

Lynn Freeland
Programme Officer
C/O Ashford Borough Council
Civic Centre
Tannery Lane
Ashford
Kent TN23 1PL

Our ref; WH/Hales Place

30 July 2010

Dear Lynn,

**Tenterden and Rural Sites Development Plan Document-Post Hearing Consultation.
Response to Inspector Enquiry on behalf of Appledore Developments Ltd.**

Further to your letter of 12th July, we would respond as follows.

The revocation of Regional Strategies;

This must affect the soundness of the DPD, as set out in PPS12; Local development Frameworks, and in respect of the terms of paras 4.23-4.25.

The DPD follows on from the terms and policies of the Adopted LDF Core Strategy, which was based on RPG9 and the Kent and Medway Structure Plan, and the Draft SE Plan, the housing targets in which are key determinants for the components of the Ashford LDF's. These are now revoked.

We therefore consider that there is now no strategic basis for the housing targets in both the Adopted Ashford Core Strategy and the Tenterden and Rural Sites DPD.

It is now, therefore, incumbent on Ashford Borough Council to determine its own basis for the housing targets and consequential housing strategy, policies and housing land allocations in both of these Policy documents.

We have noted the stated concerns of the Inspector of the Ashford LDF Core Strategy EIP 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 (which includes Tenterden), the housing targets had been prescribed with little or no assessment of the demographic and social needs of the rural population, and that a more rigorous assessment ought to have been carried out. Those targets exceeded those set out in the then operative Kent and Medway Structure Plan.

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.

The inspector also questioned the extrapolated basis for windfall assessments of projected housing provision.

The approach to the provision of housing now needs to be reassessed.

In our opinion this should now reflect both essential housing needs and the pent up demands for open market housing and larger family sized dwellings.

The changes to PPS3: Housing;

Additionally, the Government's revisions to the terms of PPS3; Housing, in its deletion of the national minimum density of 30 dwellings per hectare, will have material implications for the formulation of Development Plan Policy.

There has been an increasing concern at the falling spatial standards in new residential development, both in terms of external amenity space and internal room standards, as a result of the drive to make an efficient use of development land. This has been allied to drive to increase the proportion of smaller dwellings to meet housing 'need' at the expense of meeting larger family housing market demand.

This fundamental shift in housing policy will now need to be reflected in the manner in which housing densities in LDF DPD housing allocations are prescribed, the implication being that high density development will now need to be justified on the basis of local surveys and prescriptions rather than being determined in National Government Policy.

This revised approach may well lead to proposals for more spatially open forms of residential development, and internal standards that are more appropriate to modern living, rather than what was being becoming a 'shoe box' approach to new housing development.

On this basis the manner in which housing allocations are formulated and detailed may need to be revised, and may well require more extensive areas of land.

As an example the proposed phasing of the development of a large new neighbourhood south of Tenterden (Tent 1), includes densities of 40 dph in Phase 1 and 30 dph with scope for additional numbers in Phase 2, which follows the previous PPS3 density guidelines. Should these densities be reduced, the shortfall in housing provision here would have to be met by extending the land area, with potential impact on settlement and countryside character, or allocating additional land elsewhere.

The implications of the above shifts in Government Policy are therefore fundamental to the preparation of Development Plan Policy and Local Development Frameworks.

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Allied to this is the Government approach that it is now for local communities to formulate such policies and to make provision to meet the needs and demands of local communities, what the local community wants, rather than complying with and responding to targets prescribed from above.

We trust that the response of Ashford Borough Council to the Inspector's request be publicised and that the public be allowed to comment.

I trust this is in order.

Yours faithfully,

William Hall

Broadlands Planning Ltd on behalf of Appledore Developments Ltd.