



Ashford Borough Council Planning Application number 17/01613/AS

Land at Lenacre Hall Farm, Sandyhurst Lane Boughton Aluph, Kent

Further objection comments

Sandyhurst Lane Residents' Association (SLRA) 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 340 dwellings. The mission statement of the Association is *"Protecting the rural character of Sandyhurst Lane and the adjoining area"*.

In addition to its continuing opposition, as set out in its consultation response dated 22nd November 2017, the SLRA now considers the application should also be refused on the following basis:

1. The development is unnecessary

In the examination of the Ashford Local Plan 2030, Inspectors' Post Hearings Advice (document ID/10) states in relation to Housing Supply (para 20):

At Ashford almost half of the total supply comprises existing commitments and there is no evidence of a risk that rapid change may affect the need for housing. The revised housing trajectory shows that a higher proportion of housing will be completed in the first part of the remaining plan period with some of the larger sites delivering in the latter stages. Any slippage in the period to 2024 would increase the pool of sites thereafter and so it is not essential in our view for the contingency figure to be increased.

The Main Modifications to the Local Plan consultation document acknowledges this in MM3 and amends **Policy SP2 - The Strategic Approach to Housing Delivery** to reduce the scale of development in the rural areas from 1,500 to 1,017 dwellings.

As part of the original call for sites, land at Lenacre Hall Farm was appraised under SHEELA and the Boughton Aluph & Eastwell (BA&E) Neighbourhood Plan and proved unsustainable.

It was therefore not included as a development site in either the draft Local Plan or in the succeeding Main Changes publication.

This site must therefore be considered as a Windfall site

In MM3 ABC demonstrates, in the amended para 3.25, that the overall LP's housing target can be met with the delivery of only 75% of the identified windfall sites with planning approval available on 1st April 2018.

The Lenacre Hall Farm site is, therefore, unnecessary as an additional early delivery development site.

2. The development is unsustainable

The SLRA argues that the site fails to meet the sustainability criteria set out in the Draft, Main Changes and the Main Modifications versions of the Ashford Local Plan for Windfall sites and is therefore unsuitable because:

- a) The unsuitability arguments presented in ID/10 (paras. 36-38) in relation to sites S47, S48, S49 and S58, and accepted by ABC in their deletion of these sites in the Main Modifications, are equally applicable to the Lenacre Hall Farm site.
- b) The site fails to meet the criteria for windfall development in the rural areas as set out in the proposed Main Modifications since :
 - 1) Although ID/10 implies the Sandyhurst Lane community is a settlement, this site is not eligible to be considered for development within it as under Policy HOU3a - Residential Windfall Development within Settlements, Sandyhurst Lane is not listed as a permitted development settlement (para 5.45, MM60).
 - 2) The BA&E Neighbourhood Plan appraisal shows this site fails to meet the sustainability criteria required for a large Residential Windfall Development in the Countryside (para 5.59, MM61).

Sandyhurst Lane Residents' Association opposes this application, both on the grounds originally submitted on 22 November 2017 and on the above grounds.

24 September 2018