



Courtley Planning Consultants Ltd  
Tan Oast, Dairy Lane  
Chainhurst, Tonbridge, Kent TN12 9SS  
01622 820561  
howard@courtleyplanning.co.uk

**Issue 5. RN/204**  
**Courtley Planning Consultants Ltd/**  
**Pent Ltd**

## **EXAMINATION OF ASHFORD BC LOCAL PLAN 2030**

### **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?**

Submitted by Courtley Planning Consultants Ltd on behalf of Pent Ltd  
March 2018

## 1. SHELAA and Brownfield Land Register (BLR)

1.1 The Council confirmed the SHELAA assessed 700 sites with over 200 sites progressing to the final stage assessments. However, it is clear a number of site assessments were not completed and these were left to be considered under the relevant *“Neighbourhood Plan (NP) decision”* process.

1.2 Copfield Farm, Rolvenden (RTW1) was one of 11 sites that the SHELAA considered should be assessed within the Rolvenden NP process. However Site RTW1 has not been assessed under the current Regulation 14 submission.

1.3 The starting point for any housing assessment for this site should start with the Council's relevant evidence base which should include a robust SHELAA and Brownfield Land Register (BLR). A BLR has not been completed by the Council which given the fact Copfield Farm site has an implemented planning permission for over 5576 sq m of B2 and B8 use and referred to in the SHELAA as a 8120 sq m poultry farm is clearly incorrect. This inaccuracy in the SHELAA, if utilised by Rolvenden Parish Council could lead to their NP being considered contrary to national policy and Government objectives and the evidence base and preparatory process.

1.4 NPPF defines **Previously developed land** (also known as brownfield Land) as:

*“Land which is or was occupied by a permanent structure including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or has been occupied by agricultural buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built up areas such as private residential gardens, parks, recreational grounds and allotments; and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time”.*

1.5 The importance of this definition requires the SHELAA to define the use of the Copfield Farm site correctly. In doing so it also obligates the Council to consider whether the site is *“suitable for residential development”* as set under the Brownfield Land Register criteria (d). Failure to carry out these requirements would leave the Rolvenden NP deficient in the evidence it would need to assess the suitability of the site for housing or mixed use. In any event the NP has not carried any assessment of the site RTW 1 as requested under the SHELAA.

1.6 The NPPF paragraph 51 state *“local planning authorities..... should normally approve planning applications for change to residential use and any associated development from commercial buildings ( currently in the B use classes) where there is an identified need for additional housing in that area, provided that there are not strong economic reasons why such development would be inappropriate.”*

## 2. Housing Land supply

2.1 The Council relies on allocations and windfall sites to ensure that the full residual requirement for 12,949 homes is achieved by 2030 (Table1). Once housing commitments are taken into account and the final housing trajectory is considered, the actual distribution of new housing is as follows:

- Ashford and its periphery 77%
- Tenterden 4%
- Rural Areas 7%
- Windfalls 12%

2.2 Currently and in the past there has been an over reliance on large strategic housing allocations at Chilmington Green and Kennington since 2008 which has led to a shortfall of nearly 2000 dwelling since 2011, significantly more if you go back to 2008. In electing the end date of 2030 for the Local Plan we note that several of the proposed allocations will only yield completions in the five year phase 11-15. This implies some sites will only yield completions after the end of the plan in 2030. Completions on the Kennington and Chilmington Green sites have completions anticipated in years 11-15.

2.3 The Council should identify other sites in the borough to help meet its housing shortfall. The Council appears to rely on the Neighbourhood Plan process and Policy HOU5 (residential windfall development in the countryside) to meet some of its housing needs but unless the Local Plan provides a steer in terms of an apportionment of housing numbers to each of the settlements listed in Policy HOU3a then it is hard to see how Parish Councils can plan properly.

2.4 NPPF paragraph 14 requires local planning authorities to prepare Local Plans that meet objectively assessed needs with sufficient flexibility to adapt to rapid change. This necessity increases due to the tenuous nature of the Councils 5 year supply.

## 3. Five Housing Supply

3.1 The PPG state “ *If the historic rate of development shows that actual supply falls below planned supply, future supply should be increased to reflect the likelihood of under-delivery of a plan*” ( 2a-019-20140306). This statement is relevant in the context of the Council rectifying its housing shortfall since 2011. As the Council as already performed poorly against its previous targets, it needs to increase the supply of plots in the short- term to avoid the risk of under –delivery against the timetable of the new plan.

3.2 Given the Councils persistent under delivery against its housing targets, a 20% buffer should be applied to its housing requirement. The Council conceded in its

Statement of Common Ground in 2016 appeal in Smarden (ref:16/00045/AS) that it only had 3.28 years of housing supply.

3.3 Given the Councils acknowledgement of a housing shortfall 1770 since 2011. The fact it can identify a **“Contingency buffer of a 1000 units”** and deliver **Future Windfalls for 950 units** together with the support of **Policy HOU5** there appears no reason why the Council should wish to use the Liverpool method of delivery in meeting its persistent housing shortfall.

3.3 Table 1 in the plan indicates that since the beginning of the plan period an average of 529 dpa have been completed. This would indicate persistent under delivery against both the Core Strategy (1135) and the new Local Plan annual average requirement (825).

3.4 The persistent record of under delivery of housing raises the question why the Council continue maintaining the focus of development around Ashford and whether in the short to medium term a more dispersed strategy might be more appropriate in particular around the rural areas of the Borough.