

Dear Ms Freeland

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

The following are the responses on behalf of the Tenterden Town and Rural Partnership

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

Notwithstanding the Revocation, the DPD, in our opinion, remains unsound.

The underlying evidence and rationale that informed the South East Plan is robust and remains valid in the following key respects:

- Identified differential growth rates for Tenterden and adjacent rural communities
- The rates of growth, both allocated housing and windfall, since 2001
- Recognised limitations of road and rail links,
- The need to retain countryside buffers between this market town and the larger settlements of Maidstone and Ashford,

The RSS contained a series of very important policies that established a context of protection for smaller market towns such as Tenterden. These have now been removed, further exposing the omission in the DPD of overarching strategic policies for Tenterden to evaluate alternative development sites. These we highlighted in our earlier objections. They included priority to be given to lateral rather than linear development and that allocated housing should be within easy walking distance of the town centre.

Furthermore, the scale of housing development proposed for Tenterden is not matched by strategies for local employment provision and the limited employment opportunities will result in extensive commuting, contrary to low carbon solutions being advocated by the DCLG.

The DCLG indicates that the LPA will be responsible for establishing local housing level based on reliable information in

line with PPS3. Significantly, Ashford Borough Council originally indicated a requirement for Tenterden of just 265 dwellings to meet local and growth needs.

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

We welcome the flexibility this gives to the LPA to respond to local circumstances. Evidence of the scale of windfall sites over recent years suggests that these will continue to be a feature , albeit at a somewhat reduced scale.

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

We welcome the removal of this constraint. It will allow flexibility in Phase A of TENT 1 so that the development will be a natural progression from the built up area off the High Street into the countryside. However, after provision and development of green areas, a much needed enlarged new GP surgery serving a catchment of c. 14500, the retention of sight lines into and from the town, landscaping, additional parking and recreation space, the average housing density will be substantially above 30dph.

This in turn raises fundamental questions about the DPD overall allocated housing figures for TENT1. Not only do the figures incorporated in the revoked SE Plan look more realistic, but figures based on ABC's own housing trajectory figures 2008/9(after taking account house builds from 2001-8, planning approvals, the DPD figure of 475 and an allowance for windfalls) substantially exceed the sustainable allocation, as identified in the Core Strategy by the Inspector.

Yours sincerely,

Peter Davies  
Chairman  
Tenterden Town And Rural Partnership