



Programme Officer,
Ms Lynn Freeland,
Ashford Borough Council,
Civic Centre,
Tannery Lane,
Ashford,
Kent TN23 1PL

30th July 2010

Dear Ms Freeland,

Tenterden and Rural Sites DPD – Post Hearing Consultation

We are writing to respond to the Inspector's request for responses to the Revocation of Regional Spatial Strategies as it may affect the Tenterden and Rural Sites DPD

Housing Numbers

We believe that the revocation of the RSS does not alter our view that there is an over supply of housing land in the DPD, particularly in Tenterden. The Department of Communities and Local Government now requires Local Authorities to set the supply of housing land for their area.





The housing numbers originally proposed by Ashford Borough Council for Tenterden made allowance for windfall sites in the Core Strategy, which allowance was decided by the Inspector as inappropriate and numbers so decided were adopted by the Council.

Additionally there is considerable evidence submitted elsewhere that the numbers of houses allocated elsewhere are suspect. Indeed the Council originally proposed 265 as the number to meet local and growth need.

In the light of this we do not believe that there is sufficient evidence to allocate more land than that contained in TENT1 Phase A.

We submit that the Inspector should be invited to settle for TENT1 Phase A as the single allocated site for Tenterden, with a specific recommendation for an early review of the Core Strategy and DPD.

Potential Policy Omissions

We have already made submissions seeking overarching policies for Tenterden as a town of particular importance both locally and nationally, to prescribe the boundaries of future housing development.

The abolition of the South East Plan (the Regional Spatial Strategy) strengthens this argument as it has left a considerable planning vacuum. District and Borough plans have been prepared in the context of an over-arching strategic framework of policies, originally provided by the County Structure Plans (until 2009 in Kent by the Kent and Medway Structure Plan 2006) and most recently by the Regional Spatial Strategies, which included strategic planning guidance on a range of matters including countryside protection, biodiversity, built and historic environment, climate change, strategic transport and economic development, and waste and minerals matters.

Whilst local plans may provide local guidance on some of these issues there are many cross borough boundary issues for which there are now no over-arching policies. This is a particular problem in this area where a two tier system of local government exists and where local plans often fail to address many of the wider strategic issues highlighted above. The loss of these wider strategic policies, combined with conflicting local policies in some adjoining district/borough council areas, is likely to cause confusion and a general weakening of the environmental and countryside protection which the regional plans provided.

We would invite the Inspector to recommend an early review the Core Strategy and DPD to decide how these gaps should be filled. It may be that the Inspector will decide that the DPD is unsound as a result of them

In any event we believe therefore that it is now essential that any future development in Tenterden to be subject to clear policies that would maintain the setting and character of the town, would not affect nationally designated historic assets, would ensure development emanates from the centre outwards in a lateral rather than linear way and then only on sites contiguous to the town centre.

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

We do not believe that the exclusion of residential gardens from this category will make a material difference to the number of houses coming forward. There will be a change of approach which will emerge. In any event these sites are not counted in the housing targets as they tend to be windfall sites. We believe that any adjustment to numbers which arise should be considered at the time of the review of the Core Strategy.

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

We welcome the removal of this condition. It will give greater flexibility in the design of sites, particularly TENT1 Phase A with its very sensitive connection to Tenterden's High Street and Conservation Area.

Yours sincerely,

Colin Kinloch
Chairman, WKPS Planning Committee