

Response to Matter 1 – Vision and Objectives

- **Is there a firm vision and do policies reflect this?**

1. The vision set out in the DPD is based firmly upon the chapter 6 of the Core Strategy (**CD 5**), where the spatial objective for Tenterden and the Villages is stated as being to sustain vital and viable communities in Tenterden and those villages with the larger service centre roles. The Tenterden and Rural Sites DPD seeks to achieve this through promoting growth in those rural settlements identified as being the most sustainable locations and those which can accommodate a modest increase in population. These settlements have been identified through updating the sustainability matrix originally used in the Borough Local Plan.
2. The DPD echoes the Core Strategy which seeks to achieve a balance between protecting the countryside, which in itself is regarded as a valuable resource in the rural economy, and promoting growth that will contribute to the economic and social vitality of village life. The Borough includes two AONBs and the former Kent Structure Plan 2006 recognised Special Landscape Areas within the Borough which together represent about one third of the Borough's total area. The Special Landscape Areas are superseded in the Tenterden and Rural Sites DPD by the Landscape Character Areas identified on page 26 of the Ashford Landscape Character Assessment **CD 8**. These areas correlate closely with the former Special Landscape Areas but are justified by a detailed landscape assessment of each of the areas.
3. Landscape Character and Design policy TRS17 seeks to protect the special character of the rural areas by safeguarding those features of the landscape which give it the distinctiveness that makes it particular to this part of Kent. Policy TRS17 (v) refers to the pattern and distribution of settlements as one of the key matters for which proposals should have due regard. To this end development sites at Tenterden and the villages have been carefully chosen to, amongst other things, limit their impact upon the surrounding landscape and protect the character of the existing settlement.
4. In policy TRS 18, the DPD seeks to protect ancient woodlands, river corridors and tributaries, rural lanes and public footpaths, all of which are important rural features and which do not necessarily fall within one of the landscape character criteria covered by TRS17.

- **How does the vision of the DPD carry forward that of the Council's Sustainable Community Strategy [pg 3]?**

5. The Sustainability Community Strategy recognises the need to ensure that new housing is accompanied by new jobs and all the necessary social and community infrastructure. Planning policies for the

development sites in Tenterden and the villages will achieve planning gains such as affordable housing on the larger sites, new public open space, retention and enhancement of biodiversity, new cycle and pedestrian routes, play equipment and funds towards improvement and maintenance of existing public amenities and services.

6. The Council commissioned Nathaniel Lichfield and Partners to carry out an Employment Land Review in 2008. The Executive Summary can be seen at **CD 7** in which paragraph 22 concludes that no new employment land allocations are necessary in the rural areas. It was considered that demand was currently being met and will continue to be met through criteria based policies, which for example, encourage the retention of existing employment sites and premises, enable conversion of rural buildings to employment uses, the extension of existing rural businesses, new employment premises in or adjoining rural settlements and new employment premises in the countryside where such location is essential to the business. These policies are set out in TRS7 – TRS11 of the DPD. Policies TRS12 and TRS14 also enable employment related functions to take place in the countryside.
7. Policy TRS6 and TRS11 encourage the provision of community facilities and in the case of TRS11 also employment opportunities. In the case of TRS6, exception sites may be acceptable in order to facilitate the provision of community facilities. Policy TRS11 permits, in certain circumstances, the conversion of rural buildings to non residential uses which may be community uses or employment uses.
 - **Is the DPD's approach to sustainable development in rural areas limited by its concentration on housing issues?**
8. PPS1 para.13 (ii) requires that planning authorities should ensure that all development plans contribute to global sustainability by addressing the causes and potential impacts of climate change through policies which reduce the need to travel by private car. A broader definition is to be found in paragraph 3 which describes a better quality of life for everyone now and in the future. Paragraph 4 goes on to embrace protection of the environment, prudent use of natural resources and maintenance of high and stable levels of economic growth and employment.
9. The DPD addresses provision of an additional number of dwellings in Tenterden and the larger more sustainable villages, which seeks support existing community and business activities whilst maintaining a balance with the need to protect the attractiveness and function of the surrounding rural areas.
10. As explained in paragraph 6 above, the evidence base has not demonstrated a need to allocate land in the rural areas for new employment provision. There are extant planning permissions for employment uses and the range of employment policies in the DPD will

satisfy current and future needs for employment sites. The apparent concentration of the DPD on housing issues may be a misconception in that there are a number of policies which relate to employment and other matters in the DPD. The appropriate distribution of housing in the rural parts of the Borough is a critical aspect of the Council's rural planning strategy and it is reasonable that the DPD focuses on individual site allocations as well as more general housing topic policies. For the reasons explained above, there are no equivalent employment site allocation policies, but the issue of employment is covered by a number of criteria based employment policies which are of no less importance.

11. The plan also includes several policies that deal with other matters such as rural shopping, landscape character and design and infrastructure provision, all of which are dealt with by criteria based policies rather than on a site allocation basis.
 - **Is the DPD truly spatial? – does it bring together policies for the development of land with other policies and programmes from the Sustainable Community Strategy, and a variety of organisations, which influence how rural places function?**
12. Paragraph 30 of PPS1 explains what is meant by 'spatial' plans and states that policies for the development and use of land are to be brought together and integrated with other policies and programmes which influence the nature of places and how they can function. In Ashford, a Partnership has been put in place to bring together organisations that provide services for the borough's residents. An illustration on page 22 of the Sustainable Community Strategy (**CD 16**) shows how the Ashford Partnership is supported by voluntary and business partners and by public sector partners.
13. Paragraph 30 of PPS1 explains that DPDs will include policies which can impact on land use by, for example, influencing the demands or needs for development. An example is given at 4.13 of the DPD, which refers to adopted Village or Parish Design Statements and the Tenterden Healthcheck and Action Plan Report. These parish and town plans also feed into the Ashford Partnership, which is the author of the Ashford Sustainable Community Strategy (**CD 16**). The Sustainable Community Strategy and elements of the LDF are mutually supportive. For example, the strategy states on page 9 that it will continue to support the 'Tenterden Improved' project to maintain the special character of the town and enhance its appeal. Page 11 of the Strategy refers to the £300,000 allocated by the PCT to support projects that will help reduce health inequalities in Ashford. Page 17 refers to building up arts and cultural opportunities.
14. Paragraphs 7.88 – 7.95 and policy TRS19 of the DPD refers to infrastructure provision some of which, for example health, education, roads and transport, is dependent upon other authorities such as Kent

County Council and the NHS. Development contributions towards infrastructure form a link between the development plan and its policies and the provision of those services, for which in many cases Ashford Borough Council is not directly responsible.

- **Is the vision or are the aims of the DPD accompanied by objectives against which policies can be measured?**

15. The objectives of each of the policies in the DPD are set out in the supporting text to each policy. These objectives are then reflected in the content of the policy.
16. Chapter 8 of the DPD sets out how the DPD will be monitored and includes a number of indicators against which the implementation of policies will be judged. This monitoring will be carried out on an annual basis and reported in the LDF Annual Monitoring Report. A number of complementary indicators are already included in the adopted Core Strategy and together, these will produce a comprehensive picture of the success of the Council's rural planning strategy.
17. A few policies, such as those relating to landscape character (such as TRS17 and TRS18) are more difficult to measure, as their success needs to be measured in qualitative, rather than quantitative terms. The objective of the DPD policies is to conserve and enhance the landscape and biodiversity of the rural areas (paragraphs 7.71 and 7.72). The success of the policy TRS17 and its affect upon Landscape Character Areas outside of the AONBs can be assessed by comparing the survey information available in the Ashford Borough Landscape Assessment 2009 (**CD 8**) and with the condition of the landscape over subsequent years. The AONB units for the High Weald and the Kent Downs produce Management Plans which draw on information in which the condition of the parts of the AONB is scored. This information can be drawn upon to help to measure the success of policy TRS17 when the plan is reviewed.

- **Objections to the vision**

18. Of the 18 responses to consultation on the vision, 10 objections have been received. There are no objections to the vision in principle and most of the points made are comments rather than objections.
19. Mrs Jenny Oram of Wye and Hinkshill Parish Council (TPV435) has written to say that Ashford's urban expansion has not been mentioned but the Parish Council considers that its impact will be profound especially upon the urban fringes. She writes that the surroundings of Wye are considered to be attractive and vulnerable to pressure from an increased population in Ashford. In addition, she states that the DPD is not considered to reflect other uses such as recreation, amenity, parking and drainage or to explain how sustainability is to be achieved.

20. The DPD is part of a raft of documents that comprise the LDF and cannot be regarded in isolation. The Core Strategy (**CD5**) is the parent document and the growth of Ashford and the Council's response to the expansion of Ashford is contained within this document. At paragraph 6.35 of the Core Strategy the proposed treatment of the new urban fringe is discussed. Paragraph 2.2 of the DPD makes it clear that this plan concentrates on the area of the borough that lies outside the urban growth area. The policies in the DPD are formulated to protect and enhance the rural area and its settlements. The Council works in partnership with the staff of the 2 AONB units (Kent Downs and High Weald), Natural England and the other Local Authority partners to ensure that the quality of the environment of the AONBs is maintained. All policies and allocations have undergone a process of sustainability appraisal.
21. The Parish Council, in their response, also list a number of other uses, which they believe are not adequately covered by the DPD. These matters are in some cases covered by the Core Strategy for example policies Core Strategy policies CS20 and CS21 deal with sustainable drainage, and water supply and treatment respectively. Amenity is in part covered by CS1 of the Core Strategy but many of the DPD's policies also protect amenity through, for example, safeguarding existing views and encouraging high quality design. Parking is the subject of an SPD which is currently in preparation, and recreation is addressed in the site allocation policies where development will be required to make contributions to existing public open spaces and play/sports facilities and/or provide new on site facilities.
22. Mr G Smith of Pluckley Parish Council (TPV312) considers that Pluckley should not be listed as a local service centre in the DPD. The village of Pluckley has services and facilities such as a range of shops, a primary school, a village hall and public transport, which mean that it is correctly described as local service centre.
23. On behalf of Tenterden Town Rural Partnership, Peter Davies (TPV290) states that there is a major omission of overarching policy statements with reference to the development of the town. However, paragraph 4.6 of the DPD spells out the importance of the town as having exceptional character and the Council's priority to retain the qualities that make it special. Mr Davies comments that Core Strategy policies CS1 and CS6 are not taken forward into the Tenterden DPD. As stated at paragraph 20 above, the DPD is not a stand alone document and the policies of the Core Strategy are relevant to Tenterden and the rural area. He also refers to the Tenterden Health Check and Parish Wish List not being cited in this document however, paragraph 4.13 of the submission DPD refers to both of these types of Parish document and the consideration that will be given to them in assessing new development.

24. The objections from the WKPS (TPV212 and TPV208) refers to the section on design, which is paragraph 4.10 onwards in the submission document. They consider that insufficient authority is given to guide developers or residents and that the document should duplicate and reinforce the Core Strategy and should include the Borough Local Plan policies GP10 – GP13. It is not necessary to duplicate policies in the Core Strategy and only policies GP10 and GP12 have been 'saved'. GP10 is about preserving Tenterden's character by restricting development to sites identified in the plan or minor infilling and assessing all impact upon the town's special quality and setting. These elements of this policy are covered by Core Strategy policies CS1, CS6 and CS9. Ashford Borough Local Plan policy GP12 is about protection of the countryside for its own sake and DPD policies TRS17 and TRS18 reinforce this policy in Landscape Character areas.
25. Mrs S Wood of Westwell Parish Council (TPV167) comments that as well as requiring applicants to incorporate the key principles contained in village design statements in paragraph 4.13 of the submission document, the Council should commit to take note of the design statements. This is considered to be an acceptable sentiment but one which does not need to be incorporated in the DPD as Village Design Statements and similar documents are considered to have been given their due weight in the plan.
26. In comment TPV166 on behalf of the Parish Council, Mrs Wood has written that the plan does little to protect the countryside and believes that there should be more content to protect the 'non tier' villages. Development in the countryside is extensively covered in Government planning guidance, the South East Plan (CC1 sustainable development, BE6 Management of the Historic Environment, TSR2 rural tourism and BE5 village management) and the Core Strategy as well as in the topic policies in this DPD. The 'non tier' villages therefore already have a framework of policy protection in place.
27. Mr Brian Lloyd for CPRE (TPV 41) requires policy HG3 of the Ashford Borough Local Plan to be rolled forward (specific design guidance for villages). However, the support for the appropriate development of villages is now included in the form of Village Design Guides. At TPV39 Mr Lloyd suggests that as part of the vision there should be a policy incorporating the overarching needs of the rural area and that this should not simply repeat the Core Strategy. The DPD is to be read alongside the Core Strategy and provides detailed policy guidance for certain matters not dealt with in specific detail in the Core Strategy. The submission Core Strategy policy CS7 was deleted by the Core Strategy Inspector in favour of reliance on PPS7 which that policy largely duplicated. The Core Strategy paragraphs 6.28 – 6.37 address development in the countryside and Core Strategy policy CS1C reinforces the protection of these areas.

28. Wendy Rogers from KCC (TPV13), would like to see a review of historic parks and gardens, however as these are not specific to the rural areas, it may be more appropriate for such a review to form part of the generic Development Management DPD. Her comment TPV10 refers to disappointment that the historic merits of the Borough are not given more prominence. However, paragraph 4.3 of the DPD refers to the attractiveness of the small villages and hamlets which often derive their attractiveness from their historic status.