

Response to Matter 4 - Housing Mix and Densities

- **In general, are the numbers of dwellings allocated to each site realistic in terms of densities?**
 - **Do densities meet the guidance in PPS1 and PPS3, and is there some local justification where they differ from national policy?**
1. PPS3 states in paragraph 47 that *'LPA's may wish to set out a range of densities across the plan area rather than one broad density range although 30 dwellings per hectare net should be used as a national indicative minimum to guide policy development and decision making, until local density policies are in place. Where LPA's wish to plan for, or agree to, densities below this minimum, this will need to be justified.'*
 2. It is important to note the term 'national indicative minimum'. This is to guide development and decision making nationally. It should not be interpreted rigidly, particularly in the context of a rural environment which is far more sensitive to development pressure. Achieving higher densities must be balanced with impact of development on the landscape, existing built character, surrounding countryside and existing properties.
 3. PPS1 supports this approach in paragraph 20 which states that plan policies should take account of the protection of the wider countryside and the impact of development on landscape quality. Policy CS9 of the Core Strategy also requires that all development proposals need to demonstrate that the design has been conceived through a full assessment of the context of the area.
 4. Given the above, it is important that the DPD seeks to promote development that is appropriate to the surrounding environment. Each site has been assessed by in house urban design planners, taking into account landscape issues, built character, scale, form etc. Local views, Parish Plans and Village Design Statements were also considered.
 5. Overall, most of the allocated sites in the DPD will deliver an average net residential density of around 30 dwellings per hectare. However, in a few cases, a detailed assessment of the site's context has merited an indicative site capacity which would be lower than this figure. This is considered appropriate for a variety of reasons, as set out below:
 - HAM1 -The current residential area of Lancaster Close is a very low density site of mainly large, detached houses. Paragraph 6.63 of the DPD explains that to break up the urban edge that will be created on the northern part of the site that adjoins the open countryside, development should be less than 15 dwellings per hectare in this part of the site whilst significant landscaping and natural screening should be provided to assist with this transition. This justifies the overall density of approximately 20 dwellings per hectare on this site.

- CHAR1 – The site is on an important entrance to the village, and adjoins open countryside including the Alder Woods, an important area of biodiversity value. Paragraph 6.45 of the policy explains the site's prominent position on the A20 that is adjacent to the playing fields and specifies that careful attention must be paid to design and layout here. The policy requires significant screening on the south eastern boundary, housing fronting the A20 that is set back from the road and access (vehicle and pedestrian) to the playing fields. All of these factors, along with the visual impact on the landscape, contribute to the site only being able to achieve approximately a net average of 21 dwellings per hectare.
 - CHAR2 – The site is in a prominent position at a key entrance to the village and higher density housing would be out of character here. The policy includes the need for significant tree planting which also reduces the developable site area. The different phases of the site may be developed at different densities but it is anticipated that a net average of 25 dwellings per hectare across the site can be achieved.
 - WOOD1 – This site is currently an open gap in built up frontage on Front Road. The surrounding properties are very low density, large detached properties, falling within the Conservation Area. High density housing would be extremely out of character for this area and would change the character of the Conservation Area significantly. Therefore paragraph 6.139 of the policy instructs that the layout should be in keeping with the surroundings and be of linear form fronting the road. This therefore justifies a net density of approximately 20 dwellings per hectare.
6. In relation to Tenterden, policy TENT1 advocates an average density figure of around 40 dwellings per hectare for Phase A. This is considered to be appropriate given its proximity to the high street and the existing tight-knit built form present. As the site moves further south, away from the Town centre, the density figure falls to 30 dwellings per hectare, in order to deliver an appropriate transition from the built form of the Town and the countryside.
 7. When looking at the issues of perceived inconsistency with National Government guidance, it should be noted that the residential capacities attributed to all the allocated site policies in the DPD are indicative and are not intended to be prescriptive.
 8. Given this, should an appropriate scheme be submitted where a greater capacity can be satisfactorily achieved within the policy criteria, then such an approach should not be considered as a 'departure' from the DPD. This has occurred in the past where the Local Plan sites yielded more residential units than specified. For example, the Wye oil depot

site that was allocated for 35 dwellings but achieved 57 as the scheme was deemed acceptable in planning terms.

9. This approach is endorsed by Paragraph 50 of PPS3 which states '*if done well, imaginative design and layout of new development can lead to efficient use of land without compromising the quality of the local environment*'.
- **Is there a clear indication of the housing mix expected for each policy site, and how it relates to needs identified in the evidence base?**
10. The policies in the DPD do not give an indication of a specific mix of housing types required for each site as the Core Strategy already deals with this issue. Policy CS13 requires that a reasonable mix of house sizes and types are delivered to cater for a range of needs. The assessment of which types and sizes of houses are built at each location is carried out by the Council at planning application stage through surveys of local housing need and the local housing market at the time.
11. This approach is considered to be far more flexible than seeking to prescribe a particular housing mix in the DPD and then relying on this evidence throughout the plan period, as it could be out of date very quickly. The mix of houses on each site may also be influenced by the characteristics and surroundings of the site, which could also change during the plan period.
12. In relation to affordable housing policy CS12 of the Core Strategy requires that, on qualifying sites, 35% affordable housing provision is delivered.