHS Trust	Peter Platt	Kent Ambulance NHS Trust, Ambulance Headquarters, Heath Road, Coxheath, Maidstone, ME1 4BG		No
Kent Association for the Blind	Cairn Ryan	Dover Team	rehab.dover@kab.org.uk; eastkentcarers@rethink.org.uk	No
Kent Association for the Disabled	Jeanne Henderson	Dover Branch Kent Association for the disabled	Jeanhenderson5@aol.com	No
Kent Association of Local Councils	Terry Martin	Kent Association of Local Councils	secretary@kentalc.gov.uk	No
Kent Downs Area of Outstanding Natural Beauty	Mr N Johannsen	Kent Downs Area of Outstanding Natural Beauty, West Barn, Penstock Hall Farm, Canterbury Road, East Brabourne, Ashford, TN25 5LL	nick.johannsen@kentdowns.org.uk	No
Kent Fire & Rescue Headquarters		Review Support Officer, Kent Fire & Rescue Headquarters, The Godlands, Tovil, Maidstone, ME15 6XB	enquiries@kent.fire-uk.org; robert.cherry@kent.fire-uk.org	No
Kent Police	Mr W G Wallis	Head of Property, Kent Police, Estate Department, Police Headquarters, Sutton Road, Maidstone ME15 9BZ		No
Local Enterprise Partnership			SouthEastLocal.EnterprisePartnership@essex.gov.uk	No
Mobile Operators Association C/o Mono	Mr N Gillin	Mobile Operators Association, C/o Mono Consultants Ltd - see below		No
National Grid	Mr D Holdstock	Consultant Town Planner, Entec UK Ltd, Gables House, Kenilworth Road, Leamington Spa, CV32 6JX	damien.holdstock@entecuk.co.uk	No
National Trust	Jane Arnott	Land Use Planning Adviser, The National Trust, Polesden Lacey, Dorking, RH5 6BD	jane.arnott@nationaltrust.org.uk	No
Network Rail	Town Planning Team	Network Rail, 1 Eversholt Street, London, NW1 2DN	townplanningse@networkrail.co.uk	No

Organisation	Contact name	Address*	e-mail address	Comment
Statutory Consultees: National/Regional				
NFU		NFU, Unit 3, Invicta Business Centre, Ashford Market, Monument Way, Ashford, TN24 0HB		No
O2 UK		Planning & Environment Manager, O2 UK, 260 Bath Road, Slough, SL1 4UX		No
Orange Personal Communications Services Ltd C/o Mono	Ms C Wilson	Mono Consultants Ltd, 48 St Vincent Street, Glasgow, G2 5TS		No
Powergen Plc		Powergen Plc, Westwood Way, Westwood Business Park, Coventry, CV4 8LG		No
Ramblers Association		Ramblers Association	ramblers@ramblers.org.uk	No
River Stour Internal Drainage Board	Sheila Allen	River Stour Internal Drainage Board	pete.dowling@riverstouridb.org.uk	Yes
Royal Mail Properties	Claire Davies	Consultant, DTZ, 125 Old Broad Street, London, EC2N 2BQ	claire.davies@dtz.com	No
Scotia Gas Networks Plc	Mr L Keegan	Network Support Manager, Third Party Connections, Scotia Gas Networks Plc, St. Lawrence House, Station Approach, Horley RH6 9HJ	Leigh.Keegan@scotiagasnetworks.co.uk	No
South East Coast Strategic Health Authority		South East Coast Strategic Health Authority, York House, Horley, Surrey, RH6 7DE		No
South East Water	Mr P Seeley	Asset Director, South East Water, Rocfort Road, Snodland, ME6 5AH, 18-20 Massetts Road		No
Southern Water	Mr C Neale	Corporate Planning Manager, Southern Water, Southern House, Yeoman Road, Worthing, BN13 3NX	chris.kneale@southernwater.co.uk; david.nuttall@atkinsglobal.com	Yes
Sport England	John.Feetam	Sports England	John.Feetam@sportengland.org	No
Stagecoach East Kent	Mr J Cooper	Stagecoach East Kent, The Bus Station, St Georges Lane, Canterbury, CT1 2 SY	Jeremy.Cooper@stagecoachbus.com	No
T-Mobile (UK) Ltd	Ms E Larranaga	Project Manager, T-Mobile (UK) Ltd, Hatfield Business Park, Hatfield, AL10 9BW		No
Transco	Ms G Venton	Transco, 2 Leasons Hill, Orpington, BR5 2TN		No
UK Power Networks	Mr T Atkinson	Project Manager, UK Power Networks, Bircholt Road, Parkwood, Maidstone, ME15 9XH	tom.atkinson@ukpowernetworks.co.uk	No

Organisation	Contact name	Address*	e-mail address	Comment
Statutory Consultees: National/Regional				
Voluntary Workers for the Disabled			volcare@aol.com	No
Woodland Trust	Ellie Handerson	The Woodland Trust, Greater SE Policy Office, 13 Redston Road, London, N8 7HL	elliehenderson@woodlandtrust.org.uk	No
Statutory Consultees: Regional/District Councils				
Canterbury City Council	Mr A Verrall	Canterbury City Council, Council Offices, Military Road, Canterbury, CT1 1YW	Adrian.Verrall@canterbury.gov.uk	No
Shepway District Council	Mr M Aplin	Local Plans, Shepway District Council, Civic Centre, Castle Hill Avenue, Folkestone, CT20 2QY	Mark.Aplin@shepway.gov.uk	No
Thanet District Council	Mr S Thomas	Strategic Planning Manager, Thanet District Council, Council Offices, PO Box 9 , Cecil Street, Margate, CT9 1XZ	Jo.Wadey@thanet.gov.uk	No
Statutory Consultees: Regional/District Councils				
Cliffsend Parish Council	Mrs Ashley Stacey	Clerk to Cliffsend Parish Council, Sandwich Town Council, Guildhall, Cattle Market, Sandwich, CT13 9AH	ashleyjstacey@gmail.com	No
Deal Town Council		Deal Town Council	deal.town.council@deal.gov.uk	No
Eastry Parish Council	Mrs S Wells	Clerk to Eastry Parish Council, 3 Gore Terrace, Gore Road, Eastry, CT13 0LS	clerk@eastrypc.co.uk	No
Northbourne Parish Council	Ms T Barnwell	Clerk to Northbourne Parish Council, 109 Canada Road, Walmer, Deal, CT14 7EJ	teresa.barnwell@sky.com	No
Sandwich Town Council	Miss Melanie Kingshott	Clerk to Sandwich Town Council	townclerk@sandwichtowncouncil.gov.uk	Yes
Sholden Parish Council	Mrs M Shaw	Clerk to Sholden Parish Council, 42 London Road, Deal, CT14 9TE	sholdenparishcouncil@live.co.uk	No
Woodnesborough Parish Council	Mrs S Wells	Clerk to Woodnesborough Parish Council, 3 Gore Terrace, Gore Road, Eastry, CT13 0LS	woodpc@btinternet.com	No

Organisation	Contact name	Address*	e-mail address	Comment
Local Stakeholders: Farmers/Landowners				
Bakkavor	Tilmanstone Salads	Millyard Way Pike Rd Industrial Estate, Eythorne, Dover CT15 4NL	corinna.redsull@bakkavor.co.uk	No
Ben & Dawn Richardson		Ilex Cottage, Temple Way, Worth, Deal CT14 0DA		No
Bradley, Farmer	John Bradley	Selson Farm, Selson Lane, Eastry, Sandwich. CT13 0EF	jdbradley@tiscali.co.uk	No
C J Bean & Sons, Farmer	John Bean	Links Farm, Deal Road, Worth, Deal CT14 0BG		No
Canterbury Carriages	Mr & Mrs Ledwith	Fieldings, Stoneheap Road, East Studdal, Dover CT15 5BU	Info@canterburycarriages.co.uk	No
Co-operative Farms	Sean Finlayson	The Co-Operative Farms, Highland Court, Bridge, Canterbury CT4 5HN	sean.finlayson@co-operative.coop	No
David Smith, Farmer	Lakeview Veterinary Centre	Lower Farm, the Street, Finglesham, Deal CT14 0NA	lakeview@hotmail.co.uk	No
Dr Raffla, Landowner	Dr. Nagy Rafla	Felder Lodge, Deal Road, Worth, Deal CT14 0BD		No
Farmer, has horses behind Whitewalls	Iris Faulkner	19 Hershell Square, Walmer, Deal CT14 7SH	iris.faulkner@tiscali.co.uk	No
Intercrop Ltd, Farmer	Thane Goodrich	Broad Lane, Betteshanger, Deal CT14 0LU	thane.goodrich@intercrop.co.uk	No
J J Caspell & Son	Sonia Caspell	The Shrubbery Farm, Ulcombe Lodge, Dover Road, Sandwich CT13 0DQ		No
L. Austin, Landowner	Lance Austin	The Old Vicarage, The Street, Worth, Deal CT14 0DY	oldvic1@waitrose.com	Yes
Laslett, Farmer	Steve & Susan Laslett	104 St. Georges Road, Sandwich. CT13 9LE	susanlaslett8@btinternet.com	No
Lord Northbourne, Landowner	Lord Northbourne	Northbourne Court, Northbourne, Deal CT14 0LW		No
Mrs M Walter		Church Farm House, Ripple, Deal		No
N Kenton, Farmer	Nick Kenton	Statenborough Farm, Eastry, Sandwich, CT13 0DH	cllrnicholaskenton@dover.gov.uk	No
Stevens, Farmer	Bill & John Stevens	Minnis Farm, Minnis Way, Deal CT14 0DQ	john.julie@hotmail.com	Yes
W. C. Sole & Sons, Bisley Nursery	Norman & David Sole	Bisley Nursery, The Street, Worth, Deal CT14 0DD	norman@wsole.co.uk; David.Jarman@hobbssparker.co.uk	Yes

Organisation	Contact name	Address*	e-mail address	Comment
Local Stakeholders: Business owners				
Blue Pigeons Inn		The Blue Pigeons Inn, The Street, Worth, Deal CT14 0DE	enquiries@thebluepigeons.co.uk	No
Chilton Villas B&B	Tye Mayes	Chilton Villas, The Street Worth, Deal CT14 0DD	info@chiltonvilla.co.uk	No
It's Worth Heating	Tye Mayes	Chilton Villas, The Street Worth, Deal CT14 0DD		No
James Armstrong	James Armstrong	Woodside, Mill Lane, Worth, Deal CT14 0DU	jamesarmstrong.ltd@virgin.net	No
Martha Trust	George White CEO	Martha Trust, Homemead Lane, Hacklinge, Deal CT14 0PG	contact@marthatrust.org.uk	No
Model Flight Accessories		Model Flight Accessories, Felderland Lane, Worth, CT14 0BT		No
Old Mill Worth	Anthony Vatcher	Worth Mill, Mill Lane, Worth, Deal C T14 0DU	INFO@MFACOMO.COM	No
Orchard Barn B&B	Alison Ross	Orchard Barn B&B, Felderland Lane, Worth, CT14 0BT	alisonross@rocketmail.com	No
Solley Farmhouse B&B	Sandy Hobbs	Solley Farmhouse, The Street, Worth, Deal CT14 0DG	solleyfarmhouse@tiscali.co.uk	No
Sovereign Upholstery	Ronald & Linda Davies	Coventon Court, Deal Road, Worth, Deal CT14 0BJ		No
St Crispin Inn	Mike & Siobhan Heard	St. Crispin Inn, The Street, Worth, Deal CT14 0DF	info@stcrispininn.com	No
Upton House	Peter Jolin	Upton House, Deal Road, Worth, Deal CT14 0BA	peterjolin@hotmail.com	No
Worth Centre	James O'Rourke	Worth Centre, Jubilee Road, Worth, Deal CT14 0DS		No

Organisation	Contact name	Address*	e-mail address	Comment
Local Stakeholders: Local Organisations				
Busy Bees	Debbie Palmer	Busy Bees, Innisfree, Glen Road , Kingsdown, CT14 8BS	debbiepalmer@sky.com	No
St Peter & St Pauls Church	Anne Simmons	PCC Secretary, 3 St Johns Cottages, The Street, Worth, CT14 0DA		No
Village Hall Management Committee	Ian Austin	Village Hall Management Committee	ian.austin@virgin.net	No
Worth Art Group	John Hollyer	21 Temple Way, Worth. CT14 0DA		No
Worth CP School	Lynn Taylor	Worth Primary School	secretary@worth.kent.sch.uk	No
Worth Cricket Club	Gary Simmons	Worth Cricket Club, 6 Chestnut Drive, Worth CT14 0BZ		No
Worth Free Church	Miss W Larkins	Secretary, Worth Free Church, Homemead, Hacklinge Road, Deal, CT14 0PG		No
Worth Neighbourhood Watch Co-ordinator	Ken Bates	Worth Neighbourhood Watch, Pemberley, The Street, Worth CT14 0DS		No
Worth School PTA	Debbie Forsyth	Worth PTA, Worth Primary School, The Street, Worth, CT14 0DF		No
AgeUK Sandwich			office@sandwich-cr.org.uk	No
Local Councillors				
Councillor Bernard Butcher	District Councillor for Sandwich Area		cllrbernardbutcher@doover.gov.uk	No
Councillor Paul Carter	District Councillor for Sandwich Area		cllrpaul.carter@doover.gov.uk	No
Councillor Pip Russell	District Councillor for Sandwich Area		cllrpip.russell@doover.gov.uk	No
Councillor Leyland Ridings	Kent County Councillor		leyland.ridings@kent.gov.uk	No
		* Where it existed, consultees were contacted by email		

Appendix 2: Responses to the Pre-Submission Consultation

Responses shown with a white background relate to the Development Plan (Previously Planning Policies); those with a yellow background relate to the Area Portrait (previously Current Portrait of the Area)

Statutory Consultees: Dover District Council Response

Name / Organisation		
Dover District Council		
Page/Paragraph	Comments and Suggested Changes	Worth Parish Council (WPC) Response
1. Introduction		
Page 2	It would be helpful for the reader to include information on The Neighbourhood Planning process. This could take the form of a flow diagram, highlighting the stage the NDP is at.	Agreed - A flow diagram will be added
Page 4 under heading 1.3	For clarity, could this paragraph add additional text to explain what 'Community Objectives' are and that they will not be examined. This could be presented in a box similar to that used for the actual community objectives.	It will be highlighted that the Community Objectives set out the vision for the Area, that they are aspirations and not policies. It will be made obvious that they will not be examined.
2. The Plan Area		
Page 5	It would be helpful to have a clearer base map.	Agreed - A clearer base map will be used
3. Current Portrait of the District		
Page 12 Fifth Paragraph	The final paragraph presents a solution without explaining the issue. Would suggest deleting final paragraph and replace with 'Large tractors do, however, create a bottleneck around the school.'	Agreed in principal - Change to ' <i>Parked cars create a bottleneck around the school for large vehicles (particularly agricultural vehicles) to pass and plans will be put in place to remove the bottleneck.</i> '
Page 14	The issue of a replacement village hall has been raised but this is not going to be built within the plan period. Would suggest that the intention is to relocate the village hall is retained in the paragraph but delete the reference to the future proofing and the reference in the community objective. Also see suggested changes to Bisley Nursery Policy and Proposals Map 1 and Summary Map.	Agreed - Changes will be made to reflect the suggestion

Page 14 Final paragraph, second sentence	There is a discrepancy of date when the shop closed between this paragraph and the penultimate paragraph on page 13. One suggests 2008 the other 2009.	The shop closed in 2008; the error will be corrected
Page 20 3.4 Historic Environment	<p>Change the heading 'Conservation Area/Listed Buildings' to 'Heritage Assets'. The term heritage assets includes designated (such as Listed Buildings) and undesignated (buildings special to the village, such as a school, but which are not necessarily listed). This also reflects the government advice in the NPPF.</p> <p>Insert introductory text: 'There are a number of designated heritage assets in the village, including a conservation area, listed buildings and a scheduled monument, which make a significant contribution to the special character of the village. Additionally there could be a number of undesignated heritage assets which should also be identified and protected.</p> <p>The Examiner will be considering whether the NDP meets the 'basic conditions', as set out in the Act. Two of these conditions relate to the desirability of preserving any listed buildings and having regard to the desirability of preserving or enhancing the character or appearance of any conservation area. In addition to this, the District Council is currently drafting a 'Heritage Strategy' and this is likely to produce actions that would result in the identification of undesignated heritage assets. The text would provide a link to that strategy.</p>	Agreed - Changes will be made to reflect the suggestion
Page 24 Community Objective 5	For clarity, split the Community Objective to create two. One for general and one for Parish Council land.	Agreed - Changes will be made to reflect the suggestion. <i>The community objective referred to is No. 12</i>
Page 25 Second paragraph (brownfield land)	The final sentence should be clarified and the District Council should be able to assist in this.	<p>Clarification was sought with Officers with whom it was agreed that Industrial use of the Old Mill and the KCC depot define them as Brownfield. Worth Packers are currently industrial use which has been ongoing for many years, therefore Brownfield.</p> <p>Bisley – Greenfield as the percentage of land covered by concrete is small. The NPPF defines land covered by greenhouses as Greenfield.</p>

<p>Pages 27, 28 and 29 Community Profile</p>	<p>It may be better to start this section with the Community Profile as this describes the population trends and then follow with the built environment.</p> <p>It would be useful to provide conclusions to the demographics and how this indicates about the future of Worth in terms of facilities and housing.</p>	<p>Agreed - The Community Profile on pages 27-29 will be moved to the start of the section on 'Current Portrait'. Conclusions to the demographics will be included</p>
<p>Page 29 Community Objective 13- Housing</p>	<p>The demographics indicate that the population of Worth is getting older yet the Objective seems to address younger families. Does this need to be explained?</p>	<p>The Community Objective is geared at addressing the issue of the aging population and this will be made clearer.</p>
<p>Page 30 3.9 Prioritisation and Funding</p>	<p>First Paragraph. Could you 'sign post' where the 14 generic options are (background documents or annex)?</p> <p>For continuity, the S106 paragraph should come before CIL. The relationship between the two should be explained and clarified.</p> <p>Suggest adding the following text to the paragraph on CIL.</p> <p>'The community infrastructure levy is a new levy that local authorities in England and Wales can choose to charge on new developments in their area. Essentially it is a tariff-based approach to assist in funding infrastructure associated with planned growth. The charges are set by the local council, based on the size and type of the new development. The introduction of CIL is seen as necessary because the ability to pool planning obligations through legal agreements under S106 will become restricted.'</p>	<p>The generic options were listed in the NDP survey (December 2011). This is document number 35 in the main appendix. This will be more clearly signposted in the submission document.</p> <p>Agreed - Changes will be made to reflect the suggestion & that they will run side by side</p> <p>Agreed - Changes will be made to reflect the suggestion</p>
<p>4. Planning Policies</p>		
<p>Page 32 4.1 Housing Housing Need</p>	<p>Is there a need for the bracketed text '(less what has been developed...)' as it only refers to one dwelling and the sentence is discussing approximate development levels?</p>	<p>Agreed - Changes will be made to reflect the suggestion</p>
<p>Page 34 The Site and Context</p>	<p>The opening paragraphs describe the site and its setting. It is suggested that the second paragraph be moved to under the next heading 'Proposed Development' as this describes the policy area or it should be deleted.</p> <p>Figure 4 should be amended to show the site within the context of the village (listed buildings, conservation area etc).</p>	<p>Agreed - It will be moved; following other advice much of the site description will be moved into the Annex. Figure 4 will be changed as suggested</p>

	<p>The final sentence on the page refers to the Proposals Map 1. There may be confusion with this, the Summary Diagram and the Dover Districts Proposals Map. A Proposals Map illustrates where all the policies are within the area. The Proposals Map 1 is a diagram illustrating one policy. It is suggested that Proposals Map 1 be changed to 'Diagram 1' (or similar title) and the Summary Diagram be changed to Worth NDP Proposals Map.</p>	<p>The proposals & Summary map will be re-titled.</p>
Page 35	<p>Third paragraph starting with 'Housing density should...'. This paragraph should cross refer to the section on density on page 9 and then provide a commentary why it is not in conformity with Core Strategy Policy CP4.</p> <p>Fifth paragraph starting with 'A local requirement...'. Would suggest that a second sentence is added that states, 'This is in accordance with Core Strategy Policy DM5'.</p>	<p>This paragraph will be altered as suggested.</p> <p>Agreed - this sentence will be added</p>
Page 36	<p>Proposals Map 1 needs to be redrafted to make it clearer, with existing and proposed confines illustrated.</p> <p>The proposed village hall should not really be illustrated on the plan as it will not be developed within the timescale of the NDP.</p>	<p>Proposal Map 1 (to be named Diagram 1) will be redrafted. It will show the existing and illustrate the proposed Village Confines. It will be made obvious that the proposed Village Confines will be illustrative only as the exact line of these cannot be fully defined until after the development is in existence. This will be explained in the text. The key will be modified (including A, B & C).</p> <p>Agreed - remove from the diagram</p>
Page 37 Policy WDP 01	<p>The following amendments are suggested to strengthen and clarify the policy and to avoid possible conflicts with national and local policy when planning applications are being considered.</p> <p>Amend the first sentence to read; 'Bisley Nursery is allocated for residential development with a capacity of no more than 32 dwellings. Planning permission will be permitted provided that:'</p> <p>Replace the first criterion with: 'The overall proposals reflects the existing layout type of the built form; respect the existing grain, density and local character of the village; does not adversely affect neighbour amenity and result in no harm or adverse impact on the surrounding natural environment'.</p>	<p>The first sentence will be altered as suggested</p> <p>The first criterion will be altered as suggested</p>

	<p>Delete the second criterion as the area is not necessary (it is shown on the plan) and the number of dwellings is now in the opening sentence.</p> <p>Delete the third criterion as this is not necessary. Please see amendment to criterion 6.</p> <p>Delete the reference to 30% affordable from the fourth criterion as this is covered by Core Strategy policy DM5.</p> <p>Amend Criterion 5 to read;</p> <p>‘The existing boundary hedgerow and trees are retained and existing boundary planting is enhanced through the planting of additional trees and hedgerow. a safeguarded landscape strip 5 metres wide shall be provided and retained within and around the edge of the site within which no development will be permitted;’</p> <p>There is still the question of who will maintain the strip of land? This may need to be identified in the management plan.</p> <p>Amend Criterion 6 to include the reference to Bisley House;</p> <p>‘A vehicular access is created at the existing location of Bisley House on The Street, with suitable visibility sight-lines and links to existing public footways from the site are provided;’</p> <p>Criterion 7 refers to informal open space but Figure 5 identifies a football pitch which could be classed as formal open space. This needs to be clarified. Would also suggest that the criterion be amended to clearly describe how the Parish Council envisage the location of the open space;</p> <p>‘Provision is made for public open space of around 1 hectare in area between the existing rear boundaries to residential properties that front The Street and the new housing development;’</p>	<p>The area shown on the plan (to be renamed Diagram 1) is indicative only. The criteria will be retained but it will not refer to number of houses.</p> <p>Criteria 3 - The removal of Bisley House performs a much more important role than just allowing site access. Importantly it allows integration of the new development and the green space into the village. This needs to be better explained in the main text. The criteria will be retained but its purpose clarified.</p> <p>Criteria 4 will be amended as suggested</p> <p>Criteria 5 will be amended as suggested</p> <p>Maintenance of the strip will be by way of a management plan paid by all houses on the site.</p> <p>Criteria 6 will be amended as suggested, but is not the reason for demolition of Bisley house</p> <p>Change 'kick about' area to recreation area, which could be used as a football kick about area. The word informal will be retained and figure 5 altered</p> <p>Criteria 7. The location of the Open Space will be expanded upon as suggested and the term Village Green used to describe it.</p>
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	<p>Criterion 8, There is concern that a car park in the proposed location could have a detrimental impact on the setting of the Conservation Area. It is therefore suggested that additional criterion be added to the policy to ensure the conservation area is considered and that the policy does not fail at examination in terms of the 'basic conditions' (please see Heritage comments for Page 20 above). Suggested additional criterion would be;</p> <p>'Proposals do not detract from the setting of the heritage assets (conservation area)'.</p> <p>Criterion 9, the insertion of 'significant' before 'impact' would conform more with the Habitats Regs. Delete '...including provision of open space' at the end of the second sentence as the allocation includes open space. Amended text to read;</p> <p>'A mitigation strategy to address any impact on the Thanet Coast and Sandwich Bay Ramsar/SPA/SAC is developed to the satisfaction of the Local Planning Authority, in consultation with Natural England. The mitigation strategy should include a range of measures and initiatives, including contributions;'</p> <p>Add a new criterion that states 'That a management plan is prepared and agreed in advance with the Parish Council:' and amend points a to d to reflect this.</p> <p>The reference to 'the trust' in sub heading 'c' needs to be clarified as to who they are.</p> <p>Amended Policy would read:</p> <p>'Bisley Nursery is allocated for residential development with a capacity of no more than 32 dwellings. Planning permission will be permitted provided that:</p> <ol style="list-style-type: none"> 1. The overall proposals reflects the existing layout type of the built form; respect the existing grain, density and local character of the village; does not adversely affect neighbour amenity and result in no harm or adverse impact on the surrounding natural environment; 2. 15% of the overall site area is made available for up to 9 affordable dwellings; 3. The existing boundary hedgerow and trees are retained and existing boundary planting is enhanced through the planting of additional trees 	<p>A car park in the proposed location would be 22 metres at its closest point to the Conservation Area. WPC are of the opinion that by taking cars off The Street there is the potential to enhance the Conservation Area. None the less this additional sentence will be added to Criterion 8.</p> <p>Criteria 9 will be amended as suggested.</p> <p>A new criteria will be added as suggested;</p> <p>Agreed</p> <p>WPC accept all these changes except the exclusion of Criteria 3 (Bisley) which it will work with Officers to include in a more acceptable form.</p> <p>WPC will work with DDC, Hobbs Parker & English Rural to achieve a more realistic viable implementation plan for the Affordable Housing.</p>
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	<p>and hedgerow. a safeguarded landscape strip 5 metres wide shall be provided and retained within and around the edge of the site within which no development will be permitted;</p> <ol style="list-style-type: none"> 4. A vehicular access is created at the existing location of Bisley House on The Street, with suitable visibility sight-lines and links to existing public footways from the site are provided; 5. Provision is made for public open space of around 1 hectare in area between the existing rear boundaries to residential properties that front The Street and the new housing development; 6. Provision is made within the site for vehicular parking to serve the village hall; 7. Proposals do not detract from the setting of the heritage assets (conservation area); 8. A mitigation strategy to address any impact on the Thanet Coast and Sandwich Bay Ramsar/SPA/SAC is developed to the satisfaction of the Local Planning Authority, in consultation with Natural England. The mitigation strategy should include a range of measures and initiatives, contributions; 9. A management plan is prepared and agreed in advance with the Parish Council, which shall include; <ol style="list-style-type: none"> a. Timing for the transfer of land, equivalent to 15% of the development area (up to 0.28 hectares) on which the affordable housing is to be built, to Worth Parish Council, prior to construction commencing; b. Provision of affordable housing shall be in accordance with the 'needs survey' conclusions carried out by xxxxxx, and shall be constructed to the specifications and standards of the RSL. Ownership of the Affordable Housing units and details of transfer of ownership on a pre-agreed 'at cost basis' shall be confirmed by the trust (this needs clarification) before first occupation of any private market dwelling; c. Timing for the transfer of land, to be maintained as public 	<p>The word trust will be replaced by Housing Association; following other advice the implementation plan will be separated from the policy.</p>
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	<p>open space, to Worth Parish Council following clearance of all buildings (including greenhouses), materials, rubbish and rubble and other related paraphernalia from the land and it's re-seeding before the first occupation of any dwelling;</p> <p>d. Details of the layout and surfacing, including landscaping where necessary, of land for use as public car parking near The Street, prior to the first occupation of any dwelling;</p> <p>Which will be achieved by way of a legal agreement, which can be entered into under S106 or by a separate side agreement.'</p> <p>The mix of housing (two, three, or four beds) is not stipulated. Will Core Strategy Policy CP4 and related text apply? If the policy does apply it is suggested that it is referred to in the footnote beneath the policy.</p>	<p>Housing mix will be added as a note</p>
<p>Page 38 Figure 5</p>	<p>Would recommend the removal of this Figure from this section as this is arguably contrary to the policy. It could be incorporated into the annex if it was still felt that it was needed for illustrative purposes.</p> <p>Final paragraph under 'Design Characteristics', amend second sentence so that it reads 'If any development proposals came forward (e.g. development of gardens), the design and position...'</p>	<p>Figure 5 will be moved into an Annex and renamed Figure 2 (Proposed football pitch removed; bottom left, tree changed to shrub)</p> <p>Agreed - Paragraph will be amended</p>
<p>Page 39 Policy WDP 02</p>	<p>Amend the first sentence to read 'Development proposals inside the settlement confines (including gardens) will be granted planning permission provided that the spatial character of the area, including the existing grain, housing density, street scene and local character...'</p> <p>Delete '...comply with all other relevant policies' and replace with 'or detract from the setting of any heritage assets'. The NDP should be read as a whole and the supporting text already indicates that there are other policies. The heritage aspect should be identified in the policy.</p> <p>Delete final paragraph as this is not needed as it is already mentioned in the text above and is not a policy issue (the Development Plan will be read as a whole).</p>	<p>WDP 2 will be amended as suggested</p>
<p>Page 39 Countryside Protection</p>	<p>Second paragraph under the heading starting with 'Dover District Council...', delete final sentence as this is not technically correct. The settlement confines are amended when allocation policies are adopted or, in the case of the Worth NDP, brought into force.</p>	<p>This sentence will be deleted</p>

	Delete heading and paragraph but could add to Policy Background in Annex.	General Countryside Protection Paragraph will be deleted. It is already included in Annex 4.
Page 40 Figure 6	Is this diagram needed? Proposals Map 2 (page 41) illustrates the location of the two areas clearly.	Agree - remove Figure 6
Page 40 Policy WDP 03	Delete the final paragraph. This text could, however, be a note following the Policy.	The text will follow the policy as suggested
Page 41	Delete final sentence in final paragraph as it is unclear what is being requested.	Sentence will be deleted
Page 42 Worth Plant Centre Buildings	Amend first sentence of first paragraph to read; 'The buildings occupied by Worth Centre was ...'	Agreed - amend as suggested
Page 42 Policy WDP 04	Suggest amending the first criterion to read; 'Proposals do not have a detrimental impact on residential amenity'. Amend the second criterion to read; 'Traffic and highways issues are satisfactorily addressed'. The remainder of the sentence (and travel into the area and congestion is not increased) is not required as it is already covered by 'satisfactorily addressed'. Criterion 3 refers to the current footprint of the existing buildings. A diagram/map would help to illustrate this. Replace criterion 4 with; 'No likely significant impact on the Thanet Coast and Sandwich Bay Ramsar site would occur'.	Amend Criteria as suggested. A map of the existing buildings will be added.
Page 43 Policy WDP 05 The Old Mill Buildings	For clarity, add the road to the title (Mill Lane) In the first paragraph of the policy would it be possible to state the amount of residential expected? The site is not within the Settlement Confines so an explanation as to why this is acceptable for this site (for example it may be to ensure the reuse of buildings, to enable development for employment and there is planning history) Reference to the planning application could be mentioned in the introduction to the site (page 42) Replace criterion 5 with; 'No significant impact on the Thanet Coast and Sandwich Bay Ramsar site would occur'.	Agreed Up to 5 residential/craft units will be added Agreed - appropriate additions will be made Agreed - changes will be made

5. Summary Diagram		
Page 44	<p>Should this section be renamed the 'Proposals Map' and illustrate the planning policies for the area?</p> <p>The Plan needs to be a bit clearer and only identify Planning Policy allocations. A community objectives plan could be included at the end of section 3 but this should not identify land for the village hall as this is outside the plans timeframe.</p>	Agreed - A proposals map , containing only land use policies will be included. A Community Objectives map will be included after the appropriate section.
Annex		
Front Cover		
Aerial Photo	Would it be better to have the aerial photo the correct way around (north at the top)?	Agreed
Page 5	<p>Amend the title 'Site Allocation Local Plan' to 'Land Allocation Local Plan'</p> <p>Under Habitats Regulations Assessment, change 'Scott Wilson' to 'URS'.</p>	<p>Agreed - change title</p> <p>Agreed - change to URS</p>

Statutory Consultees: Other Major Bodies

Name / Organisation		
Coal Authority		
Page/Paragraph	Comments and Suggested Changes	Worth Parish Council (WPC) Response
Generally	<p>The Coal Authority is a non-departmental public body which works to protect the public and the environment in coal mining areas. Our statutory role in the planning system is to provide advice about new development in the coalfield areas to ensure that it is built safely and also protect coal resources from unnecessary sterilisation by encouraging their extraction, where practical, prior to the permanent surface development commencing.</p> <p>As you will be aware the Worth parish area lies within the defined coalfield, however there are no recorded risks or surface coal resources and consequently The Coal Authority has no specific comments to make on the Neighbourhood Plan.</p> <p>In the spirit of ensuring efficiency of resources and proportionality it will not be necessary for the Worth Parish Council to provide The Coal Authority with any future drafts or updates to the emerging Neighbourhood Plan. This letter can be used as evidence for the legal and procedural consultation requirements.</p> <p>The Coal Authority wishes the Parish Council every success with the preparation of the Neighbourhood Plan.</p>	Noted with thanks

Name / Organisation		
CPRE - Council for the Protection of Rural England		
Page/Paragraph	Comments and Suggested Changes	Worth Parish Council (WPC) Response
Generally	<p>We welcome and support the initiative taken by the Parish Council to prepare a Neighbourhood Plan. Having reviewed the Plan we are generally content with it and do not raise any objections to the proposals it contains. However, we would raise a few matters that we think the Plan needs to address/clarify.</p> <p>In addition, it would be helpful to provide paragraph numbers, as this will enable people to make clear reference to points in the plan when planning proposals are considered in the future.</p>	<p>WPC are grateful for the support</p> <p>Agreed, but only in the final document</p>

<p>Section 4.2 Page 36-37</p>	<p><u>Proposals Map 1</u>: The coloured areas (A), (B) and (C) should be explained in the key to the map.</p> <p><u>Policy WDP 01</u>: We raise no objection to this proposed land allocation, which essentially uses brownfield land. We would suggest, though, that the Policy be re-cast to reflect the areas shown on Proposals Map 1 and the illustrative layout shown in Figure 5. Also, as it stands the Policy does not mention area C, which the text explains will be undeveloped and used for grazing. This should also be covered by the proposed implementation plan. Our suggested re-worded policy is as follows:</p> <p><i>“Policy WDP 01 – Bisley Nursery Development</i></p> <p><i>Planning permission for the redevelopment of Bisley Nursery, as shown on Proposals Plan 1, will be permitted in accordance with the following:</i></p> <p><u>Area A (up to 1.9 hectares): for residential development, subject to:</u></p> <ol style="list-style-type: none"> <i>1. The number of new dwellings not exceeding 32 in total;</i> <i>2. Approximately 15% of the land being provided for up to 9 affordable dwellings, or 30% of the net gain in houses on the site, whichever is the greater;</i> <i>3. The development reflecting the clustered nature of the built environment, while respecting the existing grain, density and local character of the village;</i> <i>4. The existing boundary hedges and trees being retained and enhanced through the planting of additional trees and the provision of a safeguarding boundary of at least 5 metres; and</i> <i>5. Vehicular access being provided from The Street and links to existing public footways being provided, and appropriate vehicular access being provided to Area C.</i> <p><u>Area B (approximately 1.0 hectare): for open space, to include:</u></p> <ol style="list-style-type: none"> <i>6. An area for informal public open space to serve the housing development, but with potential to provide for a new or expanded village hall if required in the future;</i> <i>7. A football ‘kick about’ area; and</i> <i>8. Provision for parking near the village hall.</i> 	<p>Agreed - Add to Key</p> <p>It is not brownfield land.</p> <p>Disagree - there is no need to expand on the wording in the body text.</p> <p>Changes to the wording have been agreed with Dover District Council</p> <p>The Open Space is intended as a Village Green serving the whole NP area</p>
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	<p><i>Area C (approximately * hectare): to be cleared and reinstated for agricultural use.</i></p> <p><i>To enable the development of the site, and to provide satisfactory access and to integrate it with The Street, the house (Bisley) will need to be demolished.</i></p> <p><i>The development of the site will be subject to a mitigation strategy to address any impact on the Thanet Coast and Sandwich Bay Ramsar/SPA/SAC. The strategy should consider a range of measures and initiatives including the provision of open space.</i></p> <p><i>Before planning permission is granted, a phasing and implementation plan will be prepared and agreed with the Parish Council to include provision for:</i></p> <ul style="list-style-type: none"> <i>a. The transfer of land, comprising the site on which the affordable houses are to be built, to Worth Parish Council, prior to construction commencing;</i> <i>b. The construction of the affordable housing to the requirement and design of Worth Parish Council and its nominated housing trust, and the transfer of ownership of the land on a pre-agreed 'at cost basis' to the trust before first occupation of any private market dwelling;</i> <i>c. The transfer of the land to be maintained as public open space (Area B), to Worth Parish Council, following clearance of all buildings (including greenhouses), layout and seeding before the first occupation of any private market dwelling;</i> <i>d. The laying out and surfacing of land for use as car parking near The Street, prior to the first occupation of any private market dwelling; and</i> <i>e. The transfer of the land to be returned to agricultural use (Area C), to Worth Parish Council, following clearance of all buildings (including greenhouses), before the first occupation of any private market dwelling."</i> 	<p>Reference to the Village Hall has been removed following advice from DDC as it is not anticipated during the lifetime of the plan</p> <p>The integration with The Street will be emphasised.</p> <p>The wording will be changed appropriately</p> <p>Covered by new wording supplied by DDC</p>
<p>Section 4.3 Page 39</p>	<p><u>Section 4.3 Countryside Protection:</u> The second paragraph of this section explains that Policy DM1 of the Dover District Core Strategy offers protection from development to the countryside outside the rural settlement confines. As it is currently defined on the District Council's Proposals Map the settlement confine for Worth does not take into account the proposed allocation of the Bisley Nursery site. We note on page 4 of Annex 1 that it is explained that the settlement confine for Worth Village was set at the time of the last Local Plan and that it will be carried forward until it is altered in response to the Land Allocations Local Plan. However, as noted in the introduction to the draft Neighbourhood Plan, Dover DC</p>	<p>Agreed - The new settlement confines will be defined</p>

	<p>are essentially excluding Worth from consideration in the Allocations Plan because the Neighbourhood Plan is being prepared. Therefore, it falls to the Neighbourhood Plan to redefine the settlement confine to have regard to the allocation proposed. Consequently, an additional Proposals Map should be included in the Neighbourhood Plan, with appropriate text, showing the new settlement confine. This is important, as it will define the ‘countryside’ and therefore the area to which Policy DM1, and other policies in the Core Strategy, will apply.</p> <p>It would also be necessary to amend the extent of the settlement confine as currently shown in the Summary Diagram.</p> <p><u>Proposed Local Green Spaces:</u> CPRE Protect Kent supports the identification of the Local Green Spaces proposed in Policy WDP 03. We note that in addition to this, Policy DM25 of the Core Strategy also provides protection to areas of open space in the village, which are shown on Dover DC’s Proposals Map. We think that it would be helpful to make reference to this in the text of the Plan.</p> <p><u>Agriculture:</u> We welcome the emphasis in the Plan given to the importance of agriculture to the local economy, and the need to protect Grade 1 land. However, we find the final sentence of the final paragraph on page 41 a little ambiguous and lacking in clarity. We would suggest that it be re-worded as follows:</p> <p><i>“Any new development needed for agricultural purposes should be located adjacent to existing farm buildings, within the current curtilage of the farmyard. If this is not possible, and development would encroach onto Grade 1 land, proposals will only be acceptable if they are justified on grounds of operational need and new buildings are the minimum size needed for the purpose. Full regard will also need to be given to potential impact on the other priorities set out in this Plan.”</i></p>	<p>Agreed - The Settlement Confines will be shown. This Map will be renamed Proposal Map</p> <p>Agreed - it will be added to the main text</p> <p>Agreed; except 'Development Plan' will be used in place of 'Plan'</p>
<p>Section 4.4 Page 42</p>	<p><u>Policy WDP 04:</u> As for the other policies in the Plan, there should be a Proposals Map showing the site to which the Policy applies.</p>	<p>Agreed - A map will be added</p>

Name / Organisation		
Environment Agency		
Page/Paragraph	Comments and Suggested Changes	Worth Parish Council (WPC) Response
Generally	<p><u>FLOOD RISK</u></p> <p>The areas depicted to be housing 'option' sites on the submitted plan lie entirely within Flood Zone 1 (an area considered to be at 'low risk' of flooding). Notwithstanding this, any application for development on a site which is in excess of 1ha in area should be accompanied by Flood Risk Assessment/Surface Water Management Strategy (FRA/SWMS), which should concentrate on the management of surface water to ensure that any proposed development does not adversely impact upon the surrounding area. It must also be ensured that the surface water is appropriately managed within each site and that all 'more vulnerable' land uses are located away from the areas where water will be directed during extreme rainfall events. It would be worth considering the FRA/SWMS requirements from the outset.</p> <p>Paragraphs 5.19 to 5.24 of the extant Planning Policy Statement 25 Practice Guide discusses the early design of drainage systems and states that leaving the design of surface water infrastructure until after the design of the buildings, road layout and other infrastructure severely restricts available options for provision of surface water storage.</p> <p>Whilst we would generally welcome the inclusion of any SuDs feature, they should always be appropriate for the conditions encountered where any development is proposed. We would generally encourage developers to preferentially use 'open' features (swales, attenuation basins, wetland areas, etc) rather than subterranean storage tanks or over-sized pipes. Pumped solutions should be avoided (unless it can be clearly demonstrated that there is no viable alternative), and it must be ensured that the receiving network is of sufficient capacity to accommodate any proposed off-site discharge.</p> <p>The continued efficacy of any SuDs scheme is dependent on a robust and pre-determined maintenance regime, the details of which should be agreed with the LPA prior to the commencement of any development on site.</p> <p>Additionally, any excess surface water generated by an event which exceeds the design parameters should be retained on site in pre-determined areas which are well away from any vulnerable property and where the off-site flood risk will not be exacerbated by its presence.</p>	<p>Agreed - no changes to Plan required covered at the Planning Application stage.</p> <p>As above</p> <p>As above</p> <p>As above</p> <p>As above</p>

	<p>Further guidance on SuDs systems (and on designing safe and sustainable flood conveyance routes and storage) is provided in the CIRIA publications C635 and C697 (<i>Designing for exceedance in urban drainage – good practice</i> and <i>The SuDs manual</i>).</p> <p>For information. The Delf is a designated ‘main river’ and under the jurisdiction of this Agency for the purposes of its land drainage functions. The written consent of the Agency is required under the Water Resources Act 1991 and associated Byelaws prior to the carrying out of any works whatsoever:</p> <ul style="list-style-type: none"> • in, over, or under the channel of the watercourse, • on its banks, • within eight metres of the top of the bank, • within eight metres of the landward toe of any flood defence (where one exists). <p>Our formal written Consent will therefore be required for the proposed cycle path (or any other works within 8m of the Delf), irrespective of any planning permission granted.</p> <p>For maintenance reasons, the Agency will not normally consent works which obstruct the eight metre Byelaw Margin.</p> <p>On main rivers the Environment Agency also has a supervisory duty to ensure that owners fulfil their maintenance responsibilities.</p> <p><u>GROUNDWATER AND CONTAMINATED LAND</u> Groundwater Vulnerability The area of Worth parish overlies the upper chalk formation, this is classified as a principal aquifer. In this area, the groundwater in the chalk aquifer will support large abstractions and baseflow to surface water systems. Whilst there are no public water supply abstractions in this area, there are many private abstractions that use water for agricultural purposes. It is therefore important to prevent pollution of this resource and all developers should be aware of its vulnerability.</p> <p>Along the coast, the chalk is overlain by sand, clay and silt deposits in the areas covered by streams and ditches. The groundwater levels are very high in this area and are likely to be in continuity with the surface waters.</p>	<p>As above</p> <p>WPC are grateful for the information</p> <p>WPC are grateful for the information</p> <p>WPC are grateful for the information</p>
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	<p>The Environment Agency's Groundwater Protection: Policy and Practice (GP3), states what types of development will be acceptable in different locations from the point of view of protection of groundwater quality - http://www.environment-agency.gov.uk/research/library/publications/40741.aspx</p> <p>Surface Water Drainage GP3 states that other than in Source Protection Zone (SPZ) 1, we will support the use of SuDs for surface water drainage provided an appropriate level of risk assessment demonstrates the ground conditions are suitable.</p> <p>There will also be restrictions in this area where the groundwater levels are high. GP3, ground conditions and groundwater level information should be referred to when designing surface water drainage systems for individual sites. Surface water drainage options should be considered at an early stage in the planning process to ensure there is an acceptable option.</p> <p>Foul Drainage Prior to granting planning permission at individual sites, it should be ensured that adequate sewage infrastructure is available.</p> <p>Contaminated Land The past and present use of any site and adjacent sites should be determined in order to ascertain the likelihood of contamination existing on site. If a risk of contamination being present is found then further investigation should take place. Appropriate remediation should be determined and carried out following discussion.</p> <p>National Planning Policy Framework (NPPF) NPPF paragraph 109 states that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels water pollution. Government policy also states that planning policies and decisions should also ensure that adequate site investigation information, prepared by a competent person, is presented (NPPF, paragraph 121).</p>	<p>WPC are grateful for the information</p> <p>WPC are grateful for the information</p> <p>WPC are grateful for the information</p> <p>WPC are grateful for the information</p>
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	<p><u>BIODIVERSITY</u> <u>General</u> <i>Designations</i></p> <p>We note that the Sandwich Bay Bathing Water Designation (between TR3567059532 and TR3604758499) has not been marked on the Designations map on page 7. While not a nature conservation designation, it is, nonetheless, an environmental and recreational asset which could be included in the NDP. Bathing waters are designated in accordance with the Bathing Water Directive 2006/7/EC of the European Parliament and the Bathing Water Regulations 2008. Within the legislative framework, the Environment Agency collects water quality data at our sample point in the Bay (WIMS Point E0000059) and can provide some further information about it, if requested.</p>	<p>Sandwich Bay is outside the Neighbourhood Area and nothing within the Development Plan will have any impact on bathing water. Bathing water not included on map.</p>
<p>Section 3.3 Page 16</p>	<p><u>Specific</u> <i>Community Objective 6 - The Village Pond</i></p> <p>The Environment Agency is the Biodiversity Action Plan lead for ponds. We would be interested in assisting Worth PC achieve this objective and have some recommendations about potential sources of funding to help pay for the pond's restoration.</p>	<p>WPC are very grateful for the information and the offer of help</p>
<p>Section 3.5 page 22</p>	<p><i>Biodiversity</i></p> <p>We welcome both the Council's qualified commitment in Objective 11 to support the RSPB Reserve and the intention to support development that promotes creation of an ecologically rich wetland / marsh / grassland area in the Lower Stour Marshes while preventing development that would adversely affect this area.</p>	<p>Support is noted</p>

<p>Section 3.5 Page 24</p>	<p>Coventon Lane As with Objective 6, we would be interested in helping with development of the proposed Nature Reserve where the Council's intentions are aligned with our priorities. These are as given in the Water Framework Directive and Environment Act that direct us to enhance rivers and associated wetlands including ponds for the benefit of wildlife and people.</p> <p>We recommend that the Council obtains copies of the Drainage Channel Biodiversity Manual, available for free download from http://publications.naturalengland.org.uk/publication/50004, as it provides clear guidance from Natural England and the Association of Drainage Authorities on ways of complying with the aspects of Community Objective 12 – Environment. We would also welcome invitations from landowners to visit and provide advice on ways of implementing this guidance.</p>	<p>WPC are very grateful for the information and the offer of help</p>
<p>Section 4.3 Page 39</p>	<p>Policy WDP 03 - Local Green Spaces We support the concept of this policy and, in accordance with the principles of Professor Sir John Lawton's White Paper, <i>Making Space for Nature</i>, encourage the Council to oppose development where this affects buffer zones around any area designated for wildlife.</p>	<p>WPC note the comments</p>
<p>Section 3.3 Page 17</p>	<p>Sewerage Unless the author really does mean that the system of pipes in which sewage is pumped (sewerage) has started appearing above ground rather than wastewater (sewage) is flooding out of the underground pipes, the sentence commencing "Upwelling of sewerage" on page 17 should be corrected to read "Upwelling of sewage".</p>	<p>Agreed - the spelling will be altered</p>

Name / Organisation		
KCC Kent County Council		
Page/Paragraph	Comments and Suggested Changes	Worth Parish Council (WPC) Response
Generally	Thank you for consulting Kent County Council on the Neighbourhood Development Plan. The County Council has a number of comments which are set out below.	

	<p>Transport</p> <p>KCC Highways & Transport Team is willing to work with the Parish Council to bring forward as many of the highway based objectives as possible but any highway improvements sought will only come forward through developer financial obligations or contributions. To assist the Parish Council in its consideration of the sites at Jubilee Road and The Street KCC would like to offer some detailed comments on what would apply if planning applications were made:</p>	<p>WPC appreciate the support & look forward to working with KCC</p>
	<p><i>Site at Jubilee Road</i></p> <p>The site lends itself only to direct frontage development, i.e. individual dwellings with curtilage parking. There is unlikely to be enough depth within individual plots to accommodate turning to enable vehicles to enter and leave in a forward gear. This is not necessarily a problem subject to frontage treatment being subject to a planning condition for a low height to allow necessary sight lines.</p> <p>KCC would suggest that a footway is provided fronting the proposed row of properties to safeguard pedestrians. Whilst the footway is not continuous back to the village centre on the east side of Jubilee Road, it is broken only by a couple of properties, and the provision of further footway would assist pedestrian movement to the village centre and the bus stop adjacent to the church. With a footway provided, 2m x 2m pedestrian visibility splays will be required at either side of each new vehicle access above a height of 600mm.</p> <p>There will be too few dwellings on this site to warrant a travel plan or a transport assessment. To the best of our knowledge, no public rights of way cross or abut the site.</p> <p>There is a bus service (13A and 13) which accesses Worth, with stops close to the site, with approximately one bus per hour from about 7:15am to about 18:30pm but this bus does not operate at weekends.</p> <p>Parking should accord to Kent Design Guide Interim Guidance Note 3 which would result in 2 independently accessible parking spaces for dwellings which have between 2 and 4+ bedrooms. Garages would not be counted by KCC as a</p>	<p>The Development Plan contains no proposals on Jubilee Road</p>

parking space in this location and would be considered additional to the parking requirement. Cycle parking must also be provided in accordance with current guidance at 1 space per bedroom for dwellings and 1 space per unit for flats.

Site at The Street

The site is served via an existing access point onto The Street. KCC has not been made aware of the number of units proposed. If the number of units were to exceed 100 then a full Transport Assessment and Travel Plan would be required. However, the number is likely to be less than this and the application would need to be supported by a Transport Statement which will include the trip generation of the present uses of the site, to be compared with the proposed residential use.

Sight lines at the site are likely to need improving to accommodate 43m x 2m x 43m sight lines to the access above a height of 1.05m. This may require a small 'build out' at the site entrance which in turn may remove parking spaces opposite the access to accommodate turning circles for larger vehicles, but this needs to be investigated further if and when an application is submitted.

Pedestrian safeguarding will be required within the site, so the site will either be promoted as a cul-de-sac with footways and carriageway or a shared space with an entry treatment and service margins. A cul-de-sac design will generally not serve more than 25 dwellings but ultimately if the number of dwellings did exceed 50 then an alternative emergency access would also need to be provided. The internal layout will need to be laid out to an adoptable standard and accommodate delivery vehicles (11m pantechicon and refuse truck), enabling all vehicles to enter and leave the site in a forward gear.

There is a public right of way abutting the site.

There is a bus service (13A and 13) which accesses Worth, with stops close to the site, with approximately one bus per hour from about 7:15am to about 18:30pm but this bus does not operate at weekends.

Parking should accord to Kent Design Guide Interim Guidance Note 3 which would result in 2 independently accessible parking spaces for dwellings which have between 2 and 4+ bedrooms. Garages would not be counted as a parking

WPC note all the comments below. They will be addressed at the planning application stage.

	<p>space in this location and would be considered additional to the parking requirement. Cycle parking must also be provided in accordance with current guidance at 1 space per bedroom for dwellings and 1 space per unit for flats.</p> <p>There have been a number of rear end shunts at both Jubilee Road and The Street at their junctions with the A258 Deal Road, but this is more attributed to driver error than to poor visibility or junction layouts. KCC would have no objections in principle to either site coming forward for residential development.</p> <p>Housing</p> <p>KCC welcomes the commitment to the development of affordable housing but questions the benefit of clustering the affordable housing. KCC would advise working with a Housing Association such as English Rural to agree the mix, tenure and ‘pepper potting’ of the affordable housing.</p> <p>Landscape</p> <p>KCC would further encourage further application of landscape character in the main policies of the plan, not just those relating to the environment, to improve the sense of place, and to ensure new developments reinforce and conserve those features that contribute to landscape character.</p> <p>The overall plan has clearly been well thought through and makes good links with existing policy. KCC support the identification of mixed use developments, and welcomes the recognition of the strengths of the area. For example, farming is to be supported and such policies can help maintain the landscape character of the Parish.</p> <p>Sustainable Drainage</p> <p>KCC requests that a policy is included to encourage sustainable drainage systems to be used for all new developments. Sustainable drainage systems provide a more natural approach to managing water close to its source. They can reduce the impact of development by slowing runoff, encouraging infiltration, trapping pollutants, providing habitats for biodiversity and increasing amenity for residents through the provision of open space. These benefits also make an important contribution to local authority responsibilities under the Water</p>	<p>WPC are working with English Rural. It was English Rural's preference that the small scale affordable housing was in one group.</p> <p>WPC appreciate the support</p> <p>This will be dealt with as part of the planning application</p>
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	<p>Framework Directive. Drainage must be considered at the earliest stages of the development process to ensure that the most sustainable option can be delivered in all cases.</p>	
	<p>KCC is concerned about plans to enhance ditches in the Parish. Drainage ditches perform an important local drainage function, which is their primary role. Any enhancement should be done only if it can be guaranteed that there will be no loss of drainage performance, and there must be a robust maintenance programme for the enhanced ditches to ensure that the enhancement over time does not lead to a loss of capacity or conveyance. We also recommend that this is undertaken with the local land owners and River Stour Internal Drainage Board.</p> <p>KCC's Sustainable Drainage Team is willing to work with the Parish Council to enhance sustainable drainage in the Parish.</p>	WPC look forward to working with KCC
	<i>Detailed comments</i>	
	<p>Heritage</p> <p>KCC suggests that the role of the historic environment is underplayed in the draft NDP. The heritage assets of Worth Parish (the historic buildings, archaeological sites and features and the historic landscape) have the potential to make a significant contribution to the area as has been made apparent in the draft Dover Heritage Strategy (see http://www.dover.gov.uk/Planning/Planning-Policy/Local-Development-Framework/Evidence-Base/Studies/Heritage-Strategy.aspx). KCC suggests that the authors consult this document and that the NDP takes full advantage of the potential of Worth's heritage assets.</p>	WPC agree and will work with DDC to ensure Heritage Assets are fully considered
Section 2 Page 7	<p><u>Map 1</u>: the map shows the Scheduled Monument polygon but it is omitted from the legend. As this map depicts designated areas in Worth it should also show the Parish's listed buildings.</p>	<p>Agreed - it will be added. Map 1 is too small a scale to show all the Heritage Assets. The Neighbourhood Plan Heritage Assets are shown on Map 7. A catalogue of other, non listed Heritage Assets will be prepared and these will also be added to Map 7</p>
Section 3.4 Page 20	<p><u>3.4 Historic Environment</u></p> <p>At present the draft text refers only to listed structures, the scheduled monument</p>	Noted

	<p>and a general potential for archaeological remains. This underplays the scale and complexity of the historic environment and the role it can play in shaping the growth of Worth.</p> <p><i>Conservation Area / Listed Buildings</i></p> <p>The Listed Buildings of Worth constitute only part of the built heritage of the village. KCC suggests that the following text is added to the end of the existing paragraph:</p> <p><i>“As well as the listed structures in Worth there are numerous other historic buildings, particularly in the eastern half of the settlement. Although these are not Listed Buildings they nonetheless contribute to the character of the village. Together with the Listed Buildings they have the potential to help the proposed new build be fully integrated into the village provided their character is respected in terms of the layout, orientation, massing, materials and scale of the new build”.</i></p> <p>KCC also suggests that the title of this paragraph is changed to “Built heritage”.</p> <p><i>Scheduled Monument</i></p> <p>This paragraph correctly highlights that there is potential for as-yet undiscovered archaeological remains in Worth. KCC suggests, however, that the sentence “Any new development will require archaeological watches” is replaced by:</p> <p><i>“Any new development will need to be assessed for its likely impact on Worth’s archaeological heritage and, if needed, this impact will require appropriate mitigation.”</i></p> <p>KC also suggests that this paragraph has its title changed to “Archaeology”.</p> <p>KCC suggests that the following paragraph is added to this section to emphasise that Worth lies in a landscape which itself has significant heritage merit:</p> <p><i>“Historic landscape</i></p> <p><i>In addition to its archaeological and built heritage, Worth is also located within a historic landscape. Much of the landscape that is evident in the Ordnance</i></p>	<p>Agreed; A paragraph will be added and the non-listed assets catalogued.</p> <p>Change title to Heritage Assets as advised by DDC</p> <p>Agreed - change wording</p> <p>Agreed - change wording</p> <p>Agreed - add paragraph</p>
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	<p><i>Surveyor's Field Drawings of c. 1800 is still visible today and the pattern of roads, tracks, field boundaries and hedgerows that gives the modern landscape its character is firmly rooted in the past. It is important that the proposed new buildings work with this existing historic 'grain'."</i></p> <p>The <i>Kent Historic Landscape Characterisation</i> (2001) is a tool for understanding this historic context and is a useful dataset for those wanting to understand the historic nature of the landscape of Worth. The information and accompanying reports are available from the Kent County Council HER team.</p> <p><u>Map 7</u> – the text refers correctly to Scheduled Monuments. However the legend refers to 'SAM' which is the old name for these designations. The legend should just say 'SM'.</p>	Agreed
Section 3.5 Page 24	<p><u>Community Objective 12</u></p> <p>Changes to moisture levels in the ground have the potential to impact on archaeological remains and KCC requests that the <i>KCC Heritage Conservation</i> team be consulted on any proposals to create new areas of wetland/marsh/grassland.</p>	RSPB to consult with KCC
Section 3.3 Page 14	<p>Families and Social Care</p> <p>The Families and Social Care (FSC) objective is to improve the social care outcomes for the people of Kent. Social Care is part of a system that includes not only health, housing and planning, but also citizens who source, manage and fund social care services. Good quality design and range of housing options enable people to live active lives and maintain independence. KCC FSC supports the improvements to Worth Village Hall as this allows KCC to help reach local communities and deliver preventative services.</p>	WPC appreciate the support

Name / Organisation		
KWT Kent Wildlife Trust		
Page/Paragraph	Comments and Suggested Changes	Worth Parish Council (WPC) Response
Generally	<p>We very much welcome your NDP and feel there are ambitious biodiversity targets and you have taken into consideration protection of the important designations.</p> <p>This is the first NDP we have seen and it sets a high standard</p>	WPC appreciate the support
Section 3.5 Page 24	<p>Community Objective 12</p> <p>Kent Wildlife Trust welcomes and supports the ambitious targets incorporated within this Objective. It is our view that the aims to restore the ditch system and create wetland marshland and grassland will extend the habitats contained within the nearby Ramsar designation and habitats proposed within the RSPB reserve. The recreation of small woodlands and restoration of the hedgerow network will provide increased connectivity between the ancient woodland habitats within the area, enabling the dispersal of species between these habitats. We congratulate the community on the scope of your vision and if you need any assistance in these aims please do not hesitate to contact us.</p> <p>We also welcome the aim to create a nature reserve within the locality of the village. This will aid the dispersal of species through the built environment and provide a valuable educational and recreational resource for the Local population.</p>	WPC appreciate the support
Section 4.2 Page 37	<p>Housing</p> <p>We have no objections to the location of the housing proposed and welcome the safeguards put in place within the policy to ensure the protection of the internationally designated sites within the area. Dover District Council has prepared a mitigation strategy for protection of the Thanet Coast and Sandwich Bay SPA which you may want to review as part of your evidence base.</p> <p>We are extremely pleased to note the protection given to the designated sites within Policy WDP1 and fully support the need to prepare a mitigation strategy as part of any development proposals.</p>	Noted

Name / Organisation		
Natural England		
Page/Paragraph	Comments and Suggested Changes	Worth Parish Council (WPC) Response
Generally	Thank you for consulting Natural England on your Neighbourhood Plan. We welcome :	WPC are grateful for the support
Section 3.5 Page 22	the project involving some 230 hectares in the Worth Lydden Valley, to protect and enhance its habitat and local biodiversity. We are particularly pleased that the RSPB and the Parish Council are working together.	Noted
Section 3.5 Page 24	Community Objective 12 - Environment – and its encouragement for <ul style="list-style-type: none"> landowners to improve the visual interest of drainage channels and their ecological value by restoring grass and reed verges – this should dovetail with our stewardship work with landowners The Nature Reserve on Parish Council land 	Noted
Section 4.2 Page 37	the choice of the Bisley Nursery Development Site - however the use of the site by protected species, needs to be considered, and design and implementation need to be informed by this and a range of considerations, including the landscape context and local habitat networks. Clause 9 of the Policy refers to a mitigation strategy to address impact on the European sites. It would be inappropriate to leave consideration of this issue to the detailed planning stage, insofar as there may be proposals and projects which need to be outlined in the plan, to ensure successful implementation and to ensure that there is no likely significant effect on the designated sites arising from development set out in the plan.	As part of their Land Allocation Pre-Submission Local Plan, DDC are developing a district wide mitigation strategy to alleviate the potential impact of housing development on the Thanet Coast & Sandwich Bay SPA. This is based on a small financial contribution for monitoring, which could potentially cover the cost of a warden at Sandwich Bay. This levy would apply to all housing development in Worth. No further contributions to a mitigation strategy would be expected. A separate Habitat Regulations Screening Report is being carried out by DDC
Section 4.4 Pages 42 & 43	the reference in Policy WDP 04 and 05 to impact on the Thanet Coast and Sandwich Bay Ramsar site. The points made in the bullet point above also apply here	As Above
	If proposals are brought forward through the plan have not been anticipated by the Local Plan and tested through the associated HRA, they need to be screened in respect of their likely significant effect on European and equivalent sites.	Agreed

Name / Organisation		
English Rural		
Page/Paragraph	Comments and Suggested Changes	Worth Parish Council (WPC) Response
Generally	<p>English Rural supports the Parish Council's work regarding the Neighbourhood Development Plan and applaud the manner in which the community has been consulted at every stage of the project.</p> <p>I have a couple of comments:-</p>	WPC appreciate the support
Section 4.2 Page 35 & 36	<p>Page 35 refers to a housing trust; English Rural is a housing association and for the purpose of clarity might be preferable to refer to Association rather than Trust?</p> <p>Page 36 talks about the area for the affordable housing will be included within the defined settlement boundaries; I had thought this area of land would remain outside the defined boundary Usually English Rural develops on exception sites (land outside the settlement boundaries) using the appropriate Exception Policy in the Local Authority Local Plan and this ensures the homes can only be occupied by local people and can never be sold on the open market; therefore remaining available as affordable housing in perpetuity. In this instance because the land is to be owned by the Parish Council and is only to be leased to the housing association, then it will no doubt be possible to restrict ownership to local people and stipulate in the contract that the homes can never be acquired but wondered if the PC should seek advice on this point?</p>	<p>Noted & will be changed</p> <p>Noted; this ethos will be made clearer in an Annex</p>

Statutory Consultees: National or Regional Businesses/Organisations

Name / Organisation			
CAA Civil Aviation Authority	Page/Paragraph	Comments and Suggested Changes	Worth Parish Council (WPC) Response
Generally	<p>While the CAA has a duty to provide aviation safety advice when requested, it is not a statutory consultee for planning applications (unless its own property is affected). In order to reduce the time devoted to unnecessary consultations, the following guidance aims to clarify requirements.</p> <p>Other than the consultation required by Section 110 of the Localism Act 2011, it is not necessary to consult the CAA about:</p> <ul style="list-style-type: none"> • Strategic Planning Documents (e.g. Local Development Framework and Core Strategy documents) other than those with direct aviation involvement (e.g. Regional Renewable Energy Plans); • Waste Plans; • Screening Options; • Low-rise structures, including telecommunication masts. With the exception of wind turbine developments, the CAA is unlikely to have any meaningful input related to applications associated with structures of a height of 100 feet or less that are situated away from aerodromes or other landing sites; • Orders affecting Rights of Way or Footpaths; • Sub-surface developments; • General planning applications not affecting CAA property. • Solar Photovoltaic Panels (SPV) <p>In all cases where the above might affect an airport, the airport operator is the appropriate consultee. Where the above might affect a NATS installation the consultee is:</p> <p>NATS, Mailbox 27, NATS Corporate and Technical Centre, 4000 Parkway, Whiteley, Fareham, Hants PO15 7FL</p> <p>Please be advised that we will no longer respond to future correspondence received regarding the above subjects. Where consultation is required under Section 110 of the Localism Act 2011 the CAA will only respond to specific</p>	<p>Noted with thanks - DDC have been informed</p>	

questions (but will nevertheless record the receipt of all consultations).

It **is** necessary to consult the CAA in the following situations:

- When a Local Planning Authority is minded to grant permission for a development to which a statutorily safeguarded airport or NATS Plc has objected, write to:
Aerodrome and Air Traffic Standards Division, Civil Aviation Authority, Aviation House, Gatwick Airport, West Sussex RH6 0YR
- When a Local Planning Authority is considering a proposed development involving wind turbines, write to:
Renewal Energy Project Officer, Directorate of Airspace Policy, Civil Aviation Authority, CAA House, 45-59 Kingsway, London WC2B 6TE
email: windfarms@caa.co.uk (preferred option)
- When a development involves structures of a height of 90 metres or more, lasers or floodlights, write to:
Off Route Airspace 5, Directorate of Airspace Policy, Civil Aviation Authority, CAA House, 45-59 Kingsway, London WC2B 6TE

Email: marks.smailes@caa.co.uk

Further information on consultation requirements can be found on the CAA website, including document entitled [Guidance on CAA Planning Consultation Requirements](#).

Further information on Solar Photovoltaic Panels can be found on the CAA website including document entitled [Guidance on Photovoltaic systems](#).

Please could you ensure that your Planning Officers are aware of these principles and the revised policy and that any associated procedures are amended with immediate effect.

Name / Organisation		
Highways Agency		
Page/Paragraph	Comments and Suggested Changes	Worth Parish Council (WPC) Response
Generally	<p>Thank you for consulting the Highways Agency regarding the Worth Pre-Submission Neighbourhood Plan.</p> <p>I can confirm that that HA has no objections or other comments on the plan.</p> <p>I wish you every success in taking it forwards to adoption and implementing its proposals</p>	Noted

Name / Organisation		
Internal Drainage Board		
Page/Paragraph	Comments and Suggested Changes	Worth Parish Council (WPC) Response
Generally	<p>Thank you for inviting the River Stour (Kent) Internal Drainage Board to comment on the above Plan, which I consider to be well structured and informative. Whilst I have no particular issues of concern, my comments on behalf of the Board are as follows:</p>	WPC note the support
Section 3.3 Page 6	<p>Community Objective 6 – The Village Pond.</p> <p>It is stated that the RSPB is considering improving the overflow from the pond. As this would discharge into the Board's drainage district, the Board's formal consent will possibly be required (a copy of the Board's bylaws is attached for information). I would therefore be grateful to receive further details of proposals as and when they are developed.</p>	Noted
Section 3.3 Page18	<p>Community Objective 9 – Footpaths & Cycle Routes.</p> <p>Whilst the development of an improved footpath & cycle network is supported, the Board needs to be consulted on any proposals that cross, or pass close to (within 8 metres), any watercourse as formal consent will be required. This is to ensure that suitable access is retained for routine watercourse maintenance with heavy plant, thus ensuring local drainage and reducing flood risk.</p>	Noted
Section 3.3	Community Objective 11 – RSPB Reserve.	Noted

Page 22	<p>The Board supports the protection and enhancement of the local environment and welcomes the principle of developing a nature reserve at this location. However, the Board will require assurance from the RSPB that appropriate local drainage will be maintained and that flood risk will not be increased (as highlighted in the document). The Board will continue to liaise with the RSPB and its consultants in respect of its plans for the area.</p>	
Section 3.5 Page 24	<p>Community Objective 12 – Environment.</p> <p>The Board maintains a number of watercourses in the Worth area and wider Hacklinge Marshes, and incorporates sensitive maintenance and enhancement works into its activities. This work is carried out in cooperation with the Kentish Stour Countryside Partnership (along with Natural England and the Environment Agency). The Board may therefore be able to assist in the delivery of this objective, and would be willing to provide advice to landowners. Hedge and tree planting along with any other works in the vicinity of watercourses will also require the Board's formal consent (in order to ensure that suitable access is retained).</p>	Noted; WPC are grateful for the offer of help
Section 4.2 Page 37	<p>Potential Housing Sites.</p> <p>Whilst the Board has no objection to the principle of developing the sites highlighted in the document, I would be grateful to receive further information in respect of drainage and flood risk when proposals are put forward. The management of surface water runoff, including the future maintenance of the drainage systems, will be a critical element of the design. The Board also promotes the use of open SuDS (swales and ponds) in preference to closed systems (underground tanks and oversized pipes) due to the benefits they provide in terms of ecology and amenity. I would suggest that Kent County Council's advice is sought in respect of drainage arrangements at an early stage, due to KCC having the new role of SuDS Approval Body (SAB) under the Flood & Water Management Act 2010.</p>	Noted

Name / Organisation		
Southern Water		
Page/Paragraph	Comments and Suggested Changes	Worth Parish Council (WPC) Response
Generally	<p>Thank you for the opportunity to make representations to the above document. Southern Water is the statutory water and sewerage undertaker in Worth.</p> <p>We have reviewed the Neighbourhood Development Plan and have the following comments to make.</p>	
Section 4.2 Page 37	<p>Policy WDP 01 – Bisley Nursery Development Page 37</p> <p>This representation relates to the capacity of the sewerage network to support the proposed development at Bisley Nursery Development.</p> <p>Southern Water has carried out a capacity assessment to determine the impact of the proposed development on the sewerage system. This assessment has shown that there is insufficient existing capacity in the sewerage network to accommodate 32 houses at Bisley Nursery.</p> <p>This is not a constraint to development provided connection is made off-site to the nearest point with adequate capacity.</p> <p>Enhancements required to the sewerage system as a result of new development should be provided by the development. This ensures that the cost is passed to those who directly benefit from it, and protects existing customers who would otherwise have to pay through increases in general charges.</p> <p>Connection off-site is the mechanism by which developers can provide the infrastructure required to service their sites. However, Southern Water has limited powers to enforce such connection. We therefore look to the Local Plan/Neighbourhood Plans to support this approach in planning policies to facilitate delivery of the necessary infrastructure.</p> <p>Furthermore, it is important to give early warning to prospective developers regarding the need to connect off-site, as it will add to the cost of the development. Early warning will facilitate delivery of the necessary infrastructure, and contribute to the deliverability of the Neighbourhood Plan.</p>	<p>Noted; the landowner and their agent are aware of the Sewerage system constraints</p> <p>WPC do not foresee any issues with a connection to the main in Sandwich via Coventon Lane; no extra wording needed</p> <p>Noted; the landowner and their agent are aware of the Sewerage system constraints.</p>

	<p>Southern Water is concerned that unless the need for local sewerage infrastructure is recognised in Policy WDP01, there is a risk that the necessary infrastructure will not be delivered in phase with development.</p> <p>With the omission of this evidence in the policy text Southern Water is unable to support the Neighbourhood Plan as being sound. The following change will make the Plan sound:</p> <p>To Policy WDP 01 add a bullet point after bullet point 11:</p> <p><i>11) Off-site connection to the sewerage system at the nearest points of adequate capacity.</i></p>	<p>Having taken DDC Officer advice WPC do not believe there is a need for addition of extra wording in the Development Plan</p>
<p>Section 4.3 Page 40</p>	<p>Policy WDP 03 – Local Green Spaces Page 40</p> <p>Southern Water fully understands the Parish Council’s intention to protect local green spaces. However, we cannot support this policy as it could create additional barriers for the statutory utility provider (i.e. Southern Water) to deliver new essential infrastructure should this be required over the Neighbourhood Plan period.</p> <p>Paragraph 76 of the National Planning Policy Framework recognises that it would be appropriate to permit new development in designated green space areas in special circumstances, for example if the need for, and benefits of the development clearly outweigh the loss (conserving and enhancing the natural environment, paragraph 118).</p> <p>We would suggest that the following amendment be incorporated into the policy in order to make it consistent with the NPPF:</p> <p>“Policy WDP 03 – Local Spaces”</p> <p><i>Within the Local Green Spaces (shown on Proposals Map 2) development will not be permitted that would harm their function of:</i></p>	<p>Noted - the Local Green Space is a very small percentage of available land & WPC cannot envisage a scenario where Southern Water will need to build on this land. However the suggested Policy wording will be added.</p>

	<p>1) <i>Providing a degree of separation between parts of the built up area; or</i> 2) <i>Enhancing the appearance of the built up area through its setting.</i></p> <p><i>Landscape mitigation measures are not considered to be enough to offset the harm caused by a development on openness and character. For example, if a row of trees is planted in front of a building to act as a screen, the visual impact of the building will be decreased, but this does not offset the harm to the area.</i></p> <p><u>Exceptions will only be made for essential infrastructure, where it can be demonstrated there are no reasonable alternatives sites available and the benefit of the development outweighs any harm.</u></p>	
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Name / Organisation		
Sandwich Town Council		
Page/Paragraph	Comments and Suggested Changes	Worth Parish Council (WPC) Response
Generally	Your email regarding the Worth Pre-Submission Neighbourhood Development Plan Consultation was presented to Sandwich Town Council at a meeting on 22 April and Members would like to thank you for providing them with this information.	Noted

Local Stakeholders: Businesses/Organisations/Landowners

Name / Organisation		
L. B. Austin		
Page/Paragraph	Comments and Suggested Changes	Worth Parish Council (WPC) Response
Generally	Please note that should it be applicable, I wish to reserve the right to address the Examination Inquiry in person.	WPC will not be involved in decisions about how the Examination of the Submission version is carried out. This will be for the Inspector to decide.
	<p>Following the publication of Worth Neighbourhood Development Plan (The Plan) Pre-Submission NDP and Pre-Submission Annex, both dated April 2013, I make the following comment which should be read in conjunction with:</p> <p>*My representation and submission of 18th December 2012 to the Worth Neighbourhood Development Plan Evidence Base – consultative Draft</p> <p>*My submission of 14th May 2012, addressed to Mr D Whittington, Senior Planner Dover District Council (DDC), and accepted by Worth Parish Council (WPC) at the meeting of 6th June 2012.</p>	<p>This & WPC's response to the points raised is available on the NDP website Document Library Ref 11</p> <p>This & WPC's response to the points raised is available on the NDP website, Document Library Ref 20 & 21</p> <p>Correspondence between WPC and Mr Austin is available on the NDP website, Document Library Ref 46</p>
	<p>Pre-Submission NDP April 2013</p> <p>General:</p> <p>The document does not disclose those parish councillors who at the time of drafting the document had, by virtue of the proximity of their property, an interest to the development sites considered.</p>	<p>WPC Disagree - Councillor declarations of interest have been available on the NDP website since the Interim consultation in November 2012. They are available in the Document Library Ref 52.</p>
Section1 Page 3	<p>Introduction</p> <p>Pre-NDP Preparation</p>	

	<p>As evidenced in my submission of December 2012 to the Consultative Draft Plan, none of the public surveys met the criteria required for public consultation.</p> <p>(Ref: my letter to DDC 9th November 2009 and DDC confirming email of 23rd January 2012)</p>	<p>WPC disagree - all surveys were carried out with due diligence. They were overseen by an independent person and all raw (redacted) data is available to view on request.</p>
<p>Section 1 Page 4.</p>	<p>Next steps</p> <p><i>“.....will be tested through a vote....in the area”</i></p> <p>Clarification is required as to:</p> <p>Who is entitles to vote. I.e. residents only or additionally those with vested interests of land or property within the Plan Area.</p> <p>Whether a 50% vote of approval is based on actual vote or the % of eligible votes.</p> <p>Whether a % portion if those eligible to vote is the criteria for acceptance</p>	<p>The referendum requires a simple majority to bring the NDP into force. This was explained in detail at the Exhibition on the 27th of April. It will be for the Inspector to decide if individuals outside the NDP area (e.g. the whole Parish) are entitled to vote</p>
<p>Section 3.3 Page 14</p>	<p>The Churches</p> <p>St Peters & St Pauls has an electoral roll of 26, which is 2.7% of the areas population of 950. The Free Church's percentage of the Area is unlikely to account for the 11% quoted. For accuracy of the Plan further WPC inquiries are required.</p>	<p>The survey question asked <i>"Which facilities are used by any member of your household"</i>.</p>
<p>Section 3.3 Page 15</p>	<p>The Pre-School Nursery</p> <p>Busy Bees</p> <p>Approximately 90% of the use and income to the Hall is attributable to Busy Bees.</p> <p>Although operating with the same name, it would appear from Appendix A attached that the Busy Bees of Worth, are not part of, or registered with, the national Busy Bees Company. If this be true then, to avoid public confusion and/or associated issues of childcare, it is suggested that it is in the interests of WPC to encourage Worth's Busy Bees to formally register with the National Company. This would help towards sustaining the Hall's use.</p>	<p>Busy Bees use the Village Hall approximately 60% of the time and are a registered charity No. 1046109. The Charity Commission have a large number of organisations registered as Busy Bees (some with additional wording)</p> <p>WPC believe it would be inappropriate to place this requirement on Busy Bees Nursery.</p>

<p>Section 3.3 Page 17</p>	<p>Sewerage</p> <p>Southern Water confirmed that the existing local sewage system would not have spare capacity. ...This should not be seen as a restraint...all new development to be connected to the nearest sewer to the site.</p> <p>Where is the nearest point?</p> <p>A net gain of 31 houses will require an on site pumping station with at least a leading 150mm sewage system.</p> <p>The cost of this may impinge on the economic viability of development. The Pre-Submission document should have addressed this vital issue in depth.</p>	<p>Southern Water have asked this constraint is recognised in the Submission Version. WPC will take advice from Dover District Council before doing so.</p> <p>For an explanation of their expectation of the NDP see the submissions of Southern Water.</p> <p>The landowners of the proposed development site are aware of the constraint in the sewerage network & consider the development outlined in WDP 01 (Bisley Nursery Development) to be viable.</p>
<p>Section 3.5 Page 24</p>	<p>Community Objective 12 –Environment</p> <p>Loss of existing small wood/scrub area near the built area will be resisted.</p> <p>*this is meaningless unless it be “resisted” by planning restrictions not mentioned</p>	<p>This is a Community Objective. WPC will work with landowners so as to avoid unnecessary clearance of wildlife habitat. For clarity the words will be changed from resisted to 'Not Supported'.</p>
<p>Section 3.6 Page 25</p>	<p>3.6 Land Use</p> <p>*Brownfield or Previously Developed Land</p> <p>The Pre-Submission NDP has not addressed NPPF Item 9 which requires NDPs to</p> <p><i>“contribute to and enhance the natural and local environment”</i></p> <p>by</p> <p>“remediating and mitigating despoiled degraded, derelict, contaminated and unstable land where appropriate</p> <p>Map 10 Agricultural Classification</p>	<p>WPC Disagree - All brownfield sites have been identified and where possible appropriate policies have been put in place to manage them (WDP 04 & WDP 05).</p>

	<p>My submission to the Evidence Base –Consultative Draft presented professional evidence that the entire field adjacent to the south side of The Street was grade 2. The Pre-Submission document provides no evidence to displace this.</p> <p>These omissions are also addressed later when reviewing site specific development land.</p>	<p>The only independent evidence available to WPC indicates all the land to the South of The Street is Grade 1 agricultural land. The source, Kent Landscape Information System, will be properly referenced on Map 10.</p>
<p>Section 3.9 Page 30</p>	<p>3.9 Community Objectives</p> <p>The Evidence Base Consultative Draft identified an ageing population, and the need for the Plan to attract a younger element within the community. Consequently it is illogical to hoist the wishes/votes of the current aged population, onto a younger age group yet to come into the community. The Plan’s primary purpose is to plan for the future –not the present.</p>	<p>WPC place great importance on the views of the community it represents and who elected its individual members.</p>
<p>Section 3.9 Page 30</p>	<p>Funding Community Objectives</p> <p>Section 106 Agreements.</p> <p>Are any envisaged? If so they should be mentioned.</p> <p>While the Community Infrastructure Levy and Section 106 Agreements are discussed later in the financial viability of the Bisley site, it should be noted that the intention of the present government is to wave such charges in order to promote development.</p>	<p>The paragraph on Section 106 & CIL will be expanded to explain their relationship. The Government has only just introduced the legislation on CIL and there are no plans to abandon it. Conditions which may require Section 106 agreements are mentioned.</p>
<p>Section 4.1 Page 32</p>	<p>4.1 Housing Needs.</p> <p>The given number of 30 is that required to comply with DDC Local Development Framework. This is not the maximum but only the minimum requirement.</p>	<p>Neighbourhood plans may allocate more housing, they cannot allocate less than the Local Plan. DDC have advised the NDP housing allocation complies with the DDC Core Strategy.</p>
<p>Section 4.2 Page 34</p>	<p>4.2 The Bisley Nursery Site</p> <p>I have no objection to this proposed development subject to the following:</p> <p><i>*Page 34 “There is no footpath along the frontage”</i></p> <p>The new number of Pedestrian movements across the Street will include those</p>	

	<p>from:</p> <p>32 homes, 12 parking spaces, “kick about” area, open green space and general use of the Hall which has the capacity to accommodate 100 people.</p> <p>Safety measures demand as a minimum, a pedestrian crossing and centre island within The Street at the access to the development.</p> <hr/> <p>The provision in the Pre-Submission document for parking spaces for 12 cars is woefully short of actual requirement mentioned above.</p> <p>The Plan must avoid the environmental detraction of the on-street parking of cars, within the development, emanating from the use of the Hall.</p>	<p>WPC Disagree - there is no need for a pedestrian crossing in a small rural village which is not on a through route.</p> <p>Car park on the development site itself will be subject to the planning application. The 12 spaces are primarily aimed at those using the Community facilities. It is considered to be adequate.</p>
<p>Section 42 Page 35</p>	<p>*A “kick-about” area is a half measure. The Plan should have the courage to allocate land which will satisfy the youth of tomorrow, keeping them off the streets with provision of adequate facilities. Land should be allocated for a new village hall, together with surrounding land for a variety of sport with full size playing fields.</p> <p>The present hall is owned by the Parochial Church Council (PCC) of St Peter & St Paul and leased to WPC until 2018. The Pre-Submission document notes the national trend in congregation numbers. Should there be a re-organisation within the Canterbury Diocese, over which the PCC has no control, and the Hall becomes sold, there is no guarantee of the present lease being extended by a future owner. Particularly if more appropriate land is available for a modern facility.</p>	<p>WPC do not envisage a new Village Hall being needed during the lifetime of the Plan. There is no identified need for the facilities described.</p> <p>WPC have an easily renewable lease of the Village Hall. The PCC are Lessors, not owners. The Canterbury Diocesan Board of Finance, who are the owners, hold the hall in trust for the purposes of a village hall for the use of the inhabitants of the Parish of Worth.</p>
<p>Section 42 Page 35</p>	<p>The penultimate paragraph “<i>The housing trust will rent the land from the Parish Council</i>”</p> <p>This seems to conflict with Policy WDP 01, item 10I which reads “....and transfer of ownership on a pre-agreed at cost basis....”</p>	<p>This will be clarified</p>
<p>Section 42 Page 37</p>	<p>Time Limits and Financial Viability of Development</p> <p>The NDP is relying on just one site to meet the requirements of DDC’s Core Strategy.</p>	<p>The Landowners and their Agents have indicated that the development site</p>

	<p>The Pre-Submission document gives no indication or evidence of financial viability concerning the Bisley development.</p> <p>Policy WDP 01 states no stipulation of time limits for the implementation of development.</p> <p>Prior to the Plan going further, WPC should obtain a financial feasibility study to ensure that the project is financially sound, not only to WPC but also within reasonable parameters of the market implications.</p> <p>It seems to me that there are considerable “extra over” costs to those incurred in normal development costs.</p> <p>£</p> <p>*Cost of replacement to owner of Bisley destined for demolition..... 400,000</p> <p>*Cost of Community Infra-structure Levy (page 30)</p> <p>Average area of 23 houses@150m²@£125 per m² 431,250</p> <p>*Sewage connections. See page 17 –no indication has been given as to where spare capacity is located –“guestimate”..... 100,000</p> <p>*Contingencies for 106 agreements, further infrastructure costs</p> <p>Page 30 – no indication of requirements “guestimate”..... <u>100,000</u></p> <p>÷32</p> <p style="text-align: right;">Average of abnormal costs per dwelling</p>	<p>identified in WDP 01 is financially viable.</p>
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	<p>£32,226</p> <p>The above is simplistic in extreme, but made to promote/activate further investigation</p>	
<p>WPCSection 4.3 Page 39</p>	<p>4.3 Proposed Local Green Space</p> <p>The requirement for Green Space and its designation should be based on perception.</p> <p>Consequential features and issues, such as boundaries or ownership of land should not of necessity define the limits of its designation. Equally, there are no requirements for parts of land holdings to be included which give no beneficial supportive element.</p> <p>*Area 1 should be enlarged in equal width of that proposed to Coventon Lane.</p> <p>The proposed designation of Area 1 is in recognition of Policy WDP 03, which seeks to <i>“provide a degree of separation between parts of built up areas”</i>.</p> <p>Such separation should also be defend to the consequential environmental impact of the proposed development of Bisley Nurseries, which will extend to the footpath to the rear of the development abutting Coventon Lane. This would protect the space between the new development and that of Deal Road.</p> <p>*Area 2 has been arbitrarily designated.</p> <hr/> <p>The inclusion of the triangle area to the South of Ilex Cottage is an irrelevance to the main area of designation. It lends virtually no supportive aspects to the fields that continue to the north of this area. Indeed the obtrusive lineal nature of the polar trees which define the boundaries, impinge on any perception of “Green Space” that may exist to enhance the appearance of the village setting.</p> <p>The properties of Ilex Cottage and those fronting Jubilee Road should not be included in the designated area.</p> <p>De facto these represent existing development. They should not be subjected to</p>	<p>Where possible, physical features have been used to delineate the areas of Local Green Space.</p> <p>Both Local Green Spaces provide a degree of separation between parts of the built environment while minimising the amount of protected land. However, WPC accept there is a case for extending the North West Local Green Space eastwards to the natural hedge boundary (but not as far as Coventon Lane). This includes the most visible parts of the Area P2</p> <p>WPC disagree, physical boundaries have been used wherever possible</p> <p>WPC Agree in part. Properties fronting Jubilee road will be excluded from the Local Green Space</p>

	<p>the proposed restrictions of development contained in WDP 03. If an extension/alteration to a property be required, existing planning regulations allow for mitigation of impact by way of landscaping and tree screening –and this should prevail.</p> <p>The accompanying text to Policy WDP 03 (2) denies this.</p> <p>The inclusion of Sites D10 and D12 in the proposed Green Space Area 2 is contested in detail when I address the Pre-Submission Annex.</p>	<p>WPC disagree - an extension to a property can be achieved without breaching the conditions in Policy WDP 03.</p> <p>WPC agree in part - Development Site D12 is earmarked in Annex 4 as a possible future housing site beyond The Plan period. WPC agree it would be inappropriate to include this in a Local Green Space. It should be removed. Site D10 is not earmarked for future development. Its inclusion in the Local Green Space is therefore appropriate.</p>
<p>Annex 1</p>	<p>Page 1 Neighbourhood Plan Policies</p> <p>National Planning Framework (NPPF) 58 is not a “stand alone” policy. The NDP should not “cherry pick” and ignore the integration of other policies.</p> <p>The element of popularity within the Plan’s formation is but part of the NFFP. It does not override the necessity to plan for the efficient use of land.</p> <p>Policy 109 has not been mentioned or observed in relation to sites D10 and D12 (Map 1 page 19)& (Site specific pages 28& 30)</p> <p>This NPPF policy requires the Plan to “<i>contribute to and enhance the natural and local environment</i>” by “<i>remediating and mitigating despoiled, degraded, contaminated and unstable land where appropriate</i>”</p>	<p>WPC Disagree - All brownfield sites have been identified and where possible appropriate policies have been put in place to manage them (WDP 04 & WDP 05).</p>
<p>Annex 4</p>	<p>Concerning Site D10</p> <p>The adjacent field – failure to inform public of donation.</p> <p>Firstly, I have no objection to the inclusion of the main field in the Plan as Green Space However it is not Grade 1 as stated on page 21 which gives no supporting evidence. It has been graded as Grade 2 land-as evidenced in the Agricultural Site</p>	<p>The only independent evidence available to WPC indicates all the land to the South of The Street is Grade 1 agricultural land. The source, Kent</p>

	<p>Evaluation carried out by Alan Furneaax Associates included with my submissions to the Consultative Draft.</p> <p>Secondly WPC is well aware, and has apologised to me in writing, of the failure to make known to the public of my offer to donate this 3½acre field in the Neighbourhood Plan Survey of January 2012. This was an important omission from public knowledge when considering potential, centrally located land available for full sized sporting facilities, plus a potential location for a new village hall.</p> <p>Thirdly, The Consultative Draft of November 2012(Page 28 item4.5) reference to this 3½ acres as just “further land” was totally inadequate. The offered area has an extremely important, potential facility for the benefit of the village. A map and detail of the offered land should have been made available for the public to reach an opinion based on detailed information. The resultant public site rating of this D10 site as 8, has been severely skewed for lack of public knowledge as to the benefits arising from the development of 5 houses.</p> <p>Fourthly, WPC is also well aware that this written offer was made in 2009, not as stated in June 2012 (Page 28) of the The Pre-Submission Annexe. This requires public correction.</p>	<p>Landscape Information System, will be properly referenced on Map 10.</p> <p>WPC disagree - WPC have never apologised for any failings on its part to make the offer of land known to the public. WPC became aware of the offer in May/June 2012. It requested confirmation in writing and made the offer known to the public at the first available opportunity during the November 2012 Interim Consultation and again as part of this consultation.</p> <p>WPC disagree - it believes 'further land' to be an appropriate description. Irrespective of the need for a new Village Hall and additional sports area, WPC do not consider the location of the respondents field, with its extremely limited vehicular access, to be appropriate for such use. The Site Allocation Survey (NDP Main Appendix, Document 28) did not include community benefit for any of the sites. It was fair.</p> <p>WPC disagree - no offer was made to it until May/June 2012</p>
<p>Others</p>	<p>Appendix A - related to Busy Bees</p>	<p>See previous comments</p>
<p>Others</p>	<p>Appendix B - Letter from Howard Holroyd (Worth Parish Council Chairman) to Mike Ebbs, 2004</p>	<p>This is a historical letter from the then Chairman of WPC to DDC forward planning department. It holds no current significance. There is no record in the Council minutes of this letter having been formally approved by Worth Parish Council.</p>

Others	Appendix C - Submissions on the Interim Consultation, letter to Mr David Whittington and Roger Levett	<p>WPC's response to submissions & correspondence with Mr Austin is available in the Document Library Ref 20, 21 & 46</p> <p>In responding to his letter, Roger Levett advised Mr Austin to respond to the current consultation.</p>
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Name / Organisation			
W. T. Stevens			
Page/Paragraph	Comments and Suggested Changes	Worth Parish Council (WPC) Response	
	<p>In overview, I note that under Dover District Council's core strategy the balance of homes required by rural areas which has not already been covered by existing sites set out in the local development framework plan is 110 new homes. I understand that these are to be made up by new homes in the three designated neighbourhood areas being Worth, St Margarets-at-Cliffe and Ash.</p>	<p>DDC have indicated to WPC that in excess of 24 - 30 new houses in the Neighbourhood Area would comply with the Core Strategy</p>	
	<p>I further understand from the "Worth Neighbourhood Development Plan Evidence Base – Consultative draft November 2012" under section 5.5 that DDC officials had informed the Parish Council that the allocation of sites for around 24 houses in the Worth NDP area would comply with the core strategy.</p> <p>Under the Development Plan Survey it was noted that the residents preference for new housing in Worth was for less than 15 new homes.</p>	<p>DDC have indicated to WPC that in excess of 24 - 30 new houses in the Neighbourhood Area would comply with the Core Strategy</p> <p>Agreed</p>	
	<p>Obviously as the co-owner of land at Jubilee Road, I was disappointed that this site was not the favourite although I do note that the residents preference was fairly close (57% in favour of the Bisley site and 43% in favour of Jubilee Road site) even though the number of houses at the Jubilee Road site would more easily meet the residents wishes (the Bisley site resulting in a net gain of 31 houses in total).</p>	<p>Noted</p>	
Annex 4, Section 4.6 Page 35	<p>I was pleased however to note the comments at section 4.6 of the "Pre-Submission NDP April 2013" that Jubilee Road would be the next favourable site should a need for more housing be identified during the planning period.</p>	<p>Noted</p>	

<p>Section 3.1 Page 12</p>	<p>The Built Environment - Coal Mining Subsidence</p> <p>I was interested to note the comment of there being a possibility of reopening the mine, but concerned to note that as an affected landowner that I had not received any such approach or reference. If you are able to pass on any further details I would be most grateful.</p>	<p>This was reported in the Local Press in the East Kent Mercury 2012. The author is advised to contact them directly.</p>
<p>Section 3.3 Page 14</p>	<p>Facilities and Service Community objective 3 – Village Hall</p> <p>I would question the need for a new Village Hall given the existing Village Hall appears to adequately serve the Village and especially as improvement opportunities can be made available.</p> <p>The offer to provide land on which a new Village Hall could be built is unlikely ever to be taken up given the likely costs of construction of a new purpose built Village Hall and I would question whether this is any real benefit to the community under the proposed development.</p>	<p>Agree - a new Village Hall is not envisaged in the lifetime of The Plan. Policies will be amended accordingly</p>
<p>Section 3.6 Page 25</p>	<p>Land Use Agricultural Land Classification</p> <p>It should be noted that the bulk of the Grade 3 land identified on “Map 10 Agricultural Classification and Brownfield Sites” has been acquired for the RSPB Reserve referred to earlier in the document.</p> <p>The viability of the remaining small blocks of agricultural land is variable dependent upon the size of the overall holdings and proximity to farm facilities.</p>	<p>Agreed</p>
<p>Annex 1 Page 5/6</p>	<p>Pre-Submission NDP annexe Habitat Regulations Assessment</p> <p>I understand that a formal planning application for the RSPB Nature Reserve was lodged with DDC in 2009</p>	<p>Agreed - The application number 09/00780 is for Change of use of land to nature reserve for nature conservation purposes. WPC are working with the RSPB on the design details.</p>
	<p>Pre-Submission NDP sustainability report</p> <p>No comments</p>	

Name / Organisation		
Hobbs Parker for W C Soles		
Page/Paragraph	Comments and Suggested Changes	Worth Parish Council (WPC) Response
Generally	<p>We are writing on behalf of our clients, WC Sole & Sons, with our comments on their behalf with regard to the pre-submission NDP, with particular reference to the allocation of land at Bisley Nursery for residential development and open space, including the provision of car parking for the village hall.</p> <p>We have also noted that Dover District Council will be putting forward suggested amendments to the pre-submission NDP; these are to be considered at a special Cabinet meeting to be held on Monday 20th May. Where appropriate we comment on the proposed amendments put forward by the Council (subject to Cabinet approval).</p>	Noted
Section 4.2 Page 37	<p>The proposal for development of the Bisley Nursery site is welcomed, and we note that the specific provisions with regard to the area for residential development (1.9 hectares), the total number of dwellings (32, representing a nett increase of 31 dwellings after the demolition of Bisley); the area to be provided for up to 9 affordable dwellings (0.28 hectares), and the area for public open space (approximately 1.0 hectares) accord with those proposals previously considered.</p> <p>We have one specific concern, which concerns the details of the phasing and implementation plan, with regard to the affordable housing. It is agreed that it will be appropriate for the land required for affordable housing (up to 0.28 hectares) to be transferred to Worth Parish Council, before construction commences (criterion 10a); however, the wording of criterion 10(c) suggests that the construction of the affordable housing and transfer of ownership (of the housing) to the Trust should take place before first occupation of any private market dwelling. This is not a realistic provision; as the timing of delivery of the affordable housing will rest in the control of your nominated Housing Trust (English Rural), which in itself will depend on availability of funding, the priority they give to Worth, and indeed any other relevant factors.</p> <p>Once criterion 10a has been met, the matter of the provision of the affordable housing will rest with the Parish Council, and the nominated Housing Trust; accordingly, we would request that criterion 10(c) be deleted.</p> <p>With regard to the identification of components of the site at Proposal Map 1, we note the suggestion from Dover District Council (subject to Cabinet approval) that this plan should identify the existing and proposed confines illustrated; our own suggestion is that there is in fact a need for more flexibility, in the boundaries shown. The illustrative diagram at figure 5 shows a more “natural” village edge, in</p>	<p>Noted</p> <p>Agreed, WPC will work with DDC, Hobbs Parker & English Rural to achieve a more realistic viable implementation plan.</p> <p>WPC will work with DDC, Hobbs Parker & English Rural to achieve a more realistic, viable implementation plan.</p> <p>Settlement confines need to be rigid, but this does not negate the expectation of 'fuzzy' boundaries to gardens.</p>

<p>the north east corner, which will give a more rural character, a factor which we feel is agreed between all parties. Accordingly, we would suggest that the north eastern site boundary be subject to annotation stating “final boundary to be determined through planning application.”</p> <p>This would not lead to any risk of the area for residential development being increased – as this is specified clearly elsewhere in the policy at 1.9 hectares.</p> <p>We note that the comments for Dover District Council (subject to Cabinet approval) suggest that the illustrative diagram included at figure 5 may in itself be “arguably contrary to the policy”; we would not agree that this is the case, and suggest that the illustrative diagram should be retained within the Neighbourhood Development Plan. The explanatory text noting that this is for illustrative purposes gives sufficient clarity over the weight to be given to the illustrative diagram.</p> <p>Our final comment concerns the matter of the need for a mitigation strategy to address any impact on the Thanet Coast and Sandwich Bay Ramsar/SPA/SAC (criterion 9 of Policy WDP01).</p> <p>The wording put forward in the Neighbourhood Development Plan suggests that the strategy should consider a range of measures and initiatives including provision of open space. The comment from Dover District Council notes that open space is to be provided in any event, and suggests that the wording should state instead that the mitigation strategy should include a range of measures and initiatives, including contributions. We consider that this wording is insufficiently flexible; the potential issue arising (at this stage it is not possible to state with certainty that there would be any impact on the Thanet Coast and Sandwich Bay Ramsar/SPA/SAC) would concern increased recreational pressures. The approach to dealing with these is to provide compensatory open space in other suitable locations. Given that open space of a greater area than required for the development itself is to be provided at the application site, it would seem highly likely that any possible impact will be mitigated by the provision of the open space at the site itself. If it was considered necessary to maintain a reference to contributions, which it seems would be intended to be expended on public open space provision elsewhere in the Dover District Council area, then we would suggest the following wording:</p> <p>9. “Mitigation strategy to address any impact on the Thanet Coast and Sandwich Bay Ramsar/SPA/SAC is developed. The strategy will provide for the provision of open space on site; if any further mitigation is deemed necessary in the mitigation strategy then this could include financial contributions to provision of open space</p>	<p>Agreed</p> <p>WPC agree with DDC that the illustrative diagram is best placed in an Annex</p> <p>As part of their Land Allocation Pre-Submission Local Plan, DDC are developing a district wide mitigation strategy to alleviate the potential impact of housing development on the Thanet Coast & Sandwich Bay SPA. This is based on a small financial contribution for monitoring, which could potentially cover the cost of a warden at Sandwich Bay. This levy would apply to all housing development in Worth. No further contributions to a mitigation strategy would be expected.</p>
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	<p>elsewhere.”</p> <p>In summary, W C Sole & Sons support the principal provisions with regard to the allocation of land at Bisley Nursery for development, of the form proposed; the comments outlined above, with regard to the wording of the policy, are perhaps ones which could best be dealt with by a meeting with both the Parish Council and Dover District Council, prior to finalising the version of the Neighbourhood Development Plan which will go forward to Public Examination.</p>	<p>WPC acknowledge the support</p>
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Residents/Households

Name / Organisation		
Dick and Doreen Andrews		
Page/Paragraph	Comments and Suggested Changes	Worth Parish Council (WPC) Response
Generally	<p>We agree with all the (<i>NDP</i>) proposals</p> <p>We agree with all the (<i>Annex</i>) proposals</p> <p>We agree with all (<i>Sustainability Review</i>) proposals</p> <p>As relative new comers to Worth we are impressed with the comprehensive presentation of all of the above. Two suggestions</p>	WPC appreciate your support
Section 3.3	<p>(1) <i>That bins for dog "mess" be made available on the public footpaths.</i></p> <p>(2) <i>Consideration be given to making the access to the A258 from the street for a mini round about. This would slow the traffic down and make the junction safer.</i></p> <p>(3) <i>The bus service particularly in the late evenings would be nice.</i></p>	<p>WPC are currently looking into this KCC have no plans for this & it is beyond the funding potential of WPC</p> <p>Agreed; Stagecoach have indicated they may improve the service.</p>

Name / Organisation		
Martin Brown		
Page/Paragraph	Comments and Suggested Changes	Worth Parish Council (WPC) Response
Sustainability Review	<p><u>Response to Sustainability Review carried out by Levett-Therivel Sustainability Consultants.</u></p> <p>By its own admission this review was carried out without any feet on the ground, through desk study of the documentation. (Sustainability Review page 2)</p> <p>It admits that 'we have not sought any independent corroboration of these documents' (Sustainability Review page 2)</p> <p>It agrees that the main substantive issues addressed by the NDP are choices for housing development and for Local Green Space Separation</p> <p>However:</p> <p>A) The appraisal of housing development sites ignores, or does not know of, the fact that the offer of site SAD09 came with the offer of a games field. Levett-</p>	<p>This is correct</p> <p>WPC disagree - See Pre-Submission Annex 4 page 20, Additional Housing</p>

	<p>Therivel however describes the 'appraisals as thorough systematic and fair.'</p> <p>B) Levett-Therivel describe the process of determining Local Green Spaces as thorough fair and effective. There must be many who would not describe deciding what voting system to use after the votes have been counted as fair.</p> <p>C) The appraisal of the Local Green Spaces Sites according to the Sustainability criteria is also described as thorough systematic and fair. Is it possible to make such a judgement without visiting Worth and seeing the sites concerned?</p> <p>D) Levett-Therivel appears to have no knowledge of any interests members of the Working Party or Council may have had in any of the sites or matters under consideration.</p>	<p>Site Information and Pre-Submission Annex 4 page 28, Development option B</p> <p>WPC disagree - the method used gave the maximum number of households a meaningful say</p> <p>This is Roger Levett's assessment based on the available evidence</p> <p>WPC Disagree - Councillor declarations of interest have been available on the NDP website since the Interim Consultation in November 2012. They are available in the Document Library Ref 52.</p>
<p>Generally</p>	<p>Worth Pre-submission Plan</p> <p>The important parts of the Pre-submission Plan are the proposals as to which site(s) to develop and which areas to make Local Green Spaces. These are the areas that the village has to consider carefully and make its wishes known.</p> <p>Since the Pre-submission NDP and the Pre-Submission Annex are obviously closely linked I have not been able to separate my comments to relate solely to one or other of the documents.</p> <p>A) Summary</p> <p>1) Development site selection.</p> <p>The selection of Bisley as the development site has been obvious for a long time, and the site comes with many advantages. However site SAD09, (the site to the south of the Street) also offered advantages and the owner offered to transfer the field next to the site to the district/parish council for community use. The village has never been advised of this offer by the council, and it appears that this valuable offer has been rejected without any consideration.</p> <p>2) The voting system and Local Green Spaces</p>	<p>WPC Agree</p> <p>WPC Disagree - This information was first made available during the November 2012 Interim Consultation as part of the Evidence Base, Consultation Draft, Page 28 and again as part of the Pre-Submission Consultation Annex 4 page 20, Additional Housing Site Information and Annex 4 page 28, Development option B</p>

	<p>The voting system for selection of Local Green Spaces was, it seems, decided after the votes had been counted. This leaves the organisers open to questions as to why they did this, and whether residents voted in what they probably thought was a first past the post system, only to find that it had become a rather different form of a majority vote system, which might well have affected the way they voted. In addition the assessment of the suitability of these Spaces sites according to the principles of the Sustainability Checklist is in my view, to a considerable extent a subjective one producing some contentious decisions.</p> <p>3) Authorship of the Plan</p> <p>Is it not proper that those involved in the production of these proposals should put their names to the work, and declare interests any of them might have had at any time during their work on the Plan?</p>	<p>WPC disagree - The system of 'counting votes' and analysis was devised at the outset to give the maximum number of households a voice and to be fair to everyone.</p> <p>The Sustainability Checklist was subject to community consultation as part of the November 2012 Interim consultation. Subjectivity was reduced as much as possible by setting out the Council's approach to landscape in advance and by involving multiple individuals in the assessment.</p> <p>WPC, whose members were elected in a contested election in May 2011, are the qualifying body responsible for 'The Plan'. All documents are formally approved by WPC.</p>
<p>Section 4.2 Page 33 & Annex 4</p>	<p>B) Expanded comments</p> <p>1) Development site selection</p> <p>Two sites that were put forward came with distinct advantages for the village, that of the Bisley site, and that of the site to the south of the Street, site SAD09. Both sites are behind houses in the Street. The selection of the Bisley site is an obvious one, is welcome, and offers the village some long term advantages, such as a car park, football pitch and site for a possible new village hall. Site SAD 09 came with the offer of a large field to be used as a sports field by the village.</p> <p>It might have been expected that the council would have considered all sites carefully with the owners, including these two sites, to determine the possibilities of the village taking advantage of any offers, while mitigating any possible drawbacks. Annexe 4 page 28 comments that the offer of the field with SAD09 was not made until June 2012. The offer of the field with site SAD09 was in fact made to DDC by the owner in 2010. The Pre-submission Annexe pages 19 and 20 reads that in the land allocation survey carried out by the Council:</p>	<p>No offer of land in association with site D10 (previously identified by the Local Authority as SAD09) was made to the Parish Council until May/June 2012. The Parish Council were omitted from any correspondence between the landowner and Dover District Council until then.</p> <p>The assessment of all potential housing sites is covered in Pre-Submission Annex 4, Table 3, Page 22-33. This includes site D10 (Option A) and site D10 plus the offer of extra land (Option B)</p>

	<p><i>'The preferred housing site option to be taken forward in the Worth NDP (Bisley Nursery) was identified through consultations undertaken by Worth Parish Council and a separate objective assessment of the options. This included testing all the potential sites against the Sustainability Criteria Checklist.'</i></p> <p><i>'All sites in Worth ever put forward by landowners to DDC during their Land Allocation Process were used as the starting point.'</i></p> <p>If all these sites were used as the starting point, did not the council read what had been offered by landowners, and if not, why not? Item 11 of the Sustainability Criteria Checklist reads:</p> <p><i>'11.Ensure that development benefits everyone in the Neighbourhood Area.'</i> and then Annex page 19 reads:</p> <p><i>'The two remaining sites (D8/9 and D13), were taken forward for further investigation. Landowners and their agents were asked to show their 'best bid' at the Exhibition. This included any community benefit they proposed.'</i></p> <p>SAD09 was not included in this and the offer of the field next to SDA09 never made known to residents. Was the benefit site SAD09 offered of a games field considered by the Council?</p> <p>Annex 4 page 28 reads:</p> <p><i>'? the offer of extra land was not made until June 2012 and was not included in the site allocation survey.'</i></p> <p>In view of the above should not the Parish Council have known of this offer which was made in 2010, which is on Dover District Council's website, and is in the public domain. If they did not know of the offer, why did they not know?</p> <p>Would knowledge of this offer of a games field have affected the site selection choices made by residents?</p> <p>Has the council therefore missed an opportunity here?</p>	<p>WPC Disagree - This information was first made available during the November 2012 Interim Consultation as part of the Evidence Base, Consultation Draft, Page 28 and again as part of the Pre-Submission consultation, Annex 4 page 20, Additional Housing Site Information and Annex 4 page 28, Development option B</p> <p>The original April 2010 'Site Allocation Survey' did not contain any associated benefits from any of the sites</p> <p>WPC are of the opinion that the procedure followed has been both transparent and fair and that the best options have been identified</p>
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<p>Section 4.3 Page 39 & Annex 5</p>	<p>2) Choice of Green Spaces.</p> <p>a) Voting procedures</p> <p>Annex 5 page 38 reads:</p> <p><i>'Area P1 is the most popular and was chosen by 64 households (39% of those voting). Although clearly special to the community, it would not on its own, give voice to a majority of households. As a result, an analysis was undertaken by the Working Group to determine which of the other most popular areas, in combination with P1, gave voice to the highest number of unique households.'</i></p> <p>Traditional voting in this country is on the first past the post and rank order system, and it is probable that most, if not all, residents assumed that it is how the voting was to be conducted. Sites P1, P2 and P6 were clearly first past the post.</p> <p>It is clear from Annex 5 page 38 that after the votes had been opened and counted the voting system was changed from a first past the post system to a form of a majority system. There are countless different ways of organising a poll. A common denominator should be that the voters know what system is being used, as clearly this affects the way they vote. Equally clearly the voters did not know what system was going to be used in Worth as it was only brought into play after the votes had been counted.</p> <p>Is it proper to choose a voting system after the votes have been opened and counted?</p> <p>What is the point in giving residents three votes per household, and then changing the system so that for some, but quite probably not all, only one vote was allowed, that for site P1.</p> <p>Why are the votes for the P2 and P3 sidelined, while some residents were almost certainly allowed two votes, for sites P9 and p11?</p> <p>In general, some alternative voting systems come in to play when there is no clear cut result. In this event however the rank order of preference was very clear. In the process the sites that came second and third in the voting were passed over in favour of sites that came fourth and fifth. It is hard to imagine that it was the intention of the voters that P9 and P11, with 44 and 38 votes should be preferred</p>	<p>WPC chose the most democratic system of assessing the Communities views. Roger Levett, an independent observer, found the appraisals to be thorough, systematic and fair. He commended the sophisticated analysis of which (sites) households preferred.</p> <p>WPC chose the most democratic system of assessing the Communities views. The evidence does not support the assertions made.</p> <p>Site P3 obtained one of the lowest popular votes.</p> <p>The reasons for choosing P1, P9 & P11 are explained in Pre-Submission Annex 5, page 45. This includes a combination of popular vote and the sustainability checklist. No other combination of sites</p>
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to sites P2 and P6 with 48 and 47 votes. To take the votes for the fourth and fifth sites P9 and P11 and add them to the votes for P1, and then to argue that this produces a majority of votes for these two sites and this therefore makes sites P9 and P11 'special to the community' (Annex 5 page 45) simply can not, in my view, be sustained when there were more votes for P2 and P6 than there were for P9 and P11. To express it differently, the Venn diagram figures for site P9 on page 38 of the Annex show that for the most part those voting to protect the north side of the village were not the same as those wanting to protect the south side, and that the majority voting was in favour of supporting the north side. Yet the Council has recommended only one site to the north as a Local Green Space. Would the Council have behaved in this way if it had been the election of individuals rather than the selection of land?

Annex 5 page 45 reads:

Area P11 is just outside the community top ranked sites, but in combination with P1 it gives voice to 98 households, second only to P9. It performs exceptionally strongly against the Sustainability Criteria.

But by itself area P11 gives voice to 38 votes. Contrast this with 48 votes cast for site P2 and 47 for site P6.

What other combinations of voting for sites are there which would produce, not 'a significant majority' (Annex 5 page 31) but simply a majority vote, and are there combinations that would sideline votes for P1?

Should not the change in the voting system have been made very clear in the summary on the current consultation, and in the eventual referendum so that residents know what they are commenting on/voting for?

There are 101 pages of report for residents to read. It is highly likely that not many will read all this, and will not therefore read the ten pages in the annex which outlines how the selection of the Local Green Spaces was made.

There are further points to be made about the system used.

Alternative voting systems quite often depend on there being no clear winner or winners produced. In this instance there were.

produce the advantages of Option 4 (P1, P9 & P11). However WPC accept there is a case for extending the North West Local Green Space eastwards to the natural hedge boundary. This includes the most visible parts of P2

There are no combinations that sideline P1 or indeed Option 4 in which P1, P9 and P11 are designated as Local Green Spaces. However WPC accept there is a case for extending the North West Local Green Space eastwards to the natural hedge boundary. This includes the most visible parts of P2.

Every household was given three votes. This was very clear at the outset. The analysis of the votes was carried out to give voice to the maximum number of households.

	<p>The logic behind the analysis of the votes seems to be that after site P1, sites P9 and P11 are the two sites with the most overall votes (104 and 98) when the votes for these two sites are put together with votes for P1. However since each voter had three votes, but did not indicate any rank order for his or her three votes there is no way of knowing whether the votes for P9, or any other site, were first second or third choice votes. Moreover had voters known the system of voting that was to be used they might well have voted differently. The voting system was therefore opaque, and to relegate sites P2 and P6 to behind P9 and P11 can not be justified.</p> <p>Voters were asked to say whether they favoured some protection or complete protection for sites from development. In both cases they then chose their favoured sites as above, but it appears that the votes for both categories have been put together, thereby producing even more opacity.</p> <p>As in previous surveys voting was by household, not by individual, and while the results may be indicative, the voting can not be described as properly democratic, nor the results as completely reliable.</p> <p>In an ideal world the sites for development would be decided first, and then a selection of sites for Local Green Spaces made. If that had taken place it would have been possible to offer land to the north of Bisley as potential Local Green Spaces. Given the voting pattern for sites north of the Street, a Local Green Space north of Bisley might well have been a popular choice.</p> <p>It is true that it is possible to argue that sites P9 and P11 give a degree of separation between parts of the build up area (Annex 5 page 39) but this it to ignore that most of the votes cast were for sites to the north of Worth. If the offer of P9 as a playing field had been taken up this would have given a degree of separation between built up areas. In addition the church yard next to P11 also gives a degree of separation. It is quite likely that residents were expressing concern about being subsumed by Sandwich, and were trying to protect Worth's northern border. There is no threat on Worth's southern borders.</p> <p>b) Assessment of Local Green Space sites according to the Sustainability Checklist Criteria.</p> <p>Five of the Criteria came in to play. Evaluation of the sites according to these criteria is to a considerable extent subjective and therefore contentious, but</p>	<p>WPC disagree - Every household was given three votes. This was very clear at the outset. The analysis of the votes was carried out to give voice to the maximum number of households.</p> <p>This is not correct</p> <p>Given the need to validate results the voting system was as democratic as possible.</p> <p>WPC disagree - the results are a combination of two surveys; the results of which are internally consistent.</p> <p>WPC agree that sites P9 & P11 offer protection between parts of the built up area and this features in their appraisal. The majority of households did not vote for protection of the sites in the North. This is explained in Pre-Submission Annex 5 Table 5, Page 37-38 & 45.</p> <p>WPC believe the assessment was thorough, proportionate and effective.</p>
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	<p>fundamentally the criteria apply pretty much equally to all sites.</p> <p>In detail:</p> <p>SC3: Health and well being, and minimising traffic: given that each site would attract traffic and generate noise SC3 applies equally to all sites in proximity to the Street and Jubilee road.</p> <p>SC5: Conserving biodiversity: this would seem to apply to all sites equally, but one imagines that there is more biodiversity in the orchards to the north of Worth than in fields to the south that are ploughed once a year.</p> <p>SC6: Environment Accessibility: this seems to apply better to the sites north of the Street.</p> <p>To the south P9 is not accessible to the public without crossing private land, and can not be seen. I did not know it was there for many years.</p> <p>P11 is to the south of the village; there is a screen of trees stretching from the Church yard, through a line of Poplar trees in the grounds of Ilex Cottage to Upton House. There is no view from the village to the south. Only a small section of it opens on to Jubilee road. It is not a field that figures largely in visual and amenity terms.</p> <p>Conversely the fields to the North are for the most part orchards, a historic part of Kent's life, and criss-crossed with paths. As such they are sites very well worth preserving.</p> <p>SC8: Creating a high quality built environment; this would seem to apply to all sites equally.</p> <p>SC10: Creating employment and tourism. The relevant sites are agricultural land, and create employment. Orchards are more likely to attract tourism than open fields, but the provisions of these criteria seem to apply equally to all sites.</p>	<p>WPC disagree - Local Green spaces do not generate traffic.</p> <p>WPC disagree - all sites are not equal. Not all fields in the north are orchard and not all fields in the south are ploughed regularly.</p> <p>WPC disagree - In applying the five criteria of this category to the potential sites P1 - P15 there is considerable variation between sites irrespective of their location to the north or south.</p> <p>The visibility of area P9 from public space is described in Pre-Submission Annex 5, page 42</p> <p>WPC disagree - The visibility of area P11 is described in Pre-Submission Annex 5 page 43</p> <p>The visibility of the sites to the north P1 - P6 are described in Pre-Submission Annex 5, page 40 & 41.</p> <p>WPC disagree - some areas offer greater protection to the built environment than others.</p> <p>WPC disagree - not all areas are currently used for agriculture; some forms of agriculture are more labour intensive than others</p>
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	<p>To argue that these criteria justify selection of sites 9 and 11 is at best contentious. To argue that sites P9 and P11 are special to residents and popular is also contentious, and in my view ignores the votes of residents.</p>	<p>WPC disagree with these assertions. The reasons for choosing the Local Green Spaces are explained fully in the Pre-Submission Annex 5</p>
<p>Generally - Authorship</p>	<p>3) Authorship and Declaration of Interests</p> <p>In the interests of openness and transparency should not the names of the Parish Council Working party and all those responsible for the documentation be appended to all documents, together with a declaration of any interests members may at any time have had in the sites under consideration?</p> <p>There appears to be no record of the first surveys being commissioned, scrutinised and accepted by Worth Parish Council. These first surveys were 'robustly scrutinised (page 3 pre-submission NDP). There is no record that these scrutineers were appointed by the Worth Parish Council. Is it not proper that any interests these scrutineers had at any time should be declared. Two of these scrutineers later served on the Parish Council's Neighbourhood Development Plan Working Party.</p> <p>It was only in January 2013 that application was made for the three councillors who had interests at that time to be granted dispensations in order that they could work on the Neighbourhood Plan. It was the Parish Council, that granted these dispensations. That is, a parish council of seven members granted dispensations to three of its own members. A further two had, until they moved property had interests next to one of the sites under consideration.</p>	<p>WPC are the qualifying body and they are responsible for all documentation which has been approved in Open Council meetings.</p> <p>WPC disagree with these assertions. The respondent has previously made multiple complaints to DDC Standards Committee about Councillor 'interests'. All allegations have been fully investigated. In considering Worth Parish Councils NDP governance arrangements the Monitoring Officer found them to be sound. In investigating individual Councillors the Investigating Officer found that either Councillors did not have the personal interest claimed and could not have a prejudicial interest or in the case of one Councillor who had an interest, they were found to have an excellent understanding of the code of conduct and to have behaved impeccably.</p>
<p>Generally - Further Points</p>	<p>4) Some further points</p> <p>The Draft Plan and Annexe is 101 pages long, too long for many to want to read and reach an informed decision, and on that score raises concerns. Many will almost certainly vote on the proposals without knowing how the decisions were reached. An index would have been helpful. The summary is very brief, and a reference to where proposals are discussed in the documentation would have been very helpful, particularly relating to the selection of development sites, and the method adopted for choosing green spaces, a method that might well surprise many, if not all residents.</p>	<p>WPC accept that not everyone will read the full documentation. WPC consequently sent out a four page summary to every household. This summary, by its nature cannot repeat all the information. WPC have held a total of three Exhibitions during preparation of and delivery of the draft NDP. A</p>

	<p>There are houses included in the Local Green Spaces. Have the owners been advised as to the implications of owning property which is part of a Local Green Space?</p> <p>Have the owners of land proposed as Local Green Space been consulted, and the possible effects of these proposals discussed with them, and if not why not?</p> <p>The effect of land becoming a Local Green Space is intentionally to restrain any future development. The Neighbourhood Development Plan however should consider derelict sites, whether greenfield or brownfield. Differentiating between greenfield and brownfield sites can, in Worth be rather misleading, and a rather artificial distinction in relation to some of the sites in Worth. The Plan does not always recognise this, and there are sites in the Local Green Spaces that will remain derelict and unsightly for the foreseeable future, possibly at some cost to the owners. What does the Council suggest?</p> <p>Why make the council land in Coventon Lane a nature reserve? Why not sell it and put the money to good use?</p> <p>Is the council's view about the parish hall accurate? How secure is the lease, and how secure is the level of rental charges?</p>	<p>consultation statement will accompany the submission version of the Neighbourhood Plan</p> <p>Everyone, including residents, land owners and organisations in Worth have been informed about the NDP and properly consulted</p> <p>Development will be restricted in Local Green Spaces. It is up to landowners to manage their own land</p> <p>WPC wish to develop the land it owns up Coventon Lane as a Nature Reserve for the wider benefit of the whole community.</p> <p>WPC believe its views on the Parish Hall to be accurate. There have been no representations that lead it to believe otherwise.</p>
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Name / Organisation			
Malcolm Bernardes			
Page/Paragraph	Comments and Suggested Changes	Worth Parish Council (WPC) Response	
Generally	Having seen the excellent presentation in the village hall, I would like to offer two suggestions for consideration for potential inclusion in the Neighbourhood Development Plan which have just occurred to me:	WPC appreciate your support	
Section 3.1 Page 9	I offer this comment as an observation and suggestion relating to the Pre-Submission Consultation for the Worth NDP inasmuch as it relates to Worth's	The Conservation Area and the Settlement Confines do not need to	

	<p>"Conservation Area":</p> <p>If you lay the footprint of the Confines of the Village over the footprint of the relevant confines of the Conservation Area, it is surprising to discover that whereas you might expect them to match, they do not.</p> <p>Finalising the Worth NDP offers Worth Parish Council an opportunity to address this, and to introduce some consistency by adjusting the relevant Village Confines, (i.e. only those which relate to the Conservation Area), so that going forward, they match the Conservation Area Confines. This would both simplify matters and potentially strengthen the hand of Worth PC, when at some future date, it interacts with DDC Conservation Dept on planning matters arising within the Conservation Area of the village. Conversely, would Worth Parish Council prefer DDC to adjust the Conservation Area Confines to match the Village Confines to achieve consistency</p>	<p>coincide. It would be inappropriate for the Settlement Confines to match the Conservation Area in all cases (e.g. where the conservation area extends over green areas)</p>
<p>Section 3.3 Page15</p>	<p>1) Village School: Given the current baby boom and the potential construction of 32 new family houses, the Village School is unlikely to see any foreseeable reduction in the demand for pupil places. Thus Worth Parish Council might wish to consider encouraging the removal of the ugly "temporary" pre-fab classroom located beside the pond and promote its replacement with a permanent brick structure, which would be far better for the pupils, especially in the heat of summer, more in keeping with its sensitive position beside the pond, (arguably the main focal point of Worth Village), and located in the middle of a Conservation Area too. Could this be added as an additional stated goal of the Parish Council, by using any powers of influence it may have, (even if limited), to encourage DDC and/or KCC to address this matter?</p> <p>2) Village School: Given the recognised shortage of nearby open space for the Village School's use, other than the distant cricket ground up by the main road corner, might the Council consider an approach to the church authorities to see if an agreement could be reached to lease some of the nearby church owned Glebe land for a sports/playground, assuming it is suitable or can be made suitable? However, if the football kick around area included on the Bisley site is planned to be used by the Village School for this purpose, then this need may potentially be satisfied already.</p> <p>I appreciate these ideas may not be quickly realisable given the current education budget restrictions, but given this Neighbourhood Development Plan is a long</p>	<p>If it occurs, this is an issue for the Local Education Authority. There are currently many fewer children of primary school age in the area than the school's capacity.</p> <p>The new Open Space to the front of the new development will be for public recreation, including use by the school.</p>

	term plan for 20+years, during which the temporary classroom will deteriorate, might it be desirable to have these as stated goals while it is still possible to include them in the plan. Probably easier now than later. I offer this as food for thought.	
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Name / Organisation		
Miriam Bull		
Page/Paragraph	Comments and Suggested Changes	Worth Parish Council (WPC) Response
Section 3.3 Page 14	Should any developer be asked to contribute towards the cost of a new village hall if built on their land in future?	A new village hall is not anticipated within the lifetime of The Plan.

Name / Organisation		
Robert Clarke		
Page/Paragraph	Comments and Suggested Changes	Worth Parish Council (WPC) Response
Generally	<p>Kelvin Spooner and I would like to express our appreciation of the recent exhibition of the Worth Neighbourhood Development Plan</p> <p>In the Village Hall on 27th April 2013. We thought the exhibition was very impressive, professional and informative. We appreciate all the hard work and commitment given by Alan Stobie, Steve Stobie, Caroline Austin and Ken Bates. We fully support the plans as drawn up for the Bisley Nurse site of 32 new houses to include 9 affordable dwellings for local use. We hope that these plans will be formally adopted by Dover District Council</p> <p>Please pass on our thanks and comments to the above mentioned to the Worth Parish Council.</p>	WPC appreciate the support

Name / Organisation		
Mr and Mrs Forster		
Page/Paragraph	Comments and Suggested Changes	Worth Parish Council (WPC) Response
Section 3.3 Page 20	<p>6. <u>Traffic Issues.</u> The A258 between Upton Lodge and the first roundabout at the Felderland Farm Shop is used on Wednesday nights and Sundays as part of a motor bike race track / time trial. Speeds of 70mph to 80mph are often accelerated to with dangerous overtaking of cars and other vehicles on this stretch of road. Present speed limit of 40mph are not observed and police activity and monitoring are completely non-existent.</p>	<p>Comments Noted, speeding is being addressed in The Plan</p>
Section 3.3 Page 16	<p>3. <u>Community Facilities.</u> King George V Field is better than adequate and should be shown on summary diagram as a protected sports area. The outgoing chairman, told me that the King George Field was already protected in Dover Plans, and as such does not need to be included in the Worth NDP plan. I disagree with his comments. It should be included in the Worth NDP as a designated community facility, not just shown on the summary diagram as an "existing open space." The King George V Field should be named on the summary diagram. The King George V Field is used by Worth County Primary School for Sports Days, athletics, baseball, rounders, it is also used Worth Village Cricket Club. Village resident children use the play area, and grass area is used by young children as a football 'kick about' area.</p> <p>Vandalism of the Pavilion is presently occurring, and has been reported to Neighbourhood Watch representative Ken Bates. The Cricket sight screens are being vandalized and broken by two village youths. They were repaired and broken again, 16th May 2013, at 8.50pm two aerosol cans with a hole punctured in each one were found, near the sight screens, and two used energy drink cans were also found. The sight screen was found to be weakened at the repaired area.</p> <p>Three young children (boys) together with both parents visit the play area after school time. The three boys climb a tree (watched by both parents). The eldest boy then walks along the top of the fence (The Street Fence), holding onto the tree. The father is seen to climb to the top of the slide. This incident has been reported to the NHW co-ordinator Ken Bates.</p>	<p>It is a protected open space covered by DDC Policy DM25</p> <p>These issues have all been addressed and are not within the remit of The Plan</p>

	The King George V Field should be monitored more closely, for vandalism and misbehavior and asection under Health and Safety and policing of the Area should be included in the NDP.	Unfortunately this is not within the remit of The Plan
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Name / Organisation		
Mr and Mrs Ledwith		
Page/Paragraph	Comments and Suggested Changes	Worth Parish Council (WPC) Response
Section 4.3 Page 39	<p>With reference to the last meeting in Worth Village Hall explaining forward procedure for the Parish Plan of Worth. We were given an explanation of how we should move our enquiries forward by the councillors present during the meeting. We are very concerned that our property (1, Church Farm Cottages, Jubilee Road, Worth, Deal, Kent CT14OON), has been included within the green space open area in the village.</p> <p>We should be very grateful if the Parish Council would reconsider this decision. We are moving into the above address at the end of June as our rental agreement in Studdal comes to an end and, as the Parish Council are aware, we had hoped to have our plot considered for one dwelling. We understand that the formal application should be made at a later date when the council has considered the various options. However, if the property is in the green open space area this may not be possible.</p> <p>We would be very grateful if the Council would reconsider the plot as being outside of the green space area to allow us the opportunity of applying for planning permission once the Parish Council have made their final deliberations.</p>	<p>Agree - this land will be removed from the Local Green Space.</p>

Name / Organisation		
Mr & Mrs R.C. Harvey		
Page/Paragraph	Comments and Suggested Changes	Worth Parish Council (WPC) Response
Generally	The Parish Council are to be congratulated for producing the Pre-Submission NDP draft which would appear to cover all aspects of village planning both for the present and the future. We appreciate the fact that the community has been consulted and kept informed at every stage of the process	WPC appreciate your support
Section 3.3 Page 20	Speed limits are ineffective without proper enforcement; constantly changing speed limits are distracting and therefore dangerous. Junction safety would be	Noted

	improved if verges and hedges were properly trimmed to provide good sight lines. We are totally opposed to the imposition of speed humps for traffic calming.	
Section 3.5 Page 24	We support the idea that farmers are to be encouraged to replace non-native hedging with native species and would suggest this should apply equally to owners of wooded/scrub areas. Where these exist close to built areas inappropriate species, eg neglected leylandii hedges and other intrusive vegetation, can constitute a nuisance and have the potential to interfere with overhead utility cables	Current legislation allows reduction of overheight leylandii and similar hedging in residential areas.

Name / Organisation		
Roger & Lorna Jones		
Page/Paragraph	Comments and Suggested Changes	Worth Parish Council (WPC) Response
Section 3.3 Page 16	Speaking as allotment holders ourselves, we cannot support this objective because in our view the cost of installing a fence that would deter both rabbits and crime would be completely out of proportion. Secondly, we believe that such a construction would be out of keeping with the generally open aspect of the area.	WPC envisage erection of stock/rabbit fencing which would be in keeping with a rural area.

Name / Organisation		
John Mills		
Page/Paragraph	Comments and Suggested Changes	Worth Parish Council (WPC) Response
Generally	After studying the plans, everything seems satisfactory.	WPC appreciate your support

Name / Organisation		
David Ross		
Page/Paragraph	Comments and Suggested Changes	Worth Parish Council (WPC) Response
Generally	I am happy with The NDP.	WPC appreciate the support
Section 5 Page 44	My only comment concerns the designation of the allotments as 'Existing Open Space'. Given the propensity for such areas to fall under development (in the	The allotments are an Open Space, protected from development by DDC Core Strategy Policy DM25

	<p>longer term), is it possible to change this designation so as to afford some greater protection to this area, so as to ring fence for future generations as an allotment site? As Protected Green Space? There is a strong drive to encourage horticulture.</p>	
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Worth Neighbourhood Plan Discussion

Notes for Worth Parish Council

A discussion via a Telecom on the Pre-Submission version of the Worth Neighbourhood Development Plan took place on Monday, May 13th between Alan Stobie (Chairman, WPC), David Whittington (Senior Planner, DDC), Gareth Bradford (DCLG) and Kate Thompson (DCLG). The aim of the discussion was to obtain independent, expert advice on any changes that might be required to 'The Plan'. It was understood prior to the discussion that any comments or advice should not be interpreted as formally attributable to the Department for Communities and Local Government (DCLG).

The main comments and suggested actions are listed below. They fall into three main criteria.

1. Plan Structure

- It needs to be made clearer that only the land use policies form the 'Development Plan' and that only these will be subject to Examination and voted upon in a referendum.
- Suggested Action:
 - The document is named the Worth Neighbourhood Plan. Only the Planning policy section is named the Worth Neighbourhood Development Plan. This document should be very clearly distinguished from the remainder of 'The Plan'.

2. Rationale, Justification and Achievement

- All policies should be justified with a clear rationale. The preamble to a Policy should contain justification for the policy and what it is trying to achieve. For example:
 - The policy on housing should be clearer on why the number of houses and why this site. It should also explain in more detail what the policy is designed to achieve.
 - The Local Green Space Policy should show how all the criteria of the NPPF are met.
- Suggested Actions:
 - Move some of the material from the annex into the main body of the document and possibly move some of the site description into an annex.
 - Describe in more detail how the Local Green Spaces meet all the requirements of the NPPF

3. Policy Wording & Associated Diagrams

- The Policy wording is in places very prescriptive (e.g. the use of 'will') and, if retained, this will require considerable justification.
- The phasing and implementation plan is too prescriptive within a policy, preventing some flexibility and perhaps reducing viability. It would be better located elsewhere. This should not prevent it being referred to in the Policy. Figure 5, Illustrative Diagram is too prescriptive. It would be better located in an Appendix. This should not prevent it being referred to in the main development plan or its use in advertising literature.
- Suggested Actions:
 - Use the word 'should' in place of 'will' in the policies; further fine tuning of the opening words of Policy WDP 01 may be required and this will need input from DDC.
 - Refer to phasing and implementation in the policy but include the wording elsewhere, possibly making the timelines less prescriptive.
 - Move the Illustrative Diagram to an Annex. Ensure the wording used does not misdirect or be over prescriptive for developers.

In addition it was noted SEA screening may be required and will be supplied by DDC. Other suggested changes will be supplied by the LPA as part of the consultation response.