



## **Response to Ashford Borough Council Local Plan 2030 'Main Changes' public consultation**

### **MC90: Policy S47 - Land East of Hothfield Mill**

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"*.

The SLRA believes that Policy S47 in the Main Changes to the Local Plan is unsound for the following reasons:

- Matters of Principle
  - Matters of Fact
  - Matters of Policy
  - Sustainability
- 
- **Matters of Principle**

Creating an urban development on this site is at variance with the long standing principle that north-western urban development of Ashford should be contained within an urban envelope broadly defined by a landscape buffer on the south-eastern, town, side of Sandyhurst Lane. This was first clearly delineated in maps of the Greater Ashford Development Framework (GADF) under the Sustainable Communities Programme (2006 - 2010). See Appendix 1.

It was further acknowledged in 2015 when ABC accepted the SLRA proposition to move the rural Westwell Parish boundary southwards behind the even numbered properties of Sandyhurst Lane. ABC also recognised this principle in 2016 with the publication of the draft Local Plan 2030 which required the S20 Eureka Park development to include "a generous landscaped buffer to residential properties along Sandyhurst Lane".

Most recently it was reiterated by the LGBCE who, in their 2017 Final Recommendations for the warding arrangements for Ashford Borough Council supported another SLRA proposition that the Downs West rural ward boundary be moved to include ALL of Sandyhurst Lane including parts originally included in the new urban Goat Lees ward. Following their electoral review of the County of Kent, LGBCE have also realigned the boundary of the Ashford Rural West division to

include ALL of Sandyhurst Lane, including parts previously included in Ashford Central division.

**The “A20 Corridor” as a concept is unsound as it is an undefined spatial area and its developments are unsupported by Policy Statements. Any site proposals within it are therefore equally unsound.**

### **Recommendation**

- a) **The concept, spatial definition and new “A20 Corridor” specific policy statements should be defined and published for public consultation before inclusion in the draft Local Plan.**

**Such policy statements should recognise the unique geography, geology and transport infrastructure of the area and their impacts, including noise and vibration, on the amenity of existing and new residents.**

- b) **Site S47 should be**

**either**

**re-allocated as a site under Residential Development in the rural settlements or Residential windfall development in the countryside and subject to the same conditions as are set down in either HOU4 or the new Policy HOU5 and paras 5.57 to 5.63 together with any additional conditions appropriate to the spatial area**

**or**

**suspended from inclusion in the draft Local Plan until Condition (a) above is satisfied.**

- **Matters of Fact and Omissions**

Reference to a **layby** in the Policy S47 document is incorrect. The piece of road referred to is still a public highway, currently misused as an overnight HGV park. Appropriate statutory steps would be required to remove it.

The **KCC A20 Development Sites Access Assessment Feasibility Report**, in its consideration of Location D, Site 1 (para. 4.2.2 of the Stage 1 Road Safety Audit) identifies the problems in amending the piece of highway that provides access to and parking for, the nearby Hare and Hounds pub and bus stop, but fails to recognising its additional community use with a post-box, coach pickup/drop off point and occasional local on-street parking. **No solutions are proposed. This document needs revision.**

**Recommendation:** amended paragraph

**S47 Para c); Investigate revisions to the access to the property 'Woodside' and the "Hare and Hounds" pub, the bus stop, post-box and local on street parking from the A20.**

**Consult with the local owners and community when revised recommendations are available from Kent Highways.**

The **KCC A20 Development Sites Access Assessment Feasibility Report** is unsound in that it fails to pro-actively support or address road safety issues in respect of pedestrians to/from Site 1 wishing to cross the A20 either at the access point (60mph) or at the bus stop 450m away at the A20/Sandyhurst Lane junction (70mph).

**S47 is unsound in that it fails to recognise its obligations under Policies TRA5 & TRA6 to promote and support safe pedestrian and cyclist access.**

**Recommendation:** new paragraph

**S47 Para h): in accordance with Policies TRA5 & 6 suitable provision is made for pedestrians and cyclists (and public transport users) residing in the S47 development to safely cross the A20**

**Para 2: Purpose of the Scheme** in Stage 1 Road Safety Audit of the **KCC A20 Development Sites Access Assessment Feasibility Report**, qualifies the report findings in para 2.2.4 by stating ***"It is understood that only one site will be selected for construction."***

**Recommendation:** new paragraph.

**S47 Para i): In the event any other site(s) in addition to S47 being selected for development along this stretch of the A20, the appropriate A20 Development Site Access Assessment should be repeated, taking into account the additional site(s).**

- **Matters of Policy**

S47 is unsound in that it fails to acknowledge that the site is part of an **Area of Archaeological Potential** (Figure 4, page 30 - ABC draft Heritage Strategy Consultation) and as such national (NPPF), county (KCC Heritage) and local levels (**ENV15- draft Local Plan** and **Para 2.2.15 draft ABC Heritage Strategy**) policies require careful assessment of such sites before development to ensure potential archaeological heritage assets are not lost.

**Recommendation:** new paragraph

**S47 Para j); Evidence will be required to show that the development will not cause loss or substantial harm to archaeological assets or their settings**

The Kent Nature Partnership map of the **Mid Kent Greensand & Gault Biodiversity Opportunity Area** clearly shows that Site S47 is specifically identified as a biodiversity area. Policy ENV1 recognises the importance of the biodiversity strategy.

The Site also neighbours both the Hothfield Heathland SSSI (<1 mile), and the Hoads Wood & Warren Wildlife Reserve (~0.3 mile) and has a fresh water stream running through it.

Thus S47 should be afforded the same protection as is proposed for S34 Hothfield - Land east of Coach Drive.

**Recommendation:** new paragraph

**S47 Para k); Ensure that any direct or indirect impact on the Mid Kent and Greensand and Gault Biodiversity Area, the Hothfield Heathland SSSI and the Hoads Wood and Warren Wildlife Reserve are suitably mitigated in accordance with Policy ENV1**

- **Sustainability**

As part of its evidence collection for this consultation response, the SLRA undertook a survey of the residents of all the properties bounding Westwell Lane. This included gathering views on the effective abandonment of the existing rural/urban boundary principle and detailed questions on infrastructure needs resulting from S47 and any other A20 Corridor development.

The results show unanimous support for the S47 development footprint being restricted to the A20 end of the site and access to Westwell Lane being restricted to pedestrian and cycle. However, concerns have been raised about potential road safety issues at the Westwell Lane/Sandyhurst Lane and Potters Corner/A20 junctions.

M20 noise mitigation and better internet access were again majority demands.

Residents highlighted infrastructure shortcomings, unanimously demanding speed restrictions on the A20 at pedestrian/cyclist crossing points with mixed support for street lighting. Strong support was shown for the expansion of the Charing surgery capacity and new playgroup and primary school facilities being provided in the A20 corridor area to cope with the increased demand. Better bus services were also considered important.

Enhanced green recreation space, both on the S47 site itself and elsewhere within the A20 Corridor were priorities but with lesser demand being shown for a

convenience store or sub-post office. A new Community Centre received little support.

The detailed results are shown in Appendix 2.

**S47 is unsound since it fails to demonstrate how existing levels of social, community, physical and e-technology infrastructure facilities and services will be maintained in accordance with para d) Policy SP1.**

**Recommendation:** new paragraph

**S47 para l) That provision will be made through developer contributions and stakeholder funding for the local delivery of social, community, physical and e-technology infrastructure facilities and services to be maintained at existing, or improved, levels.**

### Noise and vibration

**Site S47 is unsound as no provision is made to assess and manage noise and vibration pollution in accordance with EU and NPPF guidelines.**

Site S47 is the closest A20 Corridor Site to Ashford town centre and, as such, is at the apex of the triangle formed by the transport routes that converge in the centre of the town and justify its claim to be “Best Placed”.

The M20 and Network Rail mainline to London are approximately 250m north-east from the nearest boundary point of the development footprint, whilst the south-west boundary borders the A20 with the HST/Eurostar line 300m distant at its nearest point (Appendix 3).

Whilst extrapolations of noise level measurements are imprecise, nearby planning application assessments (Yonsea 2010) and (Oakover (2017) can indicate approximate levels of the ambient noise to be expected at both these boundaries of the development.

These are tabulated below

:Source	Distance	Day (dBA)	Night (dBA)
Point A: Rear of Site			
M20 *	246m	64	64
A20	281m	55	45
HST**	598m	57	51
<b>Combined (log)</b>		<b>65</b>	<b>64</b>
Point B: Front of site			
M20*	528m	60	60
A20	20m	65	55
HST**	306m	60	54
<b>Combined (log)</b>		<b>67</b>	<b>62</b>

\* 2017 \*\* 2010

NPPF paragraph 123 and planning policy guidance requires a noise standard for bedrooms of 30 dBA and living rooms at 35 dBA, which is considerably quieter than the ambient noise level and very much lower than the peak noise levels in the area. Thus the site is not viable without a noise assessment and recommendations on how the noise conditions should be managed.

The local geology is sand. Residents in the area experience vibration from the trains which increases in wet conditions. A further assessment of this problem will be needed prior to construction to ensure adequate mitigation is included in building standards.

**Recommendation:** new paragraph

**S47 Para m): Measures are taken to minimise the impact of noise and vibration from the M20, A20 and the two railway lines on the amenity of future occupiers of the development, informed by a noise and vibration assessment undertaken no earlier than at the commencement of the development.**

**Site S47 is unsound as it**

- a) **does not meet the NPPF criteria of a site which “has good access to services and facilities, does not require significant infrastructure to deliver it and can be delivered early”.**
- b) **does not meet Local Plan Policy stated in paras a), b), d), and e) of Policy SP1 and the new SP2 (MC4)**

The SLRA disputes, based on its comments above, that Site S47 meets a number of the statements made in Policy MC4 to justify A20 Corridor development, namely that Site S47

- *does not adversely impact on the local landscape*
- *housing development here would be consistent with the prevailing character of the built form*
- *has excellent access to the main local road network*
- *is relatively unconstrained and requiring little in the way of new infrastructure provision*

**Recommendation:**

**That site S47 is unsound, unsustainable and should not be included in the emerging ABC Local Plan.**

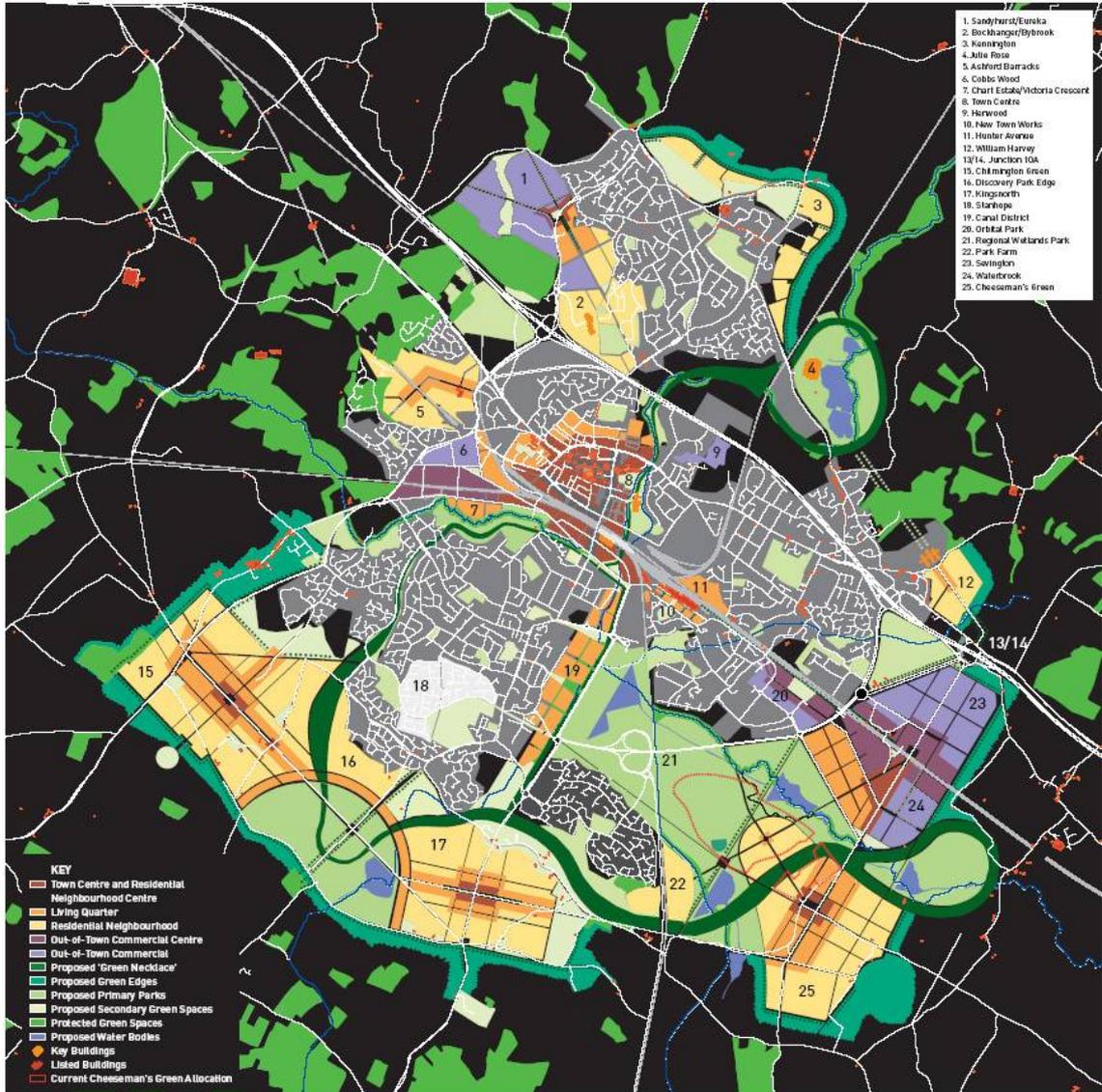
## **Deliverability**

**Delivery Schedule MC84 is unsound in that the issues identified during this consultation will need evaluating through an overarching sustainability appraisal and solutions identified and funded before development can proceed.**

### **Recommendation:**

**That site S47 is unsound, undeliverable and should not be included in the emerging ABC Local Plan.**

# Appendix 1: Map from the Greater Ashford development Framework (GADF)



## Appendix 2: Resident survey results

The A20 Corridor development Infrastructure needs							
<i>I am against any HOUSING DEVELOPMENT on the S47 (formerly Woodside) site because:</i>							
	For	Against	No view expressed	Own submission			
	1	6	4	for	against		
				0	3		
<i>If such development does go ahead I believe the following infrastructure improvements should be considered</i>							
			Essential	Important	Good to have	Un- important	Un- necessary
<b>S42 (formerly Woodside) site only</b>							
Guaranteed no vehicle access to Westwell Lane			12	1			
Development restricted to A20 end of site below			12	1			
Noise reduction measures on M20			10	2	1		
Improved tree screening along Westwell Lane			8	5			
Noise reduction measures for Network Rail			5	4	4		
<b>S47 site plus A20 Corridor development</b>							
Green recreation space		On S47 site	6	5	1		
Green recreation space		A20 corridor	5	4	3		
Street lighting		A20 corridor	5	2	3	2	
Childrens play area		On S47 site	3	4	3	1	1
Childrens play area		A20 corridor	3	3	5	1	
Street lighting		On S47 site	3	3	3	2	1
Childrens play group facility		A20 corridor	3	3	5		1
Street lighting		On S47 site	3	3	3	2	1
Childrens play group facility		On S47 site	2	2	5	1	1
Convenience Store		A20 corridor	1	2	4	2	3
sub post office		A20 corridor	1	1	6	2	2
Convenience Store		On S47 site		3	5	1	3
<b>Infrastructure</b>							
Speed restrictions at access points to A20			11	2			
Local access to high speed broadband			8	4	1		
Enlargement of Charing Surgery medical facilities			8	2		3	
New primary school covering A20 corridor development			6	2	4		1
Improved local bus services to Ashford			5	4	1		2
NHS dentistry at Charing Surgery			5	3	5		
Community Centre			1	1	3	1	4
<b>Other (please specify)</b>							
Footpath to Ashford							
Connection to mains drainage							
Vets							
Improvements to WHH							

### Appendix 3



#### Legend

Noise Source	Point A	Point B
HST	306 m	598 m
A20	20m	281 m
M20	528 m	246 m