



Gladman Developments Ltd (RN: 367)

Examination of the Ashford Local Plan 2030

Issue 10 – Are the other topic policies for housing including high design, justified, deliverable and consistent with national policy? Will they be effective?

(iii) Should the settlements identified for windfall development in Policy HOU3a have defined boundary lines? Is the list of settlements justified having regard to achieving sustainable development?

1. Gladman would note that whatever principle is applied to settlement boundary lines, be they applied, not applied or left to be the subject of Neighbourhood Plans, it is essential that policy HOU3a and HOU5 are linked. The current proposed criteria based approach does allow for an element of flexibility in the plan which could be lost if changes were made to one policy but not the other.

(v) In policy HOU5 how will criterion a) regarding proportionate and commensurate development be assessed? Will the expectation in criterion b) that the site is within easy walking distance of basic services prevent development taking place? How will development be expected to maximise the use of public transport, cycling and walking near to rural settlements in criterion d)? Would criterion f) ii) regarding settlement setting be unduly restrictive in that any new build development is liable to have some impact in this respect? Is it clear what is meant by an “appropriately sized” buffer zone in criterion f) ii)? Is it reasonable to expect all development to enhance biodiversity interests in accordance with criterion f) vi)?

2. Gladman would note that criterion (a), in order to be fully cognitive of any development proposals coming forward should also highlight that services may be provided through the development of a site itself which can contribute to providing additional services in a settlement. For example a site may contain localised, much needed or desirable services, such as sports pitches, community hall, allotments etc.
3. With regard as to how proportionate or commensurate development can be assessed Gladman have previously used localised housing needs assessments which consider such issues as what housing level might be appropriate to sustain such things as shops or schools. This is done by considering the demographic profile of an area, looking at working age population and extrapolating how such

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demographic groups would use services. The approach can help identify what is in effect a critical point on population growth to retain services. Such an approach could be used as a basis for the consideration of what is an appropriate housing level for a settlement.

4. It may be prudent to alter the text of points (e) and (f) to outline that should detrimental aspects of any of these characteristics be found a balance will need to be struck, having considered any potential mitigation, of the potential for harm arising and the need for development and the benefits it would bring.

(vi) What is the evidence, including that from the register, to justify the site thresholds and proportion of self and custom build development in Policy HOU6? Does the policy include sufficient flexibility and criteria a) – c) justified?

5. The Council's website indicates that between April 2016 and October 2017 a total of 97 people were entered onto the self-build register. How many of these expressions of interest would likely turn into genuine requests to build is impossible to quantify, but given that registration on the list was free until October 2017 it may be that it will be a low percentage that turns into people actually taking plots to build.
6. Delivering 5% of all sites over 40 units in urban areas, and 20 units in rural areas, will likely leave a level of plots beyond the levels of demand indicated by the register at present. Such an approach may also lead to problems in site delivery and or delays in the construction of dwellings on such sites. Particularly if a developer wishes to provide a comprehensive development of a site and there is no demand for self-build plots, which must then be marketed for 12 months before being developed as open market housing.
7. Gladman would therefore contend that the Council needs to produce additional evidence to justify the inclusion of the 5% requirement for self-build plots, and the reason for choosing the sites thresholds it has.