



27th. July 2010

Ms. Lynn Freeland
The Programme Officer
Planning & Development Unit
Ashford Borough Council
Civic Centre
Tannery Lane
Shford TN23 1PL

Dear Ms. Freeland,

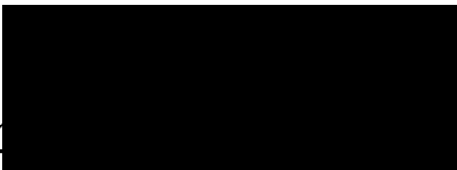
Tenterden & Rural Sites DPD

I write with reference to your e-mail dated 12th. July 2010 inviting comment on the abolition of RSS and amended PPS3.

I enclose a document addressed to the Inspector concerning the effect of these changes to the Council's submission for development at Rolvenden (ROLV1).

I should be obliged if you would pass the document to the Inspector.

Yours sincerely,



J.Field

c.c. Whitehead Manekton, Soken, Maidstone

**SUBMISSION DOCUMENT DATED
27th. July 2010**

Revocation of Regional Strategies and their associated regional housing targets in relation to the Tenterden and Rural Sites Development Planning Document - Ashford Borough Council Local Development Framework- Rolvenden

Presented to Ms. Stephnie Chivers BA DipTP MRTPI
(Appointed Inspector to conduct the public Examination to consider the soundness of the Tenterden & Rural Sites Development Plan Document - Ashford Borough Council Local Development Framework)

The Tenterden & Rural Sites Development Planning Document was predicated on the basis of housing targets established under Regional Strategy. With the revocation of Regional Spatial Strategies (Secretary of State for Communities and Local Government letter, dated 25th. June 2010) Local Authorities will be responsible for identifying the supply of housing land without the burden of imposed regional housing targets. Accordingly, it will be for the Local Authority to defend any allocation of future housing that the Local Authority may make without resort to the shelter of conformity to obligatory regional numbers. Thus the removal of such statutory obligation leaves the Local Authority obliged to defend proposals that they make in the light of other more traditional planning criteria.

It is my argument that the proposals for Rolvenden contained in the Tenterden & Rural Sites Planning Document (ROLV 1) cannot now be sustained on such arguments alone.

Location of Housing

1. The over-arching policy in meeting housing provision remains that development should be within the region's cities and towns. **Rolvenden is neither.**
2. Housing development should generally be in a location that is well served by a choice of transport modes. **Rolvenden has no direct rail links and very limited public bus service. Therefore, reliance on the private motor car is paramount for virtually all journeys involving employment, schooling, shopping and pleasure.**
3. Future housing development should protect the countryside and focus on urban renaissance. **The proposed Rolvenden development site (ROLV 1), which back onto open country and faces open country across a public highway (A28), is clearly a countryside site and by the above criteria should be protected. Rolvenden is situated in, and is part of a clearly defined rural area. It has no urbanisation and therefore the criterion of urban renewal does not arise**

It is clear that the proposed development site (ROLV1) does not satisfy these criteria. With the revocation of RSS and its targets philosophy, the main prop of the Local Authority's policy for development in Rolvenden falls away. Any proposal will now have to conform to a policy framework that is not numbers orientated and has to be justified in relation to local demand for housing from within the village. Such demand has yet to be established. The current development for social housing (Glebe Field) may well have met that demand and the opposition to further development (Rural Community Workshops para. 3.5) needs to be quantified before any development can be seen to satisfy local

preference. Therefore, as currently proposed, ROLV1 is an inappropriate development within the framework of the new planning regime.

In addition there are several factors that bring an adverse element to any large scale development plan such as ROLV1. The following points illustrate the consequential disadvantages that arise from such a plan.

Rolvenden's geographic position.

Ashford Borough Council does not recognise formal parish boundaries. Therefore, for the purposes of this document I have used the speed restriction signs placed on the public highway approaches to the village as defining the geographical limits of Rolvenden; namely, those located at the eastern and western entrances on the A28; the northern entrance on the B2086 and the southern entrance on the unclassified road from Rolvenden Layne (see map Appendix A).

Rolvenden's present housing stock.

Within the above defined geographic position the housing stock consists of 332 dwelling houses, of which 220 (69%) are contained on 5 estates: Sparkeswood, Monypenny, Gatefield, Gybbons and Glebe Field (see Appendices A & B). The remaining 112 dwelling houses, mostly situated along the public highways, reflect the architectural development of the village over many centuries. Thus, another estate-type development, with its proposal of a further 40 dwelling houses, will further distort the relationship of historic village houses to new estate dwellings; bringing the percentage of the estate element to nearly 70%. This will further dilute the historic village ambience; an ambience that due planning process seeks to protect.

Services and infrastructure

Rolvenden has no medical services directly available in the village; the nearest general practitioners, pharmacists, dentists, etc. are only available in Tenterden and further afield. Provision of public education is limited to the Primary School (7-11years) with reliance on portable-type classrooms. No secondary education is provided within Rolvenden's geographical confines. All secondary school students and many primary school students commute to Tenterden, Cranbrook, Ashford and further afield, many by motor car.

Employment opportunities

With the exception of a small food-processing factory (Korkers Ltd.) the only employment opportunities in the village are confined to bar work in the two public houses and assistants in the village shop/post office and hairdressing salon. All other employment opportunities have to be found in London and the nearer larger towns, Ashford, Maidstone, Tunbridge Wells, etc. which can only reasonably be accessed by motor car commuting.

Commuting

1. The lack of employment and scholastic opportunities within the Rolvenden environment compel residents to commute, predominately by motor car. Similarly, the lack of retail outlets obliges residents to commute, again predominately by motor car, to the larger towns. Such journeys contribute to the present high levels of commuter traffic on the A28. Tenterden High Street is consistently jammed with commuter/scholastic traffic during the morning and afternoon/early evening week-day peak periods with the traffic tail-back stretching well beyond the town limits. Similarly, the A28 Matalan roundabout junction, on the outskirts of Ashford, and through which Rolvenden/Tenterden commuter traffic must pass to reach/leave Ashford, is a notorious bottleneck with traffic subjected to substantial delays at peak period (and unsuccessful attempts to avoid the queue each morning has created a "rat run" and tail-back through Great Chart village, adding to the difficulties of local traffic accessing the village school). Further housing expansion, as proposed by ROLV1, will only exacerbate the problems associated with commuting.
2. Similarly, the very restricted choice of goods available at the village shop ensures regular shopping forays to Tenterden, in particular to the Waitrose and Tesco supermarkets, and longer journeys to the larger towns for more substantial items. Thus, further housing expansion in Rolvenden and its associated retail demand can only increase congestion on local roads, particularly the A28
3. The same problems of congestion arise for those commuting for employment in London and other large towns. The absence of a direct rail link at Rolvenden obliges London bound commuters to travel either directly by road to their places of employment or to drive to Staplehurst and Headcorn railway stations where parking is already at full capacity. Similarly, commuting by car to other large towns such as Maidstone and Tunbridge Wells, presently causes congestion and delay in villages passed en route; Sissinghurst, Goudhurst and Staplehurst are notable examples, where local scholastic traffic battles with commuter traffic. Such journeys only add to the general congestion on the local road network.

The proposed development (ROLV 1) therefore can only add to the existing congestion of the surrounding road network and runs counter to policy to reduce such journeys from their present levels.

Safety

The A28 is the main road between Ashford and Rolvenden. Although designated an “A” road it is a single carriageway with many very sharp and dangerous bends. Kent County Council “designated the whole of the A28 as an advisory route for through lorry traffic” (letter dated 2 January 2007 Appendix C) and consequently, commuter and scholastic traffic mingles with increasing volumes of HGV usage. The road safety record of the A28 between Rolvenden and Ashford is not good; there have been many accidents, unfortunately some involving fatalities. Additional commuter traffic can only increase traffic density with the potential to lead to an increase in the frequency of such accidents.

Summary

The consequence of recent changes announced by Government, not only Revocation of RSS but also its general philosophy of reducing the power of the centre, leaves the Local Authority with some difficulty. The ROLV1 plan was predicated to meet the numbers inherent in the Regional Spatial Strategy. As a consequence of the reformation that removes the obligation of housing development to be built around centrally imposed numbers, Local Authority development plans have to reflect other criteria that now have greater importance than hitherto; namely to concentrate housing development in urban areas and to seek a wider mandate of local resident opinion if such development is suggested for rural areas. Under the present Development Plan, local opinion was sought on the basis “these are the numbers allocated to your area: where should the dwellings be situated?” with less importance attached to objections that challenged the supposed need in a particular area and little or no heed taken of the peripheral consequences of the development plan as applied to a particular area.

As I hope I have demonstrated, the consequences of the adoption of ROLV1 would ignore, or place too little weight, on the current deficiencies inherent in the local infrastructure; will further diminish the village’s rural ambiance; and expand the adverse affect of increased traffic numbers (which in themselves bring both increases in light and atmospheric pollution and expose pedestrians, passengers and drivers alike to greater danger). With the removal of the obligation to meet Regional targets, the DPD, in so far as it applies to Rolvenden, is now shown to be unsound.

Rolvenden Proposals Map



Appendix B

ROLVENDEN HOUSING STOCK AND LOCATION

Location

Individual housing

A28: Hastings Road speed sign to Ashford Road speed sign	
North side (including Squires, Tweedies and Lamsden House)	47
South side (including Church Cottages)	43
B2086: Benenden Road speed sign to junction with A28	
West side	16
East side	2
Minor road to Rolvenden Layne: speed sign to junction with A28	
West side	1
East side	3
	112

Estate housing

Sparkeswood	112
Gatefield	35
Gybbons	28
Monypenny	33
Glebe Field	12
	220



Mr J Field
The Little House
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**Environment & Regeneration
Directorate
Strategy and Planning Division**

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Kent ME14 1XX
Tel: 01622 221612
Fax: 01622 221635

Email: mick.sutch@kent.gov.uk
Ask for: Mick Sutch
Your Ref:
Our Ref: T/FRT/01
Date: 2 January 2007

Dear Mr Field

Advisory Lorry Routes

Thank you for your letter of 27 November and follow-up of 20 December. I apologise for not responding to your original letter which I did not receive.

In answer to your questions, the County Council produced its Advisory Lorry Map in March 2001, in association with the Freight Transport Association and Road Haulage Association. The object of the Map is to assist lorry drivers to take the most appropriate route on roads throughout the County and to give guidance on routing lorries to specific locations which generate many lorry trips and are relatively difficult to find.

The whole A28 is shown as an advisory route for through lorry traffic and all 'A' class roads in Kent are included on the Map unless they have a height restriction due to a low bridge.

Please contact me if you require further information

Yours sincerely

Mick Sutch
Head of Planning & Transport Strategy

