

TENTERDEN AND RURAL SITES DPD
REGULATION 30 SUBMISSION VERSION

**POST HEARING CONSULTATION
FURTHER STATEMENT**



July 2010

Our representations relate to the omission of Challock from the Tier 3 Settlement list and the resultant failure to allocate land NW of Clockhouse Farm, Canterbury Rd, Challock for residential development.

1. The revocation of the South East Plan with effect from 6 July 2010 has undermined the justification for setting a lower housing allocation figure in this DPD for the rural areas of Ashford Borough than the evidence base provided by the Kent and Medway Structure Plan (Paragraph 5.5 of the DPD).
2. It is our opinion therefore that the overall housing allocation figure for the rural areas of the Borough cannot now be considered to be robust. In the case of Challock this exacerbates the existing position, as we set out in our Further Submission to the Inquiry on Issue 3, where the evidence base is far from adequate, challenging the soundness of the DPD. We would argue that the allocation of our client's land in Challock, a straightforward deliverable site with an existing access, with an indicative capacity of 10 dwellings would not in these new circumstances challenge the soundness of the overall housing allocation level.
3. With regard to the recent revisions to Annex B of PPS3 (June 2010) to exclude private residential gardens from the definition of previously developed land, placing gardens in the same category as parks, recreation grounds and allotments we would re-state our previous argument that all recent additional housing created in Challock has been on garden land (Core Document 12). Such revisions to PPS3 only *strengthen* the need for small scale housing allocations to be delivered in a planned manner through the policy-making process in small thriving rural villages such as Challock, which do not possess a brownfield land supply, in order to ensure even modest growth in the housing stock.
4. We therefore again request that this DPD is amended to include the allocation of our clients site in order to be consistent with the Core Strategy in the case of the village of Challock. If the Inspector is not minded to increase the overall housing provision levels through the additional allocation of our client's site we would again request that it replace ROLV1 in order to be consistent with the previous Inspectors report into the current Ashford Local Plan (Core Document 29 which

the Inspector is reminded was determined by the previous Inspector as being

“located away from the core of the village and would create a substantial enclave of housing unrelated to the built up areas of Rolvenden. Both the scale and location would cause significant harm to the character of the village and this part of the AONB.”

(paragraph 5.1001 Core Document 29, page 312)

5. It is our view that both the revisions to PPS3 and the revocation of the South East Plan strengthen the need for this housing allocation in Challock.