

HEARING STATEMENT  
ISSUE 6 – AFFORDABLE HOUSING  
1 MAY 2018 (AM SESSION)  
ASHFORD BOROUGH LOCAL PLAN  
EXAMINATION  
EXAMINATION HEARING SESSIONS

PREPARED BY BARTON WILLMORE ON BEHALF OF  
PERSIMMON HOMES & TAYLOR WIMPEY (REPRESENTOR ID 793)

MARCH 2018

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ASHFORD BOROUGH LOCAL PLAN EXAMINATION  
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**Prepared by Barton Willmore on behalf of Persimmon Homes & Taylor Wimpey (ID 793)**

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**Issue 6: *Is the overall target for affordable housing and the type of tenure justified? Does the Local Plan make adequate provision for specialist housing?***

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**Issue 6: Is the overall target for affordable housing and the type of tenure justified?  
Does the Local Plan make adequate provision for specialist housing?**

*i) Has the need for affordable housing in the Strategic Housing Market Assessment (SD13) been calculated in accordance with paragraphs 022 to 028 of the PPG on Housing and economic needs assessments (ID02a)?*

1.1 No comment.

*ii) In Policy HOU1 what is the justification for departing from national policy in the Written Ministerial Statement of November 2014 and referred to in the PPG on Planning Obligations (ID23b-031-20160519) regarding the site thresholds for affordable housing?*

1.2 No comment.

*iii) Are the percentages sought for the 3 different areas of the Borough for the total affordable housing requirement and the different types of tenure justified? Are the boundaries of the different areas properly defined?*

1.3 In respect of tenure, whilst it is acknowledged that the NPPF amendments contain transitional arrangements for the purposes of Plan Making (and that paragraph 209 of the Draft NPPF advises that for the purposes of examining this plan there is no need to have regard to this document), Paragraph 207 of the Draft NPPF does in fact confirm that it will be a material consideration from the day of its final publication.

1.4 The Draft NPPF clearly sets out the Government's direction of travel in respect of delivering Affordable Housing, the definitions of which have been significantly expanded, to include a number of different types of Affordable products and tenures to expand choice and increase opportunities for homeownership. Whilst the adoption of the Local Plan would safeguard the Council from undertaking a review for at least 5 years (under transitional arrangements), paragraph 207 of the Draft NPPF does state that plans may need revising 'as quickly as possible' to reflect policy changes.

1.5 As currently drafted, it is evident that Policy HOU1 and the tenure splits would not reflect the final amended NPPF once released and accordingly the Council would be required to undertake a review (either as quickly as possible or within 5 years as required). If the latter length of time is adhered to, this would result in a policy that would be 'out of kilter' with a key Government objective to increase choice and housing affordability. It is therefore likely

that the Policy would fail the consistency check set out at paragraph 208 of the Draft NPPF creating complications with the weight in which the NPPF is given as a material consideration vs a policy recently adopted. This lack of transparency could delay and frustrate Site delivery as well as fail to deliver affordable housing choice.

1.6 Accordingly, it is recommended that this opportunity is embraced and that Policy HOU1 is 'Positively Prepared' to accommodate the clear direction of travel of the NPPF in order to be more flexible and able to respond to the final NPPF once released without the need to undertake a partial review of the plan 'as soon as possible'.

1.7 With regards to the definition of boundaries. The Affordable Housing Viability Areas Map at Chapter 7 is very difficult to read, especially if your site lies very close to one of the viability area boundaries and in some cases it is probably impossible to tell where the boundaries run, depending on the size of the Site. A clearer plan should be provided if this is going to form the basis for applying Policy HOU1.

*iv) Does the Local Plan adequately address the needs for all types of housing (excluding affordable housing) and the needs of different groups in the community as set out in paragraph 159 of the NPPF?*

1.8 No comment.