



## **Gladman Developments Ltd (RN: 367)**

### **Examination of the Ashford Local Plan 2030**

#### **Issue 1 – Have the relevant procedural and legal requirements been met, including the duty to co-operate?**

(i) Is the Sustainability Appraisal (SA) (L.1.D) undertaken suitably comprehensive and satisfactory and has it sufficiently evaluated reasonable alternatives?

1. Whilst the SA has assessed a range of sites as development options, and in doing so produced more comprehensive assessment than the SHELAA, the Council has failed to use the results of the SA to properly and adequately allocate sites in the plan. Gladman in our publication representation have highlighted the SA assessment of a number of sites in the A20 corridor which have been allocated in the Local Plan.
2. These sites clearly score worse than many of the sites allocated within the plan, given the location of some of the sites in the A20 corridor this is not surprising. Therefore whilst the SA may have made reasonable assumptions, its findings have not been used by the Council to produce a sound strategy or to underpin sound allocations within the Local Plan. A detailed breakdown of the sites in question is contained within the August 2017 publication representation submitted by Gladman.
3. There is also some concern with regard the SA and the additional and new site assessments published in November 2017. It is unknown how these assessments published after the plan was submitted have helped inform and shape the plan now subject to examination.

(vi) In the light of Regulation 4 of the 2017 Regulations which requires a review to be completed every 5 years should the commitments in paragraph 2.26 and in Chapter 6 to adopting a further plan by 2025 be adjusted?

4. Yes. Given the changes in regulations it is paramount that paragraph 2.26 and Chapter 6 are changed to reflect that reviews must be completed every 5 years. It may also be prudent for the Local Plan to set out measures by which it will also judge which parts of the plan will be reviewed in 5 years, or the triggers which will be monitored which may indicate that certain parts of the plan require review. For example a failure of delivery of sites in Ashford may trigger the need to review the sites allocated in the plan or trigger a further consideration of the spatial strategy that underpins the plan. One clear example is the

Examination of the Ashford Local Plan 2030  
Gladman Developments (RN: 367)

forthcoming changes to the calculation of OAN through the Standard Methodology, this in itself is likely to cause the need for the housing requirement to be reviewed.

5. What Gladman would wish to add additionally however is that we contend that a review mechanism, or a future review brought about by legislation change, should not be a mechanism for making an unsound plan sound. If the Inspector arrives at the conclusion that the plan is unsound, then it is exactly that and the Council must be invited to go and do any additional work needed in order that the plan might be made sound. If the flaws are so inherent then the plan should be found unsound. The soundness of a plan is a binary choice: it is either sound or it is not. If it is unsound a future review will not remedy the fundamental defect