

**Ashford Local Plan to 2030
Public Examination Hearing – A20 Corridor
17 May 2018**

The examination was conducted by Inspector Stephen Lee of the Planning Inspectorate.

Mr Lee said that the Plan had been submitted by Ashford Borough Council on the basis that it was sound. The hearing would allow challenges which would need to state why the Plan was unsound and what changes would be necessary to make it sound. There was no need to repeat anything which had already been submitted in writing.

The three A20 corridor sites being considered were:

- S47 – Land east of Hothfield Mill
- S48 - Land rear of Holiday Inn Hotel
- S49 - Land north of Tutt Hill, Westwell

Discussion

The following main points arose:

- Ashford Borough Council (ABC, Simon Cole) had included the A20 sites in the “Main Changes” to the Plan as a response to the need for a greater housing allocation. Reasons included the A20 providing ready and convenient access, the wish to avoid large settlements and coalescence, the nature of the landscape and AONB. ABC had looked at other options such as greater allocations in villages but decided the A20 corridor was the best option.
- Discussion of “omission sites” was not permitted. However, developers with interests in such sites (Gladman and Millwood) vigorously opposed the A20 corridor sites, claiming that SHELAA and Sustainability Appraisal scores were poorer for the A20 sites than other sites omitted from the Plan.
- Their objections included criticisms of ABC’s claims for accessibility to local services, eg distances to Repton Park, Charing and Ashford Town Centre, the fact that the A20 is an unlit 70 mph dual carriageway, inadequate bus services, limited range of services (especially for S48 and S49).
- Westwell PC (Christine Drury) and Charing PC (Jill Leyland) also opposed, adding points about a “corridor” being inconsistent with planning guidance, failure to meet the criteria of Policies HOU3a and HOU5 (which both refer to residential windfall developments), the importance of the A20 as a through route, pressure on facilities and services in Charing, including car parking, for which Charing PC would like to see an S106 funding requirement included.
- SLRA also opposed, adding that S47 would coalesce with the existing Potters Corner and Sandyhurst Lane “settlements” which had no services or facilities and was an entirely rural area, being recognised as being located in a rural ward and rural parishes.
- The ABC response to these objections referred to the small scale of the developments (295 out of a total of over 6,000 dwellings in the Plan). They were not claiming that these were the best scoring sites, but the choice of sites was not based solely on “a rather crude scoring exercise”. S48 & S49 included contributions for facilities. These could be in Hothfield, Charing or Repton Park. ABC also claimed the A20 sites did not represent any coalescence and that there was no intention to create a solid corridor between Ashford and Charing.

- **Traffic & Accessibility:** ABC claimed there was relatively light traffic on the A20 (except for Operation Stack) with no traffic capacity issue, supported by the Amey transport assessment. Any safety issues could be overcome, supported by KCC response.
- Westwell & Charing PCs challenged the Amey transport assessment which referred to mid-morning traffic flows. At peak times, queues would occur at S47 for traffic turning right on to the A20, which was a 60/70 mph road. (Harrietsham and Charing are 40 mph). Car traffic would increase because the bus service is inadequate and the distances are too far to walk. Facilities would be required for pedestrians to cross the A20.
- The current overnight lorry parking ban on the A20 is temporary. If this does not become permanent it will become a major issue with HGVs using the A20 to access the cold store and other nearby sites.
- It was agreed by ABC to refer, in Policy 47, to **access to the Hare & Hounds**, in addition to the existing reference to access to the property "Woodside".
- SLRA requested removal of the reference to vehicle access from the A20 being "**primary**" and replacement with explicit reference to vehicle access being only from the A20 and not from Westwell Lane. (This would be consistent with Policy S20 references to Trinity Road and Sandyhurst Lane). **ABC agreed, subject to a possible need for emergency access from Westwell Lane.** [Note: this is exactly what para 4.232 says in relation to Sandyhurst Lane and S20 Eureka Park] Assurances were given that no vehicle access would normally occur from Westwell Lane.
- **Landscape & Visual appraisal:** On S47 there is an outstanding disagreement between ABC and the AONB Unit, who consider the tree belt just beyond the western side of the site needs strengthening. Margery Thomas thought the development would be visible from the AONB above Westwell.
- ABC rejected objections on the noise of the M20 and HS1. Argued that M20 and HS1 run through the "middle" of Ashford. It was pointed out that HS1 is on concrete, not ballast, through Ashford and HS2 will be built entirely in this way. SLRA & Margery Thomas pointed out that the M20 is noisy concrete and curves round giving the site nearly 180° of exposure. Cllr Drury said that HS1 is on ballast at the end of Westwell Lane, causing vibration as well as noise. ABC said a requirement for attenuation of noise and vibration in buildings could be included if necessary.
- **Hothfield Common SSSI & Biodiversity:** ABC considered there was no direct impact but recognised there were some concerns about off-site recreational impact and domestic pets/predation, but considered the site Policy criteria provided sufficient mitigation.
- Counter arguments included: the SSSI is very fragile, peat bog is unique in Kent, and has no inherent resilience. An Environmental Impact Assessment of the cumulative effect of noise, light, air and water pollution, vibration and over-use by residents and their dogs from all three sites plus S34 Coach Drive, Hothfield, was requested.
- **Groundwater:** ABC said that the Environment Agency (EA) has agreed an additional paragraph to Policy ENV8 which says an appropriate risk assessment may be required, in consultation with the EA.
- **Heritage Assets:** These include, near S47, listed buildings Hothfield Mill and cottages in Westwell Lane. Potters Corner is an historic site, with the public house and tollgate cottage. Near S48 is the Beefeater in a listed building. ABC claimed that sufficient protection was provided by ENV13 & 15 and paragraphs such as 4.438 of S37 and criterion S47a). The Inspector thought that expressions such as "take account of" and "take into consideration" [listed buildings] in these paragraphs should be strengthened to "**preserve the setting of**".