

Incorporating



David Jarman Associates LLP
planning consultants

ISSUES 1, 2, 3 and 4/Mr and Mrs T Gotke

TENTERDEN AND RURAL SITES DEVELOPMENT PLAN DOCUMENT

Statement on behalf of Mr and Mrs T Gotke

Appearance with regard to:

1. Vision, Objectives
2. Housing Numbers
3. Housing Distribution
4. Housing Mix and Density

HPPC Ref: 30072

Date: May 2010



Contents

This statement sets out the case for Mr and Mrs T Gotke, with regard to the following matters comprising 1, Vision and Objectives; 2, Overall Strategy – Housing Numbers; 3, Overall Strategy – Housing Distribution; and 4, Overall Strategy – Housing Mix and Densities.

The Inspector's matters for discussion are shown in plain text, and our response in italics.

(1) **VISION AND OBJECTIVES**

- 1.1 Is there a firm vision and aims for the rural area of the borough which reflect its needs and distinctiveness, which carry forward those of the Core Strategy and Sustainable Community Strategy and which are reflected in the DPD policies?

No, we feel that the vision fails to reflect the importance of the rural areas in economic terms – 26% of all Ashford's employee jobs are located in the rural areas (source: the Ashford Strategic Economic Framework Baseline Report June 2010 (examination library document 27, paragraph 4.72).

- 1.2 In particular, how does the vision of the DPD carry forward that of the council's Sustainable Community Strategy (page 3) "to ensure that new housing is accompanied by new jobs and all the necessary social and community infrastructure" and the Core Strategy (paragraph 1.29) "... development needed to ensure the economic and social wellbeing of rural residents and workers and to build sustainable and balanced rural communities"?

We consider that the vision of the DPD fails to meet the requirement that new housing is accompanied by new jobs, and all the necessary social and community infrastructure.

*The merits of providing land in the rural settlements for business use are identified in the Core Strategy (paragraph 6.25, and footnote to Policy CS6), noting employment land allocations should be on a scale capable of avoiding any worsening of the jobs to homes ratio **in the rural area as a whole and the larger settlements in it** (our emphasis).*

The significance of the rural economy is highlighted in the Ashford Strategic Economic Framework January 2010 (examination library document 26 (paragraphs 5.17 to 5.20); the Ashford Strategic Economic Framework baseline report June 2010 (examination library document 27) notes that approximately 26% of all Ashford's employee jobs are located in the rural areas, a figure of around 12,000, although noting that this probably underestimates the number of jobs as the data set does not include the self employed or land based on agricultural jobs (source paragraph 4.72); while 42.6% of Ashford's population live in rural areas (paragraph 4.70).

Accordingly, there is evidence of an imbalance (as suggested by the Core Strategy policy), which should not be allowed to worsen, across the rural areas as a whole.

The baseline report further identifies micro businesses as being especially significant in rural Ashford (paragraph 4.73); and that the largest growth sector between 2003 and 2007 in rural Ashford was business services (plus 350 jobs, 20% increase) (paragraph 4.75).

The council refer to the issue of rural employment at section 5 of the Tenterden and Rural Sites

Housing and Employment Background Paper (examination library document 12); noting the result of the Employment Land Review of the Borough (2008) that there did not appear to be a need to allocate additional employment land in the rural area of the plan period. This conclusion does not appear to take account of the strategic emphasis of the Core Strategy, on focusing employment at the most sustainable rural settlements. Our analysis of the council's own data on planning permissions for business use (appendix 3 to examination library document 12) and appendix 4 (Rural Employment Gains 2003 to 2008) (appendix 4 to the same document) is attached at Appendix 1 to this statement.

In summary, our analysis demonstrates that the provision of new employment opportunities in the rural areas has been extremely patchy in its distribution. In particular, while Tenterden received 10.7% of new employment floor space over the period 2003 to 2008, and Charing 11.4% over the same period, Hamstreet received only 0.9%, and Wye 0.6%. We consider that it is a matter of importance that this imbalance be addressed, to accord with the specific Core Strategy provisions referred to above, and also in the general interests of maintaining the sustainability of Hamstreet as a Tier 2 settlement.

This imbalance could not be addressed, with regard to Hamstreet, by planning permissions noted as valid at 2007/2008; which relate to a number of rural settlements, including Charing (significant site), and Wye (much smaller sites); but with no site in Hamstreet. A number of sites with planning permission are noted at Tenterden.

- 1.3 Is the DPD's approach to sustainable development in rural areas limited by its concentration on housing issues?

Yes, we consider that the most appropriate means of addressing this failing is through the site specific/settlement specific policies, as set out, for example, in our own representations with regard to Hamstreet.

- 1.4 Is the DPD truly spatial – does it bring together policies for the development of land with other policies and programmes from the Sustainable Community Strategy, and a variety of organisations, which influence how rural places function?

We will contribute to the debate on this matter as appropriate, in the light of points arising at the examination.

- 1.5 Is vision or aims of the DPD accompanied by objectives against which policies can be measured?

We will contribute to the debate on this matter as appropriate, in the light of points arising at the examination.

(2) OVERALL STRATEGY – HOUSING NUMBERS

IS THE EVIDENCE BASE FOR THE HOUSING TARGETS ROBUST? INCLUDING:

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

We will contribute to the debate on this matter as appropriate, in the light of points arising at the examination.

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

We will contribute to the debate on this matter as appropriate, in the light of points arising at the examination.

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

We will contribute to the debate on this matter as appropriate, in the light of points arising at the examination.

- 2.4 What assessment is there of changes in the number, distribution, prosperity and structure of the local population which might drive rural housing needs?

We will contribute to the debate on this matter as appropriate, in the light of points arising at the examination.

(3) OVERALL STRATEGY – HOUSING DISTRIBUTION

IS THE PROPOSED DISTRIBUTION OF NEW HOUSING ROBUST, SUSTAINABLE, DELIVERABLE AND THE BEST OF ALL REASONABLE ALTERNATIVES? INCLUDING:

- 3.1 What firm evidence is there of the link between small scale population growth in villages and support for local shops and services?

We note and agree with the comments under heading 9 of the council response to the Inspector's Note 1 (examination library document 25); in addition, we would note that the corollary of this question is that a decline in population must be assumed to have an impact on support for local shops and services.

Our table below is derived from the Housing Needs Survey Update final report 2010 (not allocated an examination library number at time of writing); taking the proportion of the population living in rural areas of 42.6% at 2006 (source: Tenterden and Rural Sites DPD Housing and Employment

Background Document, examination library document 12), it will be noted that the decline in average household size from 2.47 (2006) to 2.38 (2016), would, assuming a static population level, result in a decline in the population in the rural area of 4,263; at the average household size of 2.38 in 2016, this implies that an additional 1,791 dwellings would be necessary over this period, to prevent a real decline in population numbers.

Date	Population (Borough)	Households (Borough)	Average Household Size
2006	112,200	45,000	2.47
2016	128,700	54,000	2.38
2031	150,400	66,000	2.29

Rural Population @ 2006

$$112,200 \times 42.6\% = 47,371$$

Population decline if no additional households

$$47,371 \times 0.09 \text{ (fall in household size 2006 – 2016)} = 4,263$$

Representing 1,791 dwellings at average household size 2.38 at 2016

It is of course appreciated that there will be geographic disparities, and also that support for local services will depend on income levels and other factors, however, this is still felt to be a relevant factor to take into account, with regard to this issue.

- 3.2 Is the Sustainability Matrix soundly based, and flexible enough to take account of future change?

We will contribute to the debate on this matter as appropriate, in the light of points arising at the examination.

- 3.3 Are the sites deliverable – has there been sufficient consultation with landowners and infrastructure providers?

Judgements must be made on deliverability on the basis of information available for specific sites; on the more general question of whether there has been sufficient consultation with landowners, we do not consider that this has been the case – the process of preparation of the plan has been carried out without engagement with landowners and developers, from our own experience. In general, this can only have weakened the process, and hence reliance on the proposals now set out in the TRSDPD.

- 3.4 Have the housing needs of all sectors of the rural community been sufficiently taken into account?

We will contribute to the debate on this matter as appropriate, in the light of points arising at the

examination.

- 3.5 Is the DPD in conformity with national policy and PPS1 and PPS3 in terms of prioritising development on previously developed land over Greenfield sites?

We consider that there is relatively little previously developed land available in the rural areas, in appropriate locations for new development; some sites, such as those presently in employment uses, or community uses, may in any event be prevented from coming forward for residential development.

- 3.6 Does the DPD take sufficient account of the particular problems with the pressure on adjacent rural areas from the urban fringe of Ashford and its growth areas?

If the council's growth agenda is achieved over the plan period, for the Ashford growth area, then this must add to housing pressures on rural settlements, particularly those closer to Ashford; these settlements form part of the overall housing market for the Ashford area, and clearly are likely to be considered attractive as locations to live, for persons either working in Ashford, or considering commuting to other areas for work.

Additional Issue for Consideration

- 3.7 *We would also like the opportunity to discuss the overall size of allocation appropriate to Hamstreet, as set out in paragraphs 2.1 to 2.9 of our submission at the Regulation 27 stage (August 2009).*

(4) OVERALL STRATEGY – HOUSING MIX AND DENSITIES

- 4.1 In general, are the numbers of dwellings allocated to each site realistic in terms of densities?

We will contribute to the debate on this matter as appropriate, in the light of points arising at the examination.

- 4.2 Do densities meet the guidance in PPS1 and PPS3, and is there some local justification where they differ from national policy?

We will contribute to the debate on this matter as appropriate, in the light of points arising at the examination.

- 4.3 Is there a clear indication of the housing mix expected for each policy site, and how it relates to needs identified in the evidence base?

We will contribute to the debate on this matter as appropriate, in the light of points arising at the examination.