

Planning and Development Services

Ask For: Simon Cole
Email: simon.cole@ashford.gov.uk
Direct Line: (01233) 330642
Fax No: (01233) 330682



ASHFORD
BOROUGH COUNCIL

Civic Centre
Tannery Lane
Ashford

Kent TN23 1PL
(01233) 331111

Typetalk (01233) 330744
www.ashford.gov.uk
DX 151140 Ashford (Kent) 7

Lynn Freeland
Programme Officer
c/o Ashford Borough Council
Civic Centre
Tannery Lane
Ashford, KENT TN23 1PL

Date: 23rd July 2010

Dear Lynn,

RESPONSE TO INSPECTOR'S LETTER 12th JULY 2010

Ashford Borough Council would wish to make the following comments in response to the 3 changes in Government policy referred in the Inspector's letter dated 12th July 2010.

Revocation of the Regional Spatial Strategy

At the recent Examination hearings, the Council reiterated the points made on the relevance of the RSS to the DPD set out in its Response to Matter 2 paper. In summary, the Council considered that the RSS did not seek to directly influence the level of residential development in the rural part of the Borough (outside the Ashford Growth Area) and that, consequently, the proposals for the rural area set out in the adopted Core Strategy (particularly the scale and distribution of residential development in policy CS6 of the Core Strategy) should be the basis on which allocations in the DPD are made.

Clearly, the subsequent revocation of the RSS eliminates any possible suggestion that the RSS should somehow outweigh the Core Strategy approach and leaves the Core Strategy as the remaining part of the Development Plan.

Therefore, the Council considers that the revocation of the RSS simply further reinforces the primacy of the adopted Core Strategy as the appropriate starting point for the preparation and content of the DPD and, if anything, reinforces its soundness.

Exclusion of residential garden land from the definition of PDL in PPS3 Annex B

The Council supports this change in Government policy. Insofar as it affects the content of the DPD, the change is considered to provide added weight to the definition of 'built-up confines' of settlements contained in paragraph 7.8 of the DPD. This is because the definition excluded "*any curtilage beyond the built footprint of buildings on the site (e.g. garden areas)*". Such an interpretation would appear to be now more consistent with the Government's intentions and policy with regards to restricting new residential development within garden areas and lends added weight and soundness to the Council's approach.

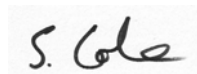
Deletion of the national indicative minimum density of 30 dwellings per hectare from PPS3 para. 47

The Council's position on residential density matters is set out in its Response to Matter 4 Paper. In this Paper, the Council stressed the importance of indicative residential densities being able to reflect their context and surroundings and not being artificially driven by a nationally based minimum density figure which may not deliver an appropriate form of development in a particular locality.

As such, the Council now welcomes this change to PPS3 as it enables policies to reflect their context without the need for any specific local justification as to why a minimum density of 30 dwellings per hectare would not be suitable.

The change has no other impact on the content or soundness of the DPD as the indicative capacities reflected in the site specific allocations already take account of their respective context and surroundings, as well as the need to accommodate any on-site infrastructure or servicing. Therefore, there is no need to amend any of the indicative site capacities in the DPD as these already reflect residential densities lower than 30 dph where that was felt to be appropriate.

Yours sincerely,



Mr Simon Cole
Policy Manager