

29 July 2010

Our Ref ADB/BID19

Lynn Freeland  
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Civic Centre  
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Dear Lynn Freeland

**ASHFORD LOCAL DEVELOPMENT FRAMEWORK  
TENTERDEN AND RURAL SITES DPD**

**Post Hearing Consultation into the Abolition of Regional Spatial Strategy (RSS) and amended Planning Policy Statement 3 (PPS3)**

Thank you for the opportunity to make representations on the possible implications of these changes for the soundness of the submitted DPD.

One of the tests of soundness in PPS12 is the need to be consistent with National Policy. The abolition of the Regional Spatial Strategy for the South East of England embodied in the South East Plan May 2009, with nothing as yet to replace it, must undermine the soundness of the submitted DPD.

Much of the plan making has been driven by the housing targets set out in the South East Plan. This appears to have led to some curious site selections and allocation numbers based on a need to meet housing target figures rather than housing need allied to an identification of local investment priorities and wider economic issues.

The Inspector of the Ashford LDF Core Strategy EIP expressed concern at the manner in which the District Council had arrived at the numerical basis for its housing land allocations, and the allocation process, and how, for the rural hinterland outside the strategic growth area the housing targets had been

prescribed with little or no assessment of the demographic and social needs of the rural population.

We believe, as the Inspector suggested, that the Council should carry out appropriate assessments of housing needs having regard to demographic trends in the rural areas, and a balanced approach to housing, jobs and services, which would support the approach to the allocations of housing land.

With regard to the amended Planning Policy Statement 3 (PPS3), the deletion of the national minimum density of 30 dwellings per hectare will have material implications for the formulation of Development Plan Policy. This, together with the new policy on 'garden grabbing' represents a major shift in housing policy.

The Government is concerned at the high proportion of smaller dwellings built in recent times due to the prescriptive density standards at the expense of family homes and retirement housing.

Whilst there will continue to be a place for high density housing it is likely that on the basis of local surveys there will be a justified case for a more balanced approach to housing to meet the needs of all sectors of society.

We consider the local strategy for spatial planning must therefore now be reviewed. It is for the local planning authority to generate this review (supported by a sounder evidence base than currently exists) along with other important stakeholders and the local communities.

We look forward to the opportunity of seeing the Borough Council's response.

Yours sincerely

Alan Bishop