

ASHFORD LOCAL PLAN EXAMINATION HEARING STATEMENT IN RESPECT OF ISSUE 3 HALLAM LAND MANAGEMENT LIMITED

Issue 3: Are the strategic objectives and the strategic approach to housing delivery and economic development delivery in terms of distribution and location sound having regards to the needs and demands of the Borough, national policy and Government objectives and the evidence base and preparatory process? Has the Local Plan been positively prepared?

1. Introduction

- 1.1 Hallam Land Management Limited (referred to hereafter as Hallam) control two sites identified amongst the Submission Version of the Local Plan's proposed allocations; the strategic allocation at Court Lodge (Site S3) to provide approximately 950 dwellings and uses associated with growth at South Ashford, and also in Hamstreet, land North of St. Mary's Close (Site S31).
- 1.2 On this occasion our Statement is directed to Questions i, iii and vi, which concern the spatial strategy in the context of the sustainability appraisal, delivery of new development and infrastructure.

2. The Spatial Strategy - Context

- 2.1 The Local Plan's Spatial Strategy should, to accord with the NPPF, actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable¹. Moreover, the Local Plan's policies should aim for a balance of land uses so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities². To complement this, and to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities³.
- 2.2 The Spatial Strategy rightly acknowledges that the Borough essentially comprises two parts, the urban area of Ashford and the rural areas that comprise the remainder of the Borough.
- 2.3 In the first instance, the Local Plan's Spatial Strategy is framed by the Strategic Priority afforded to Ashford town as the focus for development. This is consistent with various of the Local Plan's Strategic Objectives:
 - To focus development at accessible and sustainable locations which utilise existing infrastructure, facilities and services;
 - To promote access to a wide choice of easy to use forms of sustainable transport modes;

¹ NPPF para 17

² NPPF para 37

³ NPPG para 55

- To provide a range of employment opportunities to respond to the needs of business; and
 - to protect and enhance the Borough's historic and natural environment.
- 2.4 Ashford town is the pre-eminent settlement in the Borough. It contains the largest population, most job opportunities, higher order services and public transport opportunities⁴. It is also where the majority of housing need is generated⁵. In recognition of its attributes, Ashford was previously designated as one of 4 'growth areas' in the South East England Sustainable Communities Plan⁶. The Greater Ashford Development Framework (GADF) and the subsequent Core Strategy intended that Ashford should grow substantially, Policy CS2 required the provision of 16,770 new homes and the provision of 16,700 new jobs in the 15-year period 2006-2021⁷. This included two strategic urban extensions at Chilmington Green and Cheesemans Green and a third urban extension to be identified by 2015. Together these sites were to provide some 10,000 new homes and in overall terms the Core Strategy proposed 24,550 new homes and 18,100 new jobs in the Ashford Area over the longer term. The principle of Ashford as a focus for large scale development is therefore established in the Core Strategy for the period 2021 and beyond.
- 2.5 In the event, lower levels of development have in fact materialised; the planning permissions granted for Chilmington Green and Cheeseman Green are substantially less than identified in the Core Strategy and the third urban extension was not in fact identified⁸.
- 2.6 On this basis, the quantum of development proposed at Ashford town up to 2031 is some 12,500 less than had been anticipated through GADF and the Core Strategy. Whilst this is as a result of the levels of growth that have occurred and are forecast, it illustrates the overall suitability of the Local Plan's strategy to focus development at Ashford.
- 2.7 Moreover, the continued role of Ashford as the focus for development is complemented by more limited and proportionate development at Tenterden and the rural service centres including Hamstreet⁹. This reflects the established strategy in the Core Strategy which is formulated on directing the modest levels of growth to be provided in the rural areas to settlements on the basis of their relative sustainability merits in terms of their scale, population, level of services and range of provision at a parish level, and the ability for a settlement to play a more limited service centre role.
- 2.8 In the case of Hamstreet, it offers 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. It is located within 10km of Ashford and has a railway station¹⁰. In the Council's Consultation Statement, Hamstreet is referred to as "*one of the more*

⁴ SD08 para 15

⁵ SD08 para 17

⁶ SD08 para 31

⁷ TBD06 para 2.1.2 and Table 2-1

⁸ TBD06 para 2.3.6 and Table 2-3

⁹ SD08 paras 117 and 118

¹⁰ SD08 para 123

sustainable [villages] in the borough, with a full range of local services, including commerce, public house, school and even a regular train service to Ashford and Hastings”¹¹.

- 2.9 The elements of the spatial strategy described above are rightly founded on and are consistent with the NPPF.

3 The Sustainability Appraisal

- 2.10 The focus at Ashford, along with the more limited and proportionate development at Tenterden and the rural service centres including Hamstreet, is considered to be the most sustainable strategy in comparisons with the alternative assessed in the Sustainability Appraisal¹².

- 2.11 Four options were considered in the Sustainability Appraisal which reflected the structure of the Borough, ranging from Ashford as the focus for all new development to a dispersal of all new development across the rural area.

- 2.12 In comparison with the alternatives, this Strategy is shown to *inter alia*:

- have a significant positive impact on improving the accessibility of jobs;
- help promote the rural economy;
- provide a significant positive impact by locating a significant proportion of development within Ashford with access to education, health and community services;
- protect and enhance the retail offer of Ashford and the rural service centres;
- to a greater degree utilise and enhance existing social, green, transport and utilities infrastructure;
- have a significant positive effect on improving the health and quality of life as facilities would be likely to be within close range increasing opportunities for access on foot or cycle;
- support the objective of improving and sustaining the town and district centres’ economic performance and vitality and maintain their roles within the Borough’s retail hierarchy;
- be most likely to be able to optimise the use of brownfield sites in Ashford, the rural service centres, other villages or the rural area (including employment opportunities within rural buildings).

¹¹ SD05 page 178

¹² SD02 para 3.8.29

4 Delivering new development and infrastructure

- 4.1 As the Local Plan's strategy is a continuation of that set out in the Core Strategy which included allocations which were to be developed in the period to 2021 and beyond, a significant number of dwellings expected to be delivered during the Plan period are already identified through commitments¹³. Almost half of the residual requirement for the period to 2031 is already accounted for¹⁴. Whilst development of the sites allocated in the Core Strategy has been slower than anticipated at that time, the reasons for this are well known¹⁵. Importantly for this Local Plan, the urban extensions identified at Ashford have now commenced and are expected to deliver the housing and associated infrastructure during the plan period¹⁶.
- 4.2 Additional development is identified in the form mainly of new allocations. The Council describe the circumstances associated with these sites and their expected delivery in its Housing Topic Paper (SD08). For Sites S3 and S31, both of which are controlled by Hallam, we do not demur with the commentary provided in Appendix 1 of the Housing Topic Paper¹⁷ or the Housing Trajectory in the Local Plan¹⁸. We intend to provide up to date information in the respective Statements of Common Ground and at the relevant hearing sessions.
- 4.3 The Infrastructure Delivery Plan identifies the various physical and social infrastructure required in conjunction with new development.¹⁹ For Sites S3 and S31, the respective policies provide the basis to secure the provision of such infrastructure.
- 4.4 (We have made separate submissions in terms of the interdependence of the Pound Lane Link Road with Local Plan Sites and we do not repeat here – see Matter 11 Statement).

LRM Planning Limited
26th March 2018

¹³ SD08 para 79

¹⁴ SD01 Table 1

¹⁵ SD08 para 156/157

¹⁶ SD08 para 157

¹⁷ SD08 page 47 and 55

¹⁸ SD01 Appendix 5

¹⁹ SD10 Section 3