

HEARING STATEMENT

ISSUE 5 – HOUSING SUPPLY

19 APRIL 2018 (AM & PM Sessions)

ASHFORD BOROUGH LOCAL PLAN  
EXAMINATION

EXAMINATION HEARING SESSIONS

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

MARCH 2018

**HEARING STATEMENT  
ASHFORD BOROUGH LOCAL PLAN EXAMINATION  
EXAMINATION HEARING SESSION 19 APRIL 2018**

**ISSUE 5– Housing Supply**

**Prepared by Barton Willmore on behalf of Persimmon Homes & Taylor Wimpey (ID 793)**

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**Issue 5: Will the Local Plan meet the housing requirement over the plan period? Will there be a 5 year supply of deliverable housing sites with an appropriate buffer?**

*i) Are the assumptions and analysis regarding site suitability, availability and achievability and development capacity in the Strategic Housing and Employment Land Availability Assessment (SD12) reasonable and realistic? Is this assessment sufficiently comprehensive and rigorous having regard to the PPG on Housing and economic land availability assessment (ID3)?*

1.1 The SHEELA is a significant document, which contains the necessary information to undertake an assessment of this nature. It contains a standard pro forma in which sites have been assessed against in a regularised fashion. The SHEELA has appropriately determined the suitability, availability and achievability of sites in order to either discount them or continue them through to an emerging allocation. In respect of site WE6 (Park Farm South East), we can confirm that the information is reasonable and realistic and sufficiently robust for the purpose of the SHEELA evidence base.

*ii) Are the sites relied upon for the supply of housing deliverable and developable in accordance with paragraph 47 of the NPPF? Does the evidence provided in Appendices 1 and 2 of the Housing Topic Paper (SD08) give sufficient confidence that sites will be delivered as anticipated? Is there an over-reliance on large site allocations?*

1.2 Park Farm South East (Site Allocation Policy S14) is jointly owned by national housebuilders Persimmon Homes and Taylor Wimpey (PH & TW). The developers have a strong track record of jointly delivering strategic sites in Ashford, which includes Park Farm South & East (Bridgefields) immediately to the north of the Site for 793 dwellings and Repton Park, for 1,283 dwellings in the north-west of Ashford Town. Bridgefields is complete and the final parcels at Repton Park are currently under construction. In addition, both developers have brought and are bringing forward additional separate sites on their own within the Borough, see Appendix 2 of SD08.

1.3 Prior to allocating this Site, the Council actively engaged with PH & TW to ascertain its deliverability. Information was submitted to the Council (replicated in our August 2017 representations), to demonstrate how the Site was deliverable and developable. This included information which was based on technical surveys (engineering, landscape and ecological assessments etc) as well as confirmation that PH and TW own the site outright. With the proven track record of joint working and delivery in the Borough, the Council has rightly concluded (through this collaborative exercise) that the Site can be delivered as anticipated. Sufficient confidence can therefore be placed in the delivery of S14 and this is reflected in Appendix 1 (page 49) and 2 of SD08 (rep 13).

1.4 The developers have been in pre-application discussions with the Borough Council since summer 2017 in preparation of submitting a full planning application for the development of the Site for 353 dwellings (noting there is flexibility within Policy S14 that the 325 figure is an indicative capacity). The application is intended to be submitted shortly.

1.5 The e-mails contained at Appendix 2 of SD08 from TW & PH are informed by the intention to submit a full planning application (as stated in the e-mails) with delivery rates based on those experienced at Bridgefields and Repton Park.

*iii) What should be the starting date for the consideration of a 5 year supply?*

1.6 No comment.

*iv) How is any shortfall in delivery since the start of the plan period to be dealt with? Should this undersupply be dealt with within the first 5 years or over a longer period? Should the shortfall be calculated against the Strategic Housing Market Assessment (SD13) figure of 825 dwellings per annum or the annual housing target in Table 1 of 848 dwellings per annum? Is the application of a 20% buffer in addition to the annualised housing target and the shortfall since 2011 justified?*

1.7 No comment.

*v) Is the housing trajectory at Appendix 5 realistic and does it form an appropriate basis for assessing whether sites are deliverable in line with footnote 11 of the NPPF?*

1.8 No comment. See response to question ii) above.

*vi) Does the contingency buffer of over 1,000 dwellings provide sufficient flexibility to accommodate unexpected delays whilst maintaining an adequate supply?*

1.9 No comment.

*vii) Has the Council made reasonable assumptions about average densities in Table 1 of the Strategic Housing and Employment Land Availability Assessment (SD12) bearing in mind PPG advice (ID3-017-20140306)? Has this been translated into the capacity estimates for allocated sites?*

1.10 No comment.

*viii) Is the approach to windfall sites justified having regard to paragraph 48 of the NPPF? Why is it assumed that there will be 150 windfall units in 2021 and 100 from 2022-2030? Having regard to paragraph 48 of the NPPF should windfall sites be included in the 5 year supply? Is the 25% non-delivery rate of extant windfalls reasonable?*

1.11 No comment.

*ix) Does the Local Plan contain a housing implementation strategy describing how delivery of a five year supply of housing land to meet the housing requirement will be maintained in accordance with paragraph 47 of the NPPF?*

1.12 No comment.

*x) How would the supply of housing sites be monitored and managed?*

1.13 No comment.