

8Dii/Scott Brownrigg on behalf of Kier Property (277)



**RESPONDENT NUMBER 277
SCOTT BROWNRIGG ON BEHALF OF KIER
PROPERTY LTD**

**MATTER 8Dii
EAST KENT AND ASHFORD (ASHFORD)**

1.0 BACKGROUND

- 1.1 Kier Property is one of the UK's leading commercial property developers and it has substantial business interests in the South East region. Consequently, the company can make a significant contribution to the Panel in informing the debate into the soundness of the Plan.

2.0 OBJECTION

- 2.1 Previous representations made by Scott Brownrigg dated 15 May 2006 stated that Kier Property considers that the Plan is unsound for the following reasons:

1. the Plan does not properly take into account related policy initiatives and programmes relevant to meeting regional economic, environmental and social needs, where these directly impact on the development and use of land;
2. the Plan does not meet the objectives for a RSS as set out in paragraph 1.7 of PPS11;
3. the Plan is not consistent with national planning policy and the case has not been adequately made for departing from national policy;
4. the Plan is not consistent with the regional economic strategy; and
5. the Plan is not robust and able to deal with changing circumstances.

- 2.2 In response to the Final List of Matters, two main issues are discussed in these representations, being;

- the inconsistency with national policy with respect to housing projections; and
- the inconsistency with meeting the objectives of a RSS, particularly in its reliance on the Greater Ashford Development Framework (GADF), a background document prepared for Ashford Borough Council's Local Development Framework (LDF).

3.0 FINAL LIST OF MATTERS - 8Dii ASHFORD

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)?*

3.1 The RSS housing provision figures for both the South East and for Ashford are inconsistent with related policies and documents such as the Office of the Deputy Prime Minister's (ODPM) Sustainable Communities Plan, the South East of England Development Agency's (SEEDA) Regional Economic Strategy, and the Ashford Local Development Framework (LDF), including the background document, the Greater Ashford Development Framework (GADF). Critically, the lower housing provisions may harm the economic growth targets for the region and compromise initiatives to direct growth to Ashford. This would have a significant impact on Ashford, as an identified Major Growth Area by the Government's Sustainable Communities Plan.

3.2 SEEDA's RES adopts a target of an average annual increase in Gross Value Added (GVA) per capita of 3% for the region (p.6). The Review of the RES Consultation Document states that:

*'in order to support an economic growth forecast of 2.99% GVA per annum... housing completions in the region would need to be at a rate of **48,000 per annum over the period 2006 - 2016**. This strategy proposes reducing the need for more houses to some 35,000 per annum, by accelerating the rate of productivity growth and reducing economic inactivity. Given recent levels of housing completions, which rose to 31,900 in 2004-05, this would suggest a need for at least 32,000 dwellings per annum in the period to 2011, rising to 36,000 per annum thereafter to 2026'.*

3.3 Despite these figures, the RSS proposes to only provide for '**an annual average of 28,900 net additional dwellings between 2006 and 2026**'; well below even the lowest per annum figure suggested by the RES to achieve a GVA of 2.99% per annum. Even more questionable is their suggestion that economic growth can be overcome by the following (p.60):

- *'Changes in productivity - Increases in productivity would require fewer workers to produce a given output...*
- *Changes in industrial structure within the South East with a continuing decline in manufacturing and higher proportions of workers employed in the service sector*
- *Economic growth in other regions, in particular London and the North*
- *Loss of businesses to other countries ('offshoring')...*
- *Double jobbing...*
- *Increases in labour supply. Increases may result from:*
 - *Migration...*
 - *More workers living elsewhere commuting into the region and fewer resident workers travelling outside the South East to work...*

...
 - *Changes in activity rates...To increase these rates further would require co-ordinated action to bring into the labour market people of working age who are economically inactive or significantly extend the average retirement age'. (p.29)*

- 3.4 It is beyond the means of the RSS to dictate decisions which would raise the average retirement age, increase productivity levels or allocate economic growth to London or the North. Further, these suggestions made in the RSS about meeting economic growth are not supported by the RES. These suggestions are fundamentally flawed and the principal means of meeting the economic growth target of 2.99% GVA per annum is to increase housing provision as suggested by the RES.
- 3.5 The ODPM's Sustainable Communities Plan sets a target of 31,000 new homes and 28,000 new jobs by 2031, which is a figure reflected in the RES and the GADF. Policy H1 of the RSS provides for only 22,700 new homes for Ashford between 2006-2026. Whilst there is a five year difference between these figures, if the annual rate of growth as provided for Ashford in the RSS were projected forward to 2031, by this period there would be **a deficiency of 2,625 dwellings**.
- 3.6 Even if a figure of 31,000 dwellings for Ashford between 2006-2031 were to be adopted, latest projections indicate that housing needs will increase. The Government Office for the South East made representations to the draft South-East plan reinforcing similar concerns over the proposed housing provision. Importantly, the Government stated that:
- 'the 2003 based household projections, published in March 2006 indicate that the **households in the region may grow by about 739,000 between 2006 and 2026 as opposed to the 606,287 indicated by SEERA projections that underpinned the highest option consulted for the draft RSS**'.*
- 3.7 Kier believes that Ashford can accommodate **at least an additional 5,000 new homes**. Kier has already identified a site within 3km of Ashford which is available and suitable, with minimal environmental or physical constraints and with good links to the town centre. Further, it follows an established urban growth pattern to the north of Ashford.

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?*
- 3.8 The housing figures in the RSS are currently far lower than any housing figures used by the Government Office, SEEDA or Ashford Borough Council. The possibility of a further reduction is likely to compromise the aims of other plans and policies (particularly those relating to directing growth to Ashford, as a designated Major Growth Area) and will damage the economy.
- 3.9 Paragraph 2.1 of Section E3 of the RSS states that the Plan *'draws upon the Greater Ashford Development Framework'*. In referring to the GADF, the RSS is inconsistent with paragraph 1.7 of PPS11, which inter alia, states that the RSS *'should not address local issues which should be the subject of a Local Development Document'*. The GADF is a background document that informs the LDF and it has not been tested by examination. Kier is concerned that as a result of only providing for 31,000 new homes in Ashford between 2006-2031, the GADF has not considered other sites which are also suitable for housing and it will become quickly out-dated. Further, the LDF has not been formally adopted or even undergone an independent examination.
- 3.10 The Core Strategy of the LDF states that from the outset the Council has emphasised the need for a capacity-led approach to development. A spatial method of community consultation was undertaken for the GADF whereby tiles representing three density types were placed by participants on a map of Ashford, to aid discussion on the distribution of housing. However as stated in the GADF, *'all of the tiles added up to the 31000 housing units'*. As a result, not all available locations such as the North Ashford Development Corridor were properly assessed. **Appendix 1** illustrates this point by examining some of the sites identified to accommodate the housing provision for the Plan period, and compares the distance and urban and environmental constraints with Beechbrook, a broad location within 3km of Ashford Town Centre, which has not been identified in the GADF. It shows that Beechbrook is more accessible and less environmentally constrained than some other identified locations. It relies less on infrastructure and services by taking advantage of those which already exist, follows an established growth pattern along the A20 corridor, and provides good connections to Ashford Town Centre.
- 3.11 Whilst Cheeseman's Green has been allocated for an urban extension since the 1980s, and now has planning permission, the Core Strategy states that the site and others in its vicinity are constrained by the delivery of junction 10A (para 5.16). Cheeseman's Green does not contribute to a sustainable urban growth model. For this reason, Kier believes that the *'mend before extend'* approach as purported to have been adopted by the GADF exercise has not addressed decisions of the past where the principal constraints have continued to be unresolved. An approach which is focused more on the capacity of Ashford rather than housing requirements has the

opportunity to identify more locations in Ashford which can accommodate growth beyond the 31,000 dwellings by 2031 as set out in the Sustainable Communities Plan.

- 3.12 Kier believes that the RSS should allow for changes to housing requirements, and should not refer to an untested document, in particular the GADF. Kier believes that Ashford could deliver a greater step-change in housing supply, at least an extra 5,000 new homes in the short-term. As such the March 2006 housing projections can be realised, with the majority of the required provision directed at Ashford, as a Major Growth Area. The concept of reducing housing numbers is therefore invalid, given there are broad locations in Ashford which can accommodate further growth in sustainable locations with limited reliance on the delivery of new services and infrastructure.

4.0 CONCLUSION

- 4.1 In response to Question 1 of Matter 8Dii, the level of housing provision proposed at Ashford post 2016 does not take appropriate account of its growth area status, local constraints and opportunities and current build rates. Kier believes that the housing provision does not reflect up-to-date housing figures post 2016, which could jeopardise Ashford's future as a Major Growth Area.
- 4.3 In response to Question 3 of Matter 8Dii, the concept of reducing housing numbers in Ashford in the event of delays in the provision of infrastructure, services and employment is invalid. The housing provision set out in the RSS already falls short of the figures set out in all other national, regional and local figures, and there are available locations within Ashford which are not overly reliant on the provision of new infrastructure and facilities, and can deliver more homes than the figures already identified by the Sustainable Communities Plan. Kier believes that a greater provision of housing of at least 5,000 new homes can be achieved.
- 4.2 As such, Kier requests that the following key changes are made to the RSS:
- a realistic means of achieving economic growth of 2.99% GVA per annum through increased housing provision, based on current housing projections;
 - at least an additional 5,000 new homes to be distributed to Ashford; and
 - deletion of reference to untested strategies for the spatial distribution of housing in and around Ashford, in particular the GADF. The GADF has not explored sites to accommodate growth above the allocated housing provision set out in the Sustainable Communities Plan, which is already outdated.

- 4.3 If the housing provisions set out in the RSS are not revised to reflect up-to-date projections, this is likely to damage economic growth and compromise Ashford's future as a Major Growth Area.