

## TENTERDEN AND RURAL SITES DPD

### Inspector's Note No.1 – Housing and Employment Figures

1. I have a number of queries following my initial assessment of the DPD, and would be grateful for the assistance of the Local Planning Authority in clarifying certain matters or providing additional information.

#### Housing

2. **I have been comparing the RSS and the Core Strategy (CS) concerning housing figures for the DPD area. In the RSS, taking that part of the Borough within the EKA sub region, there is not any differentiation between the Ashford Growth Area and the rural areas which are outside it but within the sub region. Do you know of any other data sources which could provide such a breakdown?**
  - 2.1 *The South East Plan does not provide a separate housing figure for the rural part of the Borough that sits within the sub region. Although the SE Plan arbitrarily divides the Borough in two, it does clearly indicate between the planning approach for the town of Ashford, compared to the rural parts of the Borough falling within the sub region. Ashford itself is identified as a 'Growth Area', a 'centre of significant change' and a 'regional hub' in diagram EKA 1.*
  - 2.2 *It is therefore reasonable to assume that the Growth Area relates to the town of Ashford and should be treated in a different context to the area described as 'much of rural Ashford'. Therefore, it is expected that the vast majority of the housing numbers identified within the sub region up until 2026 should be apportioned to the town of Ashford.*
  - 2.3 *This was the approach adopted in the Core Strategy and the Masterplanning work surrounding the growth area targets. This position is explored in more detail in the Housing and Employment Background Paper which was submitted alongside the DPD.*
  - 2.4 *There are no other data sources which provide a clearer rural area housing figure for the Borough.*
3. **In the absence of detailed figures, I would welcome comment on the following: the 22,400 new dwellings for Ashford BC within the EKA sub region 2006-2026 (RSS Policy EKA3), less the 16,770 dwellings for the Ashford Growth Area 2006-2021 (CS Policy CS2) would leave some 5,630 dwellings. Does this represent just the growth of the Ashford Growth Area from 2021 to 2026, or is there some proportion of it that could be attributed to growth of the rural areas of the Borough within the sub region, in addition to the 300 dwellings for the Borough outside the sub region identified in RSS Policy AOSR6?**
  - 3.1 *As stated above, the SE Plan clearly focuses the vast majority of the sub region's housing growth figure to the town of Ashford. However it would be reasonable to assume that a small proportion of this number could be apportioned to the rural part of the Borough within the sub-region given*

Council response to Inspector's Note 1 – 20<sup>th</sup> April 2010  
*the sub-region area includes 'much of rural Ashford'. This residual figure would therefore be in addition to the 300 dwellings identified in policy AOSR6.*

3.2 *As the period of 2021-2026 falls outside the timescales of the adopted Core Strategy and the Tenterden and Rural Sites DPD, this decision would be one to be considered as part of the 1<sup>st</sup> Review of the Core Strategy which is due to be formally adopted by the end of 2014 and which will take account of the SE Plan position post 2021 and any other higher level guidance in place at the time.*

**4. Is there a five-year supply of housing land for the DPD area?**

4.1 *This is dealt with in the Council's response to the draft list of Matters and Issues, under the 'housing' section.*

**5. Are there any outstanding commitments in terms of planning permissions for residential development? Are any of them within the allocated sites in the DPD and, if so, what has restricted their implementation so far and how would this change in the future?**

5.1 *Yes – an up to date list of extant residential planning permissions can be provided. The last published list is contained under Appendix 2 of the Strategic Housing Land Availability Assessment (extant permissions at 31<sup>st</sup> March 2008).*

5.2 *None of the allocated sites in the DPD are subject to an extant residential planning permission.*

**6. Has a Strategic Housing Land Availability Assessment been carried out?**

6.1 *Yes, the key conclusions of the SHLAA are included in the overarching report which is available to view on the Borough Council's website. Link below:*

*[http://www.ashford.gov.uk/planning\\_and\\_building\\_control/planning\\_now\\_and\\_in\\_the\\_future/employment\\_land\\_review\\_shlaa.aspx](http://www.ashford.gov.uk/planning_and_building_control/planning_now_and_in_the_future/employment_land_review_shlaa.aspx)*

6.2 *The site specific assessment sheets will be published on the website by the time of the PHM. Should the Inspector wish, the Council are happy to send her a hard copy of the SHLAA and add it to the Examination Library. The rural sites contained within the SHLAA include all those which have been assessed within the Sustainability Appraisal which supports the DPD.*

**7. Has there been an assessment of the particular demography and housing supply structure of the DPD area, including past and future trends, and analysis of the 2005 Housing Needs Survey from the point of view of rural settlements and areas, as part of a bottom-up identification of needs in the rural areas?**

7.1 *Yes, the 2005 Housing Needs Survey was a key background document to the Core Strategy and informed the strategic approach taken in relation to the rural areas, as set out under Policy CS6.*

7.2 *Furthermore, Policy CS12 of the Core Strategy includes a requirement for 35% affordable housing on qualifying sites in the rural area based on an examination of the Housing Needs evidence from the rural areas. This policy is supported by the Affordable Housing SPD, adopted in February 2009.*

7.3 *The 2005 Study has recently been updated by a 2009 Housing Needs Study that has only been very recently published on the Council's website. This has updated the base demographic and housing trend data for the Borough but does not indicate specific needs in the rural areas. These have been traditionally derived through collaboration with local Parish Councils in the form of Parish and village plans and the specific local housing need information held by the Council's Housing Department.*

7.4 *The Tenterden and Rural Sites DPD provides a further layer of policy guidance reflecting the on-going need for affordable 'local needs' housing in the rural areas reflected in the Housing Needs Survey data.*

**8. Has there been analysis of the particular problems and pressures of the Ashford town urban fringe outside the Growth Areas?**

8.1 *In 2005, Studio Engleback undertook an analysis of the urban fringe landscape. This work assessed the likely impact of the Ashford Growth Area on the areas of countryside surrounding Ashford itself and identified detailed landscape character areas close to the town. This Assessment was a background document and supported the Core Strategy.*

8.2 *However, it is considered urban fringe issues in general are something that would be most appropriately addressed in the respective AAPs for the two urban extension areas and the Urban Sites & infrastructure DPD (due to be published in July 2010) as these will identify the specific areas of development that will generate direct change on the urban fringe of Ashford and provide the vehicle by which those impacts may be addressed and mitigated*

**9. Has any research been drawn upon concerning the link between housing growth in rural settlements and the health and viability of rural shops, services and facilities?**

9.1 *It is self evident that an increase in housing growth will bring with it more opportunities for the local population to help sustain their local shops and services. The 'Living Working Countryside: the Taylor Review of rural economy and affordable housing' (2008) indicates that even limited housing development can positively contribute to the vibrancy of local shops, pubs and services.*

9.2 *However, there is no empirical evidence available which clearly shows a direct link between a specific number of houses required to adequately sustain a rural shop, services or facility. A variety of other factors have a bearing on the vibrancy of these services, e.g. the evolution of internet shopping, greater ownership of private cars, greater shopping choice and the expansion and diversification of nearby supermarkets.*

**10. Sustainability Matrix – is there any information about which rural schools may be struggling or threatened with closure because of falling numbers of pupils?**

*10.1 The Sustainability Matrix is based on the most up to date information from Kent County Council. The Borough Council is not aware of any proposed closures to any specific school in the rural area and the County Council has not indicated that any are struggling through the DPD consultation process. If the Inspector wishes, the County Council can be asked to confirm that this is still the case.*

Employment

**11. The CS aims to balance the growth of dwellings and jobs (Policy CS2). Paragraph 5.33 of the DPD says that 20,000m<sup>2</sup> net of B1 to B8 employment floorspace has been completed in the rural areas in the five years from 2003 to 2008. Is there any indication of what that might mean in terms of number of jobs? How does that relate to the no. of jobs in rural areas at 2003 (or some other agreed base date)?**

*11.1 The 20,000 sqm net gain of B1 – B8 employment floorspace completed in the rural areas between 2003 – 2008, as set out under Para 5.33 of the DPD, is derived from the annual employment land monitoring which is reported in the LDF Annual Monitoring Report.*

*11.2 In order to attribute an indicative jobs figure to this floorspace, it is necessary to split this figure into employment sectors. Using the ratio of average completions in the rural areas within the B use classes (as set out under table 8.9 of the ELR) as a proxy, the 20,000 sq.m figure can be broken down, on a pro rata basis, into the following employment sectors:*

- B1 - 9,800 sqm
- B2 - 3,800 sqm
- B8 - 6,400 sqm

*11.3 The Employment Land Review (2008), under Para 6.19, provides employment density ratios for a variety of employment sectors, as follows:*

- B1 = 1 job per 20 sqm
- B2 = 1 job per 30 sqm
- B8 = 1 job per 40 sqm

*11.4 However given the nature of rural employment and the variety within B1 uses in particular, it is difficult to accurately split office development with light industrial development which would create fewer jobs per floorspace. It is therefore proposed to apply an average of 1 job per 25 sqm to B1 employment use as this better reflects a mix of rural employment B1 office and light industrial uses.*

*11.5 Using the ratios set out above, it is reasonable to assume that the 20,000 sqm of completed rural employment between 2003 – 2008 yielded approximately 680 additional rural jobs.*

- 11.6 *The Council does not hold data on the number of jobs in the rural area in 2003.*
- 12. I note the recommendation in the 2008 Employment Land Review (paragraph 8.62) to adopt a criteria-based employment policy approach, which has been carried forward in the DPD. However, to complete the picture of what the ELR consider is the demand for employment land in the rural areas, based on past trends, how would the suggested 1-1.5ha per year translate into floorspace and thus into jobs (ELR parag 8.44)? Is this able to meet demand for rural employment, taking into account any structural changes foreseen in the rural economy over the plan period?**
- 12.1 *Para 8.36 of the ELR establishes that it is difficult to accurately assess future demand for employment space in the rural area. It suggests that an indication of likely future employment space needs in the rural area could be based on past take-up rates.*
- 12.2 *Based on this, Table 8.9 of the ELR shows that average completions in the rural area between 2004-07 has delivered 5,718 sqm of employment space (B1 2,800 sqm, B2 1,080 sqm & B8 1,836 sqm) per annum. Using the established job density ratios as set out above, this overall 5,718 sqm of employment space would yield 222 jobs.*
- 12.3 *It is therefore reasonable to assume that delivering the floorspace equivalent of 1.5 ha of rural employment space per year would equate to the creation of 222 additional jobs per annum, in the rural area. Over the DPD period to 2021, this could deliver well over 2,000 jobs, which is considerably in excess of the proposed growth of residential development over the same period.*
- 12.4 *The Council's evidence base does not suggest that there are likely to be structural changes in the local rural economy over the DPD period. Both the ELR and the 2009 Ashford Economic Baseline Report suggest that the rural economy in Ashford Borough is diverse and broadly-based. The latter document also shows that a significant number of jobs were delivered in the rural area and the rural economy grew by 9% between 2003 - 2007, the same rate of growth as the urban areas. (Para 4.72).*
- 12.5 *The 2009 Report shows that the local rural economy is not reliant on one particular sector and has a reasonable spread of people employed in the manufacturing, construction, hotels and restaurants, education, health and social works, business and wholesale and retail trade sectors. (see 'Annual Business Inquiry' table on page 27 – please note this doesn't include those employed in agricultural jobs).*
- 12.6 *The 2009 Ashford Economic Framework Baseline Report was not submitted as a background document to the DPD, but it is proposed that it is added to the Examination library. The Report has been in the public domain since September 2009, being available to view and download from the Council's website and formed the basis for the Ashford Strategic Economic Framework, which was adopted by the Borough Council in December 2009 and published in January 2010 (and which is also proposed to be a background document to this Examination).*