

Statement of the Main Issues raised from Representations under Regulation 27 of the Town & Country Planning (Local Development) (England) (Amendment) Regulations 2008.

Background

The Tenterden and Rural Sites DPD 'Publication' version was released for a six week consultation between June 30th and 11th August 2009. The Council received 447 formal representations (287 objections & 160 in support).

In light of the formal representations received on the Publication Version of the DPD, the Council proposed both minor and significant changes to the Plan. A 'Schedule of Proposed Changes to the Tenterden and Rural Sites DPD' was published for a 6 week public consultation period between 27th November 2009 and 8th January 2010. The Council received 115 representations (42 objections and 73 in support).

The main issues raised from both sets of consultation are set out below, alongside the name of the person / organisation who submitted the representation/s. For ease of reference the issues have been set out in the order they are covered in the DPD.

It should be noted that the 'Publication Version' of the DPD, the 'Schedule of Proposed Changes' and all formal representations received from consultation, have been submitted as background documentation to the 'Submission' Version of the DPD. They can be viewed on the Council's website under www.ashford.gov.uk and by following the planning now and in the future pages.

Issue 1 – Whole Plan Matters

Overall residential numbers

Respondents	Comments
Mr. Martin Newman, Wye Parish Council (WPC) , Tenterden Town Rural Partnership, Weald of Kent Protection Society (WKPS), Council for the Protection of Rural England (CPRE) & the Tenterden Residents and District Association (TRDA)	<p>Objectors wished to see a lower overall housing figure than the 865 promoted in the DPD. The DPD should reflect the South East Plan which, under Policy AOSR6, appears to set out a rural housing requirement, for an area that includes the majority of the rural parts of the Borough (including Tenterden and Rolvenden), at just 300 dwellings between 2006–2026. The DPD therefore fails to take account of the most up to date part of the Development Plan which supersedes the Core Strategy position.</p> <p>Also, the DPD should take account of all rural housing completions since 2006 and extant planning permissions for rural housing, to reduce the number even further.</p> <p>The Council has not produced any evidence to demonstrate that the sites with existing planning permission cannot be developed. In particular, the failure of the Council to produce a SHLAA means that no assessment of the role of existing planning permissions has been undertaken.</p>
Mr. C Highwood, Jarvis Homes	<p>Housing provision should be higher in the DPD to reflect the requirements of the South East Plan and the Ashford Borough Core Strategy. The South East Plan figure is a target only and not an upper limit.</p> <p>Any housing allocations within the Development Plan Document should incorporate a realistic contingency to ensure delivery. The DPD should therefore identify sufficient land to deliver at least 1,000 houses, in line with Policy CS6. This figure is more robust and provides greater flexibility to ensure delivery of rural houses over the Plan period.</p>
Wye Parish Council	A more rigorous assessment of housing requirements is required in the DPD, in relation to individual settlements. It is not justified to simply recalculate the Core Strategy, particularly in light of the recently adopted SE Plan.
Mr Brannan	The Tier 3 settlements have not been assessed properly and the DPD doesn't take into account consultation from the workshops, particularly in relation to Bethersden. The total numbers identified in Tier 3 is not justified and bears no relation to the needed number to maintain individual villages continued vibrancy.

Phasing of residential site allocations

Respondents	Comments
Government Office of the South East (GOSE)	GOSE suggest that a trigger for releasing sites should be included in the DPD, so that if housing supply on phase 1 sites falls behind what is expected, for example because of infrastructure delays, the Plan has flexibility to release phase 2 sites earlier.
Wye Parish Council	The DPD does not satisfactorily state how the phasing of site allocations will be reviewed if significant numbers of windfall housing completions come forward in the rural area during the early part of the Plan. Paragraph

	8.5 implies that monitoring of windfall completions may affect the future phasing of site allocations, but this is to be determined through the review of the Core Strategy. However should the Core Strategy be delayed, an over supply of rural housing may occur.
Savills, on behalf of Imperial College London	The phasing of allocated sites in the DPD should continue to run in line with the dates and figures listed in Policy CS6 of the Core Strategy. Given the current economic conditions and the state of the housing market it is entirely likely that the Phase 2 sites will need to be commenced in 2014 at the very latest if ABC are to show a steady rate of completions in the rural area. In this context the Council should identify Wye 3, land owned by Imperial College, in Phase 1 of the DPD.

Spatial dispersion of residential allocations

<i>Respondents</i>	<i>Comments</i>
Savills, Amy Hallam – Cater Jonas, Hillreed Homes	<p>Developers promoting land at Charing and Wye, (land not promoted for residential development in the DPD), argued that the proportion of houses attributed to Tenterden was too high and should be spread more evenly across Wye and Charing.</p> <p>The tiered approach set out in the DPD is not consistent with the Core Strategy and it appears that numbers, attributed to Tier 2 under policy CS6, have been moved to Tenterden without proper justification.</p>
Savills, on behalf of Imperial College London	<p>The spatial dispersion of residential allocations in the DPD is inconsistent with the SE Plan which sets out only 300 homes should be provided (up to 2026) in the western area of the borough which notably includes the town of Tenterden, and the Tier 3 settlements Biddenden and Rolvenden. The DPD promotes 525 dwellings in this area.</p> <p>The DPD should strictly adhere to the SE Plan which is the most up to date part of the Development Plan. A greater proportion of allocations should be identified within the 'East Kent and Ashford sub region' which includes much of rural Ashford. This would be consistent with the adopted SE Plan. Objector promotes land east of Olantigh Road (WYE3) in this context.</p>
Mr Penny	Policy CS6 is not sound because it excludes Kingsnorth village from the settlement hierarchy which is a highly sustainable settlement close to Ashford.
Ms Clare Hall, Catherine Hughes	<p>Not having an allocation in Challock will result in the village becoming stagnant. Two of the sites promoted for development were put forward by villagers wanting to build homes for their children so that they can grow up in the village and support the school and youth club etc. This was supported by the Parish Council but disregarded by ABC without proper justification in the DPD.</p> <p>Land promoted to the north west of Clock house Road for allocation in the DPD.</p>
Mr C Highwood, Mr Kirk, Mr Carnegie, Mr Brannan	<p>The village of Pluckley should be attributed allocated development. The village is a tier 3 settlement, is an identified service centre and has suitable development sites within the confines of the village.</p> <p>Land near the station promoted for light industrial / car parking associated uses.</p>

Martin Newman, on behalf of Pluckley Parish Council

Object to the DPD referring to Pluckley village as a Tier 3 settlement. The review of the sustainability matrix, which supports the DPD, sets out that Pluckley is clearly not a sustainable settlement for growth.

Issue 2 – Tenterden

TENT 1

Respondents	Comments
<p>Countryside Properties, Knightspur, Price Whitehead, Appledore Developments ltd & WKPS, CPRE, TRDA</p>	<p>It is not appropriate to rely so heavily on site TENT 1 to deliver the housing units attributed to Tenterden. Any delays in the masterplanning of the site, or problems of land assembly, could lead to a significant shortfall of housing numbers in the Town. Several developers promoted alternative development sites, including - 1) land south of Appledore Road (Tilden Gill area), 2) land to the north of Appledore Road and 3) Hopes Groves Nursery.</p> <p>Other objectors also felt that by relying on one site, undue pressure would be placed on other sites in Tenterden to come forward and meet any housing shortfall associated with delays to TENT1.</p>
<p>GOSE</p>	<p>GOSE made the following points in relation to TENT1:</p> <ul style="list-style-type: none"> a) Question whether the employment land referred to should be allocated in the DPD, as is encouraged by PPS 12. As it stands employment provision is to be pursued outside the development plan process and therefore not available for comment in the same way as DPD documents b) Is this location consistent with the policy tests set out in PPS6 (paragraph 2.28) and in draft PPS4 (EC7.1)? c) The DPD should set out a clear floorspace figure for the employment provision and the scale of community and social infrastructure associated with TENT 1. d) The additional car parking in paragraph 6.6 appears to be for traffic from outside the town therefore would not appear to support modal shift, for example such as the promotion of bus services to reduce the need for car parking and supporting alternative modes of transport to Tenterden e) Paragraph 6.27 refers to the need for a transport assessment to inform the master-planned approach, which appears to be leaving the transport elements of the site's delivery to a later stage f) Does the evidence base, supporting the DPD show that there are no infrastructure barriers to the delivery of TENT 1?
<p>Kent Wildlife Trust (KWT)</p>	<p>Object to TENT 1 on the grounds of impact on the Ashenden Gill Local Wildlife Site.</p>
<p>Kent County Council (KCC) & TDRA,</p>	<p>Employment land should be allocated in Tenterden as it is the largest rural settlement and will be needed to support the 500 homes proposed.</p>

TENT 2

In its publication Version of the DPD, the Council promoted a site allocation TENT2, land off Westwell Court. The respondents' main areas of objection, at Publication Stage were broadly as follows:

Respondents	Comments
Alan Bishop, Derek Maclarenk, Michael Lyons, T Escott, Barbara Edwards, A Tomkinson, Mr & Mrs Young, Mr Webster, R Whitelaw, Mr Blacks, Elizabeth Smith, Appledore Developments Ltd, John and Joan Mills, G & W Hogben, Mr & Ms Burbridge, Mr & Mrs Craig, P Wales, R Dawkins, Mr Edwards	Housing numbers proposed to come forward in TENT 2 are not required in quantitative terms. Policy TENT 1 can and should accommodate the entire number of units attributed to Tenterden. Some also suggested that TENT 2 is inconsistent with the adopted SE Plan, notably policy AOSR6, which attributes only 300 additional units to the south west part of the Borough (including Tenterden) between 2006 -2026.
	Concerns over increase in traffic congestion as a result of the additional housing. The area is already at capacity and is considerably congested with vehicles, including non-residents parking on the street, affecting both amenity and safety.
	TENT2 would have a harmful impact on landscape character and setting of the surrounding area, notably the impact on the nearby AONB. Concerns about a negative impact on the surrounding built form, including the adjacent Conservation area was also expressed.
	Objectors felt that development on this site would significantly adversely affect the amenity of the existing residents, greatly reducing their quality of life.

In response to the objections received on this policy the Council proposed to remove allocation TENT 2 from the development Plan as part of its 'Schedule of Proposed Changes' to the DPD (Change 8). The key issues raised from consultation on this Proposed Change is summarised below.

Respondents	Comments
Mr Marks, John Bishops and Associates, D & H Taylor	Objectors consider that TENT 2 represents a suitable development site and that it should remain allocated in the DPD. Objectors argued that the site is closely related to Tenterden Town Centre and the services present there, has limited visual impact and would provide a different housing offer, compared to TENT 1. It would also provide greater certainty that housing supply; particular in the early stages of the Plan, is maintained and delivered.

The Council also proposed to add a primary shopping area on the Tenterden Proposals map, as part of its 'Schedule of Proposed Changes' to the DPD (Change 29). This raised the following objection.

Respondents	Comments
John Bishops and Ass	Object to the extent of the primary shopping area proposed. It should extend along the northern side of the High Street to the Small Hythe Road junction, as this area functions as a retail amenity to surrounding residents.

Issue 3 – Tier 2 Settlements

Charing

Respondents	Comments
David Swindale	Object to CHAR 1 given that land off Tatchell Drive is a more suitable development site.
Amy Hallam – Cater Jonas	CHAR 2 should be expanded further to the west to create a softer, more uniform edge to the built-up area. This area could also be a contingency site should CHAR 1 not come forward, or be delayed.
Kent Wildlife Trust	Object to site CHAR 1 on the grounds of impact on AS72 Alder Wood, a locally important site.
R Brasier	Both CHAR 1 & 2 have a considerable impact on the setting of the village and represent extensions into the wider countryside. The Morrison Depot site, land to the south of the A20, represents a suitable alternative development site, within the confines of the village.
Hillreed Homes, Alistair Reed	Hillreed Homes object to both CHAR 1 & 2 as they are removed from the village centre and have an impact on the wider landscape setting. Hillreed promote land south of the A20 (adjacent to the Morrison site) as an alternative development site which is more suitable given its proximity to services and its location within the confines of the village.

Hamstreet

Respondents	Comments
Mrs E Neighbour, Kent Wildlife Trust	Object to site allocation HAM1 given its significant wildlife value, orchard characteristics and varied biodiversity. Site is also very close to Hamstreet Woods SSSI which is a National Nature Reserve.
Hobbs Parker	Object to both HAM1 & 2, as they are less sustainable than land off Ashford Road to the north of the village. This site can bring with it the added benefits of traffic management measures, playing fields and public open space.
Andrew Jones	Object to HAM2 as consideration has not been given to the likely impact on residents of Orlestone View.

Wye

Respondents	Comments
Savills, on behalf of imperial college London	<p>Object to site WYE1, given that it is a greenfield site located on the periphery of the village and has been allocated in preference to readily available Brownfield sites, such as Imperial's landholdings which are also closer to the centre of the village and wholly more sustainable.</p> <p>This site also adjoins sewage treatment works, a former landfill site, and industrial uses which will pose environmental health and amenity issues for any future residents. Furthermore this site is identified as possessing ecological habitat potential within the Kent County Council produced KLIS database, and the impact any development may have on this habitat has not been considered.</p>

Messrs Houchin, Bushell & Baker (c/o John Bishop & Assocs)	WYE 1 should be deleted from the DPD. It is not connected to the public highway and the owner of the private land needed for access is understood to be against development. Promote land south of Wye surgery as an alternative.
Mrs Emma Fulton	<p>Object to WYE2 on the grounds that it promotes more homes in the AONB. It will not create a more appropriate transition to the village as suggested, the field & its views should be protected from further development. It has a public footpath/ right of way which should be preserved. The field is also unsuitable as part of flood plain.</p> <p>Development of the site will eliminate the only parking available for Little Chequers and will also bring far too much traffic from Bridge Street, adversely affecting the local road network.</p>
Ian Coulson (Wye Village Design Guide)	Object to site WYE2 given its proximity to the River Great Stour and a site of nature conservation interest. Protected site 27 provides an extensive linear habitat and wildlife corridor that connects the whole Stour Valley with the North Downs.
Savills, on behalf of Imperial College London	Object to Policy WYE2 on the basis that it is a greenfield site, located on the periphery of the village and has been allocated in preference to a readily available Brownfield site, land east of Orlantigh Road, which is closer to the centre of the village and more sustainable. This site is also allocated as Site of Nature Conservation Importance.
Savills, on behalf of Imperial College London	Object to WYE3 - Long term promotion of education / employment at Wye College should not be used as a reason to avoid making allocations in Wye in line with the Core Strategy. No justification as to why the village receives such a small proportion of the Core Strategy identified Tier 2 figure. WYE3 is a suitable Brownfield site for residential development, close to the proximity of the village and is a sustainable location for development.
Savills, on behalf of Imperial College London	Object to Policy WYE3, as the policy is inconsistent with PPS12, a marketing exercise has been carried, much of the land is underused Brownfield land with buildings with no reasonable chance of being reused. Site should not be packaged together for masterplanning – only the main campus north is suitable for this.
Care Village UK Ltd, on behalf of Imperial College London	LPA has no evidence to support restrictive approach to redevelopment of Withersdane site in light of Imperial College's intentions. Such an approach is contrary to Government guidance in PPS1 and PPS12.
Mr Roughley, Bronwyn Roughley, Ann Sutherland (Wye Business Ass), Peter Sutherland, Dr Mary Braithwaite	The DPD in relation to its approach to the whole of Wye is unsound, due to its failure to include provision for additional public car parking in the village. Objectors wish to request that a public car park is included in the DPD, both in the centre of Wye close to shops and services and near the train station.
Savills on behalf of Imperial College London & Origin Planning	Object to Proposed Change 14 & 37 objects to all the College's landholdings being included within WYE3. The land east of Orlantigh Road and land at the Withersdane site have always been demonstrably separate in function and use from the core buildings at the Campus North and should be considered as separate Brownfield sites in their own right.
Wye Parish Council & Wye Future Group	Object to Proposed Change 17, as there is ambiguity in the reasoned justification of the policy. It is not clear whether the masterplanning exercise will be carried out following, or at the same time as the marketing exercise. In addition, as written, a masterplanning exercise may produce proposals before the adoption of the Core Strategy review in 2014 and this

	might enable significant development of the campus to be brought forward before any strategic approach is agreed. The contradiction between 6.105 and 6.104 needs to be resolved.
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Issue 4 – Tier 3 settlements (Aldington, Bethersden, Biddenden, Chilham, Rolvenden & Woodchurch)

Aldington

<i>Respondents</i>	<i>Comments</i>
Mr J Payne	Landowners of ALD 1 phase 2, wish to see their land moved to phase 1 in the DPD.
Jarvis Homes & Mr C Highwood	Objectors consider that ALD1 is not a suitable housing allocation given the impact on the setting of the village and wider landscape. The slaughterhouse site (land south of Roman Road) is promoted as an alternative. This site is close to the services present, includes a proportion of Brownfield land, is not visually prominent and is surrounded by residential development.
Mr Mick Drury (Environ Communities Ltd)	Support ALD1 phase 2 but object to phase 1. Promote land off Goldwell Lane instead of phase 1. The promoted site can deliver needed community facilities such as a doctor's surgery, medical facility and car park. All of these wishes were expressed at the Community workshops and have not been taken forward by the Council.
Kent Wildlife Trust	Object to site ALD1, as it is situated in an ecologically sensitive area adjacent to natural grassland on the eastern boundary and Quarry wood on the northern boundary. Care is needed to ensure that impact is mitigated from these sensitive areas, in line with CS11 of the Core Strategy.

Bethersden

In its publication Version of the DPD, the Council promoted site allocation BETH1, Land East of Forge Hill. The respondents' main areas of objection, at Publication Stage were broadly as follows:

<i>Respondents</i>	<i>Comments</i>
Miss J. Hiley Mr H. Riley Mrs S. Scullard Clare Skidmore (on behalf of Bethersden Village Consultative Group) Mrs J. Buckman	Object to site BETH1 on the grounds that it; does not lie within easy walking distance from the centre of the village, is adjacent to the A28, a dangerous and noisy road, is not a direction in which the village Consultative Group would like the village to develop and would harm the pleasant entrance setting of the village from the A28. Flooding issues are also present. Objectors promoted land off Mill road as an alternative.
Mr J. Twycross	Objector promoted land off Norton Lane / Wissenden Lane, in place of BETH1 as it is better located to the school and services and can bring with it contributions towards community infrastructure.

In response to the objections received on this policy the Council proposed to remove allocation BETH1 and replace it with BETH1a (land off Mill Road) as part of its 'Schedule of Proposed Changes' to the DPD (Change 21 & 22). The key issues raised from consultation on this Proposed Change is summarised below.

Respondents	Comments
Hobbs Parker	Support the deletion of BETH1 but object to the proposed replacement site allocation BETH1a as it is far removed from the village and will result in urban sprawl into the countryside. Promoted land north of Church Hill as a more sustainable alternative.

Biddenden

Respondents	Comments
Alan Bishops and Associates	<p>Biddenden is a relatively sustainable rural settlement which includes a range of services. Restricting growth to just 10 houses over the plan period is therefore not justified. Biddenden needs a bolder allocation to ensure it remains vibrant, healthy and sustainable.</p> <p>Land to the west of North Street, north of Mansion House Close, has been promoted to serve this purpose, in addition to site allocation BID 1.</p>
Vic Hester, on behalf of the Milton Group	<p>Object to BID1 given that it lies outside the confines of the village, is a Greenfield site, falls within the Special Landscape Area, fails to deliver affordable housing and has received an objection from Southern Water.</p> <p>In this context they promote a far more suitable site at land south of the Weavers. This site falls within the village envelope, close to the village's services, and could deliver more numbers than BID1, subsequently providing a proportion of affordable housing.</p>
Kent Wildlife Trust	Object to BID1 as the site forms part of a wider complex of lowland meadow with a large network of ponds. Area is also likely to contain BAP and protected species.

Chilham

Respondents	Comments
Stour Valley Estates	Landowners of CHIL 1 feel that the site should accommodate more than the 30 units promoted in the DPD. They also question the validity of requiring a car park to serve the station.
Mr C Highwood & Mr J Smith	<p>Object to CHIL1 as it is far removed from the village and in a visually prominent location. Significant residential uses here would be out of character with the surrounding area. In addition, this site is allocated for employment use in the Plan and it should remain as such.</p> <p>In this context, large areas of land, around the Bagham Lane area of the village, have been promoted as an alternative to CHIL 1.</p>

Rolvenden

Respondents	Comments
Mr J Field	Developing ROLV1 as proposed would be out of keeping with the existing built character of the area. In addition, the approach will give one

	landowner a virtual monopoly over development in Rolvenden over the Plan period.
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Woodchurch

Respondents	Comments
Mrs L Barnes	Object to allocation WOOD1 given its impact on the Conservation Area. Promote land at Rectory Close as an alternative.

Issue 5 – Topic Policies

Housing (policies TRS1 – TRS5)

Respondents	Comments
Wye Parish Council, CPRE, WKPS,	TRS1 & 2 - Several objectors felt the DPD should identify the confines of settlements on the proposals map, instead of relying on a textual definition as it provided greater certainty and would result in fewer planning appeals.
Persimmon Homes, Stephen Penny, Savills on behalf of Imperial College London	TRS2 - Several developers felt that restricting residential windfall development to just within the confines of rural settlements is too restrictive. The DPD should allow suitable sites which adjoin rural settlements to come forward as well.
CPRE, WKPS, TDRA, Wye Parish Council	TRS3 - should also cover issues in relation to extensions to buildings in the rural area, as the DPD is silent on this issue. Also, a criterion 3b is too vague as to what is meant by the term 'modest'
Keith Brannon, David Banfield, CPRE	TRS4 – the approach fails to give enough incentives to developers to bring forward rural affordable housing, to the detriment of the community. In exceptional circumstances the Council should allow a proportion of general demand housing to enable the delivery of rural local needs housing.
Robert Stevenson on behalf of Martha Trust	The preamble needs to include a specific paragraph on the needs of people with profound and multiple learning disabilities (PMLD) and should be amended to say that in the case of persons with PMLD, the need is often best met in rural areas.
GOSE	Object to the text proposed in Para 7.31 of the 'schedule of Proposed Changes', (Change 24) in relation to TRS5 which now refers to exception sites for specialist housing to meet the needs from outside the Borough. GOSE request that this is made clearer and also if the Council is satisfied that its has the justification for this stance. Also question where the DPD takes into account advice in PPS3 (Para 30) which stats that a rural exception site policy should seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection.

Employment (TRS7 – TRS14)

Respondents	Comments
CPRE	Policy TRS7 should also include a criteria which refers to traffic generation. TRS 9 needs to be clarified to state that it applies only to those settlements defined in Policy TRS 1. Consequently, any development adjoining (i.e. outside) the defined built-up confines falls in the countryside to which Policy TRS 10 applies.

GOSE	Object to Policy TRS10 as it doesn't reflect advice in the draft PPS4 which sets out that local authorities should support small scale economic development where it provides the most suitable option in villages, or other locations that are remote from local service centres, recognising that a site may be an acceptable location for development even though it may not be readily accessible by public transport.
GOSE	Policy TRS11 does not reflect the advice in draft PPS4 which states that in considering planning applications for the re-use or replacement of a rural building, the LPA should take into account the suitability of different types of buildings, and of different scales, for re-use - recognising that replacement buildings should be favoured where this would result in a more acceptable and sustainable development than might be achieved through conversion.
GOSE	Policy TRS14 (b) states that diversification schemes will be permitted if the proposal can be justified as part of the long term business plan for the agricultural business. This appears to reflect PPS7 (paragraph 30) but does not take into account draft PPS4 which refers solely to supporting diversification for business purposes.
Peter Spiller	Object to the word 'exceptional' as set out in Proposed Change 28 (Policy TRS8). Companies in such buildings have the same needs as companies in buildings of less character.

Other Topic Policies (TRS15 – TRS19)

Respondents	Comments
GOSE	Object to policy TRS17 which appears to suggest that the two Kent AONBs are to be treated as landscape character areas. As this is a local designation (permitted by PPS7 paragraphs 24 & 25), it is not clear why the high level of protection afforded by AONBs (as set out in PPS7 paragraph 21) requires a lower tier of supplementary protection.
David Hickens Associates, on behalf of Kent Police	TRS19 - Kent Police require the DPD to make provision for developer contributions to be sought towards policing and other emergency services to cover increased pressure from an increased population. Policy CS8 requires new developments to make provision for community services, such as policing.
GOSE	GOSE note policy TRS19 but the Plans evidence base should clearly demonstrate that discussions have been had with the relevant landowners, early in the process, to ensure that there are no barriers to delivery and that infrastructure can come forward. This would be consistent with PPS12. Concerns over sewerage requisition were made in this context.
Wye Village Design Group	Wye suffers from sewage leakage in periods of heavy rain, and has limited capacity for further development, a position referred to within the Local Plan S70.5. The DPD fails to recognise this.

Issue 6 – Other Plan Matters

Housing mix / densities

<i>Respondents</i>	<i>Comments</i>
GOSE	<p>The DPD gives an indication of housing numbers on its site allocations, yet there is no evidence to suggest if these proposed densities are justified or realistic.</p> <p>In addition, the DPD fails to set out the appropriate housing mix for the sites allocated. The Council should produce a Strategic Housing Market Availability Assessment to determine the appropriate mix of units on all the residential allocations within the Plan, in line with the approach advocated in the Core Strategy.</p>

Lack of clear overarching objectives

<i>Respondents</i>	<i>Comments</i>
CPRE, WKPS, Tenterden and Rural Partnership	<p>The DPD should include clear objectives for the rural area. This would be inline with CS1 and CS6, and also include matters covered by Local Plan policies GP10-13, HG3 and former Kent and Medway Structure Plan policy SS7.</p>

Policy Coverage of the DPD

<i>Respondents</i>	<i>Comments</i>
Wye Parish Council	<p>The DPD fails to address issues associated with impact on the rural areas of the Borough generally, particularly areas near the Growth Area where the Town is doubling in size.</p> <p>The Parish Council also regret that the DPD focuses so heavily on housing rather than other land uses such as employment, parking, recreation and drainage.</p>