

## Matters and Issues for the Examination

As representatives for our client, Care Village UK Ltd, we are reliant on the original representations previously submitted to Ashford Borough Council. However, in response to the Inspector's questions which are set out in matters and issues for the examination, we provide further clarity.

### Issue 1 /Origin 3 on behalf of Care Village UK

#### ITEM 1: VISION AND OBJECTIVES

The vision and aims of the adopted regional and local policy are inadequately represented with regards to the provision of elderly person's specialist accommodation within the Tenterden and Rural Sites DPD.

The DPD's vision does not sufficiently reflect the growth of the ageing population and the need to consider options to address this as identified within the South East Plan (May 2009) which states in paragraph 2.4 that "over 64% of the population growth in the 20 years to 2026 is projected to come from those who are, or will be, aged 60 or above". In turn, the South East plan also identifies the need to achieve and maintain sustainable development in the region. Policy CC1 identifies one of the priorities for the region to be "(v) Achieving safe, secure and socially inclusive communities across the region, and ensuring that the most deprived people also have an equal opportunity to benefit from and contribute to a better quality of life." This is not a priority which obviously filters down into the vision of the Tenterden and Rural Sites DPD.

Similarly, policy CC5 of the South East Plan identifies the need to address the increasing proportion of older people in the region stating that "the need to adapt housing stock, make provision in new housing developments and sheltered and extra care housing to support older people living independent lives in their own homes".

Finally paragraph 5.16 of the SE Plan supports the principle of a mix of care accommodation for older people in the region, stating that "while it is recognised that staying put is the preferred option for many older people, for a significant number the benefits of sheltered or extra care housing will be essential if they are to maintain an independent lifestyle. The provision of such housing offers choice frees up under-occupied family sized homes and offers an improved quality of life including improved mental and physical well-being of older people."

With this in mind, the DPD's vision seems to inadequately reflect the importance and identified need for a range of older person's accommodation for the region. Regardless as to whether the RSS is abolished in the near future, the identified shortage of specialist accommodation for the elderly cannot be ignored and is supported within a number of other key documents including the Ashford Borough Housing Strategy 2008 and the Draft Kent Supporting People Strategy 2010-2015.

The Ashford Borough Core Strategy (CS) (July 2008) identifies the Authority's vision for the Borough over the plan period. Paragraph 1.29 states that "growth targets will not be met by development in the rural part 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 and build sustainable and balanced rural communities. Most development will take place in the larger and more sustainable rural settlements, especially Tenterden, Charing, Hamstreet and Wye."

In addition, Paragraph 4.5 of the CS identifies "a number of rural service centres (these are:- Tenterden, Charing, Hamstreet, Wye, Aldington, Bethersden, Biddenden, Chilham, Pluckley, Rolvenden and Woodchurch). These settlements generally offer a higher level of service provision, often including shops, pubs and health care facilities. Combined, these services help to serve and sustain not only their immediate residents, but also the smaller surrounding rural communities as well. They may also provide a focus for local job opportunities although the nature of the rural economy is that there is a generally dispersed pattern of employment that includes agricultural activities or former agricultural premises which have diversified into other enterprises. The Council's objective is to encourage diversity and enterprise within the rural areas whilst ensuring that uses that are suitable by their scale or type are located in the most appropriate places."

Policy CS6 of the Core Strategy identifies that outside of the Ashford Growth Area, Policy CS6 identifies Wye as a 'service centre' suitable for limited expansion.

There is a clear acceptance that Wye is an appropriate and sustainable location for limited growth in the Borough and has a key role in serving smaller rural villages in the area. As such it should be considered as a highly sustainable location for elderly care accommodation to serve the obvious need.

The vision of this DPD does not proportionally represent the aims of the RSS and Core Strategy in addressing the growing need for elderly person's accommodation as an issue of clear priority and importance. The vision also fails to account for Wye's status as a 'Service Centre' and its role in serving smaller rural communities in its locality.

### **Issue 3/ Origin 3 on behalf of Care Village UK**

**Is the proposed distribution of new housing robust, sustainable, deliverable and the best of all reasonable alternatives? Including:**

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

The DPD is insufficient in addressing how and where specialist elderly care accommodation should be provided in the Borough as part of the overall housing need. Whilst the Core Strategy identifies Wye as a key service centre and a second tier settlement suitable for expansion there is no indication on how or where elderly accommodation will be best

located to address the growing need for this type of specialist accommodation within the local area.

The DPD appears more focused on the provision of open market and affordable housing. Specialist accommodation is only given consideration within an ‘exceptions’ policy which restrains general housing development (Policy TRS5). Kent County Council issued a ‘Draft Supporting People Strategy’ in 2006, which identified Kent as having a higher population of older people (22.3%) than the national average (21%) and that priority should be the development of extra care accommodation. Therefore, a range of accommodation, including specialist accommodation for the elderly needs to be provided, not just on exception sites. However, as there has been no specific allocations set out in the DPD, it is questionable where this type of development is likely to be supported. Provision of care accommodation in Wye, as has been proposed at the former Withersdane campus site, will help maintain Wye as a key service centre. Wye offers a location which has excellent local services, shops and transport links making it a sustainable location for such a development to serve the wider elderly rural community in Ashford.

Wye is a village capable of accommodating additional accommodation on brownfield sites and this should not be limited solely to open market housing.

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

The DPD appears to contradict national policy in PPS1 and PPS3. Rather than prioritising development on previously-developed land, the WYE3 policy unnecessarily stalls development opportunities and investment on deliverable brownfield sites. This is not effective resource management. If any development is to occur within Wye over the next few years, there will be no option but to develop on greenfield sites.

Wye has been identified as a key service centre and has been identified as one of four areas where most growth will occur outside of Ashford. Therefore, it is critical that the LPA assess previously-developed sites currently available to them. The ICL land holdings have been vacant since the closure of educational uses in October 2009 with the Withersdane site closing in October 2008. Why therefore, when such sites are available, has a policy been drafted up which will inhibit any re-development of any of these sites for at least five years? Is this a prudent use of resources? What the LPA are proposing is a mismanagement of resources currently available to them, and in doing so, are clearly contradicting national policy in PPS1 and PPS3 which states priority should be redevelopment on previously-developed land over greenfield sites.

