

Response to Matter 5 – Tenterden Issues

- **Is TENT1 the best strategy when considered against reasonable alternatives?**
1. The Core Strategy proposes that Tenterden should accommodate an additional 500 residential units between 2006-2021. This position is based on the wider sustainability merits of Tenterden and its principal service centre role for the rural part of the Borough.
 2. However, this number is significant in the context of the Town. It does not represent organic rates of growth and is substantially greater than anything promoted at Tenterden through previous Local Plans. Achieving this scale of development, in a suitable and appropriate way, is a significant challenge.
 3. In order to meet this challenge effectively, it is of paramount importance to ensure that any strategy preserves the many attractive characteristics and qualities of the Town. Tenterden has an attractive historic core which contains numerous listed buildings and various conservation interests, which contribute towards the distinctive character upon which the town's success is founded. On its periphery, Tenterden is surrounded by open countryside, most of which is designated as AONB and in places there are long and beautiful views into and from the Town.
 4. The DPD advocates a single strategic release of land to the south of the High Street (TENT1). This area is located within easy walking distance of the Town Centre and the range of services present there. The area allocated is large enough to deliver the entire housing requirement for Tenterden and represents a compact growth model for the town.
 5. Adopting a different strategy would require several peripheral and less sustainable areas of land to be released for development. Such an approach would result in major areas of growth that are more distant from the town centre, increasing the reliance on car travel. This 'dispersed' approach would also erode the established and sensitive visual envelope of the Town and harm the attractive character of the Town's key entrance points.
 6. In considering the best strategy, it is a key factor that none of the alternative development sites promoted at Tenterden, on their own, can deliver the quantum of residential development proposed for Tenterden in the Core Strategy (or the refined quantum in the DPD in table 6.1). Therefore, at least two large sites on the periphery of the Town would be required to be released.
 7. In comparison, TENT1 is considered to be the only option that can strike the right balance between the need to accommodate the required residential units to be consistent with the Core Strategy with the need to ensure the Town's attractive characteristics are retained, whilst creating an opportunity to comprehensively plan for the town's expansion in a sustainable way.

8. This position is clearly endorsed through the Sustainability Appraisal (CD2) and subsequent Tenterden Southern Urban Extension Study 2009 (CD15) both of which were submitted alongside the DPD and support the DPD's strategy.
9. The Sustainability Appraisal (CD2) clearly concludes that the area to the south of the High Street represents the most sustainable location, compared to other alternative areas. Given the merits of this area, the Sustainability Appraisal recommends '*that further investigation of land to the south of this area is undertaken to establish the merits of a more significant scale of development*' (p50).
10. In response to this, the Council commissioned the Tenterden Southern Urban Extension Study 2009 (CD15) which explored the wider southern area of the High Street in greater detail, looking at a range of issues, including impact on the landscape, ecology, topography, access, built character, broad densities and flooding issues.
11. The findings of the Study showed that the full strategic housing requirement for Tenterden could, in principle, be accommodated in this area.
12. In summary, it is considered that TENT1 enjoys a variety of planning benefits, as set out below. These benefits are derived from a combination of the findings of the SA (CD2 p 48-50), conclusions of Tenterden Southern Urban Extension Study (CD15), and wider planning considerations.
 - Access to services – The entire site lies in close proximity to the range of services present in and around the Town Centre. These services include the doctor's surgery, supermarkets, shops, open space, play facilities, leisure centre and primary school.
 - Affordable housing – The site will be required to deliver a large number of affordable housing units (170 units). All of these affordable units will enjoy excellent access to Tenterden and the wider countryside.
 - Vitality – The scale of TENT1 and its proximity to the Town Centre will bring with it greater opportunities for the local population to invest in the local services present, thus sustaining their vitality and vibrancy. This will be further enhanced by the delivery of the public car park at TENT1, which will create a hub of pedestrian activity in this area and increase patronage around the high street, whilst also helping support the vibrant tourism industry present in the Town.
 - Transport – TENT1 is within easy walking distance to the central bus stops located on the high street and thus provides easy access to non-car based travel. In addition, the development of TENT1 will generate good linkages into the countryside, encourage walking and cycling activities.
 - Landscape - It is clear that TENT1 will have a visual impact on the southern side of the town. However, the topography of the area limits long-range views

of the site and helps to mitigate its visual impact. This will be supplemented by the additional planting required by the policy itself. Although only scoring a neutral score in the SA (CD2 p48) TENT1 still scores higher than any area promoted by objectors.

13. In addition, the scale and nature of TENT1 provides the opportunity to comprehensively plan for the town's significant growth in a way that is sympathetic, mirroring the closely knit, organic expansion of the town that has taken place historically.
14. This brings with it many benefits. A comprehensive approach, delivered through a Masterplan will ensure that TENT1 is delivered in a way that creates an area of distinctiveness with a positive sense of place. It will also provide an opportunity to provide more legibility to the southern side of the town where a range of varied development types have occurred over time from the more monolithic structures such as Tesco and the Leisure Centre to the cottages and bungalows that permeate the area on Six Fields Lane and Bridewell Lane.
15. A clearly defined hierarchy of streets can be established to help encourage ease of movement through the site and also help promote and enhance key landmarks, views and vistas. Good linkages can also be created through the site from the high street and out onto countryside, mirroring the traditional street pattern found south of the High Street.
16. A variety of built form can be established, with higher density development around the High Street to reflect the existing tight-knit urban grain of the historic core of the high street, moving towards a less dense built form further south, to mark a clear transition between the countryside and the Town. This range of densities will complement the delivery of a mix of dwelling types, from flats, town-houses, semi-detached and detached dwellings, thus catering for the wider needs of the future residents.
17. Such an approach also brings with it the ability to focus formal and informal spaces, and community facilities, in sustainable areas that can be easily accessed.
18. Overall, as the above shows, there are a wide range of over-arching planning benefits associated with TENT1.

Strategic Alternatives

19. Two sites have been promoted as strategic alternatives to TENT1. The Council does not consider that either site represents a suitable development alternative to TENT1, for a variety of reasons, as set out below.

1) Land off Appledore Road

(Countryside Properties – TPV 337, 341, 343, 344, 347, 348, 350, 351, 352, 353 & TRSC 107)

20. Countryside Properties are promoting land off Appledore Road for between 200 – 300 residential units. The land promoted is referred to as TENT18 in the Sustainability Appraisal.
21. TENT18 lies outside any specific landscape designations, although it forms part of the setting of the High Weald AONB. The topography of the land means that part of this site enjoys long, attractive and wide ranging views out over the countryside to the east. Development here would have a significant harmful impact on these views and thus adversely affect the setting of the AONB.
22. Furthermore, 200 - 300 residential units on this site would result in significant 'backland' development between the Woodchurch and Appledore Road frontages. This would have a major adverse impact on the character of this part of Tenterden where there is a transition from the low-density residential environments into the open countryside and would be out of keeping with the linear built form that is currently present to the north and south of this site.
23. In addition the Local Plan Inspector in his Report (CD29) concluded *'the urban edge at this point is well established by the ribbons of single plot frontage development along Appledore Road and Woodchurch Road. The open farmland to the rear is also one of the stretches of countryside which forms a green wedge reaching close to the town centre. These open areas are widely seen as playing an important role in defining Tenterden's character as a small town in an attractive rural setting. (para 5.713).*
24. Development of the scale proposed by the objector also raises significant access concerns. No evidence has been submitted by the promoter to suggest how vehicular access would be achieved or what the potential traffic implications would be. The Council assumes that the primary access would be onto Appledore Road. In order to achieve a suitable width of access, some of the mature trees which line Appledore Road and which greatly contribute to its attractive character and enhance this key entrance into the town, will need to be removed. More mature trees may also need to be removed to achieve appropriate vision splays.

2) Land off Tilden Gill Road

(Pro Vision Planning – TPV 432 & TRSC 105)

25. Pro Vision Planning is promoting land off Tilden Gill for approximately 162 residential units. The land promoted is referred to as TENT 13 in the Sustainability Appraisal.
26. TENT13 abuts the attractive listed buildings of Belgar Farm and Weavers Barn. At present, there is a clear break between the built form of the existing residential

estate and these listed buildings and as such their setting enjoys a pleasant rural character. Their setting is further enhanced by a number of trees present in the area. The development of TENT13 would fundamentally affect the setting of these Listed Buildings and thus harm their character.

27. The site adjoins the AONB, and at its far eastern part actually lies within it. This elevation enjoys wide ranging views onto the countryside. Development here would harm these attractive views and erode its pleasant rural character.
28. Additionally, TENT 13 lies in a relatively peripheral location in Tenterden that is somewhat removed from the Town Centre and thus would encourage more reliance on car -based travel.
29. The original Shrubcote housing estate has been extended significantly in the past. This piecemeal approach has resulted in a large estate, characterised by a fragmented built form which suffers from a lack of clear legibility and permeability. As such, the area fails to deliver a positive sense of place and suffers from poor connections, both within the estate and to the surrounding area. The development of TENT13 would merely exacerbate these problems and would inevitably result in simply more housing 'tacked-on' to the existing estate.
30. Delivering 162 residential units on this site also raises several traffic concerns. The current road network within the estate is highly convoluted and does not encourage easy vehicular movements. This problem is further exacerbated by the numerous cul-de-sacs present. Adding an additional 162 units here would intensify these issues, as additional traffic flows would need to move through the estate, before being able to exit onto Appledore Road.
31. It is also worth noting that in their submission, Pro Vision Planning, refer to comments made by the Borough Local Plan Inspector which they say endorse the suitability of TENT13 for residential development. However these assertions need to be firmly placed into context.
32. The Local Plan Inspector made a recommendation to the Council that two sites (shown as 'area of new development' and 'phase A' in appendix 1 of the objectors submission) in the Tilden Gill area should be allocated in the Borough Local Plan for residential development. Each of these sites was deemed suitable to deliver 23 residential units. In response, the Council allocated one of these sites in the Local Plan (S47 – Land off Tilden Gill Road) and this has subsequently been constructed. However, the Council did not endorse the Inspector's views in relation to the eastern site and it was not subsequently allocated in the Borough Local Plan.
33. Therefore, in context, the Local Plan Inspector's comments solely relate to small scale development (23 units) on a small area of land. The area now being promoted for development is substantially larger and intends to deliver significantly more development (162 units). Given this, the Borough Local Plan Inspector's comments can in no way be taken to endorse the development of the whole of the area.

Smaller Scale Alternatives

34. In addition to the two larger alternative sites promoted, a number of smaller sites have also been promoted. Even if all these alternative sites were to be allocated, they would still not deliver the necessary quantum of development for Tenterden and as such, they do not represent a realistic or appropriate alternative strategy to the allocation of TENT1. However, the Council does not consider that these sites should be allocated alongside TENT1, for a variety of reasons, as set out below.

1) Land off Hales Place

(Appledore Developments LTD – TPV 382)

35. Appledore Development LTD is promoting land off Hales Place for 36 residential units. The land promoted is referred to as TENT 20 in the Sustainability Appraisal, although it appears only the North Eastern part of this site is being promoted.
36. The area promoted for development forms an unusual and attractive ‘green gap’ within the town which provides a break from the Shrubcote estate to the east and the built development to the west. The area is characterised by numerous semi-formal orchard trees which are all managed.
37. This area also lies wholly within the Conservation Area and forms part of the setting of Hales Place which the Conservation Area appraisal states ‘*is an impressive 16th Century building with not only a walled garden but also listed garden structures, a barn and stable/house*’. Therefore, this area forms an attractive part of the Conservation Area and development upon it would adversely affect its character and appearance.

2) Land off Westwell Court

(John Bishops & Pentland Homes – TRSC 29)

38. John Bishop & Associates is promoting land off Westwell Court for 20 residential units. The land promoted by the objector is the same area of land that was initially allocated as policy TENT2 of the Regulation 27 Publication Version of the DPD.
39. The proposed allocation of TENT2 in the Publication Version of the DPD generated significant local opposition. These representations are before the Examination and may be summarized as focusing on concerns about traffic congestion, impact on residential amenity, whether access could actually be achieved through the existing garages and the impact on visual envelope.
40. It may be argued that this site could provide a small element of flexibility in the delivery of housing development in Tenterden but given that the Council is confident in the delivery of TENT1, in line with the timescales set out in the DPD, and given that 20 residential units is such a small proportion of the overall number

of dwellings attributed to Tenterden in the DPD, there seems little to suggest that this view remains valid, in this context.

41. Furthermore, TENT1 is a more sustainable location to focus development at Tenterden than this site and can easily accommodate the 20 units that were proposed for this site. As such, there is little justification to release this area either instead of or alongside TENT1.

3) Hopes Groves Nursery & Sternberg Farms

Price Whitehead – TPV 287, 288 & TRSC 108 & 109

42. Price Whitehead is acting on behalf of the land owners of Hopes Groves nursery and Sternberg farms. These sites lie next to each other and both sets of representations raise similar objections to the Plan, hence a combined response is appropriate. Land promoted at Sternberg Farms is referred to as TENT 17 in the Sustainability Appraisal whereas land promoted at Hopes Groves Nursery is referred to as TENT 16. (p38-41 CD2).
43. The Sustainability Appraisal shows that development in these areas (TENT 16&17 – p38-41) would have a negative impact on the landscape and harm the setting of the AONB, which both sites directly abut. It also sets out that both sites suffer from poor access to services, being so removed from the High Street.
44. In addition, there is no need to include these areas in TENT1 as it has been demonstrated, earlier in this paper, that TENT1 is large enough to accommodate the housing requirement for Tenterden. The housing densities promoted in the DPD are also considered to be appropriate for the context of the area, as set out in Para 16 above.
45. Furthermore, expanding the allocation to include the land promoted would reduce the compactness of TENT1 and the numerous benefits associated with that, as it would promote housing development in more remote locations, discouraging walking and cycling movements. Adopting this approach would also result in development encroaching unnecessarily into the countryside.
46. In addition, the allocation of the Nursery for residential development, would likely result in the loss of an existing active employment use. Such an approach would be contrary to Para 6.26 of the Core Strategy.
47. In relation to the perceived blight raised by the objector, there is no evidence presented to support their claim of a direct relationship between an increase in residential numbers at TENT1 and criminal damage, vandalism, theft and plant damage. Indeed, it might equally be argued that the presence of nearby residential development would provide a level of natural surveillance that would act as a disincentive to such activities.
48. In relation to drainage issues and increased run-off rates, this is answered under the Para's 59-62 below. In addition, development at TENT1 will need to ensure it

conforms to Policy CS20 'Sustainable Drainage' of the Core Strategy and the Council's Sustainable Drainage SPD.

4) Land to the West of Rodgersmead and North of Garden Cottage

TPV83 – Dr Parsons

49. Dr Parsons is promoting land for 6 residential units. The site has been assessed as part of the wider area TENT03/08 in the Sustainability Appraisal (CD2).
50. The Council considers that given the size of the site and scale of development proposed, this issue is far better dealt with through the Development Control process rather than the DPD.

Local Views

51. Para. 3.1 of the DPD has set out the important role played by the rural community workshops and how these helped shape the evolution of the DPD.
52. Para. 10.2 – 10.4 of the 'Issues and Options Report' (CD13) sets out that participants at the workshop clearly favoured a compact and focused approach to the development of the Town, to encourage walking and cycling movements. In addition, the participants felt that development should not be focused along the Appledore Road or Woodchurch Road areas of the Town.

Conclusion

53. Overall, the approach set out in the DPD advocates a sustainable and logical extension to the Town which is compact in nature. Any alternative strategy would require the release of several areas of land on the periphery of the Town, all of which score more poorly, in terms of sustainability, than TENT1. This alternative approach is clearly not as suitable and would result in a more fragmented strategy for the town's growth, harming the character of the town as a whole.

- **What are the impacts of TENT1 on wildlife, the historic character of the town and the AONB?**

Wildlife

54. There is no nationally important wildlife or ecological site within 7 km of TENT1. However, a locally significant wildlife site, referred to as 'Ashenden Gill' in the Borough Local Plan, lies directly to the south east of TENT1.
55. In terms of the principle of developing TENT1, there is no evidence available to suggest that development would cause an irreversible and non-mitigatable impact on the local biodiversity and/or geological conservation interest.
56. However, it is accepted that the development of TENT1, as with all development of this nature, could have an impact on the local ecology and wildlife. The Tenterden

Southern Urban Expansion Study (CD15) highlights the importance of the existing hedgerows, trees & orchards, ponds and semi-improved grasslands to the local wildlife and ecology. The Study also highlighted that slow-worms were found on part of the site.

57. In response, the policy for TENT1 in the DPD seeks to:
 - retain the woodland area in Phase A where the protected slow worm was noted
 - promote a 'green link' to create a wildlife corridor which can retain and enhance biodiversity interest
 - retain the ponds that lie to the east of Three Fields path
 - protect and enhance existing hedges and watercourse and other natural water features
 - in Phase B, create a substantial woodland area (incorporating wetland) belt to act as a; landscape buffer for the Town, biodiversity resource, habitat corridor and provide for adequate water retention

58. In addition to the above, the reasoned justification of TENT1 also sets out that full ecological surveys are required to be undertaken to inform the Masterplan that will support the development. This will ensure that all local ecological issues are taken into account and any detailed mitigation measures are included in the comprehensive planning of the area.

59. Kent Wildlife Trust (TPV206 & TRSC83) has objected to the allocation of TENT1, principally on the grounds of impact on the Ashenden Gill Local Wildlife Site. Their representations refer to harm to the local hydrology which feeds into the LWS and trampling caused by the increase in local population associated with the increase in residential dwellings.

60. It is accepted that mitigating surface water run-off rates from the development of TENT1 will need to be dealt and this is reflected in DPD. The land in this area is relatively impermeable (Wadhurst Clay) and therefore it is likely that the best SUDS strategy will be those not reliant on high infiltration rates, such as ponds, swales, balancing ponds and wetland. The scale, location and type of systems required will need to be addressed through the Masteplan process. However, it is considered that there is suitable land on site TENT1 and opportunities to enhance existing drainage systems in this area, so as to achieve a range of appropriate mitigation measures.

61. The Council will expect that any SUDS strategy for TENT1 will seek to achieve surface water run-off rates replicate the existing current Greenfield rate. In this context, the development of TENT1 is unlikely to generate additional harm to Ashenden Gill LWS, as has been suggested.

62. In relation to trampling of the Ashenden Gill LWS, this is a matter that can be adequately mitigated through the detailed design of the development and appropriate signage and footpath connections.

Historic Character

63. The vast majority of TENT1 falls outside the Conservation Area and the historic heart of the Town Centre and therefore will have limited direct impact on the Town's historic character.
64. The main impact from TENT1 is likely to be in the impact on the setting of the town from the south. At present, there are clear views to the higher buildings in the town and these views, to the church spire in particular, should be protected through the detailed design and masterplanning of the site and is reflected in the policy itself.
65. In fact, it is considered that given TENT1's comprehensive nature, the role of the Masterplan and its proximity to the Town Centre, there is a realistic opportunity to deliver a built form that would complement and enhance the existing tight-knit historic urban fabric that is such an attractive part of the Town's character. This position is reflected under Para 6.31 of the Plan.

AONB

66. The whole of TENT1 falls outside the designated High Weald AONB, although the south-western boundary of the site lies adjacent to it. The character of the landscape changes on the southern side of Smallhythe Road (which forms the AONB boundary) to a more parkland style characterised by the grounds of Heronden Hall. This compares to the more agricultural nature of TENT1.
67. Furthermore, the topography of the land south of Smallhythe Road means that TENT1 is relatively well enclosed in terms of a visual impact over a wider landscape area, meaning that impact on the High Weald AONB is more limited. This position is reinforced by the Sustainability Appraisal (CD2) and the Southern Tenterden Expansion Study (CD15) which states *'the topography of the town means that the visual impact of the schemes would be restricted to the immediate area to the south of the town and to the west of Smallhythe road below the western ridgeline'* page 16.
68. The Council accepts that the scale of development promoted on TENT1 will clearly have an impact on the local landscape. However, it is considered this impact can largely be mitigated through appropriate screening measures, as promoted under policy TENT1.

- **Is the degree of reliance of the DPD's housing strategy on one principal site (TENT1) sufficiently flexible? &**
 - **Have key stakeholders such as landowners and infrastructure providers been sufficiently involved and engaged so that delivery in the timescale proposed is reasonably likely? &**
 - **Is there a need for a contingency strategy should delivery be delayed?**
69. The Council accepts that relying on one principal site to deliver the bulk of the housing requirement for Tenterden is a potentially less flexible strategy than allocating a variety of sites. However, this must be balanced against the numerous planning benefits associated with TENT1, compared with the alternative available sites, as discussed above.
70. In any event, the Council considers that there is an element of flexibility in the phasing approach, as set out in the DPD. The Plan seeks to promote the most suitable phasing strategy to the release of land at Tenterden to ensure it occurs in a logical and sensitive way. Therefore the approach in the DPD should remain as set out. However, there is an in-built flexibility to this approach, as set out under Para 8.4 of the DPD.
71. This flexible approach applies to TENT1, in that, providing an overall approach to the whole of TENT1 has been agreed through the Masterplan process there is no reason, should Phase A be delayed, to suggest that it would be inappropriate for parcels of land at Phase B to come forward in tandem. This approach would ensure that any land released for development remains in accordance with the wider strategy for the site and not prejudice the ability to deliver the agreed planning objectives as set out through the Masterplan.
72. In addition, there is also a degree of flexibility in relation to the boundary of Phase A, as set out under TENT1. This line is reflective of the approach which seeks to concentrate the first phase of development nearest to the Town Centre. However, should it be necessary to deliver the numbers set out for Phase A, this line could well be altered. This would need to be explored in more detail through the Masterplan process.
73. In relation to the deliverability of TENT1, the Council is confident that TENT1 can be achieved, in line with the timescales set out in the DPD, for a variety of reasons.

Landownership

74. All but one of the landowners in Phase A are in the process of signing a Collaborative Agreement, with a view of ensuring Phase A can be delivered in accordance with the DPD. It is anticipated that this Agreement will be signed before the Examination hearings commence. These landowners have confirmed their support for the Plan and that their land is available to be released for development now.

75. The remaining Phase A landowner, Tenterden Town Council, have not yet entered into the Collaborative Agreement. However, they have written to the Borough Council to say that they support the allocation of TENT1 in principle for a number of reasons. This position is firmly reflective of their position throughout the evolution of the DPD. The Town Council's letter has been appended to this statement, see Appendix A.
76. Furthermore, the landowners of Phase B, Morghew Park Estates, have made formal representations on the DPD which express their support, in principle, for the approach set out for TENT1 (see representation TPV 284).

Strategic Infrastructure

77. There has been no strategic infrastructure constraint identified which would frustrate the delivery of TENT1. The Council targeted the relevant infrastructure providers through the formal consultation procedures, and none have raised any objection to the site coming forward in principle.
78. In relation to traffic issues and TENT1, Peter Brett Associates (PBA) have been appointed by the Council and the landowners to examine the traffic issues with TENT1.
79. PBA's clear conclusions are that there are no overriding highway, traffic or access constraints that would prejudice the delivery of TENT1. Their report concludes that there is sufficient capacity available in the nearest off-site junctions to cater for traffic growth associated with the development and that, through a combination of access points into the site from Smallhythe Road and Recreation Ground Road, suitable access can be achieved. The PBA report is published as CD 35b. Of course, the proximity of TENT1 to the town centre is also likely to encourage a higher proportion of pedestrian trips than would be the case with alternative sites and so it is clear that PBA's modeling outcomes represent a 'worst-case' scenario.

Procedural Timescales

80. The Council consider that there is adequate time to achieve the delivery of TENT1, including the formal parts of the process. Please see the table below:

Stage in Process	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021
Adoption of DPD												
Master-planning												
Planning App & Decision												
Build Rate (cumulative)			30	100	170	230	300	340	380	420	460	485

81. As the above shows, the delivery of new housing at TENT1 can be achieved within the timescales set out in the DPD, thus achieving the housing quanta set out for 2016 and 2021 in the DPD. This is despite a generous amount of time being apportioned to the Masterplanning and Planning Application process.
82. At its peak, the timetable above suggests the delivery of 70 residential units per year. This figure is considered to be entirely possible, particularly given the Town's traditionally strong housing market and the subsequent likelihood of a swift return on any investment.
83. As the above shows, TENT1 is entirely deliverable, in line with timescales set out in the DPD. As there are no land ownership, infrastructure or procedural impediments, the Council does not believe there is any substantive reason to doubt that the allocation will be converted into development on the ground. As such, no formal contingency strategy is required beyond the re-phasing of the site as outlined above. Any such approach that involved the development of other, much less suitable and sustainable sites in the town would place undue and unnecessary pressure on land in far less sustainable areas of the Town. This is particularly an issue for Tenterden given its attractive and sensitive character and the high levels of development interest here.
84. In the highly unlikely event that TENT1 does not come forward at all then this issue can either be dealt a strategic level through the formal review of the Core Strategy (due to be adopted by 2014) or through a formal review of the Tenterden and Rural Sites DPD, due to be completed before the end of 2016.
85. Overall the Council considers that the housing strategy set out in the DPD offers the appropriate level of flexibility whilst ensuring the most sustainable approach to development is achieved at Tenterden.

- **Is the housing allocation balanced by the provision of jobs and community and social infrastructure?**

86. The Plan encourages other uses to come forward on TENT1, providing they complement its residential focus and deliver a sustainable and inclusive development. It encourages the role of the Masterplan process to establish what uses should come forward and where they should be located. Employment is highlighted as a possible use and in this context would likely be in the form of shops, rather than more traditional B-class type development
87. It is considered that this approach is far more flexible and encourages the market to deliver a range of suitable, alternative uses to come forward at TENT1 and that these uses can be properly planned for in a comprehensive manner. Therefore it is not necessary to require employment use to come forward in TENT 1 through the allocation process.
88. This approach should also be viewed in its wider context. The Employment Land Review (CD7) clearly demonstrates that employment allocations are not required in the rural area, as the supply of rural jobs can be adequately delivered through appropriate criteria based policy. Please see the Council's response to Matter 11 – Employment & Council's response to Inspector's Note 1 (CD25) which show rural jobs are likely to balance housing growth over the Plan period.
89. In terms of social infrastructure there have been no formal comments made by the relevant parties which suggest there is a need generated by the development that cannot be accommodated within existing resources. For example, the County Council, as Education authority has confirmed that no additional land for new primary or secondary school facilities would be required based on the proposed scale of housing in Tenterden.
90. Other infrastructure, required to serve the needs generated by the development, will be required to come forward. This is reflected in the justification to policy TENT1 and reinforced through policy TRS19 of the DPD.

- **Does the strategy for Tenterden support and promote public transport and the limitation of reliance on the private car?**

91. Yes, both phases of TENT1 are within reasonable walking distance of the Town Centre. The policy promotes good linkages within the site and onto the High Street area, where a wide range of shops and services are present, including the supermarkets of Tesco's and Waitrose. These linkages will help encourage greater walking and cycling movements in and around the Town, especially when compared to other sites promoted by objectors.
92. Tenterden is also well served by bus services to Maidstone and Ashford, both of which provide substantial employment opportunities and are identified as Growth Points in the SE Plan. Ashford also provides quick access to the London markets, following the introduction of High Speed 1.

- **Is the Tenterden shopping frontage policy TRS15 the most effective way of enhancing and sustaining the role of this principal town?**
93. Tenterden, as with most historic market towns, has maintained its focus for trading. The Town Centre currently provides a specialist retail offer and has an attractive traditional shopping character, reinforced by numerous independent retailers, housed in historic buildings. This retail offer greatly contributes to Tenterden's overall character and attractiveness.
 94. The identification of specific shopping frontages is considered a useful tool in ensuring A1 retail uses remain focused in key town centre locations, particularly where footfall needs to be maintained or increased. PPS4 (Para EC1 3.1c) encourages the use of primary shopping frontage policies providing they are reasonably defined.
 95. The shopping frontage survey, conducted in June 2009, (CD14) assessed the wider Town Centre shopping area and showed the A1 and non-A1 uses present.
 96. The shopping frontage survey showed that the existing 'Station Road to East Cross' Local Plan frontage contained 65% of A1 retail uses whereas the 'Webb's shop to Recreation Ground Road' Local Plan frontage, contained 60% A1 retail uses. These figures show that each frontage has a reasonably high concentration of A1 retail uses at present. In addition, these two frontages remain in a central location within the town centre, and are the subject of high pedestrian flows.
 97. However, it has been deemed appropriate to extend the 'Webb's shop to Recreation Ground Road' Local Plan frontage further west. The context of this area has changed somewhat since the adoption of the Borough Local Plan, due to the development of Tesco's to the west of the Town Centre. This new development, and its associated car park, is now a significant generator of pedestrian movements into and around the western area of the High Street.
 98. The approach identified in the Tenterden and Rural Sites DPD seeks to harness the additional footfall movement in this area whilst also building upon the reasonably high proportion of A1 uses that are currently present (55% - Area 1 CD14).
 99. It is important to note that the frontage policy still allows for a degree of flexibility in terms of non-A1 shops, within the Town Centre as a whole. A significant proportion of non-A1 uses (35%) are still able to come forward, even within the identified frontages. In addition, substantial areas within the wider Town Centre are not covered by any frontage policy.
 100. Overall, the Council considers that the shopping frontage policy provides the most effective way of maintaining the Town's vibrant and healthy retail offer.