



8Dii/ DTZ for Church Commissioners for England (7548)

South East Plan - Regional Spatial Strategy Examination

December 2006

8Dii – Ashford

8Dii.1 – Does the Level of Housing provision proposed at Ashford post 2016 take appropriate account of its growth area status, local constraints and opportunities, and current build rates (Policy EKA1)?

The Church Commissioners for England (“Church Commissioners”) support the highest option (Option C) for 32,000 dwellings per annum in the region. In relation to the sub-region, we support the levels of growth proposed for Ashford as set out in Policy EKA1 which prioritises growth for housing and investment around Ashford, but would emphasise that this is largely dependant on the provision of adequate infrastructure, particularly relating to junction 10a of the M20.

The Church Commissioners are generally supportive as to the proposed location of growth around Ashford, to the south of the town. However, it is considered that stronger recognition should be given to existing built development and proposed development where permission has been granted. Furthermore, emphasis should be placed on the need to avoid development within flood plains.

The Commissioners support the overall growth level of 22,400 new homes in Ashford to 2026, as set out in Policy EKA1. It is considered that this will require a significant ‘step-change’ in housing growth levels to underpin the infrastructure and employment growth aspirations for the area. The delivery rates as set out in the RSS require delivery of 269 homes per annum above the existing RPG9 delivery rates. Ashford is not anticipated to reach this rate until 2008/2009 (their current all time high of delivery rate being 962 units per annum), therefore although Ashford’s Housing trajectory shows adequate sites to be available the Commissioners have concerns as to the rate of delivery. It is considered this will be achieved through the proactive delivery of supporting infrastructure to deliver development and maximising the development potential of the identified sites.

The Church Commissioners have prepared a Development Concept in relation to their landownership at Cheeseman’s Green in Ashford which shows the way in which the site is capable of delivering growth to form an integral part of the compact centre growth strategy for Ashford and help deliver the number of houses required by the Regional Spatial Strategy, as reflected in Ashford’s LDF Core Strategy.

Although Ashford’s Housing trajectory shows adequate sites available for housing, the Commissioners do not consider that the delivery numbers for these sites are necessarily realistic. They apply average densities to broad areas without due consideration of constraints, including floodplains, existing woodland, existing properties and the setting of listed buildings. As such, sites may need to be reconsidered in terms of the realistic level of housing provision they may be capable of delivering.

The Church Commissioners have carried out investigations into these delivery levels, through their consideration of Ashford’s Core Strategy, and the aspirations set out for the Cheeseman’s Green/ Waterbrook Urban extension. We consider it relevant to set out these investigations, and the way in which urban extension sites are capable of delivering development to meet RSS growth levels. For information, the Commissioners are close to securing a developer for the first phase of the Cheeseman’s Green scheme, enabling early delivery of housing and employment in this area.



8Dii/ DTZ for Church Commissioners for England (7548)

South East Plan - Regional Spatial Strategy Examination

December 2006

The Commissioner's have prepared a Development Concept as set out in representations to Ashford's Core Strategy (December 2006) for Cheeseman's Green, which is in accordance with the planning permission granted in January 2006, to deliver 1,100 homes, 180 live work units, 70,000sqm of employment floor space and a District Centre to the south east of Ashford.

In relation to the site at Cheeseman's Green, the Commissioners agree with Ashford Borough Council's contention in their LDF Core Strategy that the majority of the permitted employment land is better relocated to an alternative site to northern side of the CTRL at Sevington to provide easier access for businesses from the M20 and provide the opportunity to create a new, high profile gateway to Ashford when viewed from the CTRL corridor. Only the permitted pre-junction 10a employment land (8,250sq m) is needed at Cheeseman's Green to help sustain a district centre. The proposals described in the Commissioners' development concept support the employment proposals of the Ashford Core Strategy and the achievement of 1,475 jobs by 2021. As set out in relation to the RSS the Church Commissioners are satisfied with the employment and economic aspirations.

The land at Cheeseman's Green North, from which employment land is relocated, is more sustainably allocated for high density housing alongside the permitted district centre and the SMARTLINK terminus indicated on the Ashford Growth Area Diagram (AGA). This juxtaposition of sustainable uses reinforces the compact growth model for Ashford.

The Development Concept for Cheeseman's Green shows the High Street at East Stour Village, for which planning permission has already been granted, at one end of the SMARTLINK route and Ashford town centre at the other. The location of the SMARTLINK terminus alongside the permitted commercial and community facilities is shown on the AGA diagram; on the SMARTLINK map it is referred to as Cheeseman's Green North, presumably to distinguish it from the intermediate stop - Cheeseman's Green - serving the new neighbourhoods to the south. It is considered that this demonstrates the way in which provision of essential infrastructure can be supported by urban extensions.

It is considered imperative that recognition should be given in the RSS to both existing built development and proposed development where land has been granted planning permission or there is a commitment to deliver planning permission. In some respects the Ashford Core Strategy does not meet this requirement, which should be enforced by the RSS. For example, at Cheeseman's Green, the location of a SMARTLINK terminus alongside a district centre including a 3500 sq.m. food store, smaller retail units, a public house/restaurant, a primary healthcare facility, a place of worship and a community centre which is designed to accommodate a range of facilities including a library, is obviously sensible and sustainable. This should be reflected in the Core Strategy aspirations.

This would be reinforced by the use of land at Cheeseman's Green North, north of the permitted district centre, for high density housing. This land could accommodate some 700 dwellings and would enhance the viability of public transport, including SMARTLINK, and support the facilities to be provided in the permitted district centre. This would create a true anchor for SMARTLINK and the three uses - public transport, district centre and housing - a highly sustainable mix. Indeed, being the closest part of the urban extension area to the town centre, they would reinforce the compact growth model sought by Ashford Borough Council and help facilitate early delivery of public transport.

The Church Commissioners therefore support the growth levels for the Sub-Region and Ashford in particular, however consider the means of delivering these levels should be robustly and realistically



8Dii/ DTZ for Church Commissioners for England (7548)

South East Plan - Regional Spatial Strategy Examination

December 2006

set out at a local level. We submit a copy of the Development Concept prepared for Cheeseman's Green for reference, as we consider it is an example of an appropriate means of facilitating the growth levels as set out in the RSS.

The Church Commissioners therefore support the overall growth levels and those for Ashford, as set out in the South East Plan, however consider there will need to be a step-change in delivery rates in order to meet these aspirations. This will require the delivery of key infrastructure to facilitate housing growth.



8Dii/ DTZ for Church Commissioners for England (7548)

South East Plan - Regional Spatial Strategy Examination

December 2006

8Dii.2 – Is the level of 30% affordable housing justified and capable of being implemented (Policy EAK3)?

The Church Commissioners have no specific comment in relation to this issue.



8Dii/ DTZ for Church Commissioners for England (7548)

South East Plan - Regional Spatial Strategy Examination

December 2006

8Dii.3 – How valid is the concept of reducing housing numbers particularly at Ashford in the event of delays in the provision of infrastructure, services and employment (Policy EKAI) and how would this be applied?

As set out in relation to 8Di.2, the Church Commissioners consider the level of growth proposed is highly dependant on a greater commitment to the delivery of infrastructure. Currently there is too great an onus on delivery of infrastructure being brought forward by the developer, which is unlikely to be achievable. It is considered local policy needs to be encouraged to strengthen the commitment of Local Authorities and relevant strategic and national bodies to deliver infrastructure and services, rather than a reduction in housing numbers to accommodate slow infrastructure provision. Indeed, it is considered that as demonstrated by the draft Concept Plan prepared for Cheeseman's Green, residential development is capable of delivering infrastructure, and associated services, therefore should be encouraged in order to promote sustainable growth.

The Church Commissioners are particularly concerned that whilst the Policy recognises that delay in infrastructure, services and employment may delay the number of dwellings that can be achieved, the Policy does not include sufficient flexibility to allow alternative sites to come forward in the event that the preferred sites are constrained. There may therefore be a shortfall in the delivery of the housing requirements within the Plan period due to infrastructure constraints. As such, the Church Commissioners suggest that it is essential that the Plan allows for sufficient flexibility to enable local planning authorities to deal with any shortfall, through the 'plan, monitor and manage' approach to housing delivery.

The Church Commissioners do not therefore consider that the concept of reducing housing figures is valid. It is clear that there are constraints to the delivery of housing, but none is insurmountable. Concerns as to the rate of growth, can be overcome through the coordinated delivery of infrastructure and flexibility in delivery, in order to achieve the required step-change in housing delivery rates.