

RESPONSE TO MATTER 17 - MONITORING

- **Are there clear objectives for each policy in the DPD, and an indication of how they will be achieved and when?**

1. Each site allocation policy has a clear objective to achieve an indicative level of residential completions in the rural area up to 2021. Policy CS6 of the Core Strategy establishes that the total residential requirement is divided into two phases and this is retained in this DPD. However, it has been proposed to adopt different phasing dates than originally planned in order to reflect the current position. Therefore phase 1 is 2006-2016 and phase 2 is post 2016. The site allocation policies in this DPD are divided into these strict phasing timescales.
2. The topic policies each have their own objectives. TRS1 is required to allow suitable housing within the built-up confines of settlements in the Borough that have been identified as being able to support new dwellings. In contrast, the objectives of policies TRS2 and TRS3 are to restrict windfall residential development that is outside the confines of the rural settlements listed in TRS1 or in the countryside, in line with paragraphs 8 -10 of PPS7.
3. Policies TRS4 and TRS5 comply with paragraph 30 of PPS3 that requires LPAs to allocate or release sites solely for local needs housing to secure the future of local communities. These policies allow development on sites that would usually be restrained by policies TRS1-3 and enable residents from the rural area to remain in the area. PPS1 Paragraph 27(v) requires that LPAs provide improved access to community facilities by ensuring that new development is located where everyone can access services and recognises that this may be more difficult in rural areas. The objective of policy TRS6 is to raise the quality of life in rural areas by providing community facilities, where a local need for them is identified, on sites that would not usually be considered for development.
4. A main objective of the Council is to retain local job opportunities in the rural area and policies TRS7 and TRS8 will facilitate that objective by allowing extensions to existing employment premises and restricting the loss of employment sites. Policy EC6 of PPS4 states that the focus of new employment development in the rural area should be located within or next to existing rural service centres. This is the objective of policy TRS9. Policy EC6 also sets out guidelines regarding the strict protection of the countryside and therefore the aim of policy TRS10 is to restrict new employment premises in the countryside.
5. The objectives of policies TRS11 and TRS12 are to enable but limit conversions of rural buildings to non-residential or tourist-related residential

- uses following guidance from PPS4 policies EC6 and EC7. This is because many agricultural buildings or other rural buildings may no longer be suitable for their original purpose and it is a way of enabling the local rural economy to evolve without the use of new buildings. Conversely, the aim of TRS13 is to restrict the conversion of these buildings into general residential use in line with policies TRS1 and TRS3.
6. Diversification of agricultural businesses into non-agricultural enterprises can prove essential to the viability of some farming businesses and the rural economy. Policy TRS14 is in place to specifically deal with this issue.
 7. The objective of Policy TRS15 is to restrict non-A1 uses on the Tenterden High Street to no more than 35% of the total length of the primary shopping frontages to ensure that Tenterden retains its unique shopping character and preserve the town's economic vitality. The rural service centres and villages also need to retain their economic vitality and therefore the aim of policy TRS16 is to limit the loss of retail uses in these areas.
 8. The main objective of Policies TRS17 and TRS18 is to protect and enhance the landscape character and important features in the rural area as guided by PPS7 and PPS1.
 9. Policy CC7 of the South East Plan requires LDD's to address the role and scope of developer contributions toward infrastructure. There are policies in the Core Strategy that cover most of these issues but the objective of policy TRS19 is to ensure there is a single infrastructure policy that covers the needs for the rural area.
- **Is this reflected in the targets set in the Annual Monitoring Report?**
10. The targets identified in the AMR (**CD19**) have been updated to reflect the policies included within this DPD. They continue to monitor housing completions on allocated sites in this DPD and also windfall sites but now also include a number of new local indicators to monitor some of the topic policies. These are:
 - Recording completions of local needs and specialist housing exception sites to monitor policies TRS4 and TRS5.
 - Monitoring the non-A1 uses within the Tenterden Primary Shopping frontage area to monitor TRS15.
 - Reviewing the Sustainability Matrix to enable the monitoring of TRS6, TRS7, TRS8 and TRS16.
 11. Two of the indicator targets are unable to be split out into the rural area only as they are borough-wide. These are the targets for increase in affordable housing completions and the amount of employment floorspace completed. However, to assist in monitoring these borough-wide targets for the rural

areas, the AMR now includes a specific indicator section relating to the rural area only and the results of these indicators are recorded here. This table can be found at **Appendix 3 of CD19**.

12. The policies relating to protection of the countryside will apply to all planning applications for the rural areas and must be taken into account. The AMR includes an indicator that measures the success of the Borough Wide biodiversity and geological conservation policy (CS11), and this takes into account all SSSIs in the Borough.
 13. Representation TPV259 from KWT requests that the Council includes monitoring of Priority Habitats and species mitigation measures that are created as a result of new development. The Council believes that this would be a very difficult indicator to monitor effectively as they do not hold any data relating to the Priority habitats and species contained within the Borough. With regards to mitigation measures, these are dealt with before development commences at planning application stage, if they are deemed necessary.
- **Are triggers for remedial action identified, and mechanisms to start remedial action if objectives not met?**
14. The AMR includes a housing trajectory specifically to record the housing completions in the rural area. This trajectory has been recently updated to list all of the sites allocated through this DPD and the anticipated timescales of delivery. This will enable the Council to effectively monitor, on a site by site basis, the housing completions being achieved each year.
 15. The strict phasing approach to these housing allocations will be monitored to ensure that a suitable supply of residential development is coming forward. If sites allocated are not coming forward then the Council, through its AMR can elect to promote phase 2 development in its place. If schemes in Phase 1 have not developed to planning permission stage by the end of 2013 at the latest, then it may be appropriate to bring forward phase 2 sites. This would provide adequate time for developments to be planned and implemented before the end of 2016, as set out in para. 8.4 of the DPD.
 16. The AMR will also continue to monitor the windfall completions in the rural area. Paragraph 6.3 of the Core Strategy requires the validity of the assumptions about delivery of windfall development in the rural area to be re-assessed in the review of the Core Strategy in 2014 as this could affect the scale of site allocations required for housing post-2016.
 17. Representation TPV450 requests further clarification of how the site allocations will be amended if a significant amount of windfall completions come forward in the plan period, especially if the Core Strategy review is delayed. There is no mechanism, except for a formal review of the DPD itself,

that would enable any reduction in the allocations in the Plan to be made and that would need to be set against Government guidance on windfall development at the time. The on-going need for rural housing development beyond 2021 would also need to be taken into account (Although that would need to be a matter for the Core Strategy review). However, it is the Council's view that the Core Strategy review will take place by the end of 2014 and cannot foresee any reasons why it might be delayed.

18. The AMR will also monitor the supply of new or converted premises for employment in the rural area to ensure that an adequate level of floorspace has been provided to meet the demands. Using the results of the employment floorspace indicator in the AMR, the Council will be able to investigate whether the employment policies TRS7-TRS11 are effective. This could enable the Council, as part of the Core Strategy and subsequent DPD review, to allocate employment sites in the rural areas to supplement the supply of employment floorspace.
19. Using the sustainability matrix annual review indicator now included in the AMR, we will be able to monitor the success of policy TRS16 in preventing the loss of village shops and services. The retail uses of Tenterden High Street will also be closely monitored to ensure the range of goods and services available there is retained and if possible, enhanced. If this appears not to be the case, then these policies will be re-assessed during the review of the DPD, which enables time to rectify any issues before the end of the plan period.
 - **If not, is the DPD sufficiently flexible in other ways to accommodate change?**
20. The policies are flexible in their approach to allocation of sites. The DPD does not allocate employment locations, instead applying a flexible approach to new employment locations coming forward in the most sustainable service centres and allowing extensions to existing locations. There is a variety of different site sizes and locations of housing sites, this allows flexibility to enable the housing completions to be achieved on the most deliverable sites first.
21. The Core Strategy review must be adopted before the end of 2014 and will formally review the rural housing requirement for the Borough, taking into account any subsequent higher-tier guidance, the state of the housing market and the level of housing delivery achieved in the rural areas. The adoption of this first review of the Core Strategy will then trigger a formal review of this DPD, to be programmed for adoption by the end of 2016. This is an early opportunity to refresh and update all of the policies and makes the DPD flexible to a variety of changes.