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Planning & Development Unit  
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30<sup>th</sup> July 2010

Dear Ms Freeland

### **Tenterden & Rural Sites DPD - Post Hearing Consultation**

We are pleased to respond to the request from the Inspector to comment post hearing on the recent planning changes. These comments relate to Tenterden.

### **Revocation of Regional Spatial Strategies (6 July 2010)**

This revocation in no way alters our view that the DPD is unsound. Evidence that informed the preparation of the South East Plan remains valid and is a material consideration. In particular, the annual growth rate for Tenterden with the adjacent settlements of Rolvenden and Biddenden was indicated at 15dpa. This growth rate recognised the relatively remote location of the settlements from major road and rail links and the ability of the area to provide a rural buffer between the growth area of Ashford and towns further to the west, particularly Maidstone. Historically Tenterden has grown at a faster rate, in response to the importance and attractiveness of this market town, and over the eight year period 2001 to 2009 some 280 new dwellings were completed at a rate of 35dpa, comprising a mixture of windfall and larger development sites.

Current advice from the Department for Communities and Local Government reinforces the need for low carbon solutions. Significant development within Tenterden, which has limited employment opportunities, will result in long distance commuting which is contrary to such Government advice.

The Department for Communities and Local Government indicates the LPA will be responsible for establishing the right level of local housing provision in their area. However, justification of housing numbers should be based on reliable information in line with PPS3. We contest there is reliable information for the allocations proposed in the DPD, particularly as the Council originally indicated a requirement for Tenterden of just 265 dwellings to meet local needs.

A further concern is the withdrawal of policies contained in the South East Plan and the lack of overarching policies for Tenterden. These deletions and omissions potentially add to the unsoundness of the DPD.

### **Exclusion of residential garden land from the definition of Previously Developed Land in PPS3 Annex B**

The number of garden plots coming forward for development is likely to remain unchanged as the financial driver for the landowner remains the same. Whether approval is granted will be down to the Council's view on such development. We might expect a reduction, but not elimination of windfall sites and these can be anticipated throughout the DPD period despite their exclusion from the DPD numbers within the first 10 years of the Plan.

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

This change is welcomed. The setting of TENT1, Phase A, although adjacent to the built area south of the High Street, mainly interfaces with lower density development, open space and countryside. A move to lower densities would be more in keeping with the area as the concept of replicating the lanes and twittens of the High Street would be out of place for the vast majority of the area – perhaps the extreme northern part of Tent27 being the exception for such high density development.

The land available in TENT 1, Phase A through the landowner collaborative agreement is some 9.3ha. After allowing for the retention of the pond and woodland, the provision of perimeter landscaping and the provision of open space/ play areas as outlined in the DPD, the land available for development would be significantly less and might not exceed 6ha. If the Town Council land were included the net increase after allowing for the additional public car parking would not add significantly and even if 7ha were available this would imply an average density of over 40dpha.

The above observations on the three matters under review during this post hearing consultation indicate that the rate of development in the DPD area and the density of housing should both be reduced.

Oral evidence given at the hearing concerned the Council's housing trajectory published in the latest 2008-09 Annual Monitoring Report. Section 2.6 of that report indicates that the housing trajectory figures were assessed against the regional housing requirement, which we take to be the provisions in the now revoked South East Plan; that is 15dpa for Tenterden plus the two adjacent settlements. The trajectory indicates an oversupply of housing at the end of the plan period in 2021 of 389 dwellings over the Core Strategy target of 1500 dwellings for the whole of the rural area of the Borough so there is room to reduce the provision for Tenterden. Furthermore, the trajectory provision for Tenterden based on the 280 odd properties constructed since 2001, the 24 extant planning approvals, outlined in the same report, the DPD provision of 475 dwellings and a 50% allowance for windfalls in the last 5 years of the plan brings the total for Tenterden to over 860, well in excess of the 50% allocation the Inspector of the Core Strategy thought Tenterden could support. The excess of 110 dwellings over the 750 dwellings (50% of the Core Strategy target) should be deleted from the provisions of the DPD, bringing the number down to a maximum of 365 dwellings. This rate of provision for the remaining 10 years of the Plan period equates to the historic provision figure and a growth that the town can more readily assimilate.

Finally, reviewing the Core Library documents the Council's written representation dated 18<sup>th</sup> June was added to the library at some point on or before 5<sup>th</sup> July, but was not available immediately prior to the hearing. Section G of that representation relates to car parking in Tenterden and the generation of additional traffic. The statement that it is a replacement facility runs contrary to the DPD. Section 6.26 of the DPD clearly recognises the need for additional public car parking and quotes an indicative capacity of 150 – 200 spaces. This inconsistency is yet another example of the unsoundness of the DPD.

Yours sincerely



Chris Mason  
Chairman  
Tenterden and District Residents' Association