

**SUBMISSIONS TO THE EIP  
FOR THE RSS FOR THE SOUTH EAST  
ON BEHALF OF  
HALLAM LAND MANAGEMENT LTD  
SUB-MATTER 8Dii**

**OUR REF: RSS9 8Dii**

**Prepared by**

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## 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)?**

- 1.1 The "Sustainable Communities Plan" identifies Ashford as a growth area and states that this should provide some 31,000 dwellings by 2031.
- 1.2 One of the key objectives in the Growth Areas is to achieve a 'step change' in housing completion rates (paragraph 4 of RPG9 2004). It is noted that this objective is not replicated in the draft RSS. It is therefore suggested that the policies for this Sub Region do not meet the objectives of the SCP.
- 1.3 Chapter 5 of the regional monitoring report figure 41 illustrates that with the exception of 2004 to 2005 the region has been delivering between 25,000 and 29,000 dwellings each year. The draft RSS proposes to provide a total of 28,900 dwellings a year in the region which contains not only the Ashford Growth Area but also the Thames Gateway Growth area and part of the Milton Keynes Growth Area. In considering Ashford's regional role therefore it is clear that the policies for this Sub Region have not produced the "Step Change" required by Government.
- 1.4 In considering the Role of Ashford at the lower county level figure 42 of the regional monitoring report illustrates that with the exception of 2004 to 2005 the county has been delivering between 5,000 and 5,500 dwellings each year. The draft RSS proposes to provide a total of 6,100 dwellings a year in the county is a modest increase at best.
- 1.5 The table below considers the likely demand generated from DLP's commissioned ARU projections (3,900 dwellings a year) and the output of the TEMPRO model (4,500 dwellings a year). These suggest that at a rate of dwelling provision of only 2,400 dwellings a year the Sub Region is not even meeting its own projected needs. This is confirmed by the evidence of KCC who wish to rely upon the LTM forecast but this again results in a annual rate of 2,500 dwellings a year for this Sub Region (KCC Short Term Migration annualised rate is 3,425 dwellings a year).
- 1.6 Taking all of the above assessments into account it is strongly suggested that the Draft RSS policy for this Sub Region containing the Growth Area of Ashford does not achieve a "step change" in the delivery of housing for any area except for the District itself. In this respect the Draft RSS policies for this Sub Region have "side stepped" the Governments intention of providing a "step change".

**Comparison of ARU and TEMPRO forecasts for Ashford Sub Region.**

	ARU STM Change 2006 to 2016	ARU STM Change 2016 to 2027	ARU STM Total 2006 to 2026	ARU STM Average 2006 to 2027	TEMPRO 2006 to 2016 (HH*1.03)	TEMPRO 2016 to 2026 (HH*1.03)	TEMPRO 2006 to 2026 (HH*1.03)	Ave Dwgs TEMPRO 2006 to 2026 (HH*1.03)
Kent	85,321	81,863	167,184	8359	75,378	145,713	221,092	11055
Ashford	9,442	9,950	19,392	970	11,400	22,403	33,803	1690
Canterbury	10,911	11,392	22,303	1115	5,336	9,964	15,301	765
Dover	4,828	4,779	9,607	480	4,064	7,640	11,704	585
Shepway	6,407	6,605	13,012	651	4,609	8,527	13,137	657
Thanet	6,514	6,811	13,325	666	5,491	10,219	15,710	785
Sub Region Districts	38,102	39,537	77,639	3882	30,901	58,752	89,653	4483

1.7 It is noted that much is made in the Draft Plan regard to the need to match employment with new housing in this sub area. However the evidence of the drafting authorities is clear that even with their highly amended forecasts there is likely to be an excess of employment over labour force in the Sub Region some 6,500 by 2026 (Maintaining Economic Growth in a Pressured Region table 4.2).

1.8 If the forecast from Cambridge Econometrics as utilised in the TEMPRO model is used then a comparison with the level of participants generated by a dwelling led ARU forecast produces different results. While Ashford still has a surplus of workers over jobs the situation for all other districts and the Sub Region (and County) is that by 2016 the growth in jobs will be outstripping the growth in participants and in some cases the dwelling provision is so low in the RSS that the number of participants will shrink.

**Changes in worker to total jobs RSS Dwg /Tempro**

RSS Dwg led projections	Change 2006 to 2016		Change 2016 to 2026		2006 to 2016 participants - jobs	2016 to 2026 participants - jobs
	Jobs	Participants ARU (RSS DWG led)	Jobs	Participants ARU (RSS DWG led)		
KENT	54798	22733	26831	-678	-32065	-27509
ASHFORD	4459	10709	2448	8446	6250	5998
CANTERBURY	4431	-608	2096	-2906	-5039	-5002
DOVER	3771	2964	1770	1696	-807	-74
SHEPWAY	3112	-507	1481	-2464	-3619	-3945
THANET	3260	143	1561	-2184	-3117	-3745
Sub Area Districts	19033	12701	9356	2588	-6332	-6768

1.9 It is noted that in these situations where there is a tightening of the labour market the expected result is increased commuting into the are from outside of the South East.

**Changes in worker to total jobs STM Dwg /Tempro**

Total worker to total jobs STM Dwg /Tempro	Change 2006 to 2016		Change 2016 to 2026		2006 to 2016 participants - jobs	2016 to 2026 participants - jobs
	Jobs	Participants ARU (STM DWG led)	Jobs	Participants ARU (STM DWG led)		
KENT	54798	53625	26831	21221	-1173	-5610
ASHFORD	4459	8278	2448	6764	3819	4316
CANTERBURY	4431	9620	2096	8414	5189	6318
DOVER	3771	1656	1770	-1056	-2115	-2826
SHEPWAY	3112	4053	1481	1740	941	259
THANET	3260	3697	1561	1280	437	-281
Sub Region Distriicts	19033	27304	9356	17142	8271	7786

- 1.10 The TEMPRO forecast for employment growth for the Sub Region at 1,400 jobs a year is below that of both the EIR forecast at 1,650 a year and the KCC forecast of 2,500 jobs a year. If either of these forecasts prove to be the more representative then the difference between new jobs and new participants will be even greater.
- 1.11 In considering the above information it should be noted that it fails to take into account the large level of employment land provision at Ashford which could, if taken up, change the pattern of employment growth substantially.
- 1.12 In light of the above there are clearly strong sub regional demographic and economic forces that would encourage the panel to investigate whether a higher level of provision can be accommodated in the Sub Region.
- 1.13 Turning to consider potential completion rates the 2004 revision of RPG9 required the Ashford Growth Area to deliver 7,900 new dwellings over the period 2001-2011 in response to Ashford's designation as a Growth Area (790 dwellings per year).
- 1.14 The housing trajectory in appendix 1 extracted from the Council's monitoring statement shows this RPG requirement. This illustrates that if the proposed areas for development in the first phase are brought forward Ashford will exceed the RPG requirement of 7,900 by an estimated 1,254 dwellings by 2011. For the period 2011 to 2016 the RPG requires a rate of 1040 per year, if the Council's projected higher rates of completion were to continue during this period at about 1,100 a year then the post 2016 requirement would be 16,346 dwellings (31,000 - 5,500 - 9,154) or 1090 a year.
- 1.15 While the council are suggesting such rates can be achieved in accordance with the current Greater Ashford Development Framework (GADF) it is our opinion that the long term maintenance of these rates of completions will need a number of areas to be under construction at the same time and as such it is considered that serious consideration needs to be given to the early release of what are currently Phase 2 sites in order to achieve these higher rates of completion and therefore justify a reduced rate in the post 2016 period.
- 1.16 It is noted that the council suggest in their core strategy that the development of all three major urban extensions would result in the unnecessary take-up of greenfield

land at an early stage, contrary to the objectives of Government planning policy. It could be argued conversely that the failure to deliver an early step change in the level of new housing completions would also be a failure of government policy and when the need is greatest during the early part of the plan periods and the fact that all three locations will be required to meet the Governments targets such in any event suggest that the “greenfield” issue as far as it is a concern is a matter of timing rather than principle.

- 1.17 It is noted with some concern that the approach in the core strategy adopted by the council and the suggestion in the RSS to under provide dwellings in the post 2026 period together with the lack of a step change in the rate of delivery of housing in the sub area all suggest that the drafting authorities are not willing to pursue the growth agenda set by the government for this area. It is our view that this is an inappropriate response to the national, regional and sub regional issues in this area.
- 1.18 Ashford’s suggestion in their Core Strategy that early release of all three urban extensions may prevent the early development of brownfield sites within the town centre clearly prioritizes redevelopment of limited PDL sites above achieving the government’s growth targets. It is also a more restrictive approach to that which has been adopted by Milton Keynes where simultaneous release of large urban extension sites together with the realisation that there would be a continued flow of PDL sites from the urban area and that the holding back development of urban extensions would compromise meeting the objectives of the Growth Area. In terms of creating community and public transport services this may be achieved by higher rates of revenue brought about by the higher levels of growth that could occur with the release of all three areas concurrently.
- 1.19 Higher levels of dwelling provision appear to be achievable based upon the council’s current trajectory on this basis, and particularly in light of the large scale under provision of housing that is being contemplated in the South East a higher rate of growth in the post 2016 to 2026 could easily be justified. In particular we would note from the ARU projections that DLP Planning have run to 2031 for the South East the higher levels of demand are in the early period of the Draft Plan, in terms of the migration led projections.
- 1.20 In considering the ability of the area to perform as the council have stated. It should be noted that the published timescales for DPD preparation in Ashford have already slipped some six months from the approved LDS programme. DPD to bring forward the proposed urban extensions are consequently unlikely to emerge before 2008. To meet PPS3 requirements DLP have submitted representations to Ashford’s Core Strategy to adopt a plan period to 2026 and a strategic spatial approach to the allocation of sites that will maximise opportunities for housing delivery in that period, this must include commencement of delivery from urban extensions at the earliest opportunity.
- 1.21 One of the key objectives in the Growth Areas is to achieve a ‘step change’ in housing completion rates (paragraph 4 of RPG9 2004). The Council should be aware of longstanding research by RTP that has demonstrated that build rates can be generally increased by providing for a greater number of deliverable sites across an area.

- 1.22 DLP do not consider that the suggested high rates of provision can be sustained in the early part of the plan period with just two peripheral urban extensions. It is our considered view that to achieve the necessary delivery, a further urban extension to the south of Ashford will be necessary.
- 1.23 It is considered that there are still issues to be addressed in the re-planning of the presently selected Phase 1 locations and that this may cause problems with the delivery of the requisite number of dwellings to meet the Governments Sustainable Communities Plan. The main delay has been caused by Ashford Borough in granting planning permission. While it is true that there are constraints to delivery and in particular improvements to Junction 10 these infrastructure improvements are being put in place as part of these developments will assist in releasing further development.
- 1.24 It is considered that there is the capacity for 31k houses and no reason why these can not be delivered by 2026.
- 1.25 There are clearly strong demographic pressures for higher rate of dwelling delivery in this Sub Region and the Panel is requested to interrogate the drafting authorities why these are not being met and what alternatives the drafting authorities have considered in this Sub Region to meeting these needs. It is our opinion that a higher rate of development could be delivered without harming the strategic environmental assets of the Sub Region and this could be achieved by proceeding with development on other site sin the Ashford Growth Area rather than restricting the development to the two presently in the GADF.

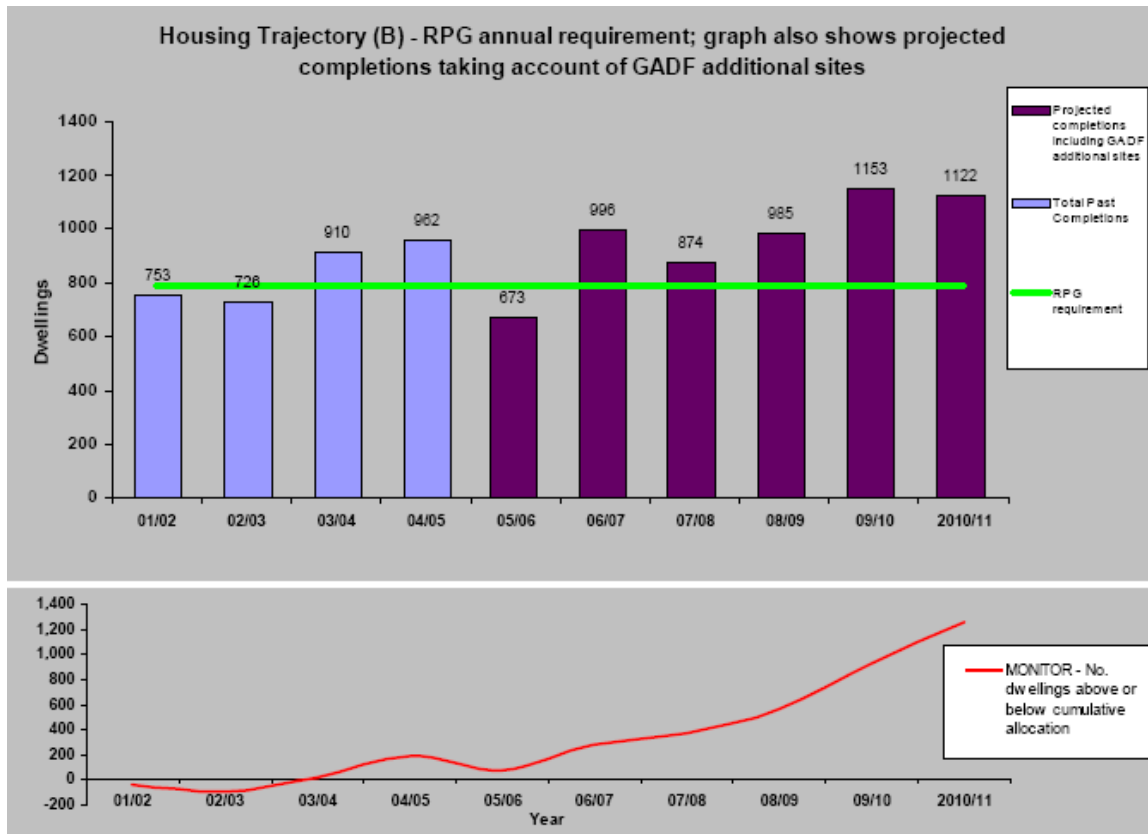
**8Dii.2 Is the level of 30% affordable housing justified and capable of being implemented (Policy EAK3)?**

- 2.1 The percentage of affordable housing need to be justified in terms of the overall level of housing to be provided. It is the Government's aim to encourage home ownership and therefore affordable housing should not attempt to substitute tenure when there is clear evidence that households in the housing market can continue to purchase dwellings at the rate they are coming forward. If it is intended to supply dwellings at rates beyond which the market can consume then there is justification to provide this additional element in the form of affordable housing in order to provide for those who can not compete within the market.
- 2.2 There might also be a justification based upon the need to secure certain skills within the growth area however this is very much a local demand and should be treated as an additional element to the calculation of the overall level of housing provision.
- 2.3 In light of these factors and the understanding that the figure of 30% is only a guide then it would appear to be too high if the Government's aim is to increase access to market housing. Restricting the level of new market housing to below the existing proportion of market housing to social housing would appear to be contrary to this objective.

**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 EKA1) and how would this be applied?**

- 3.1 There would appear to be a contradiction between policies EKA1 and Ashford Policy 1 which is retained unaltered in so far as the newer policy suggests that lower levels of completions might be justified in this Growth Area based upon the delivery of infrastructure and employment.
- 3.2 It is accepted that if specific infrastructure required to access and service sites is not in place then sites cannot come forward. This it is argued strengthens the case to bring all three growth areas forward at the same time so that any problems which arise with one can be off set to some degree by the continued progress and development of the other two. In terms of the provision of infrastructure to serve the needs of the wider community it is normal for these to be provided as demand arises and not before. There would appear to be no justification in the delaying of this important contribution to the housing needs in the South East.
- 3.3 Given the evidence outlined in our submissions on matters 8Di.1 and 8Dii.1 it is not considered that there can be any justification in reducing housing numbers at Ashford.

**APPENDIX 1**



	2001/02	2002/03	2003/04	2004/05	2005/06	2006/07	2007/08	2008/09	2009/10	2010/11
Total actual / projected completions	753	726	910	962	673	966	774	640	578	622
GADF additional sites	-	-	-	-	-	30	100	345	575	500
Completions plus GADF additional sites	753	726	910	962	673	996	874	985	1153	1122
Cumulative completions	753	1479	2389	3351	4024	5020	5894	6879	8032	9154
RPG - Strategic requirement	790	1580	2370	3160	3950	4740	5530	6320	7110	7900
Monitor - Number of dwellings above or below RPG requirement	-37	-101	+19	+191	+74	+280	+364	+559	+922	+1254