

## Overall Strategy - Housing Numbers

### South East Plan

1. The starting point for assessing housing numbers for the rural areas has to be the most recently adopted part of the development plan - the South East Plan (adopted May 2009).
2. The Plan identifies that outside of the East Kent & Ashford Sub Region, 300 dwellings should be allocated in the remainder of Ashford Borough for the period 2006-2026. This clearly relates to the rural south west of the Borough, including Tenterden.
3. Within the East Kent & Ashford Sub Region, “new development will be primarily accommodated through the expansion of Ashford and at the other main settlements” (policy EKA1). In making its recommendations, the Panel which examined the Plan commented that “we note that there is no separate allowance for the rural areas beyond the Ashford urban area within the East Kent and Ashford sub-region. However, as there are no sizeable settlements here and Ashford itself is clearly the growth focus, we do not suggest any changes.” (Panel report, para. 18.50)
4. The adopted development plan context for this DPD is therefore:
  - There is a need to identify housing targets for the south west of the Borough (including Tenterden) for 300 dwellings 2006-2026;
  - There are no housing targets for the rural hinterland of Ashford (including Wye) as growth should be concentrated within the Ashford urban area;
5. Whilst the Borough Council has to look specifically at addressing local rural needs, the development plan clearly establishes that the growth focus should be on Ashford itself with little development within the rural areas, and of that, a focus on the south west of the District outside of the Ashford rural hinterland.

### Ashford Core Strategy

6. The Core Strategy identifies a requirement for 1000 dwellings in the rural areas for the period 2006-2021.
7. However, the Inspector who examined the Core Strategy, in referring to the housing figures identified for the rural areas, stated that there had been “little or no assessment of how reasonable that figure is having regard to the demographic and social needs of the rural population. In my view it was not necessary for the Council to feel bound by the Structure Plan, which the CS will in part replace, and a more rigorous assessment of housing requirements ought to have been carried out” (para. 4.187).
8. He went on to conclude that “whilst it would have been more desirable for the merits of the housing target to have been more rigorously assessed (and this should be done in the Tenterden and Rural Sites DPD), it is at least broadly consistent with other plans and there is currently no clear justification for increasing it” (para. 4.191). The work on the DPD should however “include reviews of (i) the appropriateness of the overall housing target” (para. 4.227).

9. It is essential that a proper justified and robust plan for the rural areas should include a credible analysis and justification for the overall levels of development. The assumption stated in the DPD at para. 5.10 that reviewing the figures would result in a consequential delay in the adoption of the DPD is not a sufficient justification for not having followed the considered opinion of the Core Strategy Inspector.
10. Having failed to analyse rural housing needs properly in determining the housing requirement in the Core Strategy, the Borough Council has compounded this error by not considering it in this DPD.
11. In summary, Wye with Hinxhill Parish Council considers that this DPD should have formally reviewed the Core Strategy requirements for the rural areas, within the context of the most recently adopted development plan for the Borough (the South East Plan) and based on a proper assessment of the needs of the rural area and the needs of each settlement. The Plan as submitted is not justified in simply recalculating the Core Strategy figure on the basis of a reduced timescale.

#### Housing completions and commitments

12. In order to bring the residential allocation target up to date from the Core Strategy the DPD Housing and Employment Background Paper has taken into account in the rural parts of the Borough both housing completions on Local Plan allocation sites between 2001 and 2006 and other completions since 2006.
13. Notwithstanding the Parish Council's position on the overall housing requirements, the Parish Council supports this exercise. However, in June 2006 the Borough Council approved an application for 57 units in Wye, against a site policy allocation of 35 units (Local Plan 2000, Policy S69). By June 2009 only 24 units had been completed on the development and 33 remained to be built. It is unclear whether these figures (and, most importantly, the difference between the 35 units allocated under Policy S69 and the 57 units actually approved) have been properly taken into account when updating the rural residual housing allocation target to 2021, and, specifically, when considering the allocation target for Wye. This needs clarification in order to demonstrate that the allocation of 861 dwellings in para 5.6 is sound.
14. Furthermore, the Borough Council should take into account the planning permissions granted on windfall sites between 2006 and June 2009 when considering future housing allocations, particularly in the case of Wye.
15. In Wye 18 new dwellings were given planning consent on Imperial College owned windfall sites between August 2008 and June 2009. The DPD should take these permissions into account when considering the overall housing target of the rural areas and of Wye in particular, and failure to consider this evidence renders the DPD unsound.

#### Rural housing needs

16. The Ashford Core Strategy states that the "growth targets will not be met by development in the rural parts of the Borough. In that area development will be restricted to that which is genuinely needed to ensure the economic and social well being of rural residents and workers to build sustainable and balanced communities" (para. 1.29).

17. PPS7: Sustainable Development in Rural Areas states that “it is essential that local planning authorities plan to meet housing requirements in rural areas, based on an up to date assessment of local need” (para. 8).
18. The Core Strategy Inspector commented in 2008 on the lack of any analysis of rural housing needs, other than affordable housing (Inspector’s Report, para. 4.185) and unfortunately there is no evidence that the Borough Council has undertaken any further housing needs based work to inform and support this DPD. There is no mention of any such evidence in the Housing and Employment Background Paper and there appears to be no published report into rural housing needs, other than the 2005 Ashford Borough Housing Needs Survey, which is now clearly out of date.
19. The Parish Council supports the provision of affordable and other housing to meet the needs of local people. Again, the Parish Council feels that this DPD process has been a missed opportunity to identify proper local housing needs and to identify how that provision is to be met.
20. This is not to say that work is not going on elsewhere. The Borough Council is currently exploring the feasibility of developing an older persons’ housing scheme to meet local needs in the area. Parishes interested in such schemes have been grouped into clusters within the Borough. Wye has been grouped with neighbouring villages into one such cluster and the intention is to investigate in detail the present and projected housing needs of older people within the cluster. It is unfortunate that such examples of corporate Council and other public agency initiatives have not made their way into the scope of this DPD.
21. In the absence of such a proper spatial planning approach, the Parish Council is concerned that speculative development proposals will be implemented which do not reflect the proper identified local needs of residents.
22. A recent example is the care village application proposed for the Withersdane site at Wye. The application includes a supporting statement entitled The Care Accommodation Supply and Demand Study which sets out the needs justification for the proposed development. This document includes evidence for care and extra care accommodation to be provided nationally and within Ashford Borough now and in the future. However, no evidence is provided to justify the development on the basis of meeting the local needs of rural residents within Wye, as required by national and local policy.
23. Using the evidence supplied in support of the application and using local population estimates and projections, the Parish Council has estimated the broad requirement for the care and extra care needs arising now and in the future within Wye. There is currently an estimated local need in Wye for 4 care home beds and 8 extra care units. There is an estimated future local need in Wye (in 2016/18) for 11 care home units and 11 extra care units.
24. In 2009 the Parish Council undertook a housing survey within the parish of Wye with Hinxhill and of the 370 responses 28 households said they were aged 55 years or over and possibly considering moving into some form of older persons accommodation in the future. 14 of those respondents said they would consider moving to a 1 or 2 bed home in sheltered accommodation on a rented or shared ownership basis. 12 of those households said they would not be willing to move out of the parish. This survey therefore broadly supports the statistical analysis.

25. What is clear from the above example is that even taking into account the likely needs of immediately surrounding parishes, the speculative care village proposal for 172 units will be well above meeting what is “genuinely needed to ensure the economic and social well being of rural residents” (Core Strategy, para. 1.29).
26. An assessment of this type of needs should have been carried out by the Borough Council in the preparation of this DPD.