

Response to Matter 2 – Housing Numbers

- **Is the Evidence base for the housing target robust?**

1. The Council's evidence base for the housing target in the DPD is robust and is founded on the assessment and scrutiny undertaken in the preparation and examination of the adopted Core Strategy.
2. The Council considers that the evidence base that underpinned the Core Strategy remains valid and that there is no compelling reason due to either a change in national or regional policy or due to new survey work undertaken to suggest that the housing target for the rural areas should be fundamentally changed. This position is set out in more detail below.

- **How does the housing provision for the Plan period relate to that of the Regional Spatial Strategy (RSS), the South East Plan?**

3. The adopted SE Plan does not include any housing figure that relates to the whole rural part of the Borough. This position is reflected in the Council's Housing and Employment Background Paper (CD12). Therefore, it is difficult to establish a clear relationship between the SE Plan and the housing numbers endorsed through the adopted Core Strategy.
4. When looking to interpret the SE Plan it is important to bear in mind that it adopts a strategic top-down approach to the spatial planning of the Region. Newly created sub-regions are identified to accommodate significant levels of growth. This focus on functional areas, rather than arbitrary district boundaries, enhances better linkages between labour supply, employment growth and housing growth in the region as a whole.
6. This strategic approach represents a significant shift from the old system of Regional Planning Guidance combined with County Level Structure Plans, as the means of providing the higher level guidance. The Panel Report (CD47) sets out that the new approach is a '*brave attempt to plan on broadly functional areas, promoting work across the previously strong divides of county boundaries*' (Para 29.7).
7. In terms of the Borough of Ashford, it is clear from the approach within the SE Plan that the regionally significant issue relates to the town of Ashford and its status as a Growth area, and how this growth functionally relates to the East Kent and Ashford Sub-region. It is therefore this issue that warrants the most attention in the SE Plan and requires the detailed strategic guidance. This is reflected in that Ashford is identified as a 'growth area', a 'centre of significant change', and a 'regional hub' in Diagram EKA1 and subsequent policies.
8. In relation to the lack of clarity towards the Borough's rural area, this is considered to be firmly reflective of the strategic focus of the SE Plan and the move towards concentrating development at identified sub-regions. This position is reinforced by the Panel when it stated that '*although we are*

confident in the sub-regional apportionment that we suggest, it is far more difficult at this strategic level to be confident about individual districts totals' (Para 7.106)

9. It seems reasonable to suggest, given the Panel's comments, the SE Plan's strategic focus and the subsequent lack of clear detail in the SE Plan, that rural housing provision for the Borough is of limited significance regionally. It therefore bears little or no relevance to the function of the sub-region and warrants no strategic guidance within the SE Plan.
10. Therefore, a reasonable interpretation must be that the SE Plan simply does not deal with the issue of borough wide rural housing provision, as it is not appropriate in terms of the scope and scale of the SE Plan, in the context of Para 1.6 of the adopted SE Plan.
11. The issue of rural housing provision for the Borough is far better dealt with at a local level through the Local Development Framework. This local level focus appears to be endorsed by the SE Plan Panel who stated, *'We do not see a need to adjust the proposed levels in the more rural parts of the area. Each of the four local authorities concerned (including Ashford) was confident that they had sufficient flexibility to be able to provide adequately for the needs of their rural communities. (Para 26.63)*
12. At a local level, the Core Strategy concluded that the rural parts of the Borough should accommodate an additional 1,500 residential units between 2001 and 2021. This figure was derived from balancing the strategic level guidance available at the time (the then adopted Kent and Medway Structure Plan (2006) and the then emerging SE Plan (March 2006)) with an assessment of local issues, such as the relative sustainability merits of the Borough's rural settlements and their ability, in principle, to distribute this number appropriately.
13. At the time the Core Strategy was being examined, the then draft SE Plan was before the Inspector and as such its emerging approach was taken into account when he examined the appropriateness of the proposed 1,500 figure, contained within the Submitted Core Strategy. In addition SEERA, as was, confirmed that the Submitted Core Strategy was in conformity with the then emerging South East Plan.
14. Since the adoption of the Core Strategy in July 2008 the SE Plan has been adopted and thus forms the most up to date part of the Development Plan. It has been suggested that the SE Plan promotes a lower rural housing provision figure for the Borough and that this should supersede the Core Strategy's figures in policy CS6, and as such, the DPD's housing provision figure should be amended.
15. However, this suggestion is flawed for a number of reasons. Firstly, as set out above, the SE Plan provides no guidance or target figure for the rural part of the Borough – it is considered that the SE Plan considers rural housing

provision to not be a regionally significant issue and should be dealt with at a local level, where there is in-built flexibility to ensure individual authorities can achieve the most appropriate and balanced approach for their rural communities.

16. Secondly, the amount and division of residential development within the Borough, as set out in policy H1 of the adopted SE Plan has not been amended from what was set out in the draft SE Plan (March 2006 CD48). It is therefore difficult to understand why the 1,500 figure does not still remain appropriate, simply because the SE Plan is now adopted. After all, it is the same strategic approach that was considered by the Core Strategy Inspector in reaching his conclusions and is the same number endorsed by SEERA at the time.
17. Thirdly, the South East Regional Planning Board have also confirmed that the policy approach set out in the DPD is in broad conformity with the adopted SE Plan (CD3).
18. Overall, the Council accepts that it is difficult to establish a clear relationship between the approach in the SE Plan and the housing provision levels set out in the Tenterden and Rural Sites DPD. However, this does not mean that the housing provision levels set out in the DPD are inconsistent with the SE Plan. Indeed, the comments from the SE Plan Panel reported above imply that it should be for LDFs to determine the appropriate scale of rural residential development where this would not conflict with regional priorities.
19. The Tenterden and Rural Sites DPD seeks to achieve this balance and endorses the housing provision figure to 2021 which has already been assessed through the Core Strategy process and deemed in conformity with the SE Plan at the time by SEERA, and given that the position in the SE Plan has not changed it must remain appropriate. This position is clearly reflected through the endorsement of the Tenterden and Rural Sites DPD by SERPB.

- **How has the SHLAA (November 2009) informed the DPD?**

20. The DPD took account of the emerging SHLAA as it evolved. It is important to note that the SHLAA has assessed all sites that were assessed through the Sustainability Appraisal. All of the sites proposed to be allocated in the DPD were concluded to be 'suitable' and 'deliverable' through the SHLAA.

- **Have housing completions and commitments since 2006 been fully taken into account ?**

21. Yes, paragraph 5.6 of the DPD states that that completions in the rural areas between 2006-08 have been taken into account in the re-setting of the residual housing target figure to 2021.
22. In relation to housing commitments (i.e. extant planning permissions), these have not been taken into account. To do so would be inconsistent with the

guidance on windfall development in PPS3 which suggests that commitments should not be taken into account when looking at housing supply, unless there is a particular local justification to do so.

- **What assessment is there of changes in the number, distribution, prosperity and structure of the local population which might drive rural housing needs?**
23. As part of its standard monitoring procedures, the Council has assessed development trends across the Borough. These indicate that housing growth in the rural areas has been relatively consistent in recent years as Borough Local Plan sites and windfall sites have come forward. These trends also indicate where residential development has occurred in the rural areas.
 24. This monitoring has shown that growth in the rural areas has been evolutive and has not responded to any major outside influences. For example, there have been no major new employers in the rural areas which might have generated a localised demand for housing.
 25. Similarly, there is no specific local industry that might affect the structure of the local population (e.g. coal mining) were there to be a structural change in that industry.
 26. The 2005 Housing Needs Survey was a key background document to the Core Strategy and informed the strategic approach to development in the rural areas. The 2005 survey has recently been updated by a 2009 Housing Needs Study which is available to view on the Council's website. This 2009 study has updated the base demographic and housing trend data for the Borough, however it does not indicate any specific needs in the rural areas.
 27. In addition, Policy CS12 of the Core Strategy includes a requirement for 35% affordable housing on qualifying sites in the rural area based on Housing Needs evidence from the rural area. This policy is supported by the Affordable Housing SPD, adopted February 2009.
 28. Furthermore, Policy CS13 of the Core Strategy requires a range of dwelling types and sizes to be delivered, partly to '*respond to emerging needs*'. The assessment of what types and sizes of houses are required to meet this need is carried out by the Council at planning application stage, through surveys of local housing need and the local housing market at the time.
 29. Overall, it is considered that the Core Strategy approach can adequately deal with changing housing needs in the rural area. Therefore it is not considered appropriate to revisit these issues in the DPD. Any alternative approach should be considered through a formal review of the Core Strategy, due to be adopted by 2014.