

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 regard to the needs and demands of the Borough, national policy and Government objectives and the evidence base and preparatory processes? Has the Local Plan been positively prepared?

i) Is the strategy selected for the distribution of housing and economic growth, with the emphasis on Ashford town, justified compared to the reasonable alternatives? What is the proportion of development proposed in the urban and rural areas across the plan period? How sensitive are the rural areas to further growth?

3.1.1 The strategic distribution of housing and employment development within the Borough is discussed in section 3.8 of the May 2016 SA. Four options were assessed:

Alternative 4.1 – Focus all development in and on the periphery of Ashford urban area, with no development in Tenterden or the villages

Alternative 4.2 – Focus a large majority of development in and on the periphery of Ashford urban area supported by proportionate growth in Tenterden; the rural service centres and other villages

Alternative 4.3 – Focus significant development outside of Ashford urban area, in particular at Tenterden; Charing; Hamstreet; Wye and the majority of the remaining parishes

Alternative 4.4 – Focus significant development outside of Ashford urban area with the creation of a new settlement

3.1.2 Of these alternative options Alternative 4.2 was considered to be the most sustainable alternative.

3.1.3 Whilst the emphasis on Ashford being the main focus for development is understandable given the fact it has the necessary infrastructure, services and opportunities to support significant levels of growth, it is clear that the spatial vision for the ABLP as set out at para 3.5 of the ABLP also looks to ensure that Tenterden continues to serve the south western part of the Borough as a principal rural service centre, accommodating development of a suitable scale, design and character. It is in our opinion imperative that to deliver the spatial vision the ABLP needs to provide for a reasonable level of growth in Tenterden i.e. that would be sufficient to maintain the number of working age people across all ages within the town, help to offset the impacts of ageing and help support the vitality and viability of local services. To this end we note that para 3.8.29 of the 2016 SA makes it clear that the most sustainable option for growth is one that supports not only growth around Ashford but *'proportionate growth in Tenterden, small scale development at Charing, Hamstreet and Wye and limited development in the majority of the remaining parishes'*.

3.1.4 Unfortunately the terms significant and proportionate were not quantified and the SA then jumps to a strategy of significant growth outside Ashford. Not only would it assist if ABC clarify what they perceive to be significant – is it 75%, 80% of growth etc., but what proportionate means, especially in terms of Tenterden's future growth.

3.1.5 Against this backdrop, we note that given the housing requirement of 16,120 (825dpa), and having regard to completions, commitments, windfalls and what is planned at Chilmington Green, policy SP2 of the ABLP looks to allocate land for 6,749 new dwellings; 5,159 in Ashford and 1,590 in the rest of the borough – a 76:24 split. We also note that of the 1,590 new dwellings to be provided in the rest of the district only 6% (100 dwellings) are proposed in Tenterden which amounts to just 1.48% of the overall number of new homes to be allocated in the borough. We also note that even when one takes into account existing commitments (existing allocations and consents) of 525 in Tenterden, Tenterden is only looking to provide for circa 5% of the boroughs residual housing requirement¹. This is not in our opinion a proportionate scale of growth in Tenterden.

3.1.6 Given the spatial vision of the ABLP, and the fact that Tenterden is the second largest settlement in the borough, being a 10th the size of Ashford², one could interpret proportionate growth to mean that at least a 10th of the housing proposed in the borough should go to Tenterden. i.e. circa 1,600 dwellings. Having regard to the ‘Tenterden Growth Options Study’ undertaken by Lichfields and appended to this statement, and the fact extant allocations/ permissions and proposed allocations only amount to just 625 dwellings being brought forward in Tenterden during the plan period, we would suggest, based on the OAN of 16,120 that land for circa 600 additional dwellings is identified to ensure that a proportionate level of growth does occur in Tenterden. In this regard we note that section 3.8 of the 2016 SA continually refers to proportionate being proportionate to the size of settlement yet nowhere in the LP/ its evidence base are the respective populations of Ashford borough, Ashford town and Tenterden set out. As set out in Lichfields report on ‘Tenterden Growth Options Study’ the population figures in 2012 and 2016 were:

	2002	2016
Ashford District	104,377	126,151
Ashford (town)		72,451 (57% of the District)
Tenterden	8,065 (7.7% of the District)	8,035 (6.4% of the District)

3.1.7 Lichfields report also highlights the fact that Tenterdens share of the boroughs populations has been declining, as whilst the population of Tenterden has barely changed over the last 15 years the District has seen population growth of 21%. In 2002 Tenterden represented 7.7% of the District’s population, significantly more than the 6.4% it currently represents.

3.1.8 Lichfields also explains that the lack of growth between 2002 and 2016 has inevitably led to the significant ageing in Tenterden as new households are unable to move into the area, leading to a lower proportion of families and higher proportion of older

¹ Residual requirement = 12,943 (16,120 – completions of 3,177)
 Tenterden has existing commitments of 525 and proposed allocations of 100 = 625
 $625/12,943 \times 100 = 4.8\%$

² See para 3.30.1 of the ABLP as submitted

households. It also explains that there has been a significant decline in younger age groups (particularly the younger working age group, 18-44, which saw a decline from 26.9% to 20.7%); and that a continuation of these trends would see the town age further, and this could affect the vitality and viability of local shops and services given the likely decline in local spending.

- 3.1.9 Lichfields report also explains that across all types of dwellings, average house prices in Tenterden are consistently more expensive than average house prices across Ashford District, with house prices in Tenterden being on average 32% higher than the District average [as at 2017]; that that they have risen faster in the short term and since the recession. All of which affects affordability and suggest pent up demand from lack of supply.
- 3.1.10 Lichfields report has looked at 5 different growth scenarios and their impact on the town in terms of overall population growth, the level of migration into the town, and the age profile of the town. It explains that:
'Based on current allocations, Tenterden's share [of the population] would increase slightly from its current level, from 6.4% in 2016 to 6.7% by 2030, however this is still far short of where Tenterden was just 14 years ago in 2002 (at 7.7%) ... Even at 1,200 dwellings, with growth to around 11,000 people by 2030 Tenterden would only just be returning to its share [of the population] as of 2002 (7.6% compared to 7.7%). On this basis whilst growth of this scale might appear significant (and out of line with past trends), it would not result in Tenterden becoming unusually large in the District-wide context when compared to where the town was 15 years ago. It is also notable that even at a level of 1,200 dwellings, the rate of housing growth in Tenterden would not exceed to the rate of growth across Ashford District as a whole.'
- 3.1.11 Having regard to the above we note that 6.4% of the 16,120 dwellings proposed over the plan period would equate to 1,032 dwellings, and that 7.7% of the 16,120 dwellings proposed over the plan period would equate to 1,241 dwellings.
- 3.1.12 Thus we would suggest that Tenterden should be delivering circa 1,200 dwellings, not 625 i.e. circa 600 more than currently planned for. As set out in Lichfields report circa 100 would come from windfalls, a further 250 could be provided via the allocation of the land at Appledore Road (TS3) and circa 225 from one or two further allocations.
- 3.1.13 Lichfield's report concludes:
'It is imperative that the town accommodates a sufficient scale of development to ensure that local shops and services remain viable, not least because they serve a number of settlements around Tenterden, which would have to travel further to other town centres if these services were lost'
- 3.1.14 having regard to the above, the plans failure to allocate sufficient housing at Tenterden means that the towns ability to continue to serve the south western part of the Borough as a principal rural service centre will be prejudiced – contrary to the spatial vision of the plan; and that the housing needs of the borough, esp. those in Tenterden will not be met, again contrary to the spatial objectives of the plan. The fact that Tenterden is one of the more sustainable locations within which to focus

growth, means that restricting growth here runs contrary to those elements of the spatial vision which seek to focus development at accessible and sustainable locations which utilise existing infrastructure, facilities and services wherever possible, and where development is supported by the necessary social, community, physical and e-technology infrastructure, facilities and services.

- 3.1.15 Tenterden is not as sensitive to growth as the SHELAA/ SA would have one believe. The criticism levelled at sites being promoted in and around the town, such as that at Appledore Road in the SHLAA (ref TS3), are in our opinion capable of being overcome. In this regard we note the SHELAA suggested the Appledore Road site '*remain in housing survey*' and that appendix 5 of the SHLAA indicates that whilst in the authors view '*The site is relatively peripheral to the town centre*' and that '*Development here could have a significant impact on the existing rural character of this part of Tenterden and the AONB*', that '*Access to the site is limited with potentially a major impact on the character of Appledore Road*'; it acknowledges that '*a full assessment is required of these issues*'. We have undertaken just such an assessment to demonstrate how 250 dwellings could be accommodate on the site, and how the site could also make a significant contribution towards the sport and recreational needs of the town, and the access strategy has been agreed in principle with the KCC. In our opinion there is no reason why this potential source of housing supply cannot deliver within the current plan period, rather than being phased for 16(+) years as currently suggested in appendix 5 of the SHELAA. To whit we note that the Main SHELAA document groups those sites deemed deliverable in years 11 to 15 and 16(+) together when summarising the potential supply.
- 3.1.16 It in the context of the above is noteworthy that appendix 10 (p758) of the SHELAA in commenting upon 'Location and Access to Services' states: '*The site is just outside the town centre and therefore possesses a good access to a variety of services, including a GP surgery, primary school and local shops.*' Appendix 10 also acknowledges that: '*The site is accessible via Woodchurch/Appledore Road.*' And that there are no known highway constraints.
- 3.1.17 Turning to the SA, Appendix 4 of the SA (Site Assessments for sites subject to SA but not considered to be reasonable alternatives as set out in the SHELAA), in assessing the Appledore Road site (TS3) states;
Conclusion: This is a substantial site, and its development would inevitably have a significant impact on the local community, landscape and character of the settlement. The site has various character areas, and while access to and from the site would be possible along Woodchurch Road, the pressure to place an access at the interface of Appledore Road – the link closest to the town centre – would necessitate the removal of dense sets of mature trees, while affecting existing resident amenity substantially. As the site adjoins the AONB to the east, views from the AONB will be compromised. The site is not considered suitable for development.'
- 3.1.18 We submitted a detailed review of the scheme as now proposed against the assessment criteria in the SA in our submissions of 2016 and 2017 and would suggest that the SA is both subjective and does not consider the extent to which any of the issues it raises might be resolved or mitigated.

- 3.1.19 Allocating 250 dwellings on land at Appledore Road/ Woodchurch Road Tenterden would help address the disparity in the spatial strategy. Such a strategy would in our opinion remain within the ambit of the preferred approach (alternative 4.2) advocated in the 2016 SA and supported in the 2017 SA.
- 3.1.20 If, as we believe, the OAHN is 17,290 dwellings over the plan period (910 dpa), ABC will need to find further sites, and given the level of growth already proposed in and around Ashford and in the smaller villages, the allocation of further growth in Tenterden would seem eminently sensible; especially as it would also reflect the aims and objectives of the spatial vision and objectives of the plan. Again we would suggest that allocating 250 dwellings on land at Appledore Road/ Woodchurch Road Tenterden help address the additional needs of the area on what is a highly sustainable, suitable, deliverable and available site.
- 3.1.21 In looking to accommodate more housing in Tenterden the ALP would not only help secure the economic wellbeing of the area, but also help address the issue of affordability in the area – which is more acute than in Ashford – hence the sliding scale of affordable provision envisaged in policy HOU1. Likewise it would reduce the pressure on the villages to the south (which make up sub housing market area of Ashford Rural South (see p 28 of the 2014 SHMA)), and as such the High Weald AONB to accommodate further growth.
- 3.1.22 The plans failure to provide for a proportionate level of growth in Tenterden means that it does not reflect the spatial vision and objectives of the plan, does not accord with the preferred option for spatial growth advocated in the SA, and is not planning positively for the needs of the area, so is unsound. This can only be rectified by providing for more development in and around Tenterden.

ii) Is the plan period of sufficient length to ensure the delivery of the strategic objectives?

- 3.2.1 Assuming the plan is found sound and adopted towards the end of 2018 the remaining plan period will be just 11 years. The NPPF advises in paragraph 157 that plans “should be drawn up over an appropriate timescale, preferably a 15 year time horizon”. Whilst some 3,177 completions have occurred since 2011 (an average of 529dpa), some 12,943 have still to be delivered (an average of 1,000dpa). This is a significant amount of development over a relatively short period of time, with the majority coming forward in just one area – Ashford.
- 3.2.2 Given our comments on matter 5 regarding the issue of deliverability and market saturation, we would suggest that the plan period is extended to 2034 and the housing requirement amended accordingly, with more emphasis on sites in the rural areas so that they can grow proportionately and provide for greater flexibility.

iii) Will the strategy satisfactorily and sustainably deliver the new development and infrastructure needed over the plan period?

No comment

iv) In assessing the viability of the Local Plan and having regard to paragraph 173 of the NPPF has sufficient account been taken of all the relevant standards in the Plan and the future implications of CIL?

No comment

v) In setting the strategic objectives and the approach to delivery has regard been had to the purposes of the Areas of Outstanding Natural Beauty within the Borough as required by section 85 of the Countryside and Rights of Way Act 2000 and as explained in the PPG on Natural Environment? (ID 8-003-20140306)?

No comment

vi) Does the Local Plan plan positively for the infrastructure required across the Borough? Does the Local Plan make clear, for at least the first five years, what infrastructure is required, who is going to fund and provide it, and how it relates to the anticipated rate and phasing of development in line with the PPG on Local Plans (ID 12-018-20140306)? In particular, the Infrastructure Delivery Plan (SD10) identifies a need for additional provision in respect of education, waste water, health infrastructure, sports provision, strategic parks, green space and allotments. Where and how is that provision to be made?

No comment