

Home Builders Federation

Representor Number 412

Hearing Session: Issue 3

ASHFORD LOCAL PLAN EXAMINATION

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?

The focus on Ashford within the Local Plan is understandable. It has the necessary infrastructure, services and opportunities to support significant levels of growth and we support the allocations in this area. However, it is important to have flexibility in any plan to ensure that delivery isn't solely reliant on one area or on a limited number of large sites. As the Council have stated in the Sustainability Appraisal (SD02) the most sustainable option is one that supports not only growth around Ashford but also seeks a proportionate level of development in other areas. It is therefore essential that the Council seeks to provide for a more proportionate mix of development across the Borough, not only to ensure delivery comes forward steadily across the plan period but also to support the housing and infrastructure needs for its smaller settlements and rural communities. So whilst the increase in allocated sites in areas outside of Ashford and its hinterland are welcomed there is still potential to consider development in the towns and villages across the Borough to create a more balanced plan through the allocation of smaller sites in these areas. Such an approach also has the benefit that smaller sites will deliver homes more quickly – something that is important given the limited time remaining within the proposed plan period.

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

Even in 2016 with an expected start date for the plan of late 2017 the HBF were concerned that the plan would not be deliverable within timeframe indicated. If the plan is found sound and adopted towards the end of 2018 this would leave a delivery period of only 11 years. The NPPF advises in paragraph 157 that plans “*should be drawn up over an appropriate timescale, preferably a 15 year time horizon*”. As such the Council are seeking to deliver a significant amount of development over a short period of time with the majority of development coming forward in just one area. There is very little flexibility should delivery not go as expected. We recognise that the Council expects

delivery to be 8% above its requirement for the 2017 to 2030 period but as we set out in our Matter 5 statement on land supply this level of contingency is below those recommended by DCLG and does not offer the necessary flexibility, especially given that only 11 years of the plan period remains.

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

No. We are concerned that the viability of the strategy is compromised given the impacts on the costs of development from policies in the local plan. There is little headroom to support infrastructure delivery which will impact on the delivery of market and affordable housing at the rates expected in the Local Plan.

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?

Our principle concern relates to the level of CIL that can be sustained on sites given the proposed level of affordable housing and other policy costs such as accessible buildings and Nationally Described Space Standards (NDSS). In Ashford and the Ashford Hinterland the Viability Assessment (SD09) suggests on p.23 that development in these areas is not able to provide policy compliant schemes or is only marginally viable with minimal headroom for planning obligations or CIL.

It appears from the viability evidence as if the Council are pushing at the margins of viability in their area. Plan makers are warned in NPPG not to take such an approach in paragraph 10-008 which states:

“Plan makers should not plan to the margin of viability but should allow for a buffer to respond to changing markets and to avoid frequent plan updating”

The same paragraph also states *“Policies should be deliverable...”* We are therefore concerned that there is limited scope for the delivery of the necessary infrastructure alongside the Council’s policies on affordable housing and the optional technical standards. Given that CIL, and any on-site infrastructure required to make the development acceptable in planning terms, are non-negotiable the Council’s will be required to compromise on other policies. It would appear that negotiations on affordable housing and other standards will be the rule rather than the exception. If this is the case then the Local Plan cannot be considered to deliverable and must be unsound. A reduced requirement for affordable housing and the optional technical standards would potentially provide the necessary “buffer” required by PPG to enable the plan to be considered deliverable.

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

Mark Behrendt
Local Plans Manager
Home Builders Federation