

Tenterden and Rural Sites DPD – Rural Capacity Studies

Introduction

In July 2004, Ashford Borough Council commissioned the consultants Halcrow to undertake a Housing Capacity Study for the rural settlements of Tenterden, Aldington, Biddenden, Brabourne Lees, Charing, Chilham, Hamstreet, Pluckley and Wye. The study was concluded in February 2005.

The purpose of the study was to provide advice to the Council on the extent of the potential residential development sites within these villages and to give a very broad estimate of potential housing capacity in these settlements.

In 2006, the Council appointed Tony Fullwood Associates to undertake a similar exercise for the rural settlements of Bethersden, High Halden, Rolvenden and Woodchurch as these were settlements which had scored well in the council's sustainability matrix exercise and were proposed to be included in list of settlements in policy CS6 of the Core Strategy Submission Document (November 2006).

In total, the two sets of studies identified an indicative potential housing capacity of over 2,800 dwellings on the 'retained' sites in the rural settlements that were surveyed. However, for the reasons set out below, the Council does not consider that this is an accurate or robust conclusion due to the nature of many of the sites 'identified' in the studies.

Informing the DPD preparation process

The first set of rural capacity studies by Halcrow were undertaken at the very initial stages of the production of the Tenterden and Rural Sites DPD. They provided a starting point for identifying possible development sites within the broad confines of the larger rural settlements in the Borough.

Since these studies were completed, other important parts of the DPD preparation process have provided further potential sites for consideration.

Notably, in July 2007, landowners/ stakeholders were invited, by advertisement, to submit sites that they felt were suitable for development in the rural areas. This information gave the Council an initial understanding of potential land available for potential allocation.

Then subsequently, the first round of community workshops, held between October 2007 and March 2008, gave the opportunity for an invited cross section of the local community to discuss the issues facing their settlement and the options for any future development. This innovative approach provided the Council with valuable feedback on the proposals emerging within their parishes and resulted in several alternative approaches being suggested that could then be subsequently tested and appraised. The outcomes from these workshops were reported in the 'Issues and Options Report', giving the community and key stakeholders the opportunity to comment on their outcomes.

The Tenterden and Rural Sites DPD 'Issues and Options' Report was published for an eight week public consultation period in May 2008. The Report represented the initial

stage of the process, highlighting the main planning policy issues facing the rural parts of the Borough and outlining the main options for addressing those issues. This included publication of the main site options that had been put forward at that date and which had been discussed in the first round of rural community workshops. The Council received 911 representations on this document (please refer to the 'Tenterden and Rural Sites DPD, Pre-submission Consultation Statement' for further details).

Areas of land were also promoted after the Issues and Options report, in the form of informal site submissions and were also taken into account.

Revisiting the Capacity studies

The rural capacity studies were a useful exercise in determining a very broad estimate of housing capacity in the rural areas. However, as with all housing capacity studies, estimating the capacities only indicates what might be possible, not what will, or should, happen in practice. Estimates provided within the study therefore reflect the potential for housing and did not represent actual housing allocation figures, nor should they be interpreted as such.

The Council has reviewed the findings of the rural capacity studies in light of the subsequent stages of the DPD preparation process and the additional information, consultation and assessment work that has been carried out since they were initially undertaken.

The Council considers that the vast majority of the 'retained' sites identified in the rural capacity studies do not offer deliverable or appropriate sites for residential site allocations for several reasons:-

- *Size* – The capacity studies assumed an indicative residential density of between 30-50 dph which is the standard model for this type of exercise. Whilst this may be suitable in urban areas, this level of housing density is less likely to be acceptable in the majority of rural settlements, given their rural character and the nature of the existing built form. Therefore, several sites that were identified as 'retained' in the capacity studies are actually unlikely to deliver 5 or more housing units and have thus been excluded for allocation purposes.
- *Relationship with the existing built form* – Some 'retained' sites fell within what was defined in the two studies as the 'broad' confines of the settlement. On closer inspection these sites could not realistically or reasonably be assumed to be within, or indeed adjoining, a policy CS6 settlement. They would therefore be unsuitable to allocate, being inconsistent with the Core Strategy approach.
- *Impact on character or amenity* – several 'retained' sites involved important areas of open space that contributed to an area's character whilst others would clearly result in an unacceptable impact on local residential amenities, e.g. significant 'backland' development.

- *Achieving an acceptable access* – a number of potential sites identified in the studies are prejudiced by having unsuitable, or any deliverable means of vehicular access.
- *Multiple landownership* – a significant number of the ‘retained’ sites involve areas of land clearly with multiple land owners, raising concerns over land assembly and thus deliverability. For example, groups of rear gardens put together for the capacity exercise are unrealistic allocation sites.
- *Site shape or layout* – several ‘retained’ sites are of such a shape that a realistic layout of development would be undeliverable, e.g long, thin sites.
- *Sites which have been built* – since the studies production some ‘retained’ sites have been built.

This review of the ‘retained’ sites from the capacity studies discounted the vast majority of them as undeliverable or unsuitable allocation options for the DPD. However, a few ‘retained’ sites were left, having ‘passed’ this initial review, and these were considered to be worthy of further assessment.

These residual ‘retained’ sites were assessed as part of the Sustainability Appraisal process, given that they fell in whole or in part within the areas assessed by this Appraisal. For reference, the relevant ‘retained’ sites are listed below, alongside the site reference in the Sustainability Appraisal.

Rural Capacity Study Reference		Sustainability Appraisal Reference
T046	Tenterden	Part of Tent 20
CG028 & CG001	Charing	Char 04
CG022	Charing	Part of Char 22
H011	Hamstreet	Ham 10 / 12 / 07
CM014	Chilham	Chil 01
BD001	Biddenden	Bid 01/11a
BD019	Biddenden	Bid 25
BE8 *	Bethersden	Beth 02 / 04

** this area is identified as a part retained site within the 2006 rural capacity study*

In revisiting the rural capacity studies, the Council has also looked again at those ‘sites’ which were ‘removed’ as part of the capacity work (i.e not felt to be suitable for housing at that time).

Given the need to be consistent with the adopted Core Strategy and the relatively limited deliverable development opportunities identified in the capacity studies, the Council were required to expand the scope of possible development sites in the rural area. By extension, several sites identified in the capacity study as ‘removed’ were re-assessed as part of the Sustainability Appraisal. For reference, the relevant ‘removed’ sites are listed below, alongside the site reference in the Sustainability Appraisal.

Rural Capacity Study Reference		Sustainability Appraisal Reference
TO 47,48,49,50	Tenterden	Part of Tent 20
TO 38,39,42,43		Tent 27 & 25
TO 57		Part of Tent 13
TO 62		Part of Tent 19
TO 10, 11		Part of Tent 13
TO 30		Part of Tent 07
WO28	Wye	Wye 01
WO31 & 45		Part Wye 17 & Wye 03
WO24 part		Wye 12
WO19		Wye 14
WO16,17,18		Wye 08
HO31	Hamstreet	Ham 12
HOO4/23		Ham 02 / 03
H001		Ham 09
CG020	Charing	Char 28
CG022		Part of Char 25
BD002&003	Biddenden	Part of Bid 07/03/17/16/11b
BD011		Bid 03/17
CM22/31 (part)	Chilham	Chil 13
CM005		Chil 10
CM007		Chil 08
CM009 & 10 & 11 (part)		Chil 02b
CM002		Chil 03a
CM003/12		Chil 03b & 02b
CM020		Chil 12
AO07 & 006	Aldington	Ald 06 / 14
A016 part		Ald 07c (part)
BE10	Bethersden	Beth 21
WC8	Woodchurch	Wood 07 (part)
R6	Rolvenden	Rolv14

These mainly related to sites on the periphery of settlements which were ‘removed’ on the grounds that they were outside the settlement confines but which had since then been subsequently put forward for consideration in another stage of the DPD preparation process. This approach showed that some of these sites offered a more suitable, sustainable and deliverable development opportunity than alternatives shown as ‘retained’ in the capacity studies.

The two sets of rural capacity studies are appended to this document for information and clarity.