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Ashford Borough Council

**LOCAL PLAN TO 2030
HOUSING TOPIC PAPER**

DECEMBER 2017



Introduction

1. This Topic Paper explains the housing strategy in the Local Plan 2030 which in the Council's view is the most sustainable planning approach for the Borough, and one that is consistent with the National Planning Policy as set out in the NPPF. Where appropriate, this Topic Paper cross references extracts from the Local Plan 2030 and the Plan's extensive range of evidence.
2. The Topic Paper begins with a summary of the Plan's housing strategy and why it represents a sound planning approach based on local circumstances.
3. Section 1 provides the background and context to Ashford's past as a growth area – a national designation attributed to the town. In doing so, it explains that the Borough has seen two distinct planning approaches being applied to the urban and rural areas respectively.
4. Section 2 provides a summary of the Borough's objectively assessed housing needs and sets out the steps and factors which have led to this figure being derived.
5. Section 3 focuses on the strategic distribution of housing across the Borough and why it is consistent with the NPPF.
6. Section 4 provides an explanation about how the housing proposed will be delivered over the Plan period.
7. Section 5 sets out the Local Plan's approach to the delivery of affordable housing.
8. Section 6 of the paper outlines the approach to Gypsy and Travellers.

Summary

9. The housing strategy in the Local Plan is a positive one. It promotes growth in order to make economic and social progress for current and future residents whilst it also recognises and responds to the Borough's environmental limits. The strategy takes local circumstances into account and responds to the different opportunities and constraints within the Borough. It is consistent with the NPPF, both the individual policies and when read as a whole, and promotes sustainable development - the golden thread that underpins the entire NPPF.
10. Importantly, the strategy is also a deliverable one. The site allocations identified within the early years of the plan are 'deliverable' within the meaning of the NPPF (para 47). The sites earmarked to come forward at the latter stages of the plan are 'developable' in that they are in a suitable location for development, there is a reasonable prospect that the sites are available and the sites can be viably developed within the timeframe established. This position is supported by evidence from the landowners, developers and/or the promoters of the sites themselves. The strategy is also supported by viability evidence that establishes that the approach is viable and that there is no reason to believe that any allocated site will not come forward on viability grounds.

The Housing Target

11. The housing strategy has adapted to changing circumstances during the Plan's preparation. Since the Publication version of the Local Plan was produced in 2016, revised national household projections were published which effectively increased the amount of housing needed in the Borough by around 1,000 dwellings over the Plan period.
12. The Council recognised this issue by updating the SHMA in January 2017 and its response has been to include more housing allocations in the Plan, mainly in the rural parts of the Borough, through the Main Changes to the Local Plan, published in July 2017. Most of these additional sites are small and without any significant constraint to their delivery.
13. The Plan seeks to meet an objectively assessed housing need (OAN) of 15,675 dwellings between 2011 and 2030 – a figure that includes a 5% market uplift. This figure is derived from comprehensive strategic housing market assessment work¹ that is consistent with the requirements stipulated in the NPPF and PPG. A further 442 dwellings are identified to cater for enhanced out migration from London – a recognition of both Ashford's excellent accessibility to London and the GLA's view that out-migration from London is likely to return to pre-recessionary levels from 2017. This results in the housing target for 16,120 homes over the 2011-30 plan period.

¹ Strategic Housing Market Assessment update - GL Hearn (January 2017)

14. A housing buffer is also being provided for – sites are identified that are likely to deliver around 1,000 more dwellings than required to meet the Plan’s target over the Plan period. This buffer is seen as a way of offering more choice and competition in the local housing market – a key aspiration of the NPPF (paras 9, 47 and 50) and ensuring that the Plan provides sufficient flexibility with a good prospect of the housing requirement over the Plan period being delivered.

Distribution of new housing

15. The distribution of housing proposed within the Plan responds to the Borough’s geography and settlement hierarchy. Ashford is by far the largest town and contains around 62% of the Borough’s households and a large range of employment opportunities, facilities and services. The rest of the Borough is extensively rural in nature and characterised by attractive rolling countryside, parts of which are designated as AONB, with other significant areas offering landscape features that are valued. The countryside is interspersed with a range of villages and small hamlets that have been in place for centuries and which help to create the prevailing character of the Borough.
16. The Plan takes account of the expectation that around half the Plan’s residual housing target will be met by existing planned commitments and the context this creates for determining where new allocations should be located. A detailed breakdown of these sites can be found in Appendix 1 to this Topic Paper. Linked to this, the Plan’s housing strategy recognises the importance of providing the necessary supporting infrastructure in a way that supports development as it comes forward. It adopts the principle of seeking to utilise existing (or already planned) infrastructure – a principle supported by the various stakeholders and providers that have helped shape the Plan and inputted into the Infrastructure Delivery Plan that is a key document supporting the Local Plan. This helps to ensure deliverability at as early a stage as possible.
17. The Local Plan responds to this context according to the principles of sustainability by focussing the majority of new housing allocations in the Plan at Ashford. It remains the most sustainable location in the Borough by far and is where the majority of housing need is generated. It provides the widest range of jobs, services and facilities that cater for more than residents’ everyday needs and it is the key transport hub in the Borough, providing direct high-speed train services to London in 38 minutes and other towns across Kent, and direct access onto the motorway network.
18. Outside Ashford, appropriately scaled new housing growth is targeted in a way that takes into account the suitability of the site put forward, the size, nature, character and role of the settlement, accessibility in terms of access to public transport and jobs and the level of services and facilities present. All of these considerations are placed within the wider environmental considerations, including the AONBs, designated ecological areas, heritage assets, flood zones and the need to respect the character of the countryside and its settlements.

19. This approach has been tested through the Sustainability Appraisal to ensure that the housing strategy does not tilt the overall balance of sustainable development being delivered through the Plan. The rural parts of the Borough are clearly far less sustainable in general and more sensitive to new housing growth than in and around the town of Ashford and this position is supported by extensive evidence. The Plan's strategy is cognisant of these factors and promotes an overall rural housing target, delivered via a range of sites that delivers sustainable development across the Borough as a whole.
20. These principles for the distribution of housing development are consistent with all higher level planning strategies for the Borough that have been adopted in previous regional, Structure and Local Plans, as well as the NPPF. This has been consistently found to be a justified and sound planning approach for the Borough's specific circumstances.

A Strategy for Delivery

21. The Local Plan 2030 is supported by a Housing Trajectory that shows expected housing delivery rates across the Plan period. These figures have been assessed following discussion with the developers/ promoters of the sites in question and assessing their views on the delivery of their sites (see Appendix 2 to this Topic Paper). In addition, extensive evidence has been produced in the accompanying Strategic Housing & Employment Land Availability Assessment (SHELAA) and Sustainability Appraisal (SA) which demonstrates that the nature of the sites allocated in the Plan are available and suitable and thus are achievable and deliverable – two key tests enshrined within paragraph 47 and footnote 11 of the NPPF.
22. The Plan's strategy for housing provides the basis for a strong and consistent flow of new housing being delivered to achieve and maintain a 5 year housing land supply in accordance with paragraph 47 of the NPPF. It acknowledges the Borough's recent levels of housing completions that have resulted in a shortfall when set against the annual requirement identified through the updated SHMA work. Although this was a consequence of many factors outside of the Council's control in its role as Local Planning Authority, such as the recession and cuts in public spending on infrastructure, it has recognised the need to rectify the housing shortfall as quickly as reasonably possible.
23. The strategy recognises that there is demand for a variety of housing products in the Borough. This includes those catering for downsizing opportunities, exclusive housing, homes for families and single person accommodation (including a strong market desire to now deliver flatted accommodation in the town centre). In response, the Local Plan identifies a range of sites to cater for this range supporting choice and competition to the market, thus providing the greatest chance that housing will be consistently delivered over the Plan period.

Conclusion

24. The above shows that the housing strategy reflected in the Local Plan 2030 is consistent with the NPPF. It:

- Meets the objectively assessed housing needs of the area and takes account of market signals, allocating sufficient land which is suitable for development (NPPF para. 17.3),
 - Takes into account the different roles and character of different areas, promoting the vitality of the main urban area in the Borough (NPPF para. 17.5),
 - Recognises the intrinsic character and beauty of the countryside and supports thriving rural communities (NPPF para. 17.5),
 - Contributes to conserving the natural environment, preferring land of lesser environmental value (NPPF para. 17.7),
 - Actively manages patterns of growth to make the fullest use of public transport, walking and cycling (NPPF para. 17.11),
 - Focuses significant development in locations which are or can be made sustainable (NPPF para. 17.11),
 - Seeks to improve health, social and cultural well-being (NPPF para. 17.12).
25. The approach in the Local Plan seeks to significantly boost housing supply locally (NPPF, para 47) by identifying suitable and deliverable housing sites that could deliver in excess of the identified housing target over the Plan period. In this context, the Council believes that it is taking all reasonable steps to boost supply locally, accepting that it is developers and housebuilders who will determine when the anticipated houses are actually built taking account of prevailing market conditions.
26. The outcome is a housing strategy that is carefully and correctly balanced between the sustainability and deliverability requirements of the NPPF. It is based on a robust and comprehensive evidence base and constructed for the specific contextual circumstances that apply to the Borough.
27. The following sections of this Topic Paper now set out the justification for the Local Plan's housing strategy in more detail.

Section 1 – Background and Context

28. Ashford has a recent past that needs to be understood as it provides important context regarding how aspects of the housing strategy in the Local Plan 2030 have taken shape.

Distinct Planning Profiles

29. The adopted Core Strategy established an overall housing target for the Borough, but also identified two separate housing targets for the urban area and the rural area. This reflected differences between the planning approaches for the two areas, in order to achieve sustainability overall. Indeed, a new spatial area was identified, called the ‘Greater Ashford Urban Area’ – referring to the town of Ashford and its immediate periphery where growth was to be focused.
30. This distinction is clearly summarised on page 5 of the Core Strategy which states *‘the growth area agenda only applies to Ashford town and its immediate surrounding area, development needed to meet the growth area requirement will not be spread across the Borough. As a result, the Core Strategy establishes widely different development profiles for the town, where rapid change and housing, employment and infrastructure is proposed and the extensive rural area of the Borough, where the emphasis is on continued small scale change designed to protect the quality of the Borough’s environment and heritage, balanced with the need to foster strong local communities with limited growth in the most suitable locations’.*

Establishing the ‘Greater Ashford Urban Area’ requirements

31. In 2003, Ashford was identified as one of the four national Growth Areas in the Government’s Sustainable Communities Plan. Subsequently, the then Regional Planning Guidance 9 (RPG9) was amended in 2004, confirming the status of the Ashford urban area as a Growth Area within the wider South East region.
32. In 2006, the draft regional plan, the South East Plan, was submitted to the South East England Regional Assembly for consideration. Policies for Ashford were reproduced from the amended RPG9 and included in the SE Plan. In 2009, the SE Plan was adopted and set out that 22,400 dwellings should be delivered between 2006 and 2026 in the part of the Borough that fell within the ‘East Kent and Ashford Sub Region’ (the urban area of Ashford). In addition, the town of Ashford was identified as a ‘Growth area’, a ‘centre for significant change’ and a ‘regional hub’ within the SE Plan.
33. In response to the then patchwork of adopted and emerging regional policy context, the Council undertook significant evidence gathering to support the then emerging Core Strategy. This largely related to identifying the town’s capacity to accept rapid and accelerated levels of housing and employment growth, focusing on what development profile would be needed and what infrastructure was required and by when to support it.

34. The conclusion of this work was debated through the evolution of the Council's Core Strategy which was ultimately found to be sound by an Inspector. It set out that land for around 16,770 new dwellings and 16,700 jobs would be identified within the 'Greater Ashford Urban Area' by 2021 (the wider Growth Area target of 31,000 homes and 28,000 jobs was to be delivered by 2031 but this was not enshrined in Core Strategy policy on account of Plan period to 2021 only.
35. Crucially, nowhere in any higher tier planning policy was there any implication that the growth area applied to anywhere other than the town of Ashford. It was not a Borough wide requirement and there was no policy position whatsoever that suggested that, if the Greater Urban Ashford Area failed to deliver, then rural parts of the Borough needed to take responsibility for its delivery. This is subsequently clearly represented in the approaches of the Council's adopted Core Strategy (2008) and the Tenterden and Rural Sites Plan (2010) – both supported by separate Inspectors as delivering a sound planning approach.

Establishing the requirements in the rural parts of the Borough

36. In direct contrast to the approach being advocated in the newly created 'Ashford Greater Urban Area', the Core Strategy identified that the rural parts of the Borough should accommodate around 1,180 dwellings by 2021, alongside appropriately scaled employment opportunities.
37. As explained through paragraph 2.7 of the Core Strategy, this figure was largely derived from the last deposit draft Kent and Medway Structure Plan that identified a housing target of 1,500 dwellings between 2001 and 2021. With the rural area completions between 2001-6 taken into account, this resulted in the residual requirement for 1,180 dwellings (2006-21). The then emerging South East Plan did not provide sufficient further clarification on this figure, on account of its focus on regional and strategic cross boundary issues. The Inspector who undertook the Tenterden and Rural Sites Plan examination accepted this position and set out that the figure in the Core Strategy had primacy in terms of the starting point for determining the housing numbers for the rural parts of the Borough, up to 2021.
38. As demonstrated above, the adopted plan position regarding the 'Greater Ashford Urban Area' and the remaining rural parts of the Borough were significantly different. In this context, each approach reflected historic planning policy approaches relating to the two distinct planning areas which have been in place in all previous local plans, albeit the focus on the town of Ashford was more acute on account of its specific regional Growth Area role.
39. It is worth noting that the approach derived for the 'Greater Ashford Urban Area' was a direct result of a top-down, Government dictated, requirement that Ashford (the town) fulfilled a regional growth area role in the South East to accommodate an increased and accelerated rate of housing development, well above what could be considered to be simply meeting its individual needs. Self-evidently, the approach was consistent with the prevailing national and regional policy in place at the time and the growth agenda supported through funding from Central Government.

40. Importantly, the scale of growth was not thoroughly tested against issues of deliverability, viability and achievability that are now all enshrined within the NPPF and are fundamental requirements of plan making today. Also, there was no specific national or local policy requirement at the time to maintain a rolling five-year housing land supply.
41. Additionally, at the time of the Growth Area designation and the whilst the Development Framework and Core Strategy strategy for Ashford was being formulated in the early / mid-2000s, the local housing market was buoyant, very different to the housing market circumstances associated with the economic crash of 2008 and the subsequent recession, which were not foreseen. This is reflected in average housing completions in the Borough, which from 2000 to 2005 - a period of relatively strong market conditions - stood at 860 dwellings per annum.
42. Even within the context of a buoyant housing market, it was recognised that the growth strategy was a highly ambitious one. Page v of the Core Strategy states that achieving the growth requirements would *'require Ashford receiving priority in economic development, planning and transport strategies by all relevant stakeholders, at all levels of governance, together with associated capital investment in infrastructure, and a concerted effort to promote the town and its development opportunities'*.
43. It was never envisaged that the strategy would be delivered by the private sector housing market alone, even at a time when the house market was at its strongest. Indeed, the delivery company 'Ashford's Future' was established which was led by a board of public and private sector partners to help deliver key infrastructure and other projects to support growth. The company was funded directly by DCLG.
44. The growth model selected for the 'Greater Ashford Urban Area' required a number of factors to all come together, and quickly. It relied upon significant and upfront investment in large-scale infrastructure that needed to come forward very early in the plan to allow the rapid housing growth to occur. Clearly, the subsequent recession affected the ability for the public purse to fund such infrastructure. The Growth Area programme and funding ceased with the change of Government in 2010. In any event, experience has shown that delivering infrastructure takes significant time, even when the economy is not in a recession.
45. The strategy also relied upon delivering high levels of flatted accommodation in a rapidly expanding town centre. At the time, this was an immature and weak local housing market. Similarly, the two significant urban extensions proposed on either side of the town would introduce a new housing offer to the market. Both of these housing products needed to achieve high rates of delivery quickly, from a standing start, and continue this rate of delivery over the plan period.
46. Experience has shown the Council that in reality, the housing market does not respond instantly and it takes time to develop markets and bring forward major strategic development sites and supporting infrastructure. It is only in recent years that the market is now able to show genuine interest in bringing forward new flats in the town centre, with a number now being built (see section 4 below). Also, Chilmington Green is only now coming forward and being built out, some ten years after it was first identified. For schemes of this massive scale, particularly where several land ownerships were involved, experience shows that it can take a

significant lead in time to start delivering on site, for a variety of reasons including securing financial agreements, establishing a cash flow model that works, achieving land equalisation and certainty over when infrastructure will be delivered and what financial commitments are being sought. This experience has fed directly in to the Council's view of deliverability in practice for the Local Plan 2030, providing a realistic and robust view of the constraints on the deliverability, and developability, of land.

Summary

47. The above factors all show that it is simply incorrect to suggest that the failure to deliver the growth area aspirations, as envisaged in 2008, was because the Council's strategy was wrong. That position takes no account of the macro factors in play, most notably the pre-conditions to achieving major housing growth and then the 2008 housing market crash and the national recession and restrictions in public spending on projects, which have influenced delivery. Housing completions in the whole Borough – not just the Growth Area – reduced to an average of 422 dwellings per year in the five years following 2008. This correlates to a reduction in housing sales seen both in the Borough, and nationally over this period.²
48. The Core Strategy's growth model relied on a variety of different components, all working together to achieve the outcome predicted – most of which were ambitious even in very buoyant market conditions due to their reliance on public sector investment in unlocking and bringing forward development.
49. The Local Plan 2030 responds to a different policy context and adopts an approach towards housing delivery which is more nuanced and more robust, and which does not depend on heavy public sector investment in infrastructure in the future, save for the Junction 10a scheme on the M20. It has been formulated with the requirements of the NPPF in mind, in that it is based on a bottom up assessment of housing need and is influenced by what is realistically achievable and deliverable, based on local circumstances and evidence from developers and housebuilders.
50. It has also been shaped by infrastructure providers' assumptions about their needs and when such provision is likely to come forward. Aside from Chilmington Green – a committed scheme which is now under construction – the strategy does not rely on very large scale proposals to deliver the Plan's housing target. Instead, it relies on a variety of sizes of sites and schemes across the Borough, catering to a variety of local markets. The strategy also recognises what is happening in the market at this point, responding to genuine interest in bringing forward several key brownfield sites in and around the town centre. In this context, the strategy is clearly delivery-focused.

² See for instance Figure 17 in the SHMA, Jan 2014

Section 2 –The Housing Target

Strategic Housing Market Assessment

51. The Strategic Housing Market Assessment (SHMA) was undertaken by GL Hearn and first published in 2014 and was reviewed in 2015. It was updated again in 2017 to respond to the most recent (2014-based) population and household projections from the Office for National Statistics (ONS) and the Department for Communities and Local Government (DCLG) being released.
52. The 2014 assessment was a joint commission with Maidstone and Tonbridge and Malling Borough Councils. However, the SHMAs themselves were three separate studies with their own respective conclusions. The updated assessments have similarly been completed for those areas.
53. The SHMA work undertaken to support the Local Plan 2030 is compliant with the National Planning Policy NPPF (NPPF) and the Planning Practice Guidance. The methodology used has also been the subject of an independent review by Cambridge Econometrics of the approach taken by GL Hearn which concluded that the SHMA work was *'robust and consistent with government guidance on the preparation of housing and economic development assessment needs as set out in the current National Planning Policy NPPF (NPPF) and Planning Practice Guidance (PPG).'*
54. The latest SHMA work concluded that:
- Ashford has a relatively contained housing market area that largely reflects the Borough boundary,
 - Strong population growth is predicted, likely influenced by strong relative past housing delivery.
 - A demographic based need for 14,934 dwellings between 2011-2030 was identified at 786 per annum over the Plan period. This is stronger than projected in the previous 2012-based projections.
 - The significant population growth is sufficient to support expected employment growth, and therefore no upward adjustments to migration are required to support economic growth within the OAN calculation.
 - There is evidence of affordability issues in the Borough, with an affordable housing need of 368 households per annum; with evidence from market signals which also point to affordability issues. The lower quartile house price to income ratio was 9.6; however rental affordability was shown to be better than other areas and with land values not pointing to a particular shortage of land.

The Demographic Need

55. The OAN is based on an assumption of strong population growth in Ashford. The 2017 SHMA evidence points to population growth (2011-31) of 23.7%, which is substantially higher than the projection across Kent (19.2%), the South East (16.2%) an England (14.6%). Indeed, it places Ashford as the 6th fastest growing area in the South East region (of 67 local authorities). Around two-thirds of the population growth is driven by net in-migration to the Borough.
56. This strong demographic need is influenced by comparatively strong housing

delivery in the Borough, which has contributed to in-migration. This is a factor in considering what further upward adjustments should be made in response to market signals evidence

Supporting Economic Growth

57. Chapter 7 in the 2017 SHMA set out that the 2014-based population projections would support growth in the Borough's workforce of 13,200; which was considered sufficient to support expected economic growth. It concluded that an upward adjustment to migration to support the economy was not required.

Market Signals and Affordable Housing Needs

58. The SHMA provides some evidence of affordability pressures in the Borough. Comparable house prices are below the Kent and national averages; indeed, in 2016 the median house price in the Borough is more than 15% below the South East average. However, like most parts of the region, values are above the national average. Lower quartile house prices were 9.6 times earnings in 2015 indicating that affordability pressures exist in the Borough, and the SHMA showed an affordable housing need from 368 households per annum.
59. The SHMA analysis however showed land values which did not point to a particular shortage of land at the local level. It indicates rents that were similar to the Kent average, below those in surrounding areas and which had grown modestly in comparative terms.

Adjustments for Market Signals

60. Paragraph: 019 Reference ID: 2a-019-20140306 of PPG provides advice on how market signals should be used to influence the OAN figure within a housing market area. This includes consideration of land and house prices, rental values, overcrowding statistics and affordability ratios between average earnings and average house prices. Paragraph: 020 Reference ID: 2a-020-20140306 of the PPG goes on to advise that "where an upward adjustment is required, plan makers should set this adjustment at a level that is reasonable". This assessment has been undertaken in the SHMA update (January 2017).
61. The Borough's strong historical housing delivery, influenced by the town's growth area status, has influenced migration to the Borough and thus trend-based demographic projections. This is a consideration in assessing what upward adjustments might be made for market signals.
62. Market signals and affordable housing evidence are appropriate considered together, given the interactions between them, whereby entry level housing costs influence the affordable housing need. By implication, an improvement in the affordability of market housing over time will reduce the level of affordable housing need.
63. The SHMA considered the historic rate of housing growth in drawing conclusions on what adjustments for market signals would be appropriate, and achievable. It set out that the dwelling need resulting from the demographic starting point would require an annual growth rate in housing stock of 1.5% pa over the 2015-31 period. It tested the

implications of 5% and 10% uplifts to this, taking account of the market signals and affordable housing needs evidence. The result showed that a 5% uplift would require the Borough to maintain an annual growth rate in housing stock of 1.6% pa, with a 10% uplift requiring an annual growth rate of 1.7% pa.

64. To set this in context, the table below profiles those authorities nationally which have delivered more than the 1.1% growth in housing stock per annum over the last 10 years achieved in Ashford Borough. It shows that
- A 1.6% pa stock growth rate would imply a rate of housing growth which is more than double that seen on average nationally. 1.7% pa growth would be exceptionally high;
 - There are only three authorities nationally which have sustained over 1.6% pa stock growth nationally over the last decade, of which two are in Central London with a very different market;
 - Delivery of a stock growth rate of 1.6-1.7% pa would represent a significant boost to housing supply in Ashford, relative to the 1.1% pa growth rate achieved over the last decade.

Comparison of Historical Housing Delivery – Best Performing Local Authorities

	Annual Rate of Housing Growth, 2006-16	LA Rank
England	0.7%	
Tower Hamlets	2.2%	1
Corby	1.7%	2
City of London	1.6%	3
Milton Keynes UA	1.5%	= 4
Uttlesford	1.5%	= 4
South Norfolk	1.4%	= 6
Islington	1.4%	= 6
Hackney	1.4%	= 6
Southwark	1.3%	=9
Dartford	1.3%	=9
Cambridge	1.3%	=9
South Cambridgeshire	1.3%	=9
Swindon UA	1.3%	=9
Forest Heath	1.3%	=9
Tewkesbury	1.3%	=9
Rugby	1.3%	=9
Peterborough UA	1.3%	=9
South Derbyshire	1.3%	=9
Harborough	1.2%	= 19
Selby	1.2%	= 19
Kettering	1.2%	= 19
Tonbridge and Malling	1.2%	= 19
Aylesbury Vale	1.2%	= 19
Mid Suffolk	1.2%	= 19
Colchester	1.2%	= 19
Newham	1.2%	= 19
Torridge	1.2%	= 19
Watford	1.2%	= 19
Gloucester	1.2%	= 19
Ashford	1.1%	= 30

65. Over the 2011-17 period, 3,177 dwellings have been delivered in the Borough (an average of 530 dpa). This results in a residual requirement to deliver 12,943 dwellings over the 2017-30 period (996 dpa). To deliver this would equate to sustaining 1.7% annual growth in the housing stock.
66. Paragraph 173 in the NPPF is clear that plans should be deliverable; and there is little point in setting a housing requirement at a level which cannot be delivered. Adding the 5% adjustment for market signals to the base demographic need for 786 dpa, the 2017 SHMA concluded in identifying an OAN of 825 dpa (Table 19, SHMA update, 2017). This would equate to 15,675 dwellings over the Plan period. To deliver this would imply sustaining a 1.7% pa growth rate on average across the remainder of the Plan period, which is very much at the limits of what can be considered to realistically achievable. The market evidence does not indicate that a higher uplift could be supported.
67. Affordability is influenced by housing market circumstances not just within Ashford but across the wider region. On realistic assumptions, sustaining the strong level of housing delivery envisaged can reasonably be expected, consistent with sustainable development, to contribute to improving affordability over time.

London Pressures

68. At the time of preparation of the 2017 SHMA, the latest evidence base underpinning the London Plan was set out in the 2013 London SHMA. This formed the evidence base for the current London Plan (FALP). It assumed enhanced out-migration from London from 2017 onwards as the economy recovered from recession. The SHMA included a sensitivity analysis which showed that modelling a generally consistent approach to this might result in a slightly higher level of in-migration. This was 34 dwellings per annum on top of the base projection in the report.
69. The Council considers that planning for an additional 34 dwellings per year on top of the OAN requirement would cater for an element of additional migration flows from the capital from 2017 onwards. This additional figure equates to a total figure of 442 dwellings over the Plan period and should be considered part of the housing target. However, this number does not form part of the OAN figure and is not to meet any unmet need from the capital.
70. Since the 2017 SHMA was prepared, the GLA has updated its evidence base publishing a 2017 London SHMA. It has also published a draft London Plan which envisages the provision of 65,000 homes a year, considerably above the 42,000 minimum figure in the FALP. This meets London's needs in full.
71. The GLA has also published 2016-round demographic projections, which provide a consistent set of demographic projections to those used in the London Plan. The core demographic projections are based on 10 year migration trends. These include demographic projections for Ashford, which show household growth of 13,700 between 2011-31, equating (including an allowance for vacant homes) to a housing need for 714 dpa.

72. Nonetheless, the Borough Council considers that maintaining the uplift of 442 dwellings is a sound planning approach that accepts the Borough’s transport links to the capital as well as the wider market signals and affordable housing evidence in the SHMA. It is expected that these migration patterns will eventually be encompassed within future ONS population and household projections and hence will become part of the demographic-based element of the OAN for the Borough in the future.

The Local Plan housing target

73. Based on the above, the Local Plan 2030 has a housing target of **16,120 dwellings** between 2011 and 2030. This equated to an annual delivery rate of **848 dwellings per annum** over the whole plan period (19 years) but which is now requiring an average delivery rate of 996 dpa from 2017 to 2030, which represents a very significant 1.7% pa growth in the Borough’s housing stock. The upward adjustments made in deriving the housing target within the Plan will support a combination of enhanced household formation and additional in-migration to the Borough. The Council is satisfied that the methodology used to determine the housing target figure is robust and represents a sound planning approach.
74. As set out in the Duty to Cooperate Statement, no requests to accommodate an unmet housing needs in this Local Plan have arisen from any of the adjoining local authorities or from the Mayor of London.

The Buffer

75. Table 1 of the Local Plan to 2030 shows a buffer of 1,006 dwellings above the residual Plan target at April 2017 and this is reflected in the Housing Trajectory that supports the Local Plan. The housing delivery rates on key sites is informed by information from the respective developers/housebuilders (Appendix 2 to this Topic Paper)
76. Identifying this additional supply provides crucial flexibility within the overall approach, again a key theme of the NPPF (paras 14 and 50) ensuring that the Plan is deliverable. The strategy advocated means that in practice not every site identified in the housing trajectory needs to come forward exactly as proposed in order to meet the housing requirement over the Plan period. Nor does the predicted future windfall allowance need to come forward precisely as predicted either, although evidence suggests it is highly likely to (see Appendix 1 to this Topic Paper).
77. This approach recognises that the housing market will be subject to various fluctuations and some potential slippage over the Plan period. Building in this recognition from the outset of the Plan provides much needed flexibility and therefore certainty that the Plan’s housing target will be delivered. In short, it is better to over-provide than under-provide. This is a sound planning approach in line with the NPPF.

Section 3 –The Strategic Distribution of Housing

78. The strategy for distributing new housing across the Borough advocated in the Local Plan to 2030 recognises the different character areas and roles played by different areas within the Borough. In general, it allocates new housing growth to locations where housing need is greatest and can be most sustainably absorbed. The following range of factors have been taken into account.

Extant commitments

79. A significant number of dwellings expected to be delivered during the Plan period are already accounted for through extant planning commitments. Table 1 of the Local Plan shows that around half of the residual housing requirement figure of 12,943 will come forward through these commitments.
80. Clearly, these commitments provide important context on which any future strategy should be based. These are development sites which will come forward regardless of what the Local Plan 2030 sets out now, and have already been judged to be acceptable in planning terms.
81. In almost all cases, these commitments stem from sites that have been allocated in Development Plan Documents that sit under the Core Strategy (adopted in 2008)³. This demonstrates that the past local plan regime was successful in selecting land that was (or remains) deliverable, achievable and developable within the context of the NPPF.
82. As a result, the future pattern of a significant proportion of the housing growth in the Borough in this Local Plan is fixed through the delivery of these existing commitments. This includes an extensive range of new services and infrastructure that will also be delivered by these developments. Both these aspects needs to be recognised and reflected within the spatial strategy for the new allocations being made in this Plan.

The settlement hierarchy

83. The 2011 census shows that the Borough of Ashford contains circa 47,800 households. These households are not evenly distributed across the Borough. The urban area of Ashford - the Borough's principal settlement – accounts for around 29,000 households, approximately 62% of the total. Clearly, this is where future housing need is most required.
84. In comparison, the next largest settlement in the hierarchy is Tenterden – the Borough's only other town - located to the south west of the Borough. As of 2011, the town contains around 3,630 households (although this relates to the Civil Parish as a whole – an area significantly larger than merely the town), around 7% of the total households within the Borough. There is a gulf between the status and role of Ashford and any other settlement in the Borough.

³ Includes the Town Centre AAP, Tenterden and Rural sites DPD, Urban Sites & Infrastructure DPD and Chilmington Green AAP

85. Below Tenterden, there are a range of small to medium-sized settlements. To put this into context, there are 34 parishes below Tenterden which could be considered solely rural (i.e. they do not include part of the town of Ashford within their boundary). Three of these contain households between 1,000 and 1,300 and ten contain fewer than 200 households. There is therefore a further step change in scale and function between Tenterden and other settlements in the Borough.

Employment opportunities

86. The Council's Strategic Employment Options Report (SEOR) (see Examination document EBD04) indicates that by far the significant majority of the overall employment in the Borough is concentrated within the Ashford urban area – table 2.9 of the SEOR – with a number of larger employers. It sets out that there are around 58,000 jobs in the borough as a whole. Of which 42,300 are at Ashford, with 15,700 jobs in the rural area.
87. The Council's Rural Economic Assessment (July 2014, Examination documents EBD01), also sets out that the rural area accommodates only 25% of all jobs in Ashford Borough. The rural area does however accommodate just under half of Ashford's businesses and consequently is an important component of the Borough's economy. Despite this, the labour market in the rural area is characterised by a lower than average economic activity rate, variations in levels of educational attainment and increasingly levels of unemployment during the recession.
88. The majority of businesses are small to medium sized enterprises with less than 10 employees. There are no large employers located in the rural area. Levels of self-employment and home working are above regional and national levels.

Access to services and facilities

89. Ashford is not only the largest settlement in the Borough, it is also the key service centre, providing by far and away the largest range of services and facilities. These provide for the needs of the Borough's residents and beyond, and cater for far more than merely residents' everyday needs. The town of Ashford contains an extensive and varied range of jobs, shops, leisure and recreational facilities, including two strategic parks, and educational establishments, including a new higher educational college.
90. Ashford is also a significant transport hub. A number of domestic train services converge at Ashford International Station, providing sustainable access to Kent, London and the wider South East market. This hub includes the High Speed 1 service that provides regular services to London St Pancras in 38 minutes (via Ebbsfleet and Stratford) and the International Passenger Station which provides direct connections to Paris, Brussels and mainland Europe.
91. Ashford is also where the national motorway network can be accessed via the M20 and the local strategic road network via the A20, A28 and A2070 which connects Ashford to the rest of Kent and the Sussex coast.

Complementing and enabling the delivery of infrastructure

92. The Council has a strong recent record of working with public stakeholders and partners, as well as developers, to ensure that new development is properly served by new or existing infrastructure that is needed to support the additional demands created by new housing development. This principle continues and underpins the approach in the Local Plan.
93. Focussing the majority of new housing development at Ashford allows new development to make best use of existing and planned infrastructure. This position is supported by local service providers and stakeholders and this is reflected through the work done on the Infrastructure Delivery Plan that supports the Local Plan.
94. Maintaining a consistent position has meant that Ashford has benefited from joined-up investment, from the public sector and also through the S106 regime from developers. The introduction of the CIL regulations and pooling restrictions provide further weight to continue the approach as it allows the Council and providers to target S106 contributions from the larger developments in certain locations, where more strategic improvements or expansions are necessary.
95. For example, the following key infrastructure projects have either been delivered in recent years in the town of Ashford, or are about to be delivered:
- *Improvements to Junction 9 and Junction 10, M20:* At Junction 9, work to widen each of the existing sliproads to the M20 at junction 9 from one to two lanes, and to widen the roundabout from two to three lanes was undertaken in 2010-11. Funding was secured through the Regional Infrastructure Fund (RIF) and cost around £16.5m.

At Junction 10, between 2006 and 2007 remodelling took place with an ‘interim improvement’ to increase capacity. Bridges across the motorway were modified to provide three lanes of traffic at the roundabout, and local approach roads were widened. Traffic lights were installed to control traffic flows at the junction between the A292 Hythe Road and the London-bound M20 entry slip road. A new footbridge was also constructed across the motorway. The total cost of this scheme was around £4.9 million.
 - *Junction 10a (emerging):* On 1st December 2017, the Secretary of State granted the Development Consent Order (DCO) permitting the construction of the Junction 10a scheme 700m east of the existing J10 on the M20. The scheme will involve the provision of a new grade-separated junction on the M20, and an associated link road to the A2070, to provide improved access to South Ashford and support development in this area. Construction is due to begin in January 2018, with the scheme being opened to traffic being expected in August 2019. The overall cost of this scheme will be £104.4m.
 - *Upgrading of Bybrook Waste Water Treatment works:* The Ashford Wastewater Treatment Works (WwTW) at Bybrook treats wastewater flows from the town of Ashford and its surrounding areas, serving a population equivalent of 110,000 people. Operated by Southern Water Services, its capacity was increased substantially when £12.6m was spent to upgrade and modify the process units

for additional capacity. The improvements were completed in March 2014.

- *Variety of infrastructure coming forward as a result of Chilmington Green development:* This provision includes the delivery of a new secondary school and four new primary schools, the dualling of the A28 and the delivery of large parts of ‘Discovery Park’ – a strategic recreational facility that will include sports, recreation and natural greenspace including a number of sports pitches, 3G sports pitch provision and a large indoor sports centre.
- *Existing e-technology infrastructure:* The town has long been ahead of the national agenda as a result of the Council’s pioneering planning policies to deliver communications infrastructure through ensuring duct space was provided for fibre cabling on each new development in the urban area. As of 2017, all urban exchanges serving the town are fibre enabled which provides a platform which new development can access.

Environmental Considerations

96. The Borough’s environment is diverse. The majority of the area can be described as countryside, made up of small agricultural fields, woodlands (including extensive areas of Ancient Woodland), connected hedgerows, wetlands, ponds and rivers. This wide range of green infrastructure includes two internationally protected sites, two national nature reserves, 13 SSSIs and 68 Local Wildlife Sites.
97. A significant proportion of the countryside falls within two Areas of Outstanding Natural Beauty (the Kent Downs and the High Weald) on account of its nationally important landscape value. Other parts of the countryside also offer landscape areas that are ‘valued’ within the context of the NPPF.
98. The countryside is interspersed with a range of attractive and historic settlements which contribute to the Borough’s diverse and rich heritage. There are 43 conservation areas and 2,395 listed buildings in the Borough. Many areas within the Borough’s rural settlements contain highly attractive townscapes that have been in place for centuries and which make a major contribution to the character of the borough.
99. Many of the borough’s rural settlements are located away from the primary road network and rely on narrow rural lanes for access and movement. These lanes are not suitable for heavy traffic use, nor for major improvement since they contribute positively to the rural character of the area.
100. Ashford has been particularly vulnerable to fluvial flooding in the past, as Ashford town sits at the confluence of five main watercourses– the Great Stour river, East Stour river, Aylesford Stream, Whitewater Dyke and Ruckinge Dyke. However, the flood risk to town of Ashford has been significantly reduced by the construction of the Hothfield and Aldington reservoirs on the Great and East Stour rivers in the 1990s, designed to withstand a 1 in 100 year flooding event, and which have been proven to withstand 1 in 50 year events.

101. Other parts of the Borough are also at risk from other sources of flooding, including from the River Beult in the west of the Borough, and from surface water flooding, groundwater and sewer flooding and, in exceptional circumstances, from tidal flooding on the Romney Marsh.
102. This shows that there are a significant and diverse range of environmental considerations which are relevant to planning for new housing development in the Borough.

Summary

103. All of the factors above when considered as a whole, clearly show that Ashford town is the most suitable and sustainable location within the Borough for new housing growth by some distance and should therefore be the focus of the majority of new housing growth. This approach best responds to the combination of environmental, social and economic considerations set out within the NPPF.

Distribution of new development allocations at Ashford

104. As the Local Plan explains, there are limited opportunities within the existing built-up part of Ashford to focus significant levels of new housing development. The opportunities that do exist either are already subject to planning approval or have been rolled forward for allocation in the Local Plan from current adopted Development Plans (e.g. Newtown Works). These sites remain suitable for development and are deliverable.
105. The main issue is therefore to determine where additional land on the periphery of the town should now be released for new housing development.
106. As mentioned above, the context provided by existing committed sites is particularly relevant here. The establishment of a major urban extension at Chilmington Green at the south western edge of Ashford, and the large developments at Finberry and Waterbrook to the south-east of Ashford means that the focus of new development and infrastructure provision has been primarily on sites to the south of the town, where, in general, environmental constraints are fewer. The delivery of Junction 10a (M20) in 2019 is a key factor in realising the development potential of the land to the south of the town and allowing further allocations in this area to come forward.
107. To the north of Ashford, the Kent Downs AONB lies in relatively close proximity to the town and the floodplains of the Great and East Stour rivers which converge in the town centre. These are important strategic considerations that should shape future allocations at Ashford.
108. At the more local level, the town is surrounded by a variety of landscape features and agricultural land that varies in importance and quality. These factors were all assessed on a site by site basis through the SA and played an important role in influencing which areas of land were included in the Local Plan.

109. In contrast to the Core Strategy approach which relied to a large degree on two very large urban extension-scale allocations, the Local Plan has focused on the ability of sites to come forward and deliver housing in the short to medium term. This has meant focusing on a wider range of sites which can provide a more varied housing offer to help drive housing delivery on the ground whilst still providing the critical mass to enable proper place-making and the creation of communities with available on-site facilities.
110. The detailed assessment of alternative sites is carried out in the Sustainability Appraisal and so is not repeated here. However, in general, the Council has sought to locate new housing allocations on sites that can either take advantage of existing (or planned) infrastructure or have the capacity to deliver new facilities to a local area that would require them to meet the additional demands created.
111. In some cases, this has resulted in allocations to extend existing residential developments or develop nearby. This applies to the proposed site allocations at Park Farm South East (S14), Finberry North West (S15), Conningbrook Phase 2 (S19) and Land south of Brockmans Lane, Bridgefield (S45).
112. This approach has also influenced the proposed development at Court Lodge (S3) – the largest site allocation in the Local Plan (950 dwellings). Here an opportunity exists to complement and consolidate the existing built form at Knights Park and the urban extension that will come forward at Chilmington Green to the west. It also provides the opportunity to extend Discovery Park – a key strategic recreational resource for the Borough that will provide significant sport, recreation, leisure and informal greenspace provision - significantly further east.
113. The proposed allocations south of Kingsnorth village (S4 and S5) will also closely relate to the development of the Court Lodge site and the on-site facilities and services proposed to be located there, whilst also providing an opportunity to create a new settlement with its own character.
114. At Kennington, site S2 represents an opportunity to create a different residential environment on the north-eastern side of Ashford. It is in close proximity to the new residential scheme now due to come forward at Conningbrook lakes and the newly-established country park there, whilst also providing the capacity to deliver a new 2FE primary school to serve the pupil catchment in this part of the town.
115. Finally, the Plan seeks to create a new mixed use development area at the Eureka site to the north-west of the town (S20). This involves the evolution of the land from an area allocated for solely B1 employment uses to create a new, high quality neighbourhood which can also take advantage of the nearby local centre and primary school. Promoting such mixed-use development in urban areas is fully supported by the NPPF (para 17.9).

Summary

116. The site allocation strategy at Ashford is considered a sound planning approach. It proposes a varied range and size of sites to accommodate new housing growth in a way that will give the market a number of opportunities to deliver and does not rely on new very large urban extension-scale development and therefore land can be brought forward sooner. It recognises what development has been delivered in the

past and what is about to be delivered through existing commitments. It also recognises and responds to the relevant environmental sensitivities.

The strategic distribution in the rural parts of the Borough

117. The approach to the distribution of new housing growth in the rural areas set out in the Local Plan is broadly consistent with the existing approach in adopted Development Plans. This strategy has delivered appropriate levels of housing growth to different rural settlements based on their relative sustainability, whilst also protecting the attractive characteristics of the rural settlements and surrounding countryside.
118. The existing approach is enshrined in Policy CS6 of the Core Strategy and through the allocations in the Tenterden and Rural Sites DPD. This has seen higher amounts of housing allocated at Tenterden, Charing, Hamstreet and Wye with smaller quantities of houses spread between a variety of the Borough’s medium-sized rural settlements (although these are small in objective terms).
119. These settlements, and the level of growth ascribed to them, were selected on account of their relative sustainability merits in terms of their scale, population, level of services and range of provision at a parish level, the ability for a settlement to play a more limited service centre role and whether a local community expressed a desire to accommodate additional housing growth. All of these aspects remain consistent with the core principles of the NPPF.
120. The approach to site allocation in the Local Plan expands these principles a little further in recognition of the NPPF and its supporting PPG. The desire to boost housing supply (para 47), promote choice in the housing market (para 9), recognise that all settlements can play a role in delivering sustainable development in rural areas and that development can help to ensure rural communities are supported (para 55), are now important considerations when seeking to deliver sustainable development as a whole.
121. In response, the Local Plan proposes a broad and varied range of rural residential site allocations that will deliver appropriately scaled housing growth at a number of settlements.
122. Tenterden – the Borough’s only other town – clearly sits at the top of the rural settlement hierarchy. It offers a number of services and facilities (including two supermarkets), a leisure centre with a swimming pool and several shops and restaurants. It caters for more than the everyday needs of residents and is a service centre for residents living in the surrounding hinterland.
123. The villages of Hamstreet, Charing and Wye all sit below Tenterden in the rural settlement hierarchy, yet offer a range of local services and facilities that can provide for residents everyday needs whilst playing a secondary service centre role to surrounding smaller villages and nearby rural communities. They are all located within 10km of Ashford and have railway stations. They continue to be important service centres in a rural context.
124. These settlements remain the most suitable locations on which to focus the majority of new housing growth in the rural parts of the Borough. It is therefore a sound

planning strategy to rely on these settlements delivering proportionately more rural housing development than other settlements.

125. For smaller settlements, the Plan proposes limited scale allocations across a broader range of settlements than the Core Strategy. This approach is very much in line with the principles for rural development in paragraph 55 of the NPPF and is considered to be a proportionate and sustainable response to extending the range of housing opportunities available in the rural area. The allocation strategy has also been cognisant of the need to ensure that no single settlement was attributed allocations that would generate a scale of new development that would not be readily absorbable by the services in the settlement or that would adversely affect its character.
126. The Sustainability Appraisal has assessed the suitability of sites in terms of their social, environmental and economic impacts, set against a range of sustainability criteria. These criteria included an assessment against access to services and facilities and whether development of a certain scale could be accommodated sympathetically within the landscape and in a way that reflected the existing character and built form.
127. As part of this process, the Council liaised with local service providers and key stakeholders regarding the capacity of local services (e.g. primary schools). In the vast majority of cases, this evidence shows that many of the local services and facilities that are in place are thriving. No service provider stipulated that new housing growth was needed to arrest a decline and no fears were raised about the long-term sustainability of any service. There is certainly no evidence to suggest that more housing is needed, as a point of principle, for these services to survive, as has been suggested in a number of responses to the Local Plan.

Neighbourhood Plans

128. As the preparation of the Local Plan has progressed, the Council has recognised the need to consider the progress of any Neighbourhood Plans in the borough. For those Neighbourhood Plans that have progressed sufficiently far in their preparation, the Council has effectively allowed the Neighbourhood Plan to take the lead in identifying new housing allocations in those parishes, providing they meet the ‘basic conditions’ tests against which the soundness of Neighbourhood Plans are examined.
129. This position is reflected in the Housing Trajectory that supports the Local Plan which reflects the housing allocation policies within the adopted Neighbourhood Plans of Wye and Pluckley. It also reflects the position set out within the Bethersden Neighbourhood Plan, which has now reached its Regulation 16 consultation stage.
130. With regard to the emerging Rolvenden Neighbourhood Plan, at the time of the publication of the proposed ‘Main Changes’ to the Local Plan in July 2017, the Council had not yet seen a draft of the Neighbourhood Plan and could not be certain about the scale of the proposed allocations that were to be included. A figure of 40 dwellings has been identified on the basis of an assessment of what a parish such as Rolvenden could reasonably accommodate bearing in mind its relative sustainability. This is also consistent with the 40 dwellings attributed to Rolvenden through a single site allocation in the Tenterden and Rural Sites Plan, which covered

the period up to 2021. The Parish Council has now published a Regulation 14 draft Neighbourhood Plan for consultation which proposes to allocate land for 24 dwellings in the parish.

131. The other parishes which have achieved Neighbourhood Area status have not yet progressed a Neighbourhood Plan to Regulation 14 stage and so the onus remains on the Borough Council to take responsibility for new housing allocations within these areas through the Local Plan.

Summary

132. The approach to planning for new housing in the rural area effectively remains a balanced one. It promotes a scale of development that can be sustainably accommodated in the rural area as a whole, allocating this in a way that ensures new rural housing is not only sustainably distributed but also appropriately sized so settlements are able to adequately absorb new development without sacrificing the character that makes them special.
133. This is all set in the overall context of the need to respect the wider environment, including the AONBs, valued landscapes, designated ecological areas, flood zones and the need to respect the importance, role and character of the surrounding countryside.
134. It is clear that the Local Plan's policy approach here is consistent with the principles of the NPPF. It takes account of the roles and character of different areas (NPPF para. 17.2), recognises the intrinsic character and beauty of the countryside and supports thriving rural communities (NPPF para. 17.2) and actively manages patterns of growth to make the fullest use of public transport, walking and cycling (para. 17.11). More specifically, it also provides a broader choice of rural housing sites beyond the villages at the top of the rural settlement hierarchy whilst taking account of local environmental conditions.

New Housing Windfall Development – Policies HOU3a and HOU5

135. The NPPF provides the context on which the housing windfall policies (HOU3a and HOU5) in the Local Plan are based. Paragraph 58 of the NPPF sets out the importance of requiring good design from new housing so it adds to the overall quality of the area, responds to the local character and history and reflects the identity of local surroundings.
136. In the rural areas, the NPPF sets out that new housing should be located where it will enhance or maintain the vitality of rural communities (para 55), including where it can support groups of smaller settlements nearby. The PPG complements this approach and establishes that all settlements can play a role in delivering sustainable development and that blanket policies restricting housing development in some settlements and preventing other settlements from expanding, should be avoided.
137. The NPPF also recognises the importance of the countryside in terms of its intrinsic character and beauty (para 17.5) and the need to protect and enhance valued landscapes (para 109).

138. The Local Plan approach responds by identifying in policy HOU3a an extensive range of settlements within the Borough which, in principle, are deemed suitable to accommodate future windfall housing development within their confines. The list of settlements excludes hamlets and sporadic collections of dwellings (which may include ‘ribbon developments’ along rural highways) where there is no identifiable form and typically have no services or facilities or ready access to them. The range of settlements now listed in the Local Plan is far broader than that currently listed in the Tenterden and Rural Sites DPD under policy TRS1.
139. Settlement confines are defined within the Local Plan by way of a written definition. This approach is consistent with current and previous Local Plans as a means of identifying where the built-up boundary of a settlement ends. This provides developers and residents alike with a consistent way of establishing settlement confines in respect of its application in relevant planning policy and decision-making. It should be noted, however, that some rural communities have sought to define settlement boundaries on a map base either through a Neighbourhood Plan or, more informally, through a ‘village envelope’ exercise undertaken with Council officers.
140. The Local Plan also recognises that new windfall housing can no longer only be acceptable in principle within the confines of settlements. Paragraph 55 of the NPPF only states that isolated new homes in the countryside should be avoided unless certain exception criteria are met (although ‘isolation’ is not defined in the NPPF or PPG). The countryside is also no longer protected for its own sake (although it remains an important consideration).
141. This emphasis in Government policy is reflected in policy HOU5 of the Local Plan. It advocates a permissive approach to new housing in areas that adjoin or are close to the existing built-up confines of the settlements identified in policy HOU3a, where it meets a range of design criteria that are consistent with the NPPF. In particular, the scale of the housing proposal will need to be proportionate to the level of service provision available in the nearest settlement and in keeping with its character.
142. Proposals that are in more remote locations or are not well connected to nearby settlements should be considered ‘isolated’ for the purposes of dealing with future windfall housing applications. In these locations, only housing that meets the criteria in the second part of policy HOU5 – which includes the exceptions set out in paragraph 55 of the NPPF - should be allowed.

Conclusion

143. The Council considers that the windfall housing policies in the Local Plan are positive, consistent with the approach advocated in the NPPF and should therefore be supported.
144. Furthermore, as the policies are demonstrably less restrictive in principle than the equivalent adopted policies, there is a reasonable expectation that this will result in more windfall schemes being permitted across the Borough over the Plan period, contrary to what some objectors have suggested.

Exclusive homes

145. Paragraph 50 of the NPPF requires Councils to plan for a wide choice of high quality

homes to meet the needs of different groups. The Council considers this should include the very top end of the housing market and, as a result, the Local Plan proposes two small site allocations to deliver up to five 'exclusive' homes. These homes will cater for a very specific and niche demand within the Borough and so it is appropriate that only a very limited supply is proposed.

146. These allocations will complement the ability for windfall proposals of 'exceptional quality or innovative design' to be proposed under the exception criterion in paragraph 55 of the NPPF.
147. The sites promoted for inclusion are considered suitable for 'exclusive' type housing only, due to the nature of the surrounding character and nearby built form. They are also large enough to accommodate very low-density housing in a way that can be supported by adequate landscaping, complementing the overall design and allowing new housing to sit sympathetically with its surroundings.
148. As the policy was formulated, the Council consulted local estate agents who advertise housing at the top end of the market, to gauge a market perspective. The feedback suggested there was a demand for such housing in the Borough, particularly for new build properties as it provided opportunities for bespoke designs and avoided the need to substantially alter and/or modernise existing properties.
149. The Council believes this is an innovative policy approach which should be supported.

Section 4 – The Approach to Delivery

150. This section deals with the Local Plan's approach to the delivery of the housing proposed over the Plan period to meet the Plan's housing target. Paragraph 47 of the NPPF sets out how Local Planning Authorities should identify specific deliverable sites to provide a 5 year housing land supply and identify specific developable sites or broad locations for the latter stages of the Plan. The associated Planning Practice Guidance also explains how the tests of suitability, availability and deliverability should be considered which has informed the full and comprehensive evidence base contained within the SHELAA and SA which supports the Plan.
151. The Council's expectations of housing delivery on allocated sites, major committed sites and windfall sites are set out in the Housing Trajectory (Appendix 5 to the Local Plan) and these expectations are justified in more detail in Appendix 1 to this Topic Paper.
152. The Council recognises the importance of identifying housing sites which have an expectation of coming forward and this aspect provides the final element in decisions around site allocation following on from the wider sustainability considerations described in the preceding chapters

Evidence of delivery

153. Several objectors to the Plan's housing strategy claim that the failure to deliver large scale housing development in the Ashford urban area since the adoption of the Core Strategy 2008 should be seen as a reason for the Council to change tack and focus much more development in the rest of the Borough.
154. Whilst the disadvantages of taking this approach in sustainability terms are discussed in this paper and analysed in greater detail in the SA, it is not reasonable to assume that past delivery rates indicate what rates will be achieved in the future in different circumstances.
155. The economic context of the last decade is well known and there is little doubt that the effects of the 2008 economic crash and subsequent recession on the housing market had a significant effect on delivery rates, especially in emerging housing markets such as in Ashford town centre. Other factors such as the access to mortgage borrowing and lack of growth in earnings have also been external factors in influencing the state of the housing market overall.
156. More locally, the restrictions in public expenditure since 2008 has seen significant parts of the infrastructure identified as being key elements to enable housing growth in Ashford being delayed or scaled back, most notably the new Junction 10a scheme on the M20.
157. However, more recently, there are clear signals that the housing market in the Ashford urban area is strengthening and broadening in its scope and the evidence is now being seen in housing starts on the ground.

Town centre Flats / apartments market

158. The town centre's market for flats and apartments gives the clearest indication of the changing mood and scope of the housing market in the Ashford urban area.
159. The conversion of the former Charter House office block (now Panorama) to 234 flats, which was completed in 2015, has triggered several additional flatted schemes that are now either coming forward or which have planning permission. A number of other former office conversions have taken place under permitted development rights, as follows:
- Crown Building, Wellesley Road (13/00844/AS) = 25 dwellings
 - Trafalgar House, Elwick Road (15/01606/AS) = 33 dwellings
 - Elwick House, Elwick Road (16/00878/AS) = 15 dwellings
160. Notably, the first phases of the large former Powergen site in Victoria Road which was allocated in the Town Centre AAP in 2010 following a previous grant of outline permission for 1000 units, is now under construction. The site now has permission for 660 dwellings (all flats) as part of planning application 15/01671/AS and the first phases are being delivered by GRE. This application was approved in November 2016, with the Council granting full permission for the first 400 dwellings and outline for the other 260.
161. Elsewhere on Victoria Road, full planning permission has also been granted for a mixed use scheme which includes 216 apartments (re: 16/1157/AS). The initial non-residential phases are now on site but with an expectation that the residential phases will come on line soon afterwards (see Appendix 1). Two further smaller flatted schemes in the Victoria Road area for 28 and 31 dwellings respectively (refs: 16/986/AS and 16/981/AS) have also been permitted with the latter now under construction.
162. Phase 2 of the Panorama redevelopment is also now on site with two new blocks due to be constructed on either side of the main Panorama building, delivering 110 new units in total.
163. The activity noted above and the views expressed by town centre flatted scheme developers provides firm and compelling evidence of a notable step change occurring in the town centre flatted market. There remains further opportunities for town centre flatted schemes to come forward (Godinton House – current application; Elwick Road, Gasworks Lane to contribute to the overall housing requirement in the Plan and in some cases, the 5 year housing land supply.
164. In addition, the mixed housing site at Godinton Way for 83 dwellings (TC8 in the Town Centre AAP) being built by Croudace Homes is nearing completion.

Rest of urban Ashford

165. Beyond the Town Centre but within Ashford and its immediate periphery, there is also strong evidence that the economic conditions affecting delivery over recent years are being overcome, as follows:

Existing sites

- At Finberry (Cheeseman’s Green), to the east of the town, this site has delivered over 100 units last year. This represents higher housing delivery rates than previously seen. Additional reserved matters applications have been recently approved. Although the site has a single housebuilder (Crest Nicholson), they are diversifying their housing offer at Finberry so that delivery rates have been high and are expected to continue (see Appendix 2). The delivery of the whole consented scheme for 1100 dwellings is constrained by the need for the new Junction 10a scheme and this is reflected in the Housing Trajectory as is the expectation that the new allocation for Finberry North West (S15) will follow on sequentially at the completion of the consented scheme.
- At Repton Park, high delivery rates of over 100 per annum are expected to continue into the next few years with further parcels expected to be commenced shortly. With two housebuilders on the site (Taylor Wimpey and Persimmon Homes), the site has experienced consistently high levels of delivery and the build out of the remainder of the site is expected by 2021.
- Phase 1 of the Conningbrook housing development is expected to deliver completions as early as 2018. The Chartway Group are due on site early in 2018.
- The former K College site in Jemmett Road (S12) is now vacant following the opening of the new Ashford College campus in the town centre in September 2017. The detailed planning permission for 160 dwellings for Chartway is now expected to start construction and the northern part of the site has been cleared in preparation.
- The Willesborough Lees allocation (S17) now has outline planning permission for 192 dwellings to Bellway Homes with a resolution to grant for an additional 28 dwellings on the Highmead House part of the site.

Chilmington Green

166. Development at Chilmington Green - the major urban extension on the edge of Ashford of up to 5,750 homes and 1,000 jobs has now commenced. In 2017, the principal access points to the development on the A28 have been constructed alongside other preliminary infrastructure to support the first phase of new housing.
167. This initial phase encompasses housing at the western and eastern end of the development and a total of four different housebuilders are expected to be active on the site during this phase (Barrett Homes, Hodson developments, Pentland Homes and Jarvis Homes).
168. The spreadsheet attached at Appendix 2 to this Topic Paper shows the high levels of delivery anticipated by each of the developers on a monthly basis over the first phase with first occupations due in early 2019. The multiple developers and different sales outlets expected during this phase of the Chilmington development gives reason to expect a strong and steady supply of new housing from this site in its early years, although it should be noted that the Local Plan Housing Trajectory takes a more cautious approach and does not match the developers’ own expectations in

respect of the rate of delivery in the first phase.

169. Chilmington Green should provide a regular outlet for new housing across the whole of the Plan period (and well beyond) and a total of 2,500 dwellings is expected to come forward by 2030. Whilst there may be ebbs and flows in the annual rate of delivery across the Plan period which would be expected on any site of this size, the overall rate and scale of delivery assumed by the Council in the Housing Trajectory is realistic and conservative.

Rural Housing Market

170. The strength and reliability of the rural housing market has been demonstrated over a prolonged period of time in the Borough. With only a couple of exceptions, rural housing sites allocated for development in the Tenterden & Rural Sites DPD have either been built out already, are under construction or have extant planning permissions granted to them. This has occurred well in advance of the 2021 end date of that DPD and is testament to the attractiveness of the Borough's rural villages and Tenterden as places to live. Of course, this needs to be set in the context of being mainly relatively small sites (compared to those in Ashford itself) with no strategic infrastructure delivery constraints to hold back schemes from coming forward.
171. The largest allocation from the TRS DPD was at Tenterden where the first phase of a new southern extension to the town is now well under way. Much care and attention was paid by the Council and the developers to the detail and quality of the scheme to be delivered here given the particularly sensitive nature of Tenterden's heritage and AONB surroundings.
172. Two developers (Taylor Wimpey and Dandara) are now building at the site and they expect the first phase to be completed by 2020 (Appendix 2). This will enable the next phase of the scheme, now reallocated as site S24 in the Local Plan to come forward earlier than had previously been expected which is reflected in the Housing Trajectory.
173. The broader picture of the Borough's rural housing market is clear. Plan-led opportunities for new housing are generally taken forward with a minimum of delay where those sites are readily available and no strategic infrastructure constraints apply and this picture is reflected in the Council's expectations of new housing coming forward on rural allocations in the Local Plan over the next 5 years.

Conclusion

174. The evidence of delivery from existing housing developments and schemes already in the pipeline is considerable and marks a significant change of gear in the Ashford urban area.
175. This evidence, alongside the evidence from developers and housebuilders in terms of expected delivery rates, fully justifies the Local Plan's assessment of the expectation of existing and committed sites in Ashford making a major contribution towards meeting the Borough's housing target over the Plan period in the short, medium and longer term.

176. Additionally, the long standing constraint of Junction 10a now has a firm timescale for resolution with the scheme due to open to traffic in August 2019. This will create developer and investor confidence and enable even more housing sites to the south and east of the town to proceed. This expectation, both for committed and allocated sites is borne out by the views of individual developers and housebuilders in Ashford (see Appendix 2) and indicated in the Housing Trajectory that supports the Local Plan.

Proposed Allocations

177. Of the new allocations proposed in the Local Plan, the majority of new housing development is planned to come forward in the Ashford urban area. Therefore, it has been important for the Council to assess the potential deliverability of sites in the short term and across the Plan period as a whole as part of the plan-making process.
178. This has meant due consideration through the SHELAA, of any land ownership or infrastructure constraints that could delay schemes being implemented as well as taking account of appropriate lead in times where sites may be larger or more complex, have potential viability issues to resolve or require a suitable level of masterplanning.
179. For all major sites, the Council has been in dialogue with lead developers / housebuilders – in some cases, since before the Regulation 19 draft Plan was published for consultation in June 2016 and in several cases, either planning applications have either been lodged or more formal, detailed pre-application discussions have commenced. The position at December 2017 on each of these sites is set out in the schedule appended to this Topic Paper at Appendix 1.
180. Of course, the Council recognises that objections have been made to these allocations and it will be for the Inspector to consider the merits of any of the points raised during the Examination. However, a detailed assessment of the representations highlights the lack of any specific evidence that would either indicate any allocated site could not come forward at all, or would be so significantly delayed as to fail to make a meaningful contribution to meeting the Plan’s housing target (see the Regulation 22c Statement – Examination document SD05).
181. Taken together, these factors have informed the Council’s expectations for start dates and build out rates for proposed new allocations in the Housing Trajectory.

Extant Windfalls and the Future Windfall allowance

182. The Local Plan assumes a proportion of the residual housing requirement will be met through extant windfall commitments (649 dwellings) and future windfalls ((100 units per annum in the years 2022-2030 (totalling 800) with 150 units in year 2021, bringing the overall estimated unidentified future windfall total to 950 units)).
183. With regards extant windfalls, those which were ‘*under construction*’ in April 2017 are included within the expected completions for 17/18 monitoring year. The totals for those ‘*Not Started*’ were reduced by 25% to account for non-delivery and phased over the monitoring years 18/19, 19/20 and 20/21, to reflect the length of planning permissions’ validity and likely spread of completions. The only exception to this is

the major windfall scheme at Tilden Gill in Tenterden for 100 dwellings that was allowed on appeal in April 2016 on the basis it would contribute to the Borough’s 5 year housing land supply.

184. The ‘non-delivery’ reduction of 25% is applied in order to reflect a reasonable level of take-up of windfall permissions. The data used for this calculation is taken from the amount of homes granted on windfall applications over the past 5 years (**1,250**) and the amount of homes actually delivered on windfall sites over the past 5 years (**1,026**) which results in a -82% conversion rate. The 25% reduction assumption is therefore considered to be a conservative approach to predicting windfall delivery⁴.
185. Regarding the future housing windfall allowance, paragraph 48 of the NPPF allows windfall sites to be taken into account in the five-year housing land supply, having consideration to the SHELAA, historic windfall delivery rates and expected future trends.
186. With regards to historic windfall delivery, completions data shows that there is a strong and consistent rate of delivering windfall housing development in the Borough. Completion data shows that a total of **2,122 residential windfall dwellings have been completed since 2005 – at an annual average of 177 units.**
187. In the future, it is considered highly likely that this strong and consistent rate of delivery from windfall sites will continue. In fact, it could be argued that this rate may be exceeded – firstly as a consequence of the Government’s extension of ‘permitted development’ rights for changes of use from non-residential to residential uses via the prior approval process; and secondly, through the application of the Council’s proposed policies for residential windfall schemes in the Submission Local Plan which can be expected to provide more scope for sustainable residential windfall schemes to be approved compared to the adopted policy base.
188. Based on the above, it is entirely reasonable to assume that residential windfall schemes will continue to play an important role in helping to meet the Borough’s housing requirement over the next 5 years and across the Plan period as a whole to 2030.
189. In fact, the Local Plan’s position to only rely on 100 dwellings per year from windfalls between 2022-2030 is considered to be very conservative, given that the annual completion rate is 177 dwellings per year – over a 12 year period. In addition, no additional windfall applications are assumed to come forward to those already extant as of 2017. Again, this is considered to be very conservative.

[Five Year Housing Land Supply](#)

190. The council recognises that being able to identify a deliverable 5 year housing land supply against the Local Plan target is a fundamental element that the Local Plan needs to address - both in its allocations strategy and its approach to residential windfall development.

⁴ Please note that these are not definitive conversion rates on an individual windfall application basis, but the overall annual permissions v. the overall annual completions for windfalls over the 5 monitoring years 2012/13 – 2016/17

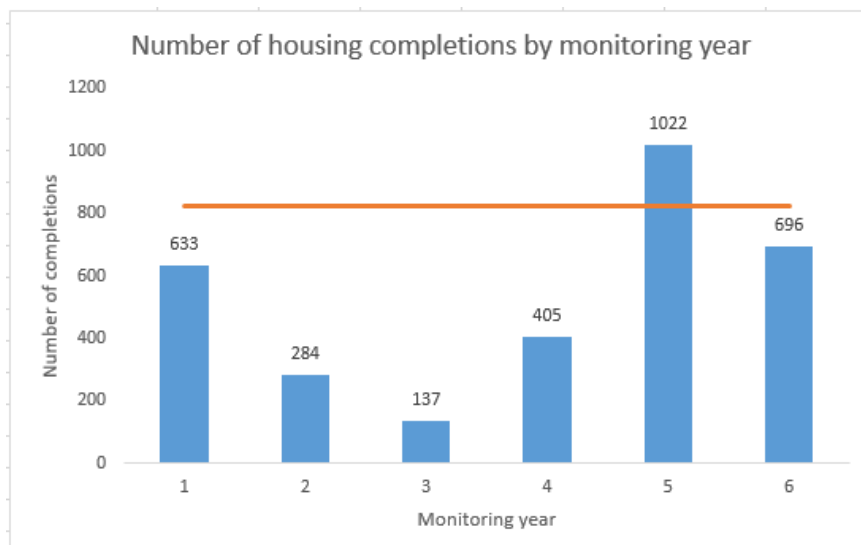
191. The SHELAA has played the primary role of identifying matters of deliverability on a site by site basis taking account of a wide range of factors including any on or off site infrastructure requirements, complexity of any on-site issues, the land ownership situation, accessibility and the need for comprehensive masterplanning on some of the larger sites.

The general approach

192. The housing trajectory which supports the Local Plan sets out what the Council expects will be the timing and rate of housing delivery across the existing committed sites allocated in the adopted Development Plan, and the proposed allocations set out in the Local Plan based on the assessment undertaken in the SHELAA and discussions with the relevant parties.
193. In reaching an assessment about the delivery of the Plan, the Council has been cognisant of the 5 year housing land supply requirement in paragraph 47 of the NPPF. This includes the need to deal with any shortfall in delivery against Objectively Assessed Housing needs since 2011 which are set out in the SHMA and the need to identify a ‘buffer’ of up to 20% to provide a realistic prospect of achieving the planned supply and ensure greater choice and competition in the market. This has also influenced the allocations strategy as described below.

Rectifying the housing shortfall

194. The table below shows housing completions since the beginning of the Plan period, set against the 825 dwellings per year housing figure identified in the SHMA.



195. As the table above demonstrates, housing completions in the Borough have not kept pace with the annual housing requirement stipulated through the SHMA work with the exception of 2015/6. At April 2017, the aggregated shortfall from 2011 was 1,773 dwellings.
196. In these circumstances, Planning Practice Guidance states that ‘Local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible. Where this cannot be met in the first 5 years, local planning authorities will need to work with neighbouring authorities under the ‘Duty to Cooperate’.

197. This approach is commonly referred to as the ‘Sedgefield’ method. However, it is worth noting that the PPG clearly states ‘*should aim*’ and ‘*where possible*’. Whilst it implies that the duty to cooperate mechanism is the next best alternative, this wording clearly does not prevent the application of alternative approaches to deal with identified housing shortfall, particularly ones which are NPPF compliant in that they recognise local circumstances (para 10) and promote sustainable development.

198. Indeed, recent case law has shown that Local Planning Authorities have sought to deal with housing shortfall in a number of ways, effectively seeking to spread the shortfall over the remainder of the Plan period, known as the ‘Liverpool method’. Examples exist in both planning appeal cases as well as Local Plans.

Applying the ‘buffer’

199. Paragraph 47 of the NPPF also sets out the requirement for an additional ‘buffer’ over and above the Plan’s housing requirements as part of the 5 year housing land supply calculations. The ‘buffer’ should be at least 5% but may be up to 20% “where there has been a record of persistent under-delivery of housing”.

200. In Ashford’s case, as described in section 1 above, delivery of housing has been adversely affected by a number of external factors and consequently, delivery rates on the ground have failed to keep pace with the annual OAN based requirement since 2011, with one exception in 2015/16.

201. Consequently, the label of ‘persistent under-delivery’ has been applied to the Borough and the additional 20% buffer on top of both the annualised housing target and the aggregated shortfall since 2011 currently forms part of the 5 year housing land supply calculation.

Meeting the target

202. Of the residual housing target of 12,943 dwellings needed to meet the Local Plan’s identified housing target to 2030, some 6,250 are expected to come forward by way of extant commitments (including at Chilmington Green) – nearly half the overall requirement. This context is important to the question of influencing housing land supply in the Borough through the Local Plan as several of these sites are only recently starting to deliver new housing completions or are now in a position to do so.

203. As a consequence, the Housing Trajectory shows that the Council expects delivery rates on these sites to increase over the next 5 years.

204. However, on their own, delivery on these sites will not be sufficient to deliver a 5 year housing land supply and rectify the existing shortfall and hence the deliverability of new allocations is key to providing enough housing land in the short term to address this issue.

205. It is recognised that, in general, smaller sites that require less in the way of new infrastructure to support them may be more likely to come forward more quickly than larger sites. The evidence on current market conditions set out above indicates that there is good reason to expect new development in both urban and rural areas to be

built out in a timely fashion.

206. Therefore, with the revised OAN arising from the 2017 update of the SHMA and the acknowledged shortfall against that target needing to be addressed, the Council's strategy has been to seek to allocate a raft of relatively small, highly deliverable sites across a range of locations in the Borough – thus maximising the choice and competition available to the market and encouraging a range of different housebuilders to come forward.
207. Seventeen new housing allocations promoted through the 'Main Changes' consultation in the summer of 2017 included extending the range of villages accommodating new residential allocations and identifying new opportunities on the main A20 road transport corridor between Ashford and Charing. The majority of these allocations are small and without any significant constraints and therefore expected to be delivered by 2022 and provide the additional short term boost to housing land supply in the Borough.
208. As a result, the Housing trajectory predicts that completions in the Borough will increase significantly from 2018 onwards as a combination of existing and proposed sites in Ashford alongside the suite of new rural allocations in the rest of the Borough are developed out. This provides a balanced and proportionate response to the need to create new short term housing supply opportunities within the wider ambit of the optimum strategic approach to new development in the Borough set out in the SA.

Calculation

209. The following table set out the 5 year housing supply calculation at December 2017. This is based on the annualised Local Plan requirement of 859 dwellings per annum that allows for the London outmigration pressure described in Section 2 above, the full rectifying of the shortfall to 2017 within 5 years (i.e Sedgefield method) and the application of the maximum 20% buffer.

5 year Local Plan requirement	4,295 (5 x 859 dpa)
Delivery shortfall since 2011 (to 2017)	1,773
Sub-total	6,068
(+ 20% buffer)	1,214
TOTAL	7,282 (1,456 dpa)
Expected supply (Housing Trajectory)	6,689

210. This position represents the maximum possible 5 year requirement and shows that, on the basis of the Plan's Housing Trajectory, a total of around 4.6 years of deliverable land supply can be demonstrated. However, the table also shows that the trajectory expects to not only deliver the Plan's annualised requirement but also

rectify the whole of the existing shortfall with over 600 dwellings to spare. Indeed, it is only the application of the additional 20% ‘buffer’ which takes the requirement beyond the expected supply.

211. It is relevant to note that the application of the NPPF paragraph 47 ‘buffer’ is not regarded as part of the overall housing requirement but should be applied to increase choice and competition in the market and improve the chances of fulfilling the Plan’s housing requirement on the ground. However, where OAN / Plan targets are already high, a 20% buffer alone can account for well over one year’s housing requirement, especially if applied to an existing shortfall in aggregate. In Ashford’s case, the 20% buffer equates to 1.41 years of housing land supply.
212. In these circumstances, there is a risk that a slavish adherence to the Sedgefield methodology for rectifying the shortfall will start to adversely affect the appropriate model for sustainable development in a Borough such as Ashford where the balance of sustainability weighs so heavily towards development in Ashford and its immediate surroundings if other short term deliverable sites there are not available.
213. In any event, the commencement of the 2018/19 monitoring year in April 2018 signals that, on the basis of the expected completions set out in the Housing Trajectory, the Council would be able to demonstrate a 5 year housing land supply even with a Sedgefield method for rectifying shortfall and a 20% buffer.

5 year Local Plan requirement	4,295 (5 x 859 dpa)
Delivery shortfall since 2011 (to 2017)	1,993
Sub-total	6,288
(+ 20% buffer)	1,258
TOTAL	7,546
Expected supply (Housing Trajectory)	7,618

214. Furthermore, the Housing Trajectory indicates that the annualised Plan target of 859 dwellings per annum will be achieved in 2018/19 and subsequent years thereafter until the mid-2020s. It is reasonable to assume that that the Council’s will then cease to be regarded as ‘persistent under-suppliers’ in the context of NPPF paragraph 47 by 2020 and the required ‘buffer’ for 5 year housing land supply calculations would reduce to 5%, giving the Council a housing land supply substantially in excess of 5 years.

Recent caselaw

215. The relevant tests for establishing housing land supply has recently been the subject of discussion in the Court of Appeal. The judgement in the case of *St.Modwen Developments Ltd v. Secretary of State for Communities & Local Government and*

East Riding of Yorkshire Council was published in October 2017 and has resolved the appropriate test for ‘deliverability’ in respect of determining 5 year housing land supply.

216. The *St Modwen* judgment makes clear that an assessment of 5 year housing land supply should be undertaken on what can realistically be delivered within that period (taking account of the Footnote 11 ‘tests’ in the NPPF) as opposed to what necessarily will be developed. To be ‘deliverable’ in this sense, a site has to be capable of being delivered within 5 years, but it does not need to be certain or probable that the site actually will be delivered within 5 years. Sites can be included in the 5 year supply if there is a realistic prospect of housing being delivered on them within the 5 year period. This judgment establishes that this different, lower threshold should be used for judging the 5 year supply position for the purposes of paragraph 47 of the NPPF.
217. The Housing Trajectory in the Local Plan shows what the Council expects to happen, which is a much more rigorous test. Therefore, the use of the Housing Trajectory to assess the 5 year housing land supply position is a very conservative approach to take. To date, the Council has not yet assessed 5 year housing land supply using the appropriate lower threshold and it is intended that this will be done in advance of the Examination hearings to inform the discussions there but the consequence should be that the Council’s 5 year housing land supply is more healthy than that indicated in the Housing Trajectory.

What are the alternatives and are they realistic and sustainable?

218. The below provides a summary of the main alternatives – and their implications – if it is considered that further short term housing delivery opportunities are required in order to achieve a more robust 5 year housing land supply in the Borough.
219. *More housing sites in the urban area:* One option would be to allocate more housing sites in and around the urban area of Ashford. In practice, this would likely only relate to smaller sites as several medium and larger-sized sites are already proposed in the Local Plan 2030 and therefore it is questionable whether further similar sites would actually deliver housing more quickly in five years.
220. With regards the suitability of these alternative sites as potential allocations, both the Strategic Housing and Employment Availability Assessment (SHELAA) and the Sustainability Appraisal (SA) have assessed their relative planning merits and concluded that they are either not suitable or not deliverable. They are therefore not reasonable alternatives in terms of providing a more sound approach to the one being advocated in the Local Plan.
221. *More housing sites in the rural area:* More likely, the only realistic alternative to increasing the short term supply of housing land in the Borough is to identify a greater level of housing to be allocated in the rural areas.
222. The SA is clear that the total number of houses being allocated in the Local Plan to the rural parts of the Borough is sustainable and underpins sound planning principles. However, the SA is also clear that higher levels of housing in the rural areas risks delivering development that is more unsustainable as a whole. It shows that the rural area is highly sensitive to disproportionate levels of new housing

growth, resulting in harmful impacts to its character, and leading to a higher level of development that is not well served by either employment opportunities or higher level services and which cannot realistically and viably be served by non-car modes of transport.

223. Based on this, and the clear sustainability advantages of Ashford and its ability to deliver, the Council do not believe that it is reasonable to focus additional levels of housing in the rural area in order to meet what, at worst, is considered to be a short term and temporary issue.

Summary

224. This section shows how the Plan's strategy has been influenced by the importance of assessing the potential deliverability of new housing and the need to enable a strong and consistent source of housing sites coming forward.
225. The strategy adopted in the Plan balances the over-riding need to plan sustainably for future housing growth with the requirements of national policy to create opportunities for short term housing delivery through the application of the 5 year housing land supply test. This is a difficult and delicate balance to strike in locations such as Ashford Borough where housing requirements are high and one location is demonstrably a much more sustainable location for new development than anywhere else.
226. The evidence now available to this examination shows that previously constrained or stalled sites in Ashford are now being brought forward in significant numbers and key infrastructure issues such as Junction 10a are set to be resolved. New allocations have been assessed for their deliverability through the SHELAA process and the views of the developers involved taken into account.
227. The above shows that there is no better alternative to the approach being advocated in the Local Plan 2030. Put simply, the harmful impact caused by further additional allocations in the rural areas should not be outweighed by the benefit of delivering what is a small proportion of the overall housing need earlier than the Plan envisages, which is likely achieved in the short to medium term anyway.
228. It should also be recognised that the Council will monitor housing completions on a yearly basis. If this data shows that completions are consistently falling below what is expected, then an early review of the Local Plan will be triggered, earlier than by 2025, as the current approach envisages. The Council fully endorse that it is far better to deal with such strategic issues in a plan-led way – something which the NPPF and the Government through the recently published 2017 Housing White Paper clearly endorse.
229. Based on this, the approach to delivery of housing set out in the Local Plan 2030 is considered sound and should be retained.

Section 5 – Approach to Affordable Housing

230. The Council's affordable housing policy seeks to balance the overall requirement for affordable housing with the potential for it be delivered.
231. The Council's Strategic Housing Market Assessment establishes that there is a significant need for affordable housing but critically it indicates that the full requirement is unlikely to be delivered on the ground, mainly due to the market's inability to deliver it. This conclusion is supported by the whole Plan viability testing that has been carried out in support of this local plan. The policy requirements have been set at a level which is considered deliverable in terms of viability, when tested alongside the other policies in the Local Plan.
232. The Council's viability evidence has comprehensively tested the potential viability of different amounts and tenure splits for affordable housing provision across different parts of the Borough. The viability evidence demonstrates significant variation in the viability of residential development across the Borough, which is mainly due to variations in sales values and hence the policy requirements have been set at different levels across the different value areas of the Borough in order to ensure development is viable and can be delivered.
233. It is acknowledged that to meet the whole affordable housing requirement indicated in the SHMA would require either much higher affordable proportions on development sites and that this would be unviable or there would have to be significantly higher amounts of development which would be unsustainable and undeliverable in practice.

Uplift to the Overall requirement to improve affordability

234. It is important to consider how housing market trends and the affordable housing need relate through to demographic projections in considering, as the Planning Practice Guidance recommends, whether there is a case for adjusting levels of housing provision in effect to improve affordability over the longer-term. However, the uplift should not increase OAN to a figure which the planning authority has little or no prospect of delivering in practice.
235. The issue of applying an uplift to the overall housing requirement to improve affordability is dealt with in the SHMA update of January 2017 and the comments in Section 2 of this Topic Paper.
236. The SHMA identified an affordable housing need for 368 dwellings per annum (2013-30). Based on current affordable housing policy this would require an overall delivery of 920-1,840 dwellings per annum in order to deliver the required level of affordable housing in full. The affordable need represents 41% of the equivalent housing requirement over the 2013-30 period.
237. The appropriate approach to addressing affordable housing within the OAN has been considered in the courts, in *Kings Lynn & West Norfolk BC v Elm Park Holdings [2015]*. This sets out that:
"The Framework makes clear these [affordable housing] needs should be addressed in determining the FOAN, but neither the Framework nor the PPG suggest that they have to be met in full when determining that FOAN. This is no doubt because in practice very

often the calculation of unmet affordable housing need will produce a figure which the planning authority has little or no prospect of delivering in practice. That is because the vast majority of delivery will occur as a proportion of open-market schemes and is therefore dependent for its delivery upon market housing being developed....

This consideration of an increase to help deliver the required number of affordable homes, rather than an instruction that the requirement be met in total, is consistent with the policy in paragraph 159 of the Framework requiring that the SHMA “addresses” these needs in determining the FOAN. They should have an important influence increasing the derived FOAN since they are significant factors in providing for housing needs within an area.

Insofar as Hickinbottom J in the case of Oadby and Wigston Borough Council v Secretary of State [2015] EWHC 1879 might be taken in paragraph 34(ii) of his judgment to be suggesting that in determining the FOAN, the total need for affordable housing must be met in full by its inclusion in the FOAN I would respectfully disagree. Such a suggestion is not warranted by the Framework or the PPG for the reasons which I have just set out.”

238. The Council and its consultants have given careful consideration to the affordable housing needs evidence. As the 2017 SHMA indicates, to meet the affordable housing need in full would require 2.4% pa growth in the housing stock, which is essentially above what any area nationally has consistently delivered recently.
239. As the analysis in Section 2 of this Paper set out, to deliver the overall Plan target figure of 16,120 dwellings requires an average 1.6% per annum growth in the housing stock to be sustained to 2030. This is considered to be the upper limit of what can be considered achievable.
240. The Inspector examining the neighbouring Canterbury City Council Local Plan found (June 2017), in similar circumstances, that:

“Following the approach set out in the PPG, the HNR identified a range of affordable housing needs of between 490 and 740 dpa. To deliver this based on the proportion of affordable housing (30%) sought in the Plan would require between 1,623 and 2,467 dpa, an amount far in excess of the overall needs identified in the HNR. There is no persuasive evidence that the housing market would support this scale of building throughout the plan period. I consider that simply increasing housing provision in the Plan to these levels would not be an effective way of addressing affordable needs.

241. Likewise, the Borough Council considers that there is no realistic prospect of the necessary scale of growth in housing stock in the Borough that would enable the identified affordable needs to be met in full being achievable across the Plan period.

Section 6 – Gypsy and Travellers Accommodation

242. This section covers the Local Plan's approach to the provision of Gypsy and Traveller sites within the Borough of Ashford. It is relevant to policies HOU16 and HOU17. In accordance with Government policy Planning Policy for Traveller Sites, these policies are based on a comprehensive evidence base that includes a Gypsy and Traveller Accommodation Assessment (GTAA).
243. In 2013 a GTAA was carried out by the University of Salford and this indicated a requirement for 57 Gypsy and Traveller pitches for the 15 year period 2013 - 2028. The 2013 GTAA indicated that there was no additional need for Travelling Showpeople. This GTAA was based upon the requirements and definitions set out in Circular 01/2006 'Planning for Gypsy & Traveller Caravan Sites' and 04/2007 'Planning for Travelling Showpeople'. Following the publication of the Planning Policy for Traveller Sites in 2015, and clarification on the definition to be used for Gypsies and Travellers, the Council re-assessed the 2013 GTAA data to establish a revised requirement for 48 pitches between 2013 - 2028. On a pro rata basis, as the Local Plan period runs to 2030, there is a revised requirement of 54 pitches.
244. As identified in the Local Plan to 2030, since the GTAA was completed 31 pitches have received full planning permission in the Borough which has left a remaining requirement of 23 pitches to be provided by 2030. During the call for sites in 2013/2014, few suitable site options were put forward and no further sites have been identified through the consultation processes. Therefore the Local Plan proposes to meet this requirement through a mix of site allocations and a windfall policy. These site allocations are detailed in Local Plan policies S43 and S44. Policy HOU16 'Traveller Accommodation' allows for suitable windfall sites to come forward to meet the need for Gypsy and Traveller pitches.
245. Ashford Borough Council are in the process of updating the Gypsy and Traveller evidence base, and Arc4 have been commissioned to conduct a revised GTAA which is ongoing at the time of writing this report. This will provide a more robust assessment that is not reliant upon adapted survey data gathered before the current Gypsy and Traveller definitions was established. Once the revised GTAA has been received, then the council will go out to consultation on issues and options for Gypsy and Traveller site provision. This issues and options consultation will include a call for sites and those that are put forward will be considered for inclusion in a Gypsy and Traveller development plan document. In accordance with the Local Development Scheme, this Development Plan Document will be published in 2018.

Appendix 1

Introduction

This Appendix details the current land supply position on all sites identified in the Housing Trajectory that accompanies the Submission Local Plan to 2030. It includes all committed sites in the Trajectory, Local Plan site allocations, Neighbourhood Plan allocations and main residential windfalls over the Plan period and the current 5-year housing land supply period.

Table 1

Objectively Assessed Need (SHMA, 2017)	15,675
Future-proofing (London out-migration)	442
The Housing Target (2011-2030)	16,120
Delivered since 2011 (to March 2017)	3,177
Residual Requirement (2017-2030)	12,943
Extant commitments (previously allocated sites with permission)	3,001
Extant windfalls*	749
Chilmington Green (2017-30)	2,500
Future Windfalls	950
Proposed Local Plan Allocations**	6,749
TOTAL	13,949
Buffer	1,006

**Those not started have been reduced by 25% to account for potential non-delivery*

***Including re-allocated sites without permission and assumed contribution from Neighbourhood Plans.*

PART 1 - Extant Commitments on allocated sites

This section outlines the position of extant commitments on sites still to build out, and / or are also previously/currently allocated sites from the existing Development Plan which have not been taken forward into to the Local Plan. The planning application reference(s) are included in the description.

**denotes where the developer / housebuilder has commented on the proposed start /build out in Appendix 2 to this Topic Paper.*

Town Centre Sites - Existing Allocations under construction/permitted (not re-allocated)

- i. **Former Powergen Site, Victoria Road (15/01671)*:** This brownfield site has permission for 660 dwellings (nearly all flatted development) in accordance with the details submitted in the hybrid planning application 15/01671/AS. This application was approved in November 2016, with the Council granting full permission for 400

dwellings and outline for the other 260. Subsequently, a variation of the outline element was approved (17/0018/AS) and reserved matters consents (17/0658/AS) and (17/1091/AS) have also been granted for 258 units in total. As work has already commenced on site, it is expected that 411 dwellings will be delivered in the first 5 years in line with the informal discussions held with developers.

Site Capacity: 660 Dwellings

Expected delivery for 5 year land supply purposes: 411 dwellings.

- ii. **Elwick Road Phase 2:** This brownfield site, which is Phase 2 of a development currently under construction for the cinema, hotel and restaurants, has a current application awaiting further evidence, for up to 200 dwellings. Due to the need for further assessment work, the site is not expected to come forward immediately and is expected the first 100 units will be complete by 2021/22.
Site Capacity: 200 dwellings.
Expected delivery for 5 year land supply purposes: 100 dwellings.
- iii. **Victoria Way East *:** This area was initially allocated for 450 dwellings within the Town Centre Area Action Plan (Policy TC11). It has not been re-allocated in the Local Plan as the area is within the ambit of policy SP5 for development in the Town Centre. The 215 dwellings in the Trajectory reflects an extant planning permission (16/1157/AS) for that number of units which is part of a major redevelopment scheme at the eastern end of Victoria Road. However, there are other extant planning permissions for flatted schemes of 28 and 31 dwellings respectively (16/0986/AS and 16/0981/AS) also within this area – the latter of which is now under construction. The area includes a large vacant and clear brownfield site within the Town Centre.

Site Capacity: 215 dwellings.
Expected delivery for 5 year land supply purposes: 0 dwellings.

Urban Area Sites - Existing Allocations under construction/permitted (not re-allocated)

- iv. **Finberry (Cheeseman's Green)*:** This site was a Local Plan 2000 allocation which has outline permission for 1100 homes (02/00278/AS) and has been under construction for some time by Crest Nicholson.

This site has been partially constrained by the need for additional motorway capacity at the nearby M20 Junction 10 and the planning permission is subject to a Grampian condition restricting occupation beyond 700 homes until additional junction capacity is available. The new Junction 10a on the M20 will provide this capacity.

The first phase (Stour Meadows) is complete and works are under construction on the Captains Wood Phase (14/01075) and the Green Oaks Phase (10/01277). With more than one housing product being delivered by Crest on this site, it delivered over 100 units last year with higher construction rates than previously seen and additional reserved matters applications have recently been approved (16/00124, 16/00125/, 15/01586) for a further 479 dwellings. The views of the developer are contained within Appendix 2.

Remaining Site Capacity: 802 dwellings

Expected delivery for 5 year land supply purposes: 600 dwellings

- v. **Repton Park (Former Barracks)*** :Originally allocated in the Local Plan 2000, at this edge of Ashford brownfield site, the first properties were completed in 2004, and the site has continued to build out since then. The initial dwellings here were constructed under a separate permission to the wider outline permission for the whole site which was granted permission in 2007 (02/01565/AS) alongside a detailed scheme for 124 units (05/00894/AS).

There are 394 dwellings remaining to be built, many of which are under construction such as 15/00315 and 15/00589 for a total of 163 dwellings and build rates were high in 2017. Reserved matters applications granted or received in 2017 include 15/01518, 06/01301, and 16/00808 totalling a further 219 dwellings.

Remaining Site Capacity: 394 dwellings

Expected delivery for 5 year land supply purposes: 394 dwellings

- vi. **Godinton Way (Policy TC8)**: In April 2017, this edge of Town Centre site for 83 homes was under construction with 31 complete, 15 under construction, with the remaining 37 about to commence. It is therefore expected the remaining 52 completions will come forward in the 2017/18 year. In addition, an application to convert and extend the frontage building which was a former retail unit with snooker hall above to 29 flats (17/0952/AS) has been submitted to the Council.

Remaining Site Capacity: 52 dwellings

Expected delivery for 5 year land supply purposes: 52 dwellings

- vii. **Blackwall Road (Policy U5)**: Development on the site for 34 dwellings (14/01456) is underway with 6 completed in April 2017 and the remaining 28 under construction expected to be complete by 2018.

Remaining Site Capacity: 28 dwellings

Expected delivery for 5 year land supply purposes: 28 dwellings

- viii. **Abbey Way (Policy U1)**: This site was not re-allocated within the Local Plan 2030, but remains available for development through planning permission 15/00260/AS which was granted in March 2017 for 23 homes.

Remaining Site Capacity: 23 dwellings

Expected delivery for 5 year land supply purposes: 23 dwellings

- ix. **Conningbrook Phase 1 (Policy U22)**: The application for the creation of a country park, alongside the delivery of 300 residential dwellings (12/01245/AS) was approved in October 2014. Ashford Borough Council is an active partner in promoting elements of the overall scheme. The development is now in the hands of Chartway and is expected to start early in 2018.

Site Capacity: 300 dwellings.

Expected delivery for 5 year land supply purposes: 225 dwellings.

Rural Area – Existing Allocations under construction/permitted (not re-allocated)

- x. **Aldington, Calleywell Lane (Policy ALD1):** A full application was approved in April 2015 for the erection of 41 dwellings (14/00681/AS). In April 2017, 29 dwellings had been completed, with the remaining 12 expected to be delivered in the monitoring year 2017/2018.
- Remaining Site Capacity: 12 dwellings.
Expected delivery for 5 year land supply purposes: 12 dwellings.
- xi. **Tenterden Southern Extension Phase A (Policy TENT1a)*:** A full application was approved in October 2015 for 250 dwellings (14/00757), in line with Policy TENT 1 of the adopted Tenterden and Rural Sites DPD (2010). The site was under construction in April 2017, with the first 80 completions expected within the 2017/18 monitoring year in line with developer ambitions and with two housebuilders involved the build rate previously assumed on this site has been revised and is now expected to occur in mid-2020.
- Remaining Site Capacity: 250 dwellings.
Expected delivery for 5 year land supply purposes: 250 dwellings.
- xii. **Wye, Land at Kelston (Policy WYE1):** This previous TRSDPD allocation is currently under construction for the erection of 27 dwellings (14/00362/AS). In April 2017, 10 were complete and 17 under construction which are expected to be complete in the 2017/18 monitoring period.
- Remaining Site Capacity: 17 dwellings.
Expected delivery for 5 year land supply purposes: 17 dwellings.
- xiii. **Rolvenden Football Ground (Policy ROLV1)*:** Outline planning permission (13/00755/AS) for 40 residential dwellings was granted in January 2015 in line with Policy ROLV1 of the Tenterden and Rural Sites DPD. Approval of reserved matters application 15/01555/AS was granted in January 2017. There are no significant constraints to delivery.

Site Capacity: 40 dwellings.

Expected delivery for 5 year land supply purposes: 40 dwellings

PART 2 – Chilmington Green *

- xiv. Following the adoption of the Chilmington Green AAP and detailed masterplanning and design, this major urban extension on the edge of Ashford of up to 5,750 homes and 1,000 jobs, has commenced. Granting of the outline permission 12/00400/AS was given at the beginning of the 2017.

Most pre-commencement conditions have been discharged. Works on Access A and D (detailed development which are not controlled by pre-commencement conditions)

are close to completion. The Council has received and approved two full applications for road infrastructure. It is expected that the first occupations will occur at the start of 2019 (see spreadsheet in Appendix 2). The expectation is that the first 50 dwellings will be completed in the 2018/19 monitoring year in line with developer intentions, with the number of completions gradually increasing year-on-year with the multiple house builders on site. The developers' intentions contained within the spreadsheet in Appendix 2 to this Topic Paper for Phase 1 of the Chilmington development are ambitious and the Council has not assumed these rates of development will be achieved in the Local Plan Housing Trajectory.

Plan Period Site Capacity: 2500 Dwellings

Expected delivery for 5 year land supply purposes: 600 dwellings.

PART 3 - Proposed Allocations

This section outlines the position the proposed Local Plan allocations (some of which are also previously/currently allocated sites from the existing development plan which have been taken forward into to the Local Plan).

Town Centre Sites – Re-allocated

- xv. **Gasworks Lane (Policy TC14/S10):** It is expected that 150 dwellings will come forward at this site within the Plan period, (reduced from original allocation for 300 units within the Town Centre Area Action Plan). The gasworks has now been de-commissioned. Given the current activity in town centre flatted schemes, there is a good prospect that this site will come forward for redevelopment within the Plan period, although delivery is not expected until towards the latter stages with the first 75 units expected to come forward in 2028/29.

Site Capacity: 150 dwellings.

Expected delivery for 5 year land supply purposes: 0 dwellings.

- xvi. **Commercial Quarter (Policy TC9/S1):** Planning permission for 159 units at the Kent Wool Growers business in Tannery Lane was granted in 2015 (13/01713/AS). However, the business has recently been placed into administration and thus the future redevelopment of this site is now more in question than was previously the case. The Commercial Quarter policy (S1) retains a supportive approach to residential apartments playing a secondary role to the wider commercial objectives of this location. Therefore, it is still expected that residential development here will come forward but given the need for a new party to acquire the site, the deliverability of these units in the short term is unlikely and the site is expected to come forward from 2022/23.

Site Capacity: 159 dwellings.

Expected delivery for 5 year land supply purposes: 0 dwellings.

Urban Area Sites – Re-allocated

- xvii. **Lower Queen's Road (Policy U4/S8):** This site is a brownfield site on the edge of the Town centre, allocated in the Urban Sites DPD but yet to come forward. It is reallocated within the Local Plan for 40 dwellings and was phased in the middle of

the Plan period due to an existing employment use on site. It has however, recently become vacant with the closure of the Invicta Press works, and therefore could come forward much earlier than originally anticipated.

Site Capacity: 40 dwellings.

Expected delivery for 5 year land supply purposes: 0 dwellings.

- xviii. **Former Ashford South Primary School (Policy U6a and S13):** Allocated for 110 dwellings in the Local Plan, this brownfield urban site is dependent on the delivery of the adjoining site S12 before it can be developed as the main means of accessing the development will be via the adjoining site. Currently, the buildings are being utilised as a temporary off-site form of entry for the first Chilmington Green primary school whilst that school is constructed at the Chilmington Green site. The opening of the new school there should mean this site can be vacated by Summer 2019. Thus it is expected that this will come forward after the completion of S12.

Site Capacity: 110 dwellings.

Expected delivery for 5 year land supply purposes: 50 dwellings.

- xix. **Former K College, Jemmett Road (Policy U6b and S12):** Allocated for 160 dwellings in the Local Plan, this brownfield urban site of the former K College, which has now relocated to the Town Centre and is now known as Ashford College, has recently been granted Reserved Matters consent (17/00354/AS) to Chartway and is therefore expected to be delivered within the first five years of the plan period.

Site Capacity: 160 dwellings.

Expected delivery for 5 year land supply purposes: 160 dwellings.

- xx. **Leacon Road (Policy U7 and S11):** The Leacon Road site that forms the adopted allocation (U7) in the DPD is re-allocated for residential development as Policy S11. This is a brownfield site in a highly accessible and sustainable part of the urban area. There are no substantive buildings on the site and the land had a temporary planning permission for use as for overnight HGV parking facility via planning permission ref: 16/0080/AS which has now expired so it is expected that the 100 dwellings will be completed within the first 5 years of the plan period.

Site Capacity: 100 dwellings.

Expected delivery for 5 year land supply purposes: 100 dwellings.

- xxi. **Willesborough Lees (Policy U14 and S17):** This site is allocated as site U14 in the Urban Sites & Infrastructure DPD with an indicative capacity of 200 dwellings and is taken forward into the Local Plan as S17. The allocation encompasses two land ownerships, one of which is land at Highmead House which fronts the A20 which had a resolution to grant planning permission for 28 houses in March 2017. The balance of the land has also now recently been granted full planning permission subject to a S106 Agreement for 192 dwellings to Bellway Homes in September 2017. An extant outline planning permission for the same quantity of housing (16/1512/AS) was also granted on appeal in August 2017.

Given the permissions now granted on this site, the overall capacity of the allocated site is likely to be around 220 units which is expected to be delivered on this site at an average rate of around 40-60 per year starting from 2018/19.

Site Capacity: 220 dwellings.

Expected delivery for 5 year land supply purposes: 220 dwellings.

- xxii. **Former Klondyke and Newtown Works Phase 2 (Policies S6 and S7):** Following completion of 108 dwellings as Phase 1 at Newtown Works, the remainder of this large brownfield site has now been allocated for at least 350 dwellings in the Local Plan. The site is in the ownership of Kier Developments in conjunction with the adjoining Klondyke Works site. The site has previously had an outline permission for over 900 units which has now expired and the Council is in discussions with both Kier and other interested parties with the aim of bringing the site forward. An application for Housing Investment Fund support of £10m has been made which, if supported, will assist in bringing forward the regeneration of the site including at least 350 units. A decision is expected in early 2018. There is a very large Listed railway shed on the Newtown Works site which is a matter that will need to be satisfactorily resolved in any redevelopment and hence early delivery of new development here is not expected although could be facilitated if the funding bid is successful. Full redevelopment of the Newtown site is also dependent on the delivery of the new M20 Junction 10a. It is expected that the first 50 dwellings at this site will be delivered in the sixth year of the Plan trajectory.

Site Capacity: 350 dwellings.

Expected delivery for 5 year land supply purposes: 0 dwellings.

New Urban Site allocations

- xxiii. **Land NE of Willesborough Rd, Kennington (Policy S2):** This site is allocated for 700 dwellings in the Local Plan. The allocation lies in two ownerships and initial masterplanning proposals have been submitted informally to the Council for discussion. The principal developer involved is Quinn Estates. The site has a principal access point from the A2070 Willesborough Road. Other than the need for the capacity created by M20 Junction 10a, which is reflected in the expected timing of the development, there are no strategic infrastructure constraints that would prevent this site being brought forward within the next 5 years. However, a limited amount of development may also be accessible from the A28 Canterbury Road to the Orchard Farm part of the allocation. To this end, an outline application for 25 units has already been submitted to the Council (ref: 17/0944/AS).

Given these circumstances, it is expected that 150 completions on this site will come forward within the 5 year land supply period with the rest to follow thereafter.

Site Capacity: 700 dwellings.

Expected delivery for 5 year land supply purposes: 150 dwellings.

- xxiv. **Land at Court Lodge (Policy S3) *:** The site is allocated for 950 dwellings. It is being promoted by Hallam Land Management and a number of meetings with Council officers have taken place over recent months around a draft masterplan for the site which will accompany a planning application. A draft transport assessment

has been prepared and discussed with KCC and Highways England. There are no ownership constraints to the site coming forward and the site can be directly accessed from roads to the west and the north.

This is the largest of the new site allocations in the Submission Local Plan and as such, it is acknowledged that the lead-in time for development to commence may be commensurately relatively longer than for other allocations but there are no strategic infrastructure constraints (save for Junction 10a, which is reflected in the expected timing of the scheme), that would prevent development coming forward in principle here and given the work already invested by the developer in working up a masterplan for the site, it is entirely reasonable to expect the initial phases of the site to be under way and delivering new housing within 5 years. Based on the experience of other similar sized developments at Repton Park and Finberry (both of which also include a new primary school), the rate of delivery here is predicted to be in line with that on those sites.

Site Capacity: 950 dwellings.

Expected delivery for 5 year land supply purposes: 140 dwellings.

- xxv. **Land North of Steeds Lane and Magpie Hall Road (Policy S4) ***: The allocation for S4 proposes 400 dwellings. There is an extant outline planning application for the land covered by this and the Land south of Pound Lane (S5) allocations for a total of 550 homes (15/0856/AS).

The site is controlled by a consortium of Pentland Homes and Jarvis Homes, both well-known local housebuilding companies. Considerable work has already been undertaken by the developers to support their planning application and agreement has been reached for their application has recently been amended to bring it into line with the proposed allocations in the Submission Local Plan.

Given the circumstances described above, there is good reason to expect the developers will commence development here by 2020, with two housebuilders on the site, delivery of around 110 dwellings within the 5 year period can be expected. This is in line with the views expressed on their behalf in the correspondence in Appendix 2.

Site Capacity: 400 dwellings.

Expected delivery for 5 year land supply purposes: 110 dwellings.

- xxvi. **Land south of Pound Lane, Kingsnorth (Policy S5) ***: This site forms part of the live planning application from Pentland Homes and Jarvis Homes referenced above under Policy S4.

This site is allocated for 150 dwellings and is more self-contained than the adjoining allocations at sites S3 and S4 and although the site needs to be planned with the emerging proposals for those sites in mind, it raises fewer strategic delivery issues and as such, would be expected to come forward as the first site of the three. It is therefore reasonable to anticipate that development could commence here a little sooner than sites S3 and S4.

With two housebuilders present, delivery of 50 units in total per year commencing in 2019/20 is a conservative estimate of delivery, which will deliver the full 150 dwellings within the 5 year supply period.

Site Capacity: 150 dwellings.

Expected delivery for 5 year land supply purposes: 150 dwellings.

- xxvii. **Kennard Way, Henwood (Policy S9):** This brownfield site on the edge of town centre is allocated for 25 dwellings. It is expected to be delivered by year 2019/20 as there are no constraints to delivery.

Site Capacity: 25 dwellings.

Expected delivery for 5 year land supply purposes: 25 dwellings.

- xxviii. **Park Farm South East (Policy S14) *:** This site is allocated for 325 dwellings in Local Plan. The site is promoted by Taylor Wimpey and Persimmon Homes, who have been responsible for the adjoining Bridgefield development which is recently completed. In May 2017, the Council determined an EIA Screening Opinion for up to 400 dwellings at this site.

Save for the potential constraint of Junction 10a, which is taken into account in the expected timing of development here, there is no reason why this site could not commence well within the next 5 years. The site has direct access from the north and south and represents a natural extension to the Bridgefield development. The housebuilders here have indicated a desire to develop the site in the short term as they have been active on the land to the north. With potentially two housebuilders on the site, a greater annual rate of housing delivery could reasonably be expected with 210 dwellings within the 5 year period justified.

Site Capacity: 325 dwellings.

Expected delivery for 5 year land supply purposes: 210 dwellings.

- xxix. **Finberry North West (Policy S15):** This allocation represents a re-designation of land granted permission for B1 employment contained within the outline grant of planning permission for the Finberry development (see site iv above). The allocation is for 300 dwellings.

The Council expects that development of this phase will follow the build-out of the extant permission for 1100 houses by Crest Nicholson and hence it is expected to come forward in the latter years of the Plan period from the mid-2020s.

Site Capacity: 300 dwellings.

Expected delivery for 5 year land supply purposes: 0 dwellings.

- xxx. **Waterbrook (Policy S16) *:** Waterbrook is also an existing allocation in the Core Strategy 2008 as part of a wider mixed use urban extension area, but is allocated in its own right as part of the Submission Local Plan for a mix of commercial and residential uses and an extension to the existing lorry parking facility. The allocation proposes 350 dwellings at the site.

The site has previously had outline planning permission for a range of employment uses and it already accommodates an overnight lorry parking facility, aggregates depot and railhead and more recently a VOSA facility. Drainage and highway works have been implemented and the site is capable of delivering new development now. The site owner (GSE) is in active discussions with Council officers over a masterplan for the remaining parts of the site (as required by the draft policy).

It is accepted that the delivery of the proposed Junction 10a scheme is a timing constraint to new residential development coming forward on this site and so the phasing assumptions for housing here have been tailored accordingly. As such, it is reasonable to assume development here would commence in 2019/20 with development of about 120 dwellings realistically achievable by early 2022.

Site Capacity: 350 dwellings.

Expected delivery for 5 year land supply purposes: 120 dwellings.

- xxxi. **Conningbrook Residential Phase 2 (Policy S19):** Following development of the Phase 1 of this site which is detailed within the extant commitments section (see site ix above), Phase 2 is allocated in the Local Plan for 170 homes and is expected to commence in the later years of the Plan following, with expected first completions in 2023/24.

Site Capacity: 170 dwellings.

Expected delivery for 5 year land supply purposes: 0 dwellings.

- xxxii. **Eureka Park (Policy S20) *:** This site is allocated for 375 dwellings and 20ha of employment land in the Submission Local Plan. The site is partially developed for principally B1 office uses resulting from its previous Plan allocations and planning permissions.

The proposed introduction of residential development to the site represents a change of approach from previous allocations and existing permissions but one that has the full support of the developer (Quadrant Estates). The site already benefits from infrastructure and access delivered to serve the office developments there and so there is no strategic reason that would delay new development coming forward. It is expected that completions will commence in 2019/20 and deliver 210 within the first 5 years.

Site Capacity: 375 dwellings.

Expected delivery for 5 year land supply purposes: 210 dwellings.

- xxxiii. **Land South of Brockman's Lane, Bridgefield (Policy S45):** This site is allocated for 100 dwellings and lies immediately south of and adjoining the proposed allocation south of Bridgefield (S14) referred to above. Policy S45 indicates development should take place here after completion of the S14 site and therefore is expected to be delivered in 2022/23.

Site Capacity: 100 dwellings.

Expected delivery for 5 year land supply purposes: 0 dwellings.

- xxxiv. **Chart Road, Ashford (Policy S46):** This site is allocated for 25 dwellings and is within urban Ashford area. The site is vacant land, which was originally retained as a possible site for a medical facility, which the NHS has now confirmed is not required. It is relatively unconstrained, has an existing access to the Chart Road and is therefore regarded as deliverable within the next five years.

Site Capacity: 25 dwellings.

Expected delivery for 5 year land supply purposes: 25 dwellings.

A20 Corridor Sites - New Allocations

The Local Plan – following an assessment of the main road corridors which enter Ashford and the ability to maximise the use of the public transport services to Ashford this presents - identifies a few appropriately scaled housing sites near to Ashford along the A20. These sites have direct access to the main local road network and are available either now or within the next 5 years. There are no strategic infrastructure constraints to their development.

As part of the evolution of the Plan, the Council has confirmation from the landowners that these sites can come forward in the early years of the plan.

- xxxv. **Land East of Hothfield Mill (Policy S47):** This site has been allocated for 75 dwellings on a greenfield site between Hothfield Mill and Westwell Lane. It has the potential for direct access from the A20 and is expected to come forward within the next five years.

Site Capacity: 75 dwellings.

Expected delivery for 5 year land supply purposes: 75 dwellings.

- xxxvi. **Rear of Holiday Inn, Hothfield (Policy S48) *:** Site S48 which lies on land currently occupied by Oakover Nurseries – a major horticultural business in the area, is allocated for 150 dwellings. The Council has held discussions with the Nursery owners and they have confirmed their agreement to the release of the site as they own other land in the vicinity. An agreement is in place with a developer (Dean Lewis Estates Ltd) who will promote and masterplan this site and the nearby site S49. Correspondence from DLE Ltd (see Appendix 2) indicates that the sites will be brought forward sequentially with S49 proceeding first whilst the current operations at S48 are relocated to other premises owned by Oakover Nurseries nearby. Some of the S48 allocation is in a separate private ownership and not in horticultural use and is potentially available for development earlier. The Local Plan Housing Trajectory reflects the position of DLE Ltd and therefore it is expected that development at S48 would commence towards the end of the 5 year supply period.

Site Capacity: 150 dwellings.

Expected delivery for 5 year land supply purposes: 50 dwellings.

- xxxvii. **Land north of Tutt Hill (Policy S49) *:** This site has been allocated for 75 dwellings and is also within the ownership of Oakover Nurseries. Unlike the S48 site, DLE Ltd have confirmed there are no operational constraints to the site coming forward for development now and access to the site can be achieved directly from the A20. It is expected to come forward and be developed out within the next five years.

Site Capacity: 75 dwellings.

Expected delivery for 5 year land supply purposes: 75 dwellings.

Rural Area Sites – Re-allocated

xxxviii.

Land South of Arthur Baker Playing Fields, Charing (Policy CHAR1 and S29):

This site was allocated within the Tenterden and Rural Sites DPD for 35 homes, and as the policy remains extant, it has been re-allocated within the Local Plan. An indicative scheme for a 42 unit elderly care scheme has a resolution to grant planning permission subject to a S106 Agreement in June 2017 (14/1486/AS).

Discussions on proposals on the balance of the site are ongoing. Once resolved, it is expected that the site will come forward promptly and an overall greater number of units than the allocation will be delivered but until that stage, the Housing Trajectory is based on the allocation's indicative capacity only.

Site Capacity: 35 dwellings.

Expected delivery for 5 year land supply purposes: 35 dwellings.

xxxix.

Land at Parker Farm, Hamstreet (Policy HAM2 and S32): This site was allocated in the Tenterden and Rural Sites DPD for 20 homes, to be phased from 2017. Due to flood mapping alterations, the Local Plan has revised the allocation capacity to 10 dwellings and this is reflected in policy S32. Given the site is in an adopted Development Plan, it is expected that the site will be delivered early in the Plan period.

Site Capacity: 10 dwellings.

Expected delivery for 5 year land supply purposes: 10 dwellings.

xl.

Tenterden Southern Extension Phase B (Policy TENT1 and S24): The TENT1 Phase A is now well underway (see extant commitments section above) and the Local Plan has revised the TENT1b policy to reflect the resulting masterplanned densities on the TENT1a site to 225 dwellings in site policy S24 (an increase of 50 over the adopted site policy).

There is no reason why masterplanning and planning application phases may not be completed on S24 in advance of the TENT1a scheme being completed as the restriction on Phase B development is on 'occupation' only and it is considered likely that developers would seek to move seamlessly from occupations at one site to the other if at all possible.

Given the accelerated completion rate at TENT1a, there is an expectation that at least 70 dwellings can be completed on the S24 site by March 2022 but there is potential for a greater number of completions to be achieved by this time depending on the overlap between the end of construction at TENT1a and the start of construction at S24.

Site Capacity: 225 dwellings.

Expected delivery for 5 year land supply purposes: 70 dwellings.

- xli. **Land on Front Road, Woodchurch (Policy WOOD1 and S40):** This site was allocated in the Tenterden and Rural Sites DPD for 10 homes, but following two unsuccessful applications and appeals where the design of the proposals were considered to be too cramped for the site, it is now re-allocated within the Local Plan for the reduced amount of 8 dwellings. Delivery rates in the rural area suggest this site will come forward over the five year period. There are no significant constraints to delivery.

Site Capacity: 8 dwellings.

Expected delivery for 5 year land supply purposes: 8 dwellings.

- xlii. **Land at Luckley Field, Wye (Policy WYE2):** A full application (14/00195/AS) was approved in November 2011 for the erection of 25 dwellings, which is slightly above the indicative capacity of 20 that was set out in the TRSDPD. It is anticipated that this site will be completed in the 2018/19 monitoring year.

Site Capacity: 25 dwellings.

Expected delivery for 5 year land supply purposes: 25 dwellings.

Rural Area - New Site Allocations

- xliii. **Aldington, Land North of Church View (Policy S51):** This site is allocated for 10 dwellings, all of which are expected to come forward within the first five years. It is a small rural greenfield site with no significant constraints to delivery. This site adjoins Policy S52.

Site Capacity: 10 dwellings.

Expected delivery for 5 year land supply purposes: 10 dwellings.

- xliv. **Aldington, Land South of Goldwell Court (Policy S52):** This site is allocated for 20 dwellings and adjoins Policy S51. It is anticipated that these will come forward within the first five years as it is a small rural greenfield site and there are no significant constraints to delivery.

Site Capacity: 20 dwellings.

Expected delivery for 5 year land supply purposes: 20 dwellings.

- xlvi. **Appledore, The Street (Policy S26):** The site is proposed for 20 dwellings in the Submission Local Plan. The site is supported by the Parish Council. It is a small rural greenfield site with no significant constraints to delivery.

Site Capacity: 20 dwellings.

Expected delivery for 5 year land supply purposes: 20 dwellings.

- xlvii. **Biddenden, North Street (Policy S27):** This site is allocated for 45 dwellings in the Local Plan. A hybrid application comprising a full application for the erection of 45 dwellings, of which 35% are affordable, access and associated works, and an outline application for the erection of a B1 office building was approved at planning committee in September 2017, subject to a S106 Agreement.

Site Capacity: 45 dwellings.

Expected delivery for 5 year land supply purposes: 45 dwellings.

- xlvi. **Brook, Nat's Lane (Policy S53):** This site is allocated for 10 dwellings, all of which are expected to come forward within the first five years. It is a small rural greenfield site with no significant constraints to delivery.

Site Capacity: 10 dwellings.

Expected delivery for 5 year land supply purposes: 10 dwellings.

- xlvi. **Challock, Land at Clockhouse (Policy S54):** This site is allocated for 15 dwellings, all of which are expected to come forward within the first five years. It is a small rural greenfield site with no significant constraints to delivery.

Site Capacity: 15 dwellings.

Expected delivery for 5 year land supply purposes: 15 dwellings.

- xlix. **Charing, Northdown Service Station (Policy S28):** The site is proposed for 20 dwellings in the Submission Local Plan. The site is partially brownfield (the frontage which is in operation as a petrol filling station and garage workshop) and partially greenfield (the larger balance of the site to the rear of the PFS and workshop). A current planning application (ref:17/0865/AS) proposes the conversion of the PFS to contain 3 flats. The workshop operation is proposed to remain in situ and can be accommodated alongside the proposed residential development. The site also adjoins a new, much larger allocation at S55 (see below).

Site Capacity: 20 dwellings.

Expected delivery for 5 year land supply purposes: 20 dwellings.

- i. **Charing, Land adjacent to Poppyfields (Policy S55):** This site is allocated for 180 dwellings in the Submission Local Plan. There are two land ownerships contained within the allocation but both are subject to agreements with developers to promote them. There are alternative options for site access from the A20. The evidence of build out rates from the adjoining Poppyfields development suggests that housing in this location will be come forward quickly and be constructed rapidly. However, the relative scale of the site and the need to ensure it is properly planned and laid out, the Council has predicted that it may take until early 2020 to realise first completions but that it is still realistic to anticipate a full build out by early 2022

Site Capacity: 180 dwellings.

Expected delivery for 5 year land supply purposes: 180 dwellings.

- ii. **Chilham, Branch Road (Policy S56):** This site is allocated for 10 dwellings. Delivery rates in the rural area suggest this small site will come forward in a timely way. There are no significant constraints to delivery.

Site Capacity: 10 dwellings.

Expected delivery for 5 year land supply purposes: 10 dwellings.

- iii. **Egerton, Land on New Road (Policy S30):** This site is allocated for 15 dwellings, all of which are expected to come forward within the first five years. It is a small rural greenfield site with no significant constraints to delivery.

Site Capacity: 15 dwellings.

Expected delivery for 5 year land supply purposes: 15 dwellings.

- liii. **Hamstreet, Land North of St.Mary's Close (Policy S31):** The site is proposed for 80 dwellings in the Submission Local Plan. An EIA Screening Opinion for development here was determined as not requiring EIA in November 2017 for up to 80 dwellings with an 80-bed care home.

The site represents a suitable and available development opportunity for new housing which has no significant infrastructure or land ownership constraints that might affect its deliverability in the short term. As such, it is entirely justifiable to consider that the proposed housing here will be delivered in the next five years.

It should also be noted that Barton Willmore on behalf of Hallam Land Management (the promoters of the site) consider that the site is deliverable, within five years and have commenced local consultation on the designs.

Site Capacity: 80 dwellings.

Expected delivery for 5 year land supply purposes: 80 dwellings.

- liv. **Hamstreet, Warehorne Road (Policy S57):** This site is allocated for 50 dwellings. Delivery rates in the rural area suggest this site will come forward in a timely way and the developer (Crabtree & Crabtree (Hamstreet)) have commenced local consultation on the designs.

Site Capacity: 50 dwellings.

Expected delivery for 5 year land supply purposes: 50 dwellings.

- lv. **High Halden, Land at Hope House (Policy S33):** This site is allocated for 35 dwellings. Delivery rates in the rural area suggest this site will come forward in a timely way. An undetermined planning application for 28 dwellings on the site is currently under consideration by the Council. There are no significant constraints to delivery.

Site Capacity: 35 dwellings.

Expected delivery for 5 year land supply purposes: 35 dwellings.

- lvi. **High Halden A28, Stevenson Brothers (Policy S58):** This site is allocated for 50 dwellings. Delivery rates in the rural area suggest this site will come forward in a timely way. The site is used by the Stevenson Brothers for storage but they have confirmed there is adequate capacity at their nearby workshop in Bethersden to enable them to vacate the site. Other than this minor relocation issue, there are no constraints to delivery.

Site Capacity: 50 dwellings.

Expected delivery for 5 year land supply purposes: 50 dwellings.

- lvii. **Hothfield - Land East of Coach Drive (Policy S34):** This site is proposed for 40 dwellings in the Submission Local Plan. It is located on the north-eastern edge of the existing village with ready access from the existing road network.

The site is being promoted by a local developer (Crabtree & Crabtree (Hothfield) Ltd). An EIA Screening Opinion application was determined as not requiring EIA for up to 60 dwellings on the site in October 2017. There are no significant constraints to delivery.

Site Capacity: 40 dwellings.

Expected delivery for 5 year land supply purposes: 40 dwellings.

- lviii. **Mersham, Land at Rectory Close (Policy S59):** This site is allocated for 15 dwellings. Delivery rates in the rural area suggest this site will come forward in a timely way. There are no significant constraints to delivery.

Site Capacity: 15 dwellings.

Expected delivery for 5 year land supply purposes: 15 dwellings.

- lix. **Mersham - Land adjacent to Village Hall (Policy S35):** This site is allocated for 10 dwellings. Delivery rates in the rural area suggest this site will come forward in a timely way. There are no significant constraints to delivery.

Site Capacity: 10 dwellings.

Expected delivery for 5 year land supply purposes: 10 dwellings.

- lx. **Shadoxhurst - Rear of Kings Head PH (Policy S36):** The site is proposed for 25 dwellings in the Submission Local Plan. However, planning permission was granted for a scheme of 19 dwellings on the site in November 2017.

Site Capacity: 25 dwellings.

Expected delivery for 5 year land supply purposes: 25 dwellings.

- lxi. **Smarden – Land adjacent to Village Hall (Policy S37):** The site is allocated within the Local Plan for 25 dwellings, however following a recent allowed appeal (June 2017) for a scheme for 50 dwellings (APP/E2205/W/16/3159895), it is expected that the 50 dwellings will be delivered by 2020.

Site Capacity: 50 dwellings.

Expected delivery for 5 year land supply purposes: 50 dwellings.

- lxii. **Smeeth – Land South of Church Road (Policy S38) *:** This site is allocated for 35 dwellings. Delivery rates in the rural area suggest this site will come forward in a timely way. There are no significant constraints to delivery.

Site Capacity: 35 dwellings.

Expected delivery for 5 year land supply purposes: 35 dwellings.

- lxiii. **Tenterden (St Michaels) (in the parish of High Halden), Land at Pope House Farm:** This site, with direct access to the A28, is allocated for 50 dwellings on the edge of St.Michaels part of the town of Tenterden. Delivery rates in the rural area suggest this site will come forward in a timely way. There are no significant constraints to delivery.

Site Capacity: 50 dwellings.

Expected delivery for 5 year land supply purposes: 50 dwellings.

- lxiv. **Wittersham, Land between Lloyds Green and Jubilee Fields (Policy S61):** This site, located at the northern edge of the village of Wittersham, is allocated for 40 dwellings. Access to the site from Lloyds Green in the west and potentially from the Jubilee Field estate to the east can be provided. Delivery rates in the rural area suggest this site will come forward in a timely way. There are no significant constraints to delivery.

Site Capacity: 40 dwellings

Expected delivery for 5 year land supply purposes: 40 dwellings.

- lxv. **Woodchurch, Land at Appledore Road (Policy S62):** This site, located adjoining the village of Woodchurch is allocated for 30 dwellings. Delivery rates in the rural area suggest this site will come forward in a timely way. There are no significant constraints to delivery.

Site Capacity: 30 dwellings

Expected delivery for 5 year land supply purposes: 30 dwellings.

Part 4 - Neighbourhood Plan Allocated Sites

- lxvi. **Wye NP:** The Wye NP was made in 2016 and was the first such Plan in the Borough. Policy WNP9 of the Plan sets out indicative quantum of housing development in the parish up to 2030, with an aggregate figure of approximately 150 dwellings. Of these, around 50 relate to the two Tenterden & Rural Sites DPD sites at WYE1 and WYE2 (sites xii and xliii above) and a further 50 relate to predicted or extant windfall / change of use proposals expected to come forward.

In addition, WNP9 identified approximately 50 dwellings at the former WYE3 allocation (former Imperial College campus) in the village. This is the main allocation in the NP and a separate, detailed policy (WNP11) sets out the Plan's requirements for development on the site.

A masterplanning exercise involving the developers of the former college (Telereal Trillium) and the Parish Council has been on-going during 2017 and consultation on a draft masterplan is expected to commence shortly. In parallel, TT has obtained an approval under permitted development rights for the conversion of the disused offices on the former ADAS site within the WYE3 / WNP11 policy area for 52 units but this remains unimplemented at present (see site lxxi below).

The outcome of the masterplanning exercise is expected to clarify the eventual residential capacity of the WYE3 / WNP11 site and inform future planning applications on the site but for the purposes of the Housing Trajectory, the Council currently expects the indicative total of units for the site from the Wye NP to be delivered within the next 5 years.

Site Capacity: 50 dwellings

Expected delivery for 5 year land supply purposes: 50 dwellings.

- lxvii. **Pluckley NP:** The Pluckley NP was ‘made’ at the Full Council meeting in April 2017. The Housing Trajectory indicates that three small sites in Pluckley are allocated in the NP (one of which already has outline planning permission (Pluckley Brickworks ref: 14/1116/AS) and Reserved matters consent (ref: 17/0331/AS) for 25 units.

Pluckley Thorne (H1 Site A) and Land off Lambden Road (H1 Site B) are the other allocated sites in the NP. Both sites are allocated for four dwellings. With regards to deliverability, site owners for all three of the sites allocated were anxious to progress with developments as soon as the Neighbourhood Plan was adopted. Thus, it is expected that these sites will come forward within the next five years.

Site Capacity: 33 dwellings

Expected delivery for 5 year land supply purposes: 33 dwellings.

- lxviii. **Bethersden NP:** The Bethersden NP has now been submitted to the Council for Regulation 16 consultation. It includes 3 proposed housing sites totalling 34 dwellings. The Regulation 16 consultation stage commenced on the 15th December 2017 meaning the Examination of the Plan is expected to start in mid-February 2018.

One of the proposed allocations (land at Church Hill, Bethersden) has also been the subject of a planning application which was approved by the Borough Council subject to a S106 Agreement in December 2017 (16/1271/AS). There is no reason to doubt the deliverability of the other sites allocated in the draft NP and the Housing Trajectory expects that these sites will come forward within the next 5 years.

Site Capacity: 34 dwellings

Expected delivery for 5 year land supply purposes: 34 dwellings.

- lxix. **Rolvenden NP:** The Rolvenden NP has now reached its initial Regulation 14 consultation stage. As one of the larger rural settlements in the Borough, the Housing Trajectory indicates an expectation that development in the parish will be at a similar scale to that allocated in the Tenterden & Rural Sites DPD.

Capacity: 40 dwellings

Expected delivery for 5 year land supply purposes: 40 dwellings.

Major Windfall Sites

- lxx. **Tilden Gill, Tenterden (14/1420/AS):** An outline application was allowed on appeal in April 2016 for the erection of 100 dwellings at the site. Following discussions with Redrow Homes, it is expected that the build-out of this site will be completed within the next 5 years.

- lxxi. **The ADAS site, Wye (15/1602):** A prior approval application for the conversion of offices to 52 dwellings was granted in January 2016. There has since been significant liaison between the developers, ABC and the Parish Council regarding the future development of this site, as it sits within the overall masterplan for the WYE3 / WNP11 designation in the Wye Neighbourhood Plan but is not included within those allocation numbers.

- lxxii. **The North School, Essella Road (14/0735):** Reserved Matters consent for 25 dwellings. In April 2017, 17 units under construction and 8 dwellings completed.
- lxxiii. **Farrow Court, Eldercare Centre (13/0357/AS):** Planning permission for 45 dwellings. 12 under construction and 33 dwellings completed at April 2017.
- lxxiv. **Former Concorde House, Austin Road (14/1515/AS):** This brownfield site has permission for 14 dwellings granted in January 2016.
- lxxv. **Northdown House, Station Road, Ashford (16/1450/AS):** Prior approval for a proposed change of use - conversion from office (B1)(a) to 20 residential apartments (C3) granted in November 2016.
- lxxvi. **Land North West of Smallhythe House, Longfield, Tenterden (16/0795/AS):** Erection of 36 retirement living apartments with associated communal facilities, access, parking and landscaping granted planning permission in December 2016.
- lxxvii. **15 to 17 North Street, Ashford (16/1350):** Prior approval for the change of use of offices (B1a) to residential use (C3) comprising 14 residential units (12 one bedroom and 2 two bedroom) granted in December 2016.
- lxxviii. **Tufton House, Tufton Street, Ashford (17/0068/AS):** Prior approval for the change of use from office B1(a) to residential C3 (36 flats) granted in March 2017.
- lxxix. **Land between The Hollies and Park Farm Close, Shadoxhurst (16/1841/AS):** Planning permission granted in March 2017 for the erection of 12 dwellings, the creation of a new access from Woodchurch Road, new landscaping and ancillary works.
- lxxx. **Plot 2, Land adjacent to the William Harvey Hospital (16/1136/AS):** Planning permission granted in July 2016 for the development of the site to provide a care home (Use class C2) for 68 units together with associated access, car parking and landscaping.