

The Sandyhurst Lane Residents' Association (SLRA) appreciates the opportunity to comment on the Boughton Aluph & Eastwell Parishes Neighbourhood Plan - Regulation 14, April 2019.

Sandyhurst Lane Residents' Association has been active for over thirty years representing the collective interests of the residents of Sandyhurst Lane and all adjacent roads, which constitute its neighbourhood of 345 dwellings. The mission statement of the Association is *“Protecting the rural character of Sandyhurst Lane and the adjoining area”*.

Following the SLRA's successful lobbying campaign in 2017 which resulted in local government boundary changes that were effective from 1<sup>st</sup> April 2019, 99% of the SLRA area is now represented by the rural Downs West borough ward member with 70% of its properties falling under the Westwell Parish Council and the balance of 30% being in the Boughton Aluph and Eastwell wards of Boughton Aluph and Eastwell Parish Council.

**As a result the SLRA believes it has a responsibility to its members to comment on this Neighbourhood Plan which, whilst it sets out the residents' vision for the Boughton Aluph & Eastwell parish, will have an impact on the quality of life, environment and character of the wider SLRA area.**

As such we have confined our comments on the Neighbourhood Plan (NP) to those issues which we believe will impact on some, or all of our residents, or which we believe will influence or be detrimental to the rural character of the area we seek to preserve.

This consultation response thus covers

- Scope
- Rural Character & Environment
- Ecology
- Transport & Safety

## **SCOPE**

**Section 3 - Vision** should reflect the recent Ashford Borough Council ward boundary changes, their inclusion of the both the Boughton Aluph and Eastwell parish wards into the rural Downs West borough ward and the larger (by population) Goat Lees parish ward into the new Goat Lees borough ward. Over the Plan period the quoted 90% of the parish population in the urban Ashford area can be expected to increase. These changes may make retaining the rural character of the whole Boughton Aluph & Eastwell (BA&E) parish more difficult. The SLRA believes the NP needs give an emphasis to preserving the existing rural areas.

### **RECOMMENDATION 1:**

**The NP should amend its maps to clearly acknowledge and set out in its Vision Statement that the Boughton Aluph and Eastwell parish wards are now in the rural Downs West ward and, as such, should retain their rural character and be protected by this Plan from development proposals that might contravene NPPF, ABC Local Plan or AONB policies intended to safeguard the character of the countryside.**

## **RURAL CHARACTER & ENVIRONMENT**

The SLRA strongly supports the objectives set out in Section 5 Environment for preserving the rural character of its area.

However the annotation to the photo of Sandyhurst Lane as forming “the well defined edge of the urban area” is now incorrect as the recent changes moved the Downs West ward boundary from the centre of Sandyhurst Lane to BEHIND a the properties on the Ashford town side of the Lane. The adopted Ashford Local Plan 2030 states that development beyond that boundary shall include “*A generous landscaped buffer to residential properties along Sandyhurst Lane*” (Condition b), Policy S20 - Eureka Park).

**RECOMMENDATION 2:**

**That the photo showing Sandyhurst Lane should be replaced by one more accurately defining the Downs West ward boundary as the de facto urban/rural boundary.**

The SLRA supports the arguments put forward in respect of the Eastwell farmlands but believes that stronger protection for this site than provided under BAE NP3 should be afforded through a specific NP policy similar to that provided in BAE NP2 for Local Green Spaces.

**RECOMMENDATION 3:**

**That the Eastwell Farmlands shown in Map 14 should be the subject of a specific BAE NP policy providing similar conditions as are provided under BAE NP2.**

**RECOMMENDATION 4:**

**That any changes of use of the open land or space at Sandyacres Sports and Social Club, shown in Map 21, arising from, or permitted under, BAE NP8 shall be the subject to the same new BAE NP policy conditions as set out under Eastwell Farmlands (Recommendation 3) above.**

Whilst the SLRA admires the accuracy and detail in describing the characteristics of Sandyhurst Lane, it is again important to reflect recent boundary changes that realign the rural/urban boundary to be BEHIND the properties on the south/southeast side of Sandyhurst Lane.

**RECOMMENDATION 5**

**That the text in Character Area 1 reflects the realignment of ward and de facto rural/urban boundary.**

## **ECOLOGY**

With developments in both urban and rural areas likely, the NP should include measures to enhance, protect, and mitigate damage to wildlife habitats, not only in its open spaces, but also the micro-habitats that exist within urban areas.

### **RECOMMENDATION 6:**

**That the NP should include an overarching policy statement to ensure developments within the Plan boundary enhance, protect and mitigate damage to wild-life habitats and promote bio-diversity.**

## **TRANSPORT & SAFETY**

In its Character description of both Sandyhurst Lane and Lenacre Street the NP fails to acknowledge the rural road nature of these busy through routes and the access problems that already exist as they exit onto Faversham Road and Maidstone Road at either end.

Sandyhurst Lane is the only access road for 328 of the properties within the SLRA area and is regularly used as a “rat run” at peak times. Developments elsewhere within the Plan area, particularly Eureka Park, which is likely to exacerbate traffic congestion in the Trinity road area, will have a potential knock-on effect to Sandyhurst Lane.

The Plan equally fails to highlight the congestion and disruption that is already experienced on the local road networks when Sandyacres Sports and Social Club holds or hosts any major sporting event.

Mirroring the Ashford Local Plan COM2, under BAE NP8 further expansion of the facilities and uptake of Sandyacres is proposed.

### **RECOMMENDATION 7:**

**The NP should ensure that any expansion in the scale of use and facilities offered by Sandyacres Sports and Social Club arising from BA&E NP8 includes appropriate improvements to on-site parking and site access.**

No provision is included in the NP to assess the transport and road safety consequences to the residents and users of Sandyhurst Lane and its adjoining roads of the individual and aggregated proposals included in the NP and any mitigation steps that might be necessary.

**RECOMMENDATION 8:**

**The NP should include an overarching policy statement to ensure developments within the Plan boundary area include an assessment of the possible traffic impact on Sandyhurst Lane and access to the A251 and A20 and identify any necessary mitigation steps.**

ACB/V2

17th May 2019