

### **Matter 3 - Housing Distribution**

- **Is the proposed distribution of new housing robust, sustainable, deliverable and the best of all reasonable alternatives?**
  - **Is the Sustainability Matrix soundly based, and flexible enough to take account of future change?**
  - **Are the sites deliverable – has there been sufficient consultation with landowners and infrastructure providers?**
1. The Core Strategy establishes that the aim of the Tenterden and Rural Sites DPD is to allocate housing development in the rural area which best achieves the strategic distribution in Policy CS6 subject to the requirement for a detailed assessment of environmental constraints. As such, it is for this DPD to confirm the precise nature of the distribution of residential allocations in the rural parts of the Borough, taking policy CS6 as a starting point.
  2. Paragraph 6.20 of the Core Strategy provides further guidance on this matter. It states that, if, after these detailed assessments have been undertaken, it is not possible to identify enough suitable land in a particular settlement that land may be reallocated to another settlement of equal or higher rank in the hierarchy set out in policy CS6.
  3. In response to the Core Strategy position, the Council has undertaken a variety of assessments which have informed the evolution of the DPD and justifies the site allocations advocated in the Plan.
  4. Initially, the CS6 residual figure of 1000 units was updated to take account of completions in the rural area between 2006 - 2008. This reduced the overall requirement for allocations to 861. The phasing periods in the DPD were changed to 2006-2016 & 2016-2021 to better reflect the timescales of the Plan and the desire to review the Plan by 2016.
  5. Table 5.1 of the DPD shows how a residual 865 residential units would be distributed between Tenterden, Charing, Hamstreet, Wye and the Tier 3 settlements, using the same proportions to those set out under Policy CS6.
  6. The Council have also, in line with Para 6.7 of the Core Strategy, revisited the Sustainability Matrix which was used to inform Policy CS6. The Council's Housing and Employment Background Paper (paras 3.1-3.12 CD12) sets out how the Sustainability Matrix has been updated and refined.
  7. Although a useful guide to a settlement's relative sustainability as a local service centre and its potential to either carry on that role or enhance it, the Matrix can only ever be a snap-shot of the services present in a settlement, at the time of the assessment.

8. It was therefore necessary to update the Matrix to establish whether any CS6 settlement had radically changed its position which subsequently could justify a different approach to that set out in the Core Strategy. This is particularly relevant to the third Tier villages as, given their size and relative sustainability merits, they are more sensitive to changes in service provision.
9. The Council has also undertaken a detailed Sustainability Appraisal to support the DPD. The Appraisal assessed the relative sustainability merits of a wide range of potential development sites in the rural area. Potential development sites were submitted to the Council in a variety of ways (see Para 3.5 of the DPD).
10. All potential development sites that were promoted within or adjoining a CS6 settlement was assessed through the Appraisal looking at their suitability compared to range of criteria, including access to services, relationship with the existing built form, impact on the landscape and impact on historic or conservation interests.
11. Furthermore, all sites appraised in detail through Sustainability Appraisal process were also assessed through the SHLAA (please visit [www.ashford.gov.uk](http://www.ashford.gov.uk) and follow the Planning Now and in the Future pages).

#### Tenterden, Charing, Hamstreet, Wye

12. In relation to the second tier settlements (Charing, Hamstreet and Wye), the revised Sustainability Matrix (findings in the Housing and Employment Background Paper CD12) showed that these settlements all retained their position at the top end of the Matrix.
13. However, the Sustainability Appraisal showed that these settlements varied in relation to the number and size of suitable sites for which residential allocations could be made. On balance, having completed the assessment of environmental constraints, as required under Policy CS6 of the Core Strategy, it was considered appropriate for the DPD to alter the distribution of development between Tenterden, Charing, Hamstreet and Wye, compared to that set out in Policy CS6.
14. This principally relates to the situation in Wye, where suitable opportunities for residential development are limited and the particular situation relating to Imperial College and their landholdings represents a specific and unique constraint. This will be discussed in further detail under Matter 8.
15. In addition, the SA shows that there are prevailing constraints such as the AONB designation that encompasses the whole village and floodplain issues present in parts of the village. Given the above, the evidence base suggests that there are only two small areas which are suitable and available for allocation through the DPD, for a combined 45 residential units up to 2016.

16. At Hamstreet, the evidence base has shown that there are limited suitable and available opportunities in which to allocate development. The SA has identified two suitable sites to deliver a combined 70 residential units over the Plan period. These sites offer sustainable and logical extensions of the village and are available for development.
17. In relation to Charing, the evidence base has shown that the village has two suitable and available sites to deliver a combined 125 residential units over the Plan period. This is more growth than envisaged for Charing in the Core Strategy, however this is considered to be a reasonable approach given the wider planning merits of the sites, and their ability to accommodate this amount of development without harming the character or integrity of the village.
18. In summary, the detailed assessments of the tier 2 settlements shows that the actual realistic capacity on suitable sites in these settlements is less than the numbers set out in policy CS6 of the Core Strategy. Table 5.1 of the DPD shows that, pro-rata to the Core Strategy, second tier settlements would aim to deliver 285 residential units over the Plan period. However, the evidence base which supports the DPD shows that these settlements can only appropriately accommodate 240 residential units, as set out in the allocations in the DPD.
19. Therefore, in line with Para. 6.20 of the Core Strategy, the DPD has made provision for the residual 45 residential units to be re-allocated to Tenterden. Tenterden is clearly the most sustainable rural settlement in the Borough.
20. The Sustainability Appraisal (CD2), combined with the Tenterden Southern Expansion Study (CD15) has shown that land south of the High Street in Tenterden (site TENT1) provides a realistic and suitable opportunity to accommodate the housing attributed to Tenterden in Policy CS6 and the residual 45 units left over from the second Tier. The DPD's approach to allocation within Tenterden is explored under the Council's Matter 5 paper.

### Tier 3 Settlements

21. The third tier is composed of a range of suitable, medium sized settlements that share similar planning characteristics. These settlements have been identified through the Core Strategy as being suitable, in principle, to deliver limited levels of housing growth between them. Given this, the range of Tier 3 settlements is fairly broad.
22. It is not the intention of the Core Strategy that all Tier 3 settlements should have allocated development attributed to them, or conversely, that one or two villages should accommodate all of the development attributed to the Tier as a whole. This is reflected by the Core Strategy which states that 'the composition of this tier will be finalised through the Tenterden and Rural Sites DPD'. (p37)
23. The revised Sustainability Matrix showed that the settlements of Chilham, Biddenden, Bethersden, Woodchurch and Rolvenden, which were all primarily

selected in Policy CS6 because of their position in Matrix that informed the Core Strategy, all retained their position towards the top of the hierarchy.

24. In relation to Aldington, Challock and Pluckley, these settlements all retained their position around the middle of the Sustainability Matrix, although it should be noted that the Matrix was not the significant determining factor for their inclusion in Tier 3 of the settlement hierarchy (refer to paras. 6.16 - 6.19 of the Core Strategy for further explanation).
25. In summary, the revised and updated Sustainability Matrix clearly shows that nothing has substantially altered in terms of the status and/or role of any Tier 3 settlement. In this context these settlements remain the appropriate starting points for seeking suitable site allocations to fulfill the tier 3 requirement.
26. The SA process showed that there are a range of suitable sites within most of the tier 3 settlements provisionally identified in policy CS6. Combined, these can deliver the entire housing requirement for the third tier of settlements, without the need to re-allocate any land in settlements higher up in the hierarchy. This is considered appropriate as the third tier was principally created so as to not to burden Wye, Charing and Hamstreet with unreasonable levels of development (Para 6.13 of the Core Strategy).
27. The SA process also showed that neither Pluckley nor Challock contained suitable and available sites, compared to those promoted at other tier 3 settlements. In this context, Pluckley and Challock should no longer be regarded as a tier 3 settlement.
28. In terms of the deliverability of the allocated sites proposed in the DPD, all have either been put forward by a landowner / agent on behalf of a landowner or have subsequently been confirmed to be available. The SHLAA confirms that all of the sites promoted in the DPD are both 'suitable' and 'achievable'.
29. In addition, infrastructure providers have been targeted through the consultation process and there has been no strategic infrastructure requirements identified which would render any potential allocated site undeliverable.
30. Overall, as the above shows, the Council has undertaken a series of detailed assessments that justifies the allocation strategy set out in the DPD. It is considered that the approach in the DPD best achieves the distribution strategy advocated in policy CS6. Therefore it is considered to be robust, sustainable, deliverable and the best of all reasonable alternatives.
31. The Council notes that sites at non-CS6 settlements have been promoted for allocation in the Plan by objectors. As the above shows, it is not necessary in quantitative terms to rely on non-CS6 settlements to deliver allocated housing growth, as there are enough suitable and available sites at the third tier villages to achieve the quantum required. In addition, allocation of a site for development in a non-CS6 settlement would, by extension, be inconsistent with

the Core Strategy and offer a less sustainable option than a site at a CS6 settlement.

32. It has also been suggested that Charing should accommodate the residual 45 units left over from tier 2, rather than the approach in the DPD which re-allocates this number to Tenterden.
  33. In response, the Council considers that Charing already has a relatively high number of housing units to accommodate up to 2021 and that any higher number would be disproportionate given the character and size of the settlement. In addition, the Council contends that none of the alternative sites promoted by objectors in Charing are suitable areas for development.
  34. It has also been suggested that Biddenden should accommodate more development than the 10 units proposed through policy BID1. However the Council considers that DPD allocates the only suitable and available site in the village and there is no justification for additional development in Biddenden.
  35. Finally, Savills, acting on behalf of Imperial College, have suggested the overall distribution strategy set out in the DPD should be amended to better reflect the adopted SE Plan. This issue will be explored in more detail in the Council's response to Matter 8.
- **What firm evidence is there of the link between small-scale population growth in villages and support for local shops and services?**
36. Please see the Council's response to Note 1, para 9.1 & 9.2 (CD25).
- **Have the housing needs of all sectors of the rural community been sufficiently taken into account?**
37. Please see the Council's response to Note 1, Para 7.1 - 7.4 (CD25).
- **Is the DPD in conformity with national policy in PPS1 and PPS3 in terms of prioritising development on previously-developed land over greenfield sites?**
38. In answering this question it is important to place the guidance in national policy into context.
  39. Planning Policy Statement 3, Para 36, sets out that '*The priority for development should be previously developed land, in particular vacant and derelict sites and buildings*'.
  40. However PPS3, Para 10 also sets out that housing should be focused '*in suitable locations, which offer a good range of community facilities and with good access to jobs, key services and infrastructure*'. In addition, Planning Policy Statement 1, Para 27.8 encourages '*efficient use of land through higher*

*density, mixed use development and the use of suitably located previously developed land and buildings'. (our underlining).*

41. Annex B of PPS3 is even clearer in stating that *'there is no presumption that land that is previously developed is necessarily suitable for housing development...'*
  42. Therefore it is clear that national policy does advocate a blanket prioritisation of previously developed land over Greenfield sites, but that any prioritisation of PDL should not be at the expense of other planning factors, such as the suitability of the location or wider planning factors.
  43. This paper has already set out that the Sustainability Appraisal and the SHLAA have both assessed a range of potential development sites in the rural area. Whether a site was Brownfield or Greenfield, was assessed as one of the SA criteria, alongside the wider sustainability characteristics associated with the site. In this context, the evidence base that supports the Plan found that there were no suitable and available Brownfield sites that warranted allocation in the DPD.
  44. In the majority of cases, the Brownfield sites assessed were simply not well related, in location terms, to a CS6 settlement. Advocating their allocation would have resulted in sporadic housing development in the countryside. Such an approach would be inconsistent with Government Guidance and the Core Strategy.
  45. Of those Brownfield sites considered to be related to a CS6 settlement, the majority were in active employment use. Proposing these sites for residential development would advocate the loss of valuable employment space in the rural area which would be inconsistent with Para 6.26 of the Core Strategy.
  46. Furthermore, the Employment Land Review (CD7) highlights the importance of these existing employment sites, in terms of maintaining a steady supply of rural jobs. Losing active employment sites would frustrate the ability to balance the provision of rural jobs with rural housing growth.
- **Does the DPD take sufficient account of the particular problems of pressure on adjacent rural areas from the urban fringe of Ashford and its Growth Areas?**
47. Please see the Council's response to Note 1, Para's 8.1 & 8.2 (CD25).