JohnsonMowat
Planning & Development Consultants

Ashford Local Plan Examination

Issue 5

Housing Land Supply Statement

Prepared on behalf of Gladman Developments Ltd

Representor ID 367

March 2018

Introduction

1.1 This Hearing Statement has been prepared on behalf of Gladman Developments Ltd to assist the Inspector in the consideration of matters relating to the Council's housing land supply position only. It covers both the five year supply and supply of housing across the life of the plan.

1.2 The statement should be read in conjunction with the Gladman Issue 4 response, prepared by Regeneris Consulting, which considers the appropriate OAN for Ashford District.

1.3 Our statement is supported by a review of the Council's Local Plan Housing Trajectory, which is set out at Appendix 1 and includes a full review of the delivery of emerging Local Plan allocations contained within. Appendix 2 is a thorough review of this Council's performance on the timescales taken to delivery planning decisions.

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?

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i. Are the assumptions and analysis regarding site suitability, availability and achievability and development capacity in the Strategic Housing and Employment Land Availability Assessment (SD12) reasonable and realistic? Is this assessment sufficiently comprehensive and rigorous having regard to the PPG on Housing and economic land availability assessment (ID3)?

1.4 The 2017 SHELAA contains an inadequate approach toward the Council's methodology for considering lead in times and delivery rates under 'Screening Part 3 – Achievable Sites and Development Potential'. This section simply states that market, cost and delivery factors have all informed the Council's judgement as to what particular point in time a site is envisaged to come forward, and the quantum of supply considered achievable.

1.5 Further assessment of each individual site for the purposes of calculating a five year housing land supply position can be found within the Council's December 2017 Topic Paper, which addresses each of the individual sites and provides commentary as to the quantum of supply considered deliverable in each case for the period 1st April 2017 to 31st March 2022.

1.6 The lead in times and delivery rates assumed in the Council's Local Plan Housing Trajectory are not considered to be realistic, and can be best described as a 'leap of faith'. Scrutiny of the Council's trajectory shows that the Authority consider almost all of the sites contained within to have commenced delivery inside the period 1st April 2018 to 31st March 2021.

1.7 In many cases, sites have yet to obtain planning permission, with no records of any applications having been made. Despite all this, the Council have considered a number of sites as commencing delivery from 1st April 2019, i.e. units coming out of the ground some 12 months from now. By way of example, both Park Farm South East (S14) & Eureka Park (S20) are identified as large scale major sites, yet both have been subject to no pending or approved applications, with the Council's Local Plan Housing Trajectory considering 50 dwellings will be delivered from each site across the 2019/20 monitoring year.

1.8 In addition to the above, a number of major strategic sites within the Council's Housing Trajectory require the Junction 10a improvement works to complete before any units on site can be occupied. The current Highways England programme for completion of the Junction 10a works is May 2020, however it is understood Highways England the road may be open to traffic by Summer 2019. Irrespective of this constraint, there will undoubtedly be further lead in times for the preparation and determination of applications, site marketing and legals, detailed reserved matters submissions, discharge of pre-commencement conditions, site purchase (valuations), up front site infrastructure works and lead in times to first completions.

1.9 The Council's past performance in bringing forward emerging Local Plan sites further brings the achievability of sites set out in the Local Plan housing trajectory into question. Included at Appendix 2 is a review of all those Local Plan sites which have been subject to planning applications, some of which remain undetermined. The average timeframe from validation of a planning application through to determination is shown to take an average of 23 months.

1.10 Unfortunately, this is not a statistic that is attributable only to major strategic sites. A review of the Appendix 2 list of sites shows that a number of smaller scale developments comprising less than 50 dwellings have seen significant delays. These include:-

- *U5, Blackwall Road (34 dwellings) – 19 months*
- *U1, Abbey Way (23 dwellings) – 24 months*
- *U11, Land at Butt Field Road, Singleton (14 dwellings) – 29 months*
- *S29, Land south of Arthur Baker Playing Field, Charing (42 dwellings) – 38 months*
- *ROLV1, Rolvenden Football Ground, Rolvenden (40 dwellings) – 29 months*
- *S36, Land rear of Kings Head PH, Shadoxhurst (19 dwellings) – 24 months*

1.11 The NPPG advocates that Local Authorities should take account of the local delivery record in preparing their annual supply assessment[1]. The Council's Housing Trajectory takes a much more optimistic view, and would suggest that many sites could facilitate first completions some 12 months from an immediate planning application being submitted. That is not a robust assumption, and in our experience lead in times generally average around 30 months, not accounting for the Council's record in determining individual applications.

ii. Are the sites relied upon for the supply of housing deliverable and developable in accordance with paragraph 47 of the NPPF? Does the evidence provided in Appendices 1 and 2 of the Housing Topic Paper (SD08) give sufficient confidence that sites will be delivered as anticipated? Is there an over-reliance on large site allocations?

1.12 Our assessment of the Council's Local Plan Housing Trajectory, and comments in respect of individual sites is set out at Appendix 1. As set out above in response to point i), we consider the Council's assumptions with regard to lead in times and delivery rates to be over optimistic.

1.13 The Council's largest contributor to the supply is Chilmington Green, with some 2,500 dwellings envisaged to be delivered across the plan period to 2030, delivering an average of around 200 d/pa from 1st April 2020 onward. Through recent s.78 Inquiries, the Council have informed that developers involved with the Chilmington Green urban extension are overly bullish with regards to the quantum of achievable supply. In our view, the Local Plan Housing Trajectory fails to account for the actual position on the ground.

1.14 At the time of writing, only a single reserved matters application has been forthcoming for a total of 346 dwellings. The application remains undetermined and no dwellings currently benefit from detailed permission. The application for 346 dwellings currently before the Council was deferred by Committee on 14th February to allow for further information to be prepared & submitted, and a re-consultation exercise undertaken.

1.15 The Local Plan Housing Trajectory assumes however that 50 completions will be achieved from 1st April 2018, rising to 150 completions the following year. Such assumption does not reflect the current planning status of the site, and the inherent delays associated with bringing a site of this scale forward.

1.16 We consider it unlikely and unrealistic that the site will deliver the 2,500 dwellings envisaged by 2030 and that delivery rates will exceed the 200 d/pa projected by the Council. As Chilmington Green is the largest contributor to meeting the plan requirement, it is imperative that delivery rates are not overstated to ensure a realistic prospect of the target being met.

[1] NPPG Paragraph: 033 Reference ID: 3-033-20150327

iii. What should be the starting date for consideration of a 5 year supply?

1.17 The Council have accepted through recent s.78 Inquiries that a 1st April 2018 base date is now appropriate as we move into a new monitoring year.

1.18 Through evidence presented at the recent Pluckley Road, Charing Inquiry, the Council have confirmed that completions for the current 2017/18 monitoring year are anticipated to fall below expectations set out in the Housing Trajectory, with a projected total of 562 completions. This represents a further year of under supply and re-affirms the application of a 20% NPPF buffer.

iv. How is any shortfall in delivery since the start of the plan period to be dealt with? Should this undersupply be dealt with within the first 5 years or over a longer period? Should the shortfall be calculated against the Strategic Housing Market Assessment (SD13) figure of 825 dwellings per annum or the annual housing target in Table 1 of 848 dwellings per annum? Is the application of a 20% buffer in addition to the annualised housing target and shortfall since 2011 justified?

1.19 We consider the Sedgefield approach as the most appropriate, that being dealing with the shortfall in delivery over the immediate five year period. The Council have accepted this approach through recent s.78 appeals, as advocated by the NPPG[2].

1.20 Whilst recent s.78 Inquiries have considered past under supply against the 825 d/pa figure, we consider that for the purposes of plan making, the 848 d/pa requirement would be more appropriate as the plan advances and is given greater weight. This would assist with ensuring that the plan requirement will actually be met, and that the additional capacity can be delivered.

1.21 With reference to the Issue 4 Statement prepared by Regeneris consulting, we are aware that others consider an OAN of 989 d/pa would be appropriate and have put forward three alternative supply figures at the end of this statement.

1.22 In terms of past performance, we are clear that a 20% buffer would be appropriate, and that the Council have persistently under delivered. The Council have accepted a 20% buffer through recent s.78 Inquiries. The Council's previous performance against the 825 d/pa requirement and previous CS requirement is set out below. As can be seen from the table, the Council met or exceeded their requirement in one monitoring year, with completions since the start of the plan period being woeful in some instances (i.e. 137 completions in Year 2013/14).

[2] Paragraph: 035 Reference ID: 3-035-20140306

Year	Requirement (d/pa)	Net Completions	Shortfall +/-
Adopted Core Strategy Requirement			
2001/02	1,118	753	-365
2002/03	1,118	728	-390
2003/04	1,118	910	-208
2004/05	1,118	962	-156
2005/06	1,118	590	-528
2006/07	1,118	359	-759
2007/08	1,118	566	-552
2008/09	1,118	536	-582
2009/10	1,118	501	-617
2010/11	1,118	555	-563
Total	**11,180**	**6,460**	**-4,720**
January 2017 FOAN			
2011/12	825	633	-192
2012/13	825	284	-541
2013/14	825	137	-688
2014/15	825	405	-420
2015/16	825	1,022	+197
2016/17	825	696	-129
2017/18	825	562	-263
Total	**5,775**	**3,739**	**-2,233**

v. Is the housing trajectory at Appendix 5 realistic and does it form an appropriate basis for assessing whether sites are deliverable in line with footnote 11 of the NPPF?

1.23 We consider the Council's Housing Trajectory remains too optimistic. Our own assessment of the Council's Housing Trajectory and commentary on specific sites is set out at Appendix 1.

1.24 The Council accept through recent appeals that a 1st April 2018 base date is now appropriate, however much of the evidence supporting the Local Plan Trajectory and in particular the Housing Topic Paper relates to a 1st April 2017 base date, despite having only been produced in December 2017.

1.25 In the case of many sites contained within the Council's Housing Trajectory, there has been little to no progress in advancing the site over the 2017/18 monitoring year, therefore the Local Plan Trajectory should be updated to reflect the current position and agreed base date.

1.26 As set out at in response to point i), the Council place heavy reliance on a number of sites currently constrained by existing infrastructure requirements, placing delivery inside the immediate five year period challenging.

1.27 With regards to the Footnote 11 test of deliverability, we draw attention to the recently published draft PPG text which offers revised guidance as to how sites without the benefit of planning permission should be considered:-

> ***"How should sites without planning permission be included?***
>
> *Where there are sites without the benefit of planning permission more detailed commentary and evidence should be provided, in line with the definition of deliverable, to include:*
>
> - *any progress being made towards the submission of an application;*
> - *any progress with site assessment work; and*
> - *any relevant information about site viability, ownership constraints or infrastructure provision which has informed the conclusions about likely deliverability."*

1.28 At the recent Pluckley Road, Charing Inquiry, the Council through evidence sought to refer to the St Modwens Court of Appeal judgment as a basis for watering down the Footnote 11 test of deliverability, considering an even greater quantum of forward supply could be achieved. Proper scrutiny showed the Council's position to be wrong, and one which does not follow any guidance contained within the Framework or PPG.

1.29 Recent consultation on the revised Framework shows the Government's intended direction of travel, placing more emphasis on delivery and the homes which are needed to be provided. It is therefore unsurprising that national policy is now seeking to strengthen the Footnote 11 deliverability test as set out in the Annex of definitions to the revised Framework as follows:-

> *"To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. Small sites, and sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (e.g. they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).* ***Sites with outline planning permission, permission in principle,***

***allocated in the development plan or identified on a brownfield register should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years**."*

1.30 The final paragraph is highlighted, as it represents new wording currently not contained within Footnote 11. The distinction is however important, and it is clear that Local Authorities will be expected to provide robust evidence moving forward to demonstrate that completions will be brought forward as intended.

1.31 As set out within our review of the Council's Housing Trajectory, in many cases the Housing Topic Paper has pointed to little evidence to show that progress is being made toward the submission of a planning application. This confirms the Local Plan Housing Trajectory is unrealistic in its assumptions, particularly where the majority of sites are considered to facilitate first completions in 12-24 months from now.

vi. Does the contingency buffer of over 1,000 dwellings provide sufficient flexibility to accommodate unexpected delays whilst maintaining an adequate supply?

1.32 No, for the reasons set out in our commentary to support the Local Plan Housing Trajectory, several sites within the Council's assessment are unreliable, and the Council's projected lead in times and delivery rates are considered optimistic.

1.33 The total Local Plan requirement inclusive of future proofing unmet need is 16,120 dwellings to be delivered 1st April 2011 to 31st March 2030. Known completions for the period 1st April 2011 to 31st March 2017 total 3,177 dwellings, leaving a residual requirement of 12,943 dwellings to be met across the remainder of the plan period.

1.34 The Local Plan Appendix 5 Housing Trajectory considers the delivery of 13,974 dwellings across the period 1st April 2017 to 31st March 2030. When taken together with the 3,177 dwellings delivered to date provides for a total of 17,151 dwellings against a plan requirement of 16,120 dwellings. This equates to a buffer of 1,031 dwellings, or **6%**.

1.35 We consider such buffer totally inadequate and does not factor in a sufficient resilience factor to allow for slippage on strategic sites. The Council have a track record of non-delivery, therefore it is imperative there is sufficient headroom to ensure the plan requirement will actually be met.

1.36 In response to point ii), we have set out our comments in respect of Chilmington Green. The ability of the site to form the main contributor to the Council's forward supply and deliver 2,500 dwellings across the plan period is questioned. The site remains subject to a single reserved

matters application yet to be determined. Delays bringing forward the Chilmington Green and any over reliance on the delivery rates put forward in the Local Plan Housing Trajectory would soon see the contingency buffer of 1,000 dwellings significantly reduce. Our Housing Trajectory set out at Appendix 1 considers little over 2,000 dwellings deliverable from this site within the Plan period, particularly if completions fail to exceed to 200 d/pa and there are inevitable fluctuations in delivery to account for the timing and determination of further reserved matters submissions. This would reduce the Council's position by around **500 units**.

1.37 Furthermore, we express concern that both the Willesborough Road, Kennington (S2) and Court Lodge, Kingsnorth (S3) sites will see slippage and delivery outside the plan period of some **440 dwellings**, owing to the progress made to date and further steps necessary before first completions can be brought forward.

1.38 In addition to the above, our review of the Council's Local Plan Housing Trajectory at Appendix 1 challenges the delivery of several sites identified as former allocations within the five year period. These include:-

- Lower Queens Road (U4 and S8) – 40 dwellings;
- Ashford South Primary School (U6a and S13) – 110 dwellings;
- Leacon Road (U7 and S11) – 100 dwellings; and
- Former Klondyke & Newton Works (S6 and S7) – 350 dwellings
- **Total 600 dwellings**

1.39 These sites are former allocations with a track record of non-delivery and therefore the Council should take a cautious approach in relying upon their ability to deliver the plan requirement. In our view, it would be more pragmatic to consider the above sites as 'windfall', to ensure a realistic prospect of the plan requirement being met and sites contained within the Council's trajectory delivering.

1.40 Similarly, we refer to the Gasworks Lane (S10) site, which is not envisaged to deliver until the very back end of the Local Plan trajectory in years 2028/29 and 2029/30. There is clearly little confidence in the short to mid term delivery of this site and we consider it would be better categorised as windfall in order to allow the Local Plan requirement to be met.

1.41 When taking the above points into consideration, we have identified a realistic prospect that a total of 1,680 dwellings identified in the Council's trajectory would not be delivered within the plan period. This is significantly in excess of the Council's marginal buffer of 6%.

1.42 We advocate the Council revise their projections accordingly, and include a minimum 15-20% buffer above the Local Plan requirement, owing to performance to date and a track record of non-delivery.

vii. Has the Council made reasonable assumptions about average densities in Table 1 of the Strategic Housing Land and Employment Availability Assessment (SD12) bearing in mind PPG advice (ID3-017-20140306)? Has this been translated into the capacity estimates for allocated sites?

1.43 We have not considered the densities put forward as part of the SHELAA in further detail, however we raise no comment and would consider these appear broadly correct.

viii. Is the approach to windfall sites justified having regard to paragraph 48 of the NPPF? Why is it assumed that there will be 150 windfalls units in 2021 and 100 from 2022-2030? Having regard to paragraph 48 of the NPPF should windfall sites be included in the 5 year supply? Is the 25% non-delivery rate of extant windfalls reasonable?

1.44 The Council has recently sought to increase the windfall allowance through the Pluckley Road, Charing Inquiry to in excess of 1,000 dwellings across the five year period. This includes an increase of 50 dwellings on projected future windfalls within the five year period, together with the removal of the 25% lapse rate applied to commitments.

1.45 Firstly, we disagree with the Council's approach to Windfall. The Local Plan Appendix 5 Housing Trajectory identifies a total of 799 windfalls as deliverable between 1st April 2017 to 31st March 2022. This equates to an average annual rate of broadly 160 d/pa or 800 dwellings across a five year period.

1.46 Such assumption would accord with the average annual record of windfall delivery to date since the start of the plan period, as set out on page 20 of the 2017 SHELAA. This informs of an average annual windfall delivery rate of 164 d/pa.

2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	Total	Average
165	119	81	168	334	114	**981**	**164 d/pa**

1.47 Careful examination of the Council's Local Plan Housing Trajectory shows the extent of windfall within the five year period is over stated. Firstly, 'major windfall' is identified within the trajectory at Tenterden, Tilden Gill. The delivery of this site is not challenged and is projected to deliver 100 dwellings across the five year period.

1.48 Additionally, the Council are now arguing the addition of further sites not already accounted for within the trajectory, such as Panorama Living. It is clear from the reading of Committee Papers (ref 08/00396/AS) that there was no specific policy in place for the redevelopment of the site at the time the application was approved, the site was therefore by definition 'windfall'. The Council

are now through the Pluckley Road, Charing Inquiry seeking to include a further 110 dwellings within the supply from this site, with its omission from the Local Plan Housing Trajectory considered an oversight.

1.49 When taking the above collectively with unidentified windfall sites set out in the Local Plan Housing Trajectory, the Council's position is that circa 1,000 windfall units will deliver across the five year period. This is at odds with the SHELAA average and should be reduced so as not to overstate the contribution from future unknown supply.

1.50 With regards to the lapse rate, it would not be a robust assumption to consider that all windfall sites subject to permissions will deliver within the five year period. Clearly some permissions will lapse, some will take longer than anticipated to implement, and some will be subject to further applications to extend their lifetime. A number of appeal decisions have supported a 10% minimum lapse rate to account for the above.

1.51 In our view, the Council Should consider their evidence base, would suggest the Council undertake a review of lapsed permissions in order to consider an appropriate rate to be used going forward. As above, we do not however accept that no lapse rate at all should be included as per the Council's updated five year supply position at the Pluckley Road, Charing Inquiry.

ix. Does the Local Plan contain a housing implementation strategy describing how delivery of a five year supply of housing land to meet the housing requirement will be maintained in accordance with paragraph 47 of the NPPF?

1.52 We do not consider the Local Plan to be sufficiently robust in respect of this point. The Local Plan is not explicit in how the Council will aim to monitor and maintain a deliverable five year housing land supply. The Monitoring Framework found at Appendix 6 of the Local Plan references the target housing requirement but provides for no trigger or intervention mechanism for rectifying the shortfall should delivery fall behind projected completions.

1.53 Our response to question v) has identified a number of concerns with regards to the Council's headroom of only 6% above the Local Plan requirement and further concerns set out at Appendix 1 with regard to the delivery of strategic allocations inside the plan period.

Five Year Housing Land Supply Position

1.54 Our review of the Council's Local Plan Housing Trajectory is set out at Appendix 1, together with our comments in respect of the delivery of individual sites. As can be seen from our trajectory, we express a number of concerns with the Council's position and the timings for starts and completions across a number of sites.

1.55 Our conclusions with regards to the deliverable five year housing land supply as of a 1st April 2018 base date are set out below.

Johnson Mowat Deliverable Supply 1st April 2018 to 31st March 2023

Category	Johnson Mowat
Town Centre Sites	1,184
Chilmington Green	610
Urban Sites	1,823
A20 Corridor Sites	0
Rural Sites	1,265
Neighbourhood Plans	100
Windfalls	935
Total	**5,917**

1.56 Should however the Inspector express preference for a 1st April 2017 base date, the total deliverable supply for the period 1st April 2017 to 31st March 2022 as set out within our trajectory at Appendix 1 would be a reduced quantum of **5,260 dwellings**, reflective of the fact that many sites are yet to see progress.

1.57 Having regard to the above, we set out the following 3 scenarios based on a varying OAN of:-

- Scenario 1 – **825 d/pa**
- Scenario 2 – **848 d/pa**
- Scenario 3 – **989 d/pa**

1.58 Our calculation with regards to Scenario 3 should be considered in conjunction with representations made by Regeneris consulting regarding the appropriate District OAN.

Scenario 1a – Five Year Supply 1st April 2018 to 31st March 2023 (825 d/pa)

Five Year Supply of Deliverable Housing Land		Dwellings	
A	Annual Requirement	825	825 x 5 = 4,125
B	Housing Requirement (Five Years)	4,125	
C	Completions 1st April 2011 to 31st March 2018	3,739	
D	Shortfall 1st April 2011 to 31st March 2018	-2,036	
E	Housing Requirement (Five Years + Shortfall)	6,161	B+D
F	Buffer Required by NPPF (20%)	1,232	E * 20%
G	Total Housing Requirement 1st April 2018 to 31st March 2023	7,393	F+G
H	Residual Annual Requirement	1,479	G/5
I	Net supply of dwellings	5,917	
J	**Supply**	**4.00 years**	I / H

Scenario 1b – Five Year Supply 1st April 2017 to 31st March 2022 (825 d/pa)

Five Year Supply of Deliverable Housing Land		Dwellings	
A	Annual Requirement	825	825 x 5 = 4,125
B	Housing Requirement (Five Years)	4,125	
C	Completions 1st April 2011 to 31st March 2017	3,177	
D	Shortfall 1st April 2011 to 31st March 2017	-1,773	
E	Housing Requirement (Five Years + Shortfall)	5,898	B+D
F	Buffer Required by NPPF (20%)	1,180	E * 20%
G	Total Housing Requirement 1st April 2018 to 31st March 2023	7,078	F+G
H	Residual Annual Requirement	1,416	G/5
I	Net supply of dwellings	5,260	
J	**Supply**	**3.71 years**	I / H

Scenario 2 – Five Year Supply 1st April 2018 to 31st March 2023 (848 d/pa)

Five Year Supply of Deliverable Housing Land		Dwellings	
A	Annual Requirement	848	825 x 5 = 4,125
B	Housing Requirement (Five Years)	4,240	
C	Completions 1st April 2011 to 31st March 2018	3,739	
D	Shortfall 1st April 2011 to 31st March 2018	-2,174	
E	Housing Requirement (Five Years + Shortfall)	6,414	B+D
F	Buffer Required by NPPF (20%)	1,283	E * 20%
G	Total Housing Requirement 1st April 2018 to 31st March 2023	7,697	F+G
H	Residual Annual Requirement	1,539	G/5
I	Net supply of dwellings	5,917	
J	**Supply**	**3.84 years**	I / H

Scenario 3 – Five Year Supply 1st April 2018 to 31st March 2023 (989 d/pa)

Five Year Supply of Deliverable Housing Land		Dwellings	
A	Annual Requirement	989	825 x 5 = 4,125
B	Housing Requirement (Five Years)	4,945	
C	Completions 1st April 2011 to 31st March 2018	3,739	
D	Shortfall 1st April 2011 to 31st March 2018	-3,020	
E	Housing Requirement (Five Years + Shortfall)	7,965	B+D
F	Buffer Required by NPPF (20%)	1,593	E * 20%
G	Total Housing Requirement 1st April 2018 to 31st March 2023	9,558	F+G
H	Residual Annual Requirement	1,912	G/5
I	Net supply of dwellings	5,917	
J	**Supply**	**3.10 years**	I / H

1.59 As evidenced above, we maintain significant concern over the Council's ability to demonstrate a deliverable five year housing land supply on adoption of the Plan and respectfully invite the Inspector to consider the Council undertake further work to ensure a deliverable supply can be met and maintained.

Appendix 1 – Johnson Mowat Review of Local Plan Trajectory

JohnsonMowat
Planning & Development Consultants

Ashford Local Plan Housing Trajectory

1st April 2017 to 31st March 2023

23/03/2018

Ashford Local Plan 2030 - Housing Trajectory (Submission - December 2017)

LP Reference	Site Address	Planning Permission	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	JM Total 2018-23	Comments
Town Centre Sites																	
	Former Powergen	15/01671/AS, 17/01091/AS				222	189	189	60							600	• LPA recently suggested through evidence exchanged at Charing that the entirety of the scheme could complete within five years. • JM consider no more than 600 completions 2018-23
	Elwick Road Phase 2	15/01282/AS - Outline application undetermined					100	100								200	• Status of current application unknown, however adjacent parcels of land being brought forward for hotel use and assumed the site will deliver as per LP trajectory following other schemes.
	Victoria Way East					28	31									59	• New addition by the LPA through evidence exchanged at Charing Inquiry. • Site has planning permission and is understood to be under construction. Completions not disputed.
	Panorama Living					110										110	• New addition by the LPA through evidence exchanged at Charing Inquiry. • Site has planning permission and is understood to be under construction. Completions not disputed.
	Victoria Way East					215										215	• Site now brought into the five year supply by the LPA through evidence exchanged at Charing Inquiry. • LPA consider an oversight as the site has planning permission.
S10	Gasworks Lane															0	• LP Trajectory confirms delivery not envisaged until 2028/29 and therefore little confidence in delivery of site. • We consider it would be appropriate to consider the site as windfall to account for strong risk of non-delivery.
TC9 & S1	Commercial Quarter										79		80			0	• Policy S1 references need for a 'design framework' to be approved and acknowledges the 'relatively long period' the site will take to be developed. • Housing Topic Paper acknowledges residential element to be secondary to commercial uses, and that a new party will need to acquire the site. • There has been no progress by way of any planning activity and therefore the site is excluded from the five year supply.
Chilmington Green																	
	Chilmington Green	12/00400/AS, 17/01170/AS		30	60	120	200	200	200	200	200	200	200	200	200	610	• Further to obtaining outline permission, only a single reserved matters application for 346 dwellings has been forthcoming. The application remains undetermined and subject to further work and a re-consultation exercise. • The Council accepted through evidence at the Charing Inquiry that developer assumptions for delivery of the site are overly optimistic. • There remains no detailed permission in place, yet 50 units are anticipated to be delivered for the 2018/19 monitoring year. • Council's assumptions remain optimistic and do not reflect the planning position of the site.
Urban Sites																	
Existing Allocations under Construction																	
	Finberry Park (LP 2000)	02/00278/AS, 09/00081/AS, 09/01566	157	120	120	120	120	100	102							580	• Site under contruction and agree with LP trajectory.
	Repton Park (LP 2000)	02/01565/AS	90	100	100	100	4									304	• Site under contruction and agree with LP trajectory.
	Godington Way (TC8)	14/01305/AS (Full)	52													0	• Site completed 2017/18.
	Blackwall Road (U5)	14/01456/AS (Full)	26													0	• Site completed 2017/18.
Existing Allocations Not Started																	
U1	Abbey Way	15/00260/AS (Full)		20												20	• Site has planning permission, agree with LP trajectory.
U4 & S8	Lower Queens Road															0	• Site formerly used for car parking in connection with operational print business. • Headley Brothers printing works recently placed into administration, however assets now secured by Henry Stone print works. • No evidence of any progress being made to bring the site forward for development. Site appears to remain in use, with future occupiers intentions unknown. • Lttle prospect of delivery in short term. • Would be better considered as windfall

U6a & S13	Former Ashford South Primary School															0	• Accompanying text to LP allocation confirms site to be used for a period of up to 8 years. • Site not therefore considered 'available now' as per tests of Footnote 11. • Would be better considered as windfall
U6b & S12	K College, Jemmett Road	11/00405/AS, 17/00354/AS		30	30	30	30	40								160	• Construction recently commenced however half of site appeared in active use further to site visit undertaken on 2nd February 2018. • Agree however that recent construction activity would likely result in completion of the scheme by the end of the five year period.
U7 & S11	Leacon Road															0	• Site has been in recent alternative use as a haulage business and has now been subject to a further application to extend the use of activities for a further 2 years under reference 18/00088/AS. • Site therefore not 'available now' and short term prospect of delivery placed in doubt. • Allocation of adjacent land S11a for B1 and B8 use provides a constraint. Site appears better used for employment purposes.
U11	Land at Butt Field Road, Singleton	11/01045/AS, 17/00703/AS		14												14	• Full permission granted, agree with LP trajectory.
U14 & S17	Willesborough Lees	16/01512/AS (Outline), 16/01722/AS			40	60	60	60								220	• Majority of site controlled by Bellway Homes and subject to recent applications. Agree with LP trajectory.
U22	Conningbrook Phase 1	12/01245/AS (Full)		30	40	40	40	40	40	40	30					190	• Site visited on 2nd of February 2018, show home under construction and up to first floor level. • Northern area of site in use as an active quarry, offering a significant constraint to delivery. • Significant groundworks and site remediation required, will clearly impact on sales rates.
S6 & S7	Former Klondyke & Newton Works Phase 2															0	• Allocation of the site seeks primary use for a tourism/visitor attraction. • The Council have little confidence in the delivery of the former allocation, reflected by the timing of delivery being first completions in the LP trajectory 2022/23. • The site has been subject to no progress, with no willing land owners, developers or agents known to be pursuing a residential scheme. Nothing has therefore changed. • We consider the site would be better considered windfall to allow a realistic prospect of the LP requirement being met. • Site would be better treated as windfall
New Urban Site Allocations																	
S2	Land NE of Willesborough Road, Kennington					25		50	75	75	75	75	75	75	75	75	• Site understood to be promoted by Quinn Estates. No application forthcoming save for small parcel comprising 25 units. • First occupations restricted by completion of Junction 10a works. • Short term delivery likely to be minimal given timings of infrastructure works and absence of planning activity to date. Need to resolve outline & detailed permissions, pre-commencement conditions, S106 and legals, marketing, up front infrastructure works and lead in times through to first completions.
S3	Court Lodge, Kingsnorth								50	90	90	90	90	100	100	0	• Site is the largest of the new urban site allocations, and is to comprise a mix of uses including retail, employment and education. • Site understood to be promoted by Hallam Land Management. Hallam are not a developer, and will promote the land with outline permission to bring the site to market. • No applications have been forthcoming to date and it is clear there will be significant lead in times associated with negotiating any future application submission.
S4	Land north of Steeds Lane and Magpie Hall Road							30	60	60	60	60	60	60	10	30	• Application for development of S4 and S5 submitted September 2015 and remains undetermined. • Current application subject to concerns from Highways England. • First occupations restricted by completion of Junction 10a works, currently scheduled to complete May 2020. • Short term delivery likely to be minimal given timings of infrastructure works. Need to resolve outstanding application, pre-commencement conditions, S106 and legals, up front infrastructure works and lead in times through to first completions.

S5	Land south of Pound Lane, Kingsnorth							30	40	40	40					30	• Application for development of S4 and S5 submitted September 2015 and remains undetermined. • Current application subject to concerns from Highways England. • First occupations restricted by completion of Junction 10a works, currently scheduled to complete May 2020. • Short term delivery likely to be minimal given timings of infrastructure works. Need to resolve outstanding application, pre-commencement conditions, S106 and legals, up front infrastructure works and lead in times through to first completions.
S9	Kennard Way, Henwood				25											25	
S14	Park Farm South East							50	80	80	80	35				50	• Site jointly promoted by TW and Persimmon. • EIA scoping request received, however application yet to be forthcoming. • LPA trajectory envisages delivery of 50 units 2019/20, i.e. 1 year from now. Council's approach cannot be sound, there remains no application submitted let alone approved.
S15	Finberry North West										75	75	75	75		0	• LPA trajectory considers delivery in year 2025/26.
S16	Waterbrook							50	50	50	50	50	50	50		50	• Part of site currently in active alternative use as truck stop. • Recent application submitted under 18/00098/AS comprising 600 space truck stop, A1, B1, B2, B8 uses and up to 400 dwellings. • As with other newly proposed LP allocations, first occupations restricted by completion of Junction 10a works, currently scheduled to complete May 2020. • Short term delivery likely to be minimal given timings of infrastructure works and absence of planning activity to date. Need to resolve outline & detailed permissions, pre-commencement conditions, S106 and legals, marketing, up front infrastructure works and lead in times through to first completions.
S19	Conningbrook Residential Phase 2											40	40	50	40	0	• To deliver later in plan period (2023/24 onward) further to completion of works on Phase 1
S20	Eureka Park							50	80	80	80	50	35			50	• Site identified as key employment land for 20 ha of B1, B2 and B8 uses with ancillary 375 dwellings. Development to be based on agreed comprehensive Masterplan of the site to ensure compatability. • No known Masterplan exists, and no applications have been forthcoming. Despite this, the Council anticipate 50 completions across 2019/20 monitoring year. • LPA proposition wholly unrealistic and does not reflect the delays associated with bringing forward a planning application for the site, yet to be submitted.
S45	Land south of Brockmans Lane, Bridgefield												30	50	20	0	• Site cannot come forward until after delivery of site S14 - Park Farm South East. • Current delays bringing forward S14 therefore site will not deliver in the five year period.
S46	Chart Road						25									25	
A20 Corridor Sites																	
S47	Land east of Hothfield Mill															0	• Sites subject to significant opposition. • Numerous objections to sustainabiltity and remoteness of the sites. • Sites subject to no live planning applications • Two of the three sites remain in active use for landscape gardening / nursery planting and therefore not 'available now'. • LPA proposition of delivery in monitoring year 2019/20 wholly unrealistic.
S48	Rear of Holiday Inn															0	
S49	Land north of Tutt Hill															0	
Rural Sites																	
Existing Allocations under Construction																	
	Aldington, Calleywell Lane (ALD1)	14/00681/AS	12													0	• Site under construction - agree with LP trajectory.
	Tenterden Southern Extension Phase A (TENT1A)	14/00757/AS	20	80	80	70										230	• Site under construction - agree with LP trajectory.
	Wye, Land at Kelston (WYE1)	14/00362/AS	17													0	• Site under construction - agree with LP trajectory.
Existing Allocations and Sites Not Started																	
S29	Land south of Arthur Baker Playing Field, Charing (CHAR1)			35												35	• Balance of 35 units not disputed, however LPA considered increase in capacity to circa 91 dwellings through evidence at the Charing Inquiry without justification.
S32	Land at Parker Farm, Hamstreet (HAM2)			10												10	
	Rolvenden Football Ground, Rolvenden (ROLV1)			20	20											40	
S24	Tenterden Southern Extension Phase B (TENT1B)							50	50	50	55					50	• Site cannot be brought forward until completion of Phase A • Phase A likely to take several years to complete. • Delivery inside five year period likely to be minimal.
S40	Land at Front Road, Woodchurch (WOOD1)			8												8	
	Land at Luckly Field, Wye (WYE2)			25												25	
	Major Windfall - Tenterden, Tilden Gill	14/01420/AS			20	40	40									100	
New Rural Site Allocations																	
S51	Aldington - Land north of Church View			10												10	

S52	Aldington - Land south of Goldwell Court				10	10										20	
S26	Appledore - The Street				20											20	
S27	Biddenden - North Street			20	25											45	
S53	Brook - Nats Lane			10												10	
S54	Challock - Land at Clockhouse			15												15	
S28	Charing - Northdown Service Station, Maidstone Road						20									20	
S55	Charing - Land adjacent to Poppyfields					30	50	50	50							130	• Largest portion of the site controlled by Gladman Developments and subject to live outline application for 130 dwellings yet to be determined. Delivery not disputed. • Remaining balance understood to be reliant upon access through third party land (Gladman) and therefore delivery of the remaining capacity inside five years doubtful.
S56	Chilham - Branch Road				10											10	
S30	Egerton - Land on New Road				15											15	
S31	Hamstreet - Land north of St. Mary's Close					25	25	30								80	
S57	Hamstreet - Warehorne Road					25	25									50	
S33	High Halden - Land at Hope House				10	18										28	• Site subject to application for 28 dwellings under ref 17/00952/AS. LPA to revise site capacity accordingly.
S58	High Halden - Stevenson Bros. A28					25	25									50	
S34	Hothfield - Land East of Coach Drive				20	20										40	
S59	Mersham - Land at Old Rectory Close					15										15	
S35	Mersham - Land adjacent to Village Hall				10											10	
S36	Shadoxhurst - Land rear of Kings Head PH				19											19	• Site subject to application for 19 dwellings under ref 15/01496/AS. LPA to revise site capacity accordingly.
S37	Smarden - Land adjacent to Village Hall					25										25	
S38	Smeeth - Land South of Church Road					20	15									35	
S60	Tenterden (St. Michaels) - Pope House Farm				25	25										50	
S61	Wittersham - Land between Lloyds Green and Jubilee Fields					20	20									40	
S62	Woodchurch - Land off Appledore Road					15	15									30	
Neighbourhood Plans																	
	Former Imperial College					25	25									50	
	Bethersden Neighbourhood Plan Area			17						17						17	• NP yet to be examined, proposes to allocate 34 dwellings, all of which are considered deliverable by LPA inside 5 years. • One application for 17 dwellings forthcoming and not disputed. • Plan can currently carry limited weight.
	Pluckley Neighbourhood Plan Area				25	8										33	
	Rolvenden Neighbourhood Plan Area									24						0	• Draft NP yet to be examined. • Unclear why LPA consider 40 units deliverable as the plan only proposes to allocate 24. • No sign of activity on any of the sites proposed, LPA consider all deliverable inside five years. • Plan can currently carry limited weight.
Windfalls (Non Allocated Sites)																	
	Windfalls - Small sites under 10 dwellings not started			150	150	150										450	
	Windfalls - Small sites under 10 dwellings under construction		109													0	
	Windfalls - Major sites over 10 dwellings not started			72	72	72	19									235	
	Windfalls - Major sites over 10 dwellings under construction		79													0	
	Projected future windfalls						150	100	100	100	100	100	100	100	100	250	
Totals																	
	Annual Total		**562**	**816**	**946**	**1708**	**1228**	**1219**	**1037**	**865**	**1055**	**775**	**835**	**760**	**545**	**5917**	
	Cumulative Total		**562**	**1378**	**2324**	**4032**	**5260**	**6479**	**7516**	**8381**	**9436**	**10211**	**11046**	**11806**	**12351**		

Appendix 2 – Ashford BC Application Timeframes

JohnsonMowat
Planning & Development Consultants

Ashford Local Plan Housing Trajectory

Determination Timeframes for Approved/Pending Applications

23/03/2018

Ashford Local Plan 2030 - Average Time Taken for Determination							
LP Reference	**Site Address**	**Planning Permission**	**No. Dwellings**	**Date Validated**	**Date Approved**	**Time Taken to Determine or to Date (Months)**	
Town Centre Sites							
	Former Powergen	15/01671/AS, 17/01091/AS	660	13/01/2016	24/11/2016	10	
	Elwick Road Phase 2	15/01282/AS - Outline application undetermined	200	28/09/2015	N/a	28	
Chilmington Green							
	Chilmington Green	12/00400/AS, 17/01170/AS	5750	30/08/2012	06/01/2017	62	
Urban Sites							
Existing Allocations under Construction							
	Finberry Park (LP 2000)	02/00278/AS, 09/00081/AS, 09/01566	1100	19/02/2002	30/01/2006	47	
	Repton Park (LP 2000)	02/01565/AS	1250	04/10/2002	17/10/2007	60	
	Godington Way (TC8)	14/01305/AS (Full)	83	27/10/2014	29/10/2015	12	
	Blackwall Road (U5)	14/01456/AS (Full)	34	24/11/2014	21/06/2016	19	
Existing Allocations Not Started							
U1	Abbey Way	15/00260/AS (Full)	23	24/03/2015	15/03/2017	24	
U6b & S12	K College, Jemmett Road	11/00405/AS, 17/00354/AS	154	06/04/2011	09/12/2016	68	
U11	Land at Butt Field Road, Singleton	11/01045/AS, 17/00703/AS	14	06/09/2011	12/05/2014	29	
U14 & S17	Willesborough Lees	16/01512/AS (Outline), 16/01722/AS	12	07/11/2016	06/02/2017	3	Refused
U14 & S18	Willesborough Lees	15/01550/AS	192	26/11/2015	N/a	26	
U22	Conningbrook Phase 1	12/01245/AS (Full)	300	22/11/2013	24/10/2014	11	
New Urban Site Allocations							
S2	Land NE of Willesborough Road, Kennington	17/0944/AS	25	20/06/2017	N/a	7	
S4	Land north of Steeds Lane and Magpie Hall Road	15/0856/AS	550	03/09/2015	N/a	29	
S5	Land south of Pound Lane, Kingsnorth						
Rural Sites							
Existing Allocations under Construction							
	Aldington, Calleywell Lane (ALD1)	14/00681/AS	41	05/06/2014	02/04/2015	10	
	Tenterden Southern Extension Phase A (TENT1A)	14/00757/AS	250	23/06/2014	01/10/2015	15	
	Wye, Land at Kelston (WYE1)	14/00362/AS	27	03/04/2014	22/12/2014	9	
Existing Allocations and Sites Not Started							
S29	Land south of Arthur Baker Playing Field, Charing (CHAR1)	14/01486/AS	42	26/11/2014	31/01/2018	38	
	Rolvenden Football Ground, Rolvenden (ROLV1)	13/00755/AS	40	12/07/2013	07/01/2016	29	
	Land at Luckly Field, Wye (WYE2)	14/00195/AS	25	28/02/2014	11/11/2015	19	
	Major Windfall - Tenterden, Tilden Gill	14/01420/AS	100	12/11/2014	13/02/2015	3	Refused
New Rural Site Allocations							
S27	Biddenden - North Street	17/00258/AS	45	20/02/2017	N/a	12	
S36	Shadoxhurst - Land rear of Kings Head PH	15/01496/AS	19	23/11/2015	29/11/2017	24	

S37	Smarden - Land adjacent to Village Hall	16/00045/AS	50	19/01/2016	29/07/2016	6	Refused
Neighbourhood Plans							
	Former Imperial College	15/01602/AS	52	07/12/2015	26/01/2016	2	Prior approval
	Pluckley Neighbourhood Plan Area	14/1116/AS	25	04/09/2014	09/12/2016	27	

Totals

Total **11063** **Average Time (Months)** **23**