

Overall Strategy - Housing Distribution

Development plan

1. The starting point for determining housing distribution is the development plan.
2. In the Parish Council's statement on Issue 2, we conclude that the most recently approved part of the development plan, the South East Plan concludes that:
 - 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;
3. 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).
4. Our statement on Issue 2 also summarises the concerns of the Core Strategy Inspector regarding the housing figures for the rural areas and the need for the Borough Council in this DPD to reassess the figures having regard, amongst other matters, to the demographic and social needs of the rural population.
5. We conclude that the up-to-date development plan identifies a strategic need for some limited housing growth (300 dwellings) to the south west of the Borough, including Tenterden and other housing to be determined looking at local housing needs and the need to achieve sustainable communities.

Housing needs

6. In the Parish Council's statement on Issue 2, we state that 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report into rural housing needs, other than the 2005 Ashford Borough Housing Needs Survey, which is now clearly out of date.
7. The Parish Council considers that a proper analysis of local housing needs is fundamental to an assessment of how housing should be distributed through this DPD.

Sustainability Matrix

8. The Parish Council agrees with the Council that a factor in determining housing distribution should be the availability and sustainability of local services and facilities.
9. CLG Guidance on Eco-towns (2008) and Shaping Neighbourhood Guide for Health Sustainability and Vitality (2001), provide guidance on the level of population required to support key facilities and have identified the following indicative thresholds:

Facilities	Population Threshold
Strategic	
1. Higher Education College	24,000
2. Secondary School	8,000
3. Swimming Pool or Sports Hall	24,000
4. Bank/Building Society	1,000 to 1,500
5. Hospital	24,000
Local	
1. Primary School	1,000 to 5,000
2. Community Centre	4,000
3. Post Office	5,000
4. Health Centre	1,000
5. Convenience Store	1,500

10. It would be useful for the Borough Council to analyse current local service provision having regard to these indicative thresholds. In particular, given projected reducing household sizes and an ageing population, the Borough Council could highlight those settlements where additional housing development may be needed to support local services. Again, it is regrettable that the Borough Council does not appear to have carried out this degree of analysis.

Access to jobs

11. The Council shares the concerns of the Core Strategy Inspector that access to jobs has not been properly factored in (see Inspectors Report para. 4.207). Achieving a local balance of houses and jobs and distributing development to influence travel to work patterns is an essential ingredient of achieving sustainable development.
12. The Borough Council appears to have missed the opportunity of integrating employment and travel to work data into the Sustainability Matrix in order to inform the assessment of the relative sustainability of rural settlements.
13. In terms of meeting future employment needs, whilst the Borough Council points to the 2008 Employment Land Review (ELR) as identifying no need for further allocations in rural areas, it is important to note that the ELR is based on ensuring that future supply meets the overall Borough demand for employment growth rather than looking at meeting the job needs of individual settlements. To complement the ELR assessment of meeting future economic growth requirements in rural areas by looking at local take up rates, the Borough Council should be analysing existing and likely future jobs per settlement and travel to work patterns in order to determine what employment is needed where to achieve more sustainable patterns of development and to meet needs arising from future patterns of housing development.

Landscape considerations

14. The South East Plan policy EKA1 identifies the unique heritage and environment within East Kent and Ashford Sub Region which should be protected for its own sake.
15. Much of the rural area around Ashford is subject to landscape and other environmental assets of international and national importance. In these areas in particular, the environmental capacity of settlements to accommodate

development should be a significant factor in determining the distribution of development between settlements.

16. The Core Strategy Inspector commented on aspects of this, which remain material to this DPD. In particular, commenting on the rural setting at Wye, the inspector stated that “I consider that it would be challenging to identify sufficient land within them...they are attractive rural settlements and..are closely surrounded, in part at least, by AONBs. Further development at Wye...and Charing seems particularly problematic.” (Inspectors Report, para. 4.201).
17. By contrast, the Inspector commented that “there appears to be several areas of land around Tenterden that have no special protection” (para. 4.201).

Proximity to Ashford Growth Areas

18. In addition, to the clear steer in the South East Plan away from any specific housing targets for the rural hinterland around Ashford (see above), the Parish Council considers that the DPD should take account of the impact of development on the urban fringe of Ashford in this DPD for adjacent rural areas.
19. The impact in terms of the growth in traffic, litter, noise, water quality, light and air pollution, habitat quality and tranquillity etc. will be profound. The submission DPD does not address the impact of development pressures that are being generated by a doubling of the population of Ashford. This is likely to undermine the effectiveness of the otherwise laudable policy TRS17 for example.