

TDRA Response to Ashford Borough Council regarding Questions raised in the Tenterden and Rural Sites DPD Document – Issues and Options Report

The TDRA Committee have had detailed discussions regarding guiding principles and criteria for proposed development sites within Tenterden as summarised below:

TDRA - Guiding Principles for the next stage of development of Tenterden

- The enlargement of Tenterden should benefit the existing town residents as well as providing additional dwellings for others.
- The selection of the sites should respond to the needs of the town as a whole and not just to the availability of land in specific locations.
- Additional development also brings with it the need for additional infrastructure and public open space. Some mechanism needs to be put in place to fairly assess this and ensure that new developments contribute appropriately to the infrastructure costs e.g. through 106 agreements.

TDRA Proposed Criteria for Development

- A clear presumption against development in the Area of Outstanding Natural Beauty (AONB) and Kent Special Landscape Area (KSLA).
- Areas that are important to the setting of the town together with “green lungs” need to be identified and protected
- The character of the entrances to the town (gradual transition from countryside to town) should be retained
- Planned open space with public access should be identified and where appropriate secured by purchase.
- Allocated housing development should be within easy walking distance of the Town Centre (900 metres / 15 minutes) ie lateral development rather than the linear development.
- A percentage of development areas should be for commercial purposes and located to facilitate “walk to work”.
- Provision for additional off-street parking should be identified.
- Site for development of larger doctors’ surgery should be identified and consideration towards inclusion of other services in a single building.
- Provision for young people, including the future of Highbury Hall, to be included in the plan. Such developments should also cater for a multi-use approach.
- Contiguous development that avoids major access road development should be given priority. Green walk-through routes should be encouraged.
- Green lungs should be incorporated into housing developments, retaining and sustaining existing natural features.

These criteria were sent to ABC as well as being made available to all Community Workshop participants.

TDRA's responses to questions presented in the Issues and Options Report

Question 17

One group felt very strongly that development should not focus around the Appledore Rd area of the Town, primarily due to traffic related issues. However, two groups both highlighted this area as a favoured location for development, notably sites Tent 18, 19 and 13 were supported. What is your view on this matter?

TDRA consider that site Tent 18 broadly complies with the criteria proposed by TDRA. Development of the western part of this area may be acceptable subject to a detailed plan of the area to incorporate open space and minimise intrusion into the countryside. However, the distance into the centre of the Town (some 1200m) is greater than at some other potential sites and development is therefore likely to generate additional traffic movements, rather than residents walking to the shops, compared to some other sites.

Development of site Tent 19 would impact on the character of the approach to the town along the tree-lined avenue of the Appledore Road. The distance to the Town centre (some 1400m) is also greater than at some alternative sites. Housing on this site as well as on site Tent 18 would generate unacceptable levels of traffic movements. This site does not meet TDRA proposed criteria.

Site Tent 13 is located a long way (some 1500m) from the Town centre and as such will tend to generate traffic. Access to this site via Tilden Gill and via Appledore road is also by means of an already congested road system. This site does not meet TDRA proposed criteria.

Question 18

One group felt very strongly against development in the Tent 07 area, primarily due to the impact on the visual setting of the area and urban sprawl into the countryside. However, 2 groups both supported this location for development. What is your view?

TDRA consider that site Tent 07 broadly complies with the TDRA's proposed criteria. However, in considering this site allocation should be made for open space particularly along the river valley running through the site and along the northern railway line margin to maintain the present amenity value for residents. Tent 07 is reasonably close to the Town centre which would help to reduce traffic movements although the steep slope from the lower parts of the site up to the High St. is likely to deter some walkers. Road access arrangements would also need to be carefully considered.

Question 19

The groups generally agreed that development should be first focussed within Tenterden to provide housing near or close to Tenterden's existing services and also to lessen the impact of development into the countryside. Do you agree?

TDRA's proposed criteria favour lateral development within close walking distance of the Town's shops and amenities. The area to the South of the Town (Sites 25, 12 and 24) meets TDRA's criteria in respect of distance to the Town centre services and could offer suitable sites for various infrastructure and amenities such as a car park and new Doctors surgery. However, the closeness of the countryside to the High St in this location is an attractive feature of the Town.

Question 20

The workshop felt that phasing the development intended at Tenterden was very important, both to ensure that it can be successfully integrated with the existing residents, and to mitigate against adverse impacts on Tenterden's character. What is your viewpoint?

TDRA feel strongly that sites for development should be identified in the LDF but that development on the approved sites should be in a phased manner.

It will be important that required infrastructure or other community facilities (open space, parking, Doctor's surgery/Healthcentre) be implemented early during the LDF period. Requirements should be identified and mechanisms put in place for funding of such facilities by means of a "land tax" on new development or other appropriate means. Such infrastructure and facilities should be implemented early in the plan period, say before 2015.

Question 21

Do you have any other comments to make on any of the outcomes of the Tenterden workshop?

The workshop concentrated on new housing sites but relatively little attention was given to detailed consideration of other issues such as infrastructure, facilities, open space, transport and parking that will become all the more important with the large planned expansion of the Town. TDRA consider that an additional workshop with ABC officers would be beneficial to discuss issues other than housing.

TDRA consider that the issue of housing density needs to be addressed. General government policy seems to favour high density developments within towns, however where the development is extending an existing town into the countryside we don't think that this is the best approach. In TDRA's view, all the developments should include a large proportion of public open space in the form of parks, play areas, footpaths, etc. The open spaces should

total as much as 20%. The remaining 80% can be high density, rather than executive homes with large gardens.

TDRA also think that design should be made an important issue. We need to champion good design and try to avoid lots of “boxes” that try to look like Kentish cottages. Good design should also encompass low energy use and so all new homes that fall outside the currently developed area should be up to level 3 of the sustainable homes code.

There should be a proper traffic plan to make sure that all these new developments can be integrated into the existing town infrastructure. That should cover cars, buses, cycles and pedestrians.

The subject of a road to the south of the Town linking the Appledore Road and Smallhythe Road was raised during discussion at the workshop. TDRA feel strongly that such a road would be detrimental to the Town and would create an undesirable “rat run” .

Issue A – Phasing of Development Allocations

Do you feel the Tenterden and Rural Sites DPD should:

A1 Allocate all the sited needed to 2021 but identify in which phase each one should be developed?

A2 Allocate only those sites needed to be developed in Phase 1 and review the DPD subsequently to separately allocate sites for Phase 2.

A3 Just allocate all the sites needed to 2021 without any phasing restrictions.

TDRA response: We consider that A1 is the preferred format.

Issue B – Identification of Village Confines

Do you feel that the Tenterden and Rural Sites DPD should:

B1 Continue with the existing approach of defining the confines of the settlement (eg by written definition)?

B2 Continue with the existing approach but review the definition?

B3 Draw the settlement boundary on the Proposals Map for some/all of the rural settlements?

TDRA response: We consider that B3 is the preferred approach for most settlements, including Tenterden, to secure the countryside setting. The current definition of “continuous and contiguous development” should be retained and a clear development envelope established.

Issue C – Windfall Housing Policy

Do you feel the Tenterden and Rural Sites DPD should:

C1 Continue to adopt the existing policy approach to windfall development?

C2 Alter the existing approach slightly to allow larger windfall schemes in all CS6 settlements?

C3 Tighten the windfall approach to restrict the size, number and/or location of where windfall schemes would be acceptable?

TDRA response: The Inspectors Report has rejected the policy that was proposed by ABC in the Core Strategy. In consequence, the allocation of new housing for planned sites in Tenterden has been increased to 500 units from 265. TDRA consider that the policy on windfall development should be tightened to restrict the size, number and location of windfall sites in order to ensure that excessive unplanned development is avoided.

The current policy (HG5) , with a presumption against more than 5 dwellings, with exceptions, has clearly not worked in the case of Tenterden, particularly in relation to the condition HG c) which refers to avoidance of “cramming” and promotion of “good design”. The Oaks Gate development in Oaks Road (within the conservation area) is a case in point.

Conditions therefore need to refer to the importance of design **especially in conservation areas**. The conditions identified in the criteria identified above for allocated housing (e.g. ease of access by on foot to the town centre and lateral rather than linear development) need also to be applied. For these reasons and in the light of the inspector’s decision to discount “windfall” development and disproportionately increase allocated housing numbers, we would support C3

Issue D – Local Needs Exception Sites

Do you feel the Tenterden and Rural Sites DPD should:

D1 Continue to adopt the existing “Exception Sites” policy?

D2 Seek to allocate all local needs housing sites?

D3 Provide a mixture of allocating some local needs schemes whilst also including an exception sites policy approach?

TDRA response: We have had bad experience of the “Exception Sites” Policy, where housing once accepted as “exceptional” is the used on appeal as a precedent for further development. TDRA consider that approach D2 is appropriate for Tenterden in the context of the increased numbers of housing sites as now required following the Inspectors report.

Issue E – Rural Employment Policy

E1 Should the Tenterden and Rural sites DPD allow more, or less, on-site expansion of existing business premises. Should this apply to the whole rural area, or just to sites in villages, or in the countryside?

TDRA response: TDRA consider that the DPD should allow more expansion of existing business premises in Tenterden, but with constraints on the development in the countryside. New employment build should be within the defined settlement boundaries or as an extension to existing light industry sites (e.g. Leigh Green),

While genuine alternative farm diversification should not be ruled out, new build should be discouraged, and the protection of the status of the countryside should be a prime consideration.

E2a Should the Tenterden and Rural Sites DPD continue to have a presumption in policy against the loss of existing employment sites to housing development?

E2b If yes, then how reasonable is it to apply a test of economic viability to determine if an employment site should be redeveloped for housing?

TDRA response: TDRA consider that the answer to E2a should be YES. It is reasonable to apply a test of economic viability, but this should not allow development of an entire employment site for housing. A proportion should be retained and redeveloped for employment, for example in small units for rent.

Issue F – Conversion of Existing Buildings in Rural Areas

Should the Tenterden and Rural Sites DPD:

F1 In principle, allow a wider range of potential uses to take place in converted buildings in the rural areas? Or take a more restrictive approach than current policy?

TDRA response: TDRA response See response to E1

F2 Continue to allow, in principle, conversion to residential use in non-listed agricultural buildings?

TDRA response: YES

F3 Amend the detailed criteria to allow a more restrictive, or less restrictive, approach to the scale and nature of uses permitted in converted buildings in rural areas?

F4 Take a different approach to the scale and nature of uses permitted in converted buildings in or adjoining villages, to those in the rest of the countryside?

F5 Should the Tenterden and Rural Sites DPD , specifically replace policy RE7 and rely on a condition in the appropriate circumstances?

TDRA consider that this policy should be replaced and a condition in appropriate circumstances substituted.

F6 Should the Tenterden and Rural Sites DPD, continue with the restrictive policy approach to village shop losses? Or take a more restrictive approach?

TDRA consider that this policy should be retained. TDRA consider that a more restrictive approach would not protect village shops but would lead to shop premises standing empty when businesses are no longer financially viable but no alternative use is permitted.

Issue G – Primary Shopping Frontage In Tenterden Town Centre

Do you feel the Tenterden and Rural Sites DPD should:

G1 Retain a primary shopping frontage policy for Tenterden?

Yes. Retain the existing policy and extend to A2 and A3 . The existing policy needs strengthening, We have concerns about the high % of charity shops occupying High Street frontage. Might there be some merit in identifying secondary frontage to encourage certain types of business

G2 Alter the identified frontage either by making it longer/shorter or altering the 20% limit of the policy?

TDRA consider that the present 20% limit is reasonable Rather than commence at Webbs on the South side of the High St, TDRA consider that this should commence at the Pebbles/Library.

G3 Remove the primary shopping frontage policy for Tenterden?

TDRA do not support removal of the primary shopping frontage policy.

Issue H – Local Landscape Designations

H1 Should the Tenterden and Rural Sites DPD retain a policy to specifically cover Special Landscape Areas in the Borough that gives a higher level of protection to the landscape than standard countryside protection policies?

Yes. We strongly support the “rolling over” of SLA status to protect the countryside setting of the town. This has been a useful and well regarded designation recognising the the importance

of the the landscape approaches to the town and the gradual transition of the main semi-rural “gateways” from the north, west and south.

H2 If yes, seek to justify the existing SLAs as warranting designation on a criteria based approach, or only designate smaller identified areas?

An approach based on the updated countryside appraisal “Tenterden Landscape Characteristics” produced by ABC for the workshop would be a useful basis.

Issue I – Allocation of Sites for Gypsies and Travellers

Should the Tenterden and Rural Sites DPD:

I1 Focus provision on several smaller sites or just one or two large sites?

I2 Only extend existing gypsy sites?

I3 What factors should the Council consider in deciding upon the location of those sites?

We believe that this is a borough wide issue that should be set in the context of the SERA review for pitch provision. We question the assumption that allocation is to be made only in the rural areas.