

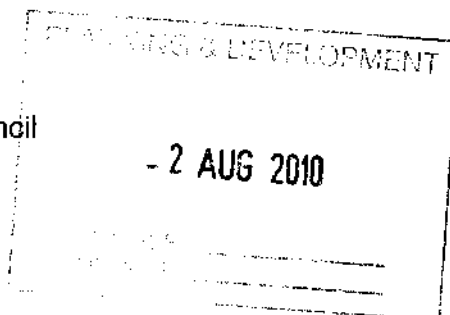


PRO VISION
PLANNING & DESIGN

Our ref: KS/963

30 July 2010

Ms Lynn Freeland
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C/O Ashford Borough Council
Civic Centre
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Dear Ms Freeland

TENTERDEN AND RURAL SITES DEVELOPMENT PLAN DOCUMENT – POST HEARING CONSULTATION

Thank you for your letter of 12 July 2010.

We note Mrs Chivers seeks comments on recent government announcements in relation to Regional Spatial Strategies and national planning policy on housing.

We are instructed to reply on behalf of Knightspur Properties Ltd.

Revocation of Regional Spatial Strategies

Policy CS6 of the Ashford Borough Core Strategy states that *“in the Borough outside the Ashford Growth Area, housing site allocations will be made through the Tenterden and Rural Sites DPD based on a hierarchy of settlements suitable for limited expansion”*. The Policy seeks to make provision for 1000 dwellings in the rural areas across the Plan period.

The South East Plan (SEP) identified part of Ashford Borough as lying within the East Kent and Ashford sub-region and part as lying outside the sub-region. Policy AOSR6 of the SEP gave a housing provision figure of 300 (between 2006 and 2026) for the area of the Borough that falls outside the East Kent and Ashford sub-region (including Tenterden).

As acknowledged at paragraph 2.7 of the Council’s ‘Rural Housing and Employment Background Paper’ (June 2009) there was no specific explanation or justification within the SEP for the arbitrary dissection of the rural part of the Borough into two parts. The Background Paper (paragraph 2.7) goes on to state that *“even by assuming the vast majority of housing identified within the part of the Borough falling in the East Kent and Ashford Sub Region being attributed to the Town of Ashford, there would still be a residual number to allocate in the Sub-Region’s ‘much of rural Ashford’ area, although how much development is unclear”*.

How housing provision for the Plan period related to the SEP was specifically discussed at the EiP as part of Matter 2. At paragraph 8 of the Council's response to Matter 2 they state *"In relation to the lack of clarity towards the Borough's rural area, this is considered to be firmly reflective of the strategic focus of the SEP and the move towards concentrating development at identified sub-regions. This position is reinforced by the Panel when it stated that 'although we are confident in the sub-regional apportionment that we suggest, it is far more difficult at this strategic level to be confident about individual districts totals' (para 7.106)"*.

The Council continue to highlight paragraph 26.63 of the SEP Panel Report which stated *"we do not see a need to adjust the proposed levels in the more rural parts of the area. Each of the four local authorities concerned (including Ashford) was confident that they had sufficient flexibility to be able to provide adequately for the needs of their rural communities"*.

Paragraph 12 of the Council's response to Matter 2 states that the Core Strategy Housing figure for the rural areas was derived from balancing the strategic level guidance available at the time (the then adopted Kent and Medway Structure Plan (2006) and the then emerging SE Plan (March 2006)) with an assessment of local issues, such as the relative sustainability merits of the Borough's rural settlements and their ability, in principle, to distribute this number appropriately.

The Core Strategy requirement to deliver 1000 dwellings in the rural areas across the Plan Period is a result of "bottom up" calculations as to what is required to meet local and sub regional needs and not a "top down" policy by way of the SEP. As noted above the SEP lacked clarity regarding the District's rural areas in any event, focussing on development at a sub-regional level, leaving the District Council to interpret / determine the housing requirement for the rural area.

Question 10 of the 'Guidance for Local Planning Authorities Following Revocation of Regional Strategies' (issued with the DCLG's letter to Chief Planning Officers dated 6 July 2010) states that in the absence of Regional Strategy targets LPA's will be responsible for establishing the right level of local housing provision in their area, and identifying a long term supply of housing land without the burden of regional housing targets.

As set out above the housing figures put forward in the Tenterden and Rural Areas DPD are derived by Ashford Borough Council through the Core Strategy, they are not as a result of the SEP. It follows therefore that the housing provision figure put forward in the Tenterden and Rural Areas DPD should remain unchanged in order to meet the needs of the local community, in compliance with central government guidance.

Notwithstanding the revocation of the SEP the Tenterden and Rural Areas DPD must continue to:

- a) Meet the requirements of PPS3 (June 2010 Version) in particular:

- Paragraph 33 - to respond to evidence of local and sub-regional need and demand, in the light of the latest projections and the needs of the regional economy; and
 - Paragraph 38 – the need to develop mixed, sustainable communities across the wider local authority area as well as at neighbourhood level (i.e. development should not be focussed solely on a District's main urban area)
- b) Achieve the vision of the Core Strategy and Tenterden and Rural Areas DPD, which is to achieve the right balance between the protection and enhancement of the rural area and the need for communities to grow and evolve.

It can therefore be concluded that the revocation of the SEP does not materially affect the soundness of the Tenterden and Rural Areas DPD in respect of the overall housing numbers, their distribution and focus on Tenterden all of which are required in order to achieve the housing numbers to meet local needs.

Deletion of the National Indicative Minimum Density of 30 Dwellings per Hectare from PPS3 Paragraph 47

The Council's Strategic Housing Land Availability Assessment (SHLAA) (December 2009) identified the capacity of sites put forward for residential development. Stage 6 (page 7) of the Assessment provided standard anticipated densities for various locations across the Borough. Tenterden was identified as capable of delivering housing development at 40 dph and 'other villages' at 30 dph. These densities and thus anticipated site capacities were used as the basis for the Tenterden and Rural Sites DPD.

Whilst not specifically acknowledged in the SHLAA the minimum density of 30 dph in 'other villages' is expected to have been derived from the minimum densities set out in PPS3 (pre June 2010 version).

The deletion of the national indicative minimum density of 30 dph allows Council's to set their own density ranges, having regard to a number of issues set out at paragraph 46 of PPS3, including the characteristics of the area.

It is likely that a number of sites identified in the Tenterden and Rural Sites DPD (particularly those in the 'other villages' will be developed at a lower density than anticipated in the SHLAA. This could in turn increase the amount of land required for development in order to meet local housing need. It is therefore essential that the DPD has a contingency strategy. The need for a contingency strategy in relation to housing delivery in Tenterden was addressed in the Participants Matter 5 Hearing Statement. The need to ensure that housing delivery is not compromised as a result of the deletion of the national indicative minimum density of 30 dph supports and emphasises the case for a contingency strategy in Tenterden as well as the wider rural area.

Ms Freeland

30 July 2010

We hope these additional comments are helpful.

Yours sincerely

PP.



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