

**EXAMINATION OF ASHFORD LOCAL PLAN 2030**  
**SUPPLEMENTARY STATEMENT**

**MCLP/146**

ISSUE 6 (iv)  
FOSTER AND PAYNE  
c/o PAUL McCREERY, PMC PLANNING

1.0 **Unsound Element**

1.1 The Ashford Local Plan 2030 is unsound because it does not fully address a major demographic change leading to an unmet qualitative need for specialist age related (C2) extra care housing provision as encouraged in paragraphs 50 and 159 of the NPPF.

1.2 Ashford Local Plan 2030 should contain a specific individual policy seeking to address the need for specialist age related C2 extra care housing at sustainable rural locations where such development may provide or support services in a village or hamlet. This approach is encouraged in paragraph 55 of the NPPF.

2.0 **Unsoundness Criteria**

2.1 Ashford Local Plan 2030 may (or may not) meet quantitative market housing requirements.

2.2 Ashford Local Plan 2030 certainly, however, fails to meet qualitative age related housing requirements as identified in the Pinders Report 'Care Needs Assessment' August 2017 submitted with Representation MCLP/146 (19<sup>th</sup> August 2017).

2.3 A Briefing note on the Pinders Report dated 5<sup>th</sup> February 2018 is submitted with this Supplementary Statement. The Report establishes that the scale of unmet need for specific age related C2 extra care housing is in the thousands.

3.0 **Why it Fails**

3.1 Ashford Local Plan 2030 deals with local needs/specialist housing in a single Policy HOU2. We believe the scale of unmet need for specialist age related C2 extra care housing is such that it should be dealt with in its own policy. This approach would provide clear guidance for members of the public, developers and local authority members on how to address this important issue.

3.2 For these reasons we believe Ashford Local Plan 2030 currently fails to provide the necessary degree of predictability and efficiency to deliver decisions on planning applications for age related C2 extra care housing. Such predictability and efficiency are required by the first bullet point of paragraph 17 of the NPPF.

3.3 More detail on why Ashford Local Plan 2030 fails the tests of soundness is set out in the attached paper 'Outline Summary Case for a Retirement Community' dated 22<sup>nd</sup> March 2018.

3.4 Foster and Payne believe that the proposed integrated retirement communities would meet some but not all of the need for additional high standard, attractively designed and well managed age related (C2) extra care housing provision.

3.5 Attached to Representation MCLP 146 (19<sup>th</sup> August 2017) is a document entitled 'Shadoxhurst Integrated Retirement Community'. This document illustrates the Foster and Payne approach to the delivery of sustainable age related C2 extra care housing. We trust this document will be given serious consideration by the Examination as an example of the approach advocated by Foster and Payne.

3.6 We also append to this Statement a word document entitled 'Shadoxhurst Retirement Community' dated 17<sup>th</sup> August 2017. This note gives more detail on how Foster and Payne plan to deliver the Integrated Retirement Community.

#### 4.0 How to change the Plan

4.1 Foster and Payne would wish the Inspectors to consider the proposal at Shadoxhurst and indicate whether they consider the site has some merit for development as an integrated retirement (C2) extra care community.

4.2 Foster and Payne would wish to prepare a Statement of Common Ground with Ashford Borough Council on how Ashford Local Plan 2030 might be changed to better reflect the qualitative need for age related development as evidenced by the Pinders Report.

4.3 Foster and Payne would wish Ashford Local Plan 2030 to contain an additional policy dealing specifically with age related (C2) rural housing as an important component of all specialist housing.

4.4 It is important to note that because of the need to build, provide and manage additional communal facilities it will not be economically viable to provide an integrated retirement community on any site which is allocated or granted planning permission for standard market housing. Viability criteria are therefore proposed in our suggested new Policy HOU2(A).

## 5.0 Precise Change/Wording being Sought

5.1 An additional new policy is sought, drafted as follows:

### *Policy HOU2(A) Age Related (C2) Housing*

*Planning permissions will be granted for age related (C2) extra care housing within or adjoining the rural settlements listed in policy HOU4 provided that the following criteria are met:*

- (a) the need or requirement for age related (C2) extra care housing is clearly evidenced;*
- (b) the proposed development is strictly controlled by a planning condition and/or planning agreement so that it remains within the category of age related (C2) extra care housing;*
- (c) the development is well designed and would not result in a significant adverse impact on the character of the area or the surrounding landscape;*
- (d) there would be no significant impact on the amenities of any neighbouring residential occupiers;*
- (e) where a proposal is located within or adjoining the AONB it will also need to demonstrate that it is justifiable within the context of the national level of protection and does not significantly undermine intrinsic scenic beauty but takes every opportunity to secure significant landscape and ecological enhancement by way of mitigation;*

*If possible, discounted market rent schemes will be delivered without the need for any cross market subsidy.*

*Where this is not the case a proposal will need to be supported by robust and transparent viability evidence that will be independently verified by the Council. Should a viability case be proven, the Council will accept an enabling amount of market age related (C2) extra care housing as a means of providing the necessary subsidy to allow the identified need to be delivered, providing the proposal remains in accordance with criteria (b) – (e) above.*

*Proposals which promote market age related (C2) extra care housing as a means of enabling the identified age related discounted market rent element of a scheme will be supported where it can be demonstrated that there is an overriding planning benefit from its delivery and that there is no other cross subsidy solution.*

Paul McCreery FRTPI, Planning Director, Foster and Payne  
26<sup>th</sup> March 2018.

## Appendices

1. Briefing Note on 'Care Needs Assessment produced by Pinders Professional Consultancy Services Limited, August 2017' dated 5<sup>th</sup> February 2018.
2. Outline Summary Case for a Retirement Community dated 22<sup>nd</sup> March 2018.
3. Shadoxhurst Retirement Community, An Integrated Retirement Community on behalf of Foster and Payne Retirement Communities Ltd. dated 17<sup>th</sup> August 2017.