

**Ashford Borough Council Planning Application number 18/01554/AS**

**Sand pit to the south of 200 and east of 198 Sandyhurst Lane  
Boughton Aluph, Kent**

**Objection comments**

**INTRODUCTION**

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 order that our comments on this application accurately reflect the views of residents in our area we invited those residents to review the results of our earlier survey carried out in November 2017 (a summary of which can be found in Appendix 1), which informed our response to the previous Application No 17/01636/AS and advise us of any changes to our conclusions they would wish us to put forward. The overwhelming reaction was that our objections were still valid.

***We therefore believe that the comments made in this response are representative of, and approved by, the majority of these respondents and not necessarily just those of the SLRA officers or its management committee.***

**Objections to this Planning application are confined to those issues NOT reserved.**

**COMMUNITY ENGAGEMENT**

The results of the 2017 SLRA consultation can be summarised as:

Q1. The vehicular access proposed is dangerous and unsuitable.						
Strongly agree & agree		Neutral		Disagree & strongly disagree		TOTAL
Number	%	Number	%	Number	%	
54	94.7%	2	3.5%	1	1.8%	57
Q2. Sandyhurst Lane is not suitable for the resultant increase in vehicular traffic.						
Strongly agree & agree		Neutral		Disagree & strongly disagree		TOTAL
Number	%	Number	%	Number	%	
55	96.5%	0	0.0%	2	3.5%	57
Q3. If the proposal is approved, vehicular access should be via the Eureka Park development, not Sandyhurst Lane.						
Strongly agree & agree		Neutral		Disagree & strongly disagree		TOTAL
Number	%	Number	%	Number	%	
51	89.5%	3	5.3%	3	5.3%	57
Q4. If the proposal is approved, it should include a generous landscaped buffer between the site and the proposed Eureka Park development, as required in the draft Local Plan (Policy S20 (b)).						
Strongly agree & agree		Neutral		Disagree & strongly disagree		TOTAL
Number	%	Number	%	Number	%	
56	98.2%	1	1.8%	0	0.0%	57

Q5. The type of dwellings proposed are not in character with the surrounding area.						
Strongly agree & agree		Neutral		Disagree & strongly disagree		TOTAL
Number	%	Number	%	Number	%	
44	77.2%	10	17.5%	3	5.3%	57
Q6. The development and the traffic associated with it will result in an unacceptable increase in the level of environmental noise.						
Strongly agree & agree		Neutral		Disagree & strongly disagree		TOTAL
Number	%	Number	%	Number	%	
52	91.2%	3	5.3%	2	3.5%	57
Q7. The local infrastructure (medical facilities, schools, public transport, etc) is already under severe strain and unable to support the demands						
Strongly agree & agree		Neutral		Disagree & strongly disagree		TOTAL
Number	%	Number	%	Number	%	
53	93.0%	0	0.0%	4	7.0%	57

**Our objections are based on the emerging key themes from this survey**

**TRANSPORT**

As is acknowledged in the Transport Statement, Sandyhurst Lane is a two lane rural road narrowing in places to 5m. Of its winding 1.8 miles total length, 1.25 miles is signposted as “No footway” and is predominantly without street lighting.



Access to all public transport is either from Faversham Road (Canterbury and Ashford) or Potters Corner (Maidstone and Ashford), the latter along the unlit part of the Lane with no footpath.

Sandyhurst Lane has long been used as a ‘rat run’ and suffers from traffic congestion at both ends during the morning and evening peak hours. In particular, long delays occur at the Faversham Road (A251) junction. Furthermore, the planned addition of 375 dwellings and 20ha of further commercial development at Eureka Park (Policy S20, Draft Ashford Local Plan) will inevitably lead to even more displacement traffic from Trinity Road using Sandyhurst Lane as a rat run, **a factor not considered in the Transport Statement**. The proposed pedestrian/cycle access to/from Eureka Park to Sandyhurst Lane will cause an increase in the use of the Lane by both cyclists and pedestrians, again **a factor not considered in the Transport Statement**. The proposed development in this Application makes exclusive use of Sandyhurst Lane for vehicular, cycle and pedestrian access to the wider Ashford transport network.

Whilst the proposed development of 18 dwellings may only represent a **6% increase** in the total number of dwellings in the Sandyhurst Lane area, this would mean a further increase of up to 50 vehicles using the Lane and a commensurate increase in pedestrian and cycle traffic.

According to the Applicant’s Transport Statement, using its existing traffic flow data in Figs 4.1 and 4.2 and its theoretical forecast of additional vehicle movements in Table 6.1.3 this development will potentially **increase peak hour traffic by about 7% on** top of the already excessive traffic congestion and delays.

However during the construction phase, **all site traffic** - materials and operatives - will need use of the Lane, for access, queueing and parking, adding not only to peak time congestion but also significantly increasing commercial vehicle movements throughout the working day, **a factor not considered in the Transport Statement**.

In the SLRA survey of residents in the local area, **95% of respondents felt that the vehicular access proposed is dangerous and unsuitable**

In addition we received numerous comments from residents about the transport aspects of this planning application, including:

*“The corner where it is situated is particularly narrow, dark and has extremely poor visibility of cars driving in excess of the speed limit as there is insufficient traffic calming”*

*“the proposed entrance to this site with the increase of traffic on a dangerous bend (3 accidents in the last 36 months) will result in accidents. Profit is being put before safety.”*

*“The access for this development is probably on the worst part of Sandyhurst Lane, some drivers see how fast they can get around the bends here. It will be another accident waiting to happen. Re access from Eureka Park totally agree 100%.”*

*“The proposed access is in a totally unsuitable position and could lead to accidents. This development should only be considered if linked to Eureka and not Sandyhurst Lane.”*

*“The access point to the site is dangerous so I can only support this development if access is provided via the Eureka site.”*

*“Strongly object on grounds that the road cannot sustain additional traffic”*

*“The speed limit would have to be reduced along this stretch and if it wasn't I would object totally to having this development. In fact I think Sandyhurst Lane needs to have a consistent 30 mph speed limit along the whole lane rather than 40 mph at the Faversham Rd end and 30 mph halfway along the Lane”*

*“The road design at that part of the lane is extremely hazardous and any access to the lane on the hill will certainly result in many more accidents and probably fatalities.”*

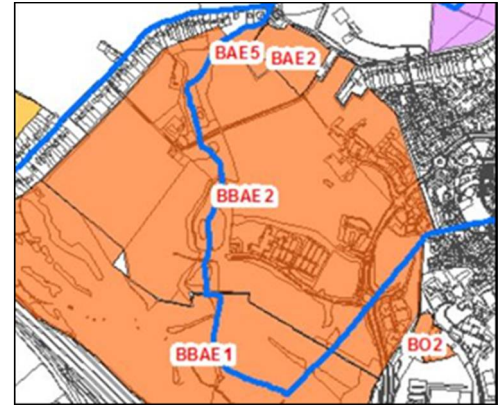
There is no evidence provided in this application that the proposed modifications to the visibility splay and the provision of a further pedestrian access will materially change these concerns.

A recent (September 2018) traffic survey commissioned by the SLRA generally confirmed the volume and profiles of traffic using Sandyhurst Lane but provided strong evidence that breaches of the 30 and 40 mph speed limits were commonplace, further adding to our concerns about the risks to all users from the proposed additional movements of motor vehicles, cyclists and pedestrians.

**The SLRA opposes this Application as it still fails to demonstrate how it will comply with Policies TRA5 Planning for Pedestrians and TRA6 Provision for Cycling in the submitted Local Plan.**

In our survey of residents in the local area, 90% of respondents agreed that, if the proposal is approved, vehicular access should be via the Eureka Park development, not Sandyhurst Lane.

The SLRA also considers that as this site, BAE2, is located within the accepted urban/rural boundary of urban Ashford and directly abuts site BBAE2 (Eureka Park), its access should be subject to the same conditions as were applied, in the Draft Local Plan, to **Policy S20 - Eureka Park (BBAE2)** in para (e): ***Vehicular access to the site shall be provided from Trinity Road only.***



The Design and Access Statement (para 3.1.1) already acknowledges the potential for access to Eureka Park.

The SLRA opposes this Application on the basis of its inappropriate vehicular access.

The SLRA opposes this Application in its present form on the grounds that during the construction phase it “*would generate levels and types of traffic movements, including heavy goods vehicle traffic, beyond that which the rural roads could reasonably accommodate in terms of capacity and road safety*” on Sandyhurst Lane and at its access junctions, contrary to Policy TRA7 *The Road Network & Development in the Draft Local Plan.*

The SLRA opposes this Application in its present form as it argues that, during the construction phase, the proposed development site is, de facto, a new employment site which should not be permitted since it fails to demonstrate how it will meet the requirements of paragraphs

*c. there would be no significant impact on the amenities of any neighbouring residential occupiers; and,*

*d. it can be demonstrated that the development will not generate a type or amount of traffic that would be inappropriate to the rural road network that serves it.*

of Policy EMP5 *New employment premises in the countryside in the Draft Local Plan.*

### **URBAN/RURAL BOUNDARY**

Since originally set out in the Greater Ashford Development Framework (GADF - 2006), it has long been recognised that Sandyhurst Lane provides the urban/rural boundary on the northern side of Ashford. This view was endorsed by the Inspectors at the 2018 Examination of the submitted Ashford Local Plan and recent planning application refusals by the ABC Planning Committee.

Whilst the Applicant recognises the site forms the Northern boundary of urban Ashford, the SLRA argues that the developers’ Design and Access Statement and Illustrative Landscape Master Plan must recognise this by mirroring both the vehicle access and “*generous*

*landscaped buffer to residential properties along Sandyhurst Lane*” conditions as are required for the abutting BBAE2 site (**Policy S20 - Eureka Park**, para (b) in the submitted Draft Local Plan)

**The SLRA opposes this Application on the basis that its access and landscape design fails to recognise the rural character of Sandyhurst Lane.**

## **ENVIRONMENTAL**

### **a) Biodiversity and Landscape**

The SLRA has consulted local experts on wildlife and landscape issues, who will be making their own representations to ABC, but for completeness their comments and recommendations are included here:

*“I am concerned the findings of the wildlife survey suggest that a number of important local species would suffer as a result of this.”*

*“The sandpit is an important part of an ecosystem linking the warren, the lake, the alders and tilelodge wood (local nature reserve) The protected Hazel Dormouse discovery is not a surprise as I have been monitoring them in my garden. The reptile survey was conducted in October which the report acknowledges is 'a suboptimal month' so little was found I have been surveying reptiles in the area for Kent Wildlife Trust and can confirm that little is likely to be found in October even at established recording stations. There are reports of Adders in the area which are becoming rare and endangered and the sandpit provides a good habitat. Connectivity on the sites is important for the wildlife they contain and for the amenity of local residents.”*

*“The invertebrate study indicates that this site could be considered a SSSI - perhaps a survey can be undertaken on the sandpit on the other side of Sandyhurst lane to see if it supports the same species. If so to make this the SSSI instead?”*

*“After seventeen years of living in Sandyhurst Lane we are greatly concerned with regards to the natural environment of the area and destruction of the wildlife habitat.”*

In view of the important part that the neighbouring Eureka Park (S20) site is to play in the residential and employment land provision in the Draft Local Plan, the SLRA believes the Sandpit site, and any other new housing development proposals, should be part of a wider environmental “masterplan” to ensure that the sensitive natural habitat of north east Ashford is protected and enhanced and not destroyed.

**The SLRA opposes this Application on the basis that inadequate evidence and mitigation proposals are provided to comply with Policy ENV1 Biodiversity in the submitted Local Plan.**

### **b) Environmental Pollution**

**Any street and domestic lighting on such a dense site will create light pollution and be contrary to the ABC Dark Skies policy.**

We also have concerns about the amount of noise which is likely to be generated by a compact site of 18 dwellings.

**The SLRA is opposed to this Application in that it fails demonstrate how it will comply with Policy ENV4 *Light Pollution and Promoting Dark Skies* in the submitted Local Plan.**

### **c) Local infrastructure**

The SLRA has serious concerns about the ability of the local rural infrastructure to support the additional population associated with even the proposed 18 new dwellings. Reference has already been made to traffic issues in Sandyhurst Lane. There are also concerns about the adequacy of local medical and dental facilities, schools, public transport and broadband.

In our survey of residents in the local area, **those who already rely on the local infrastructure**, 93% of respondents agreed that the local infrastructure (medical facilities, schools, public transport, etc) is already under severe strain and unable to support the demands which will result from this development of potentially 50+ local users, particularly the demographics with properties targeted at down-sizing.

The SLRA argues that vehicular and pedestrian access to Eureka Park and its emerging new infrastructure will mitigate the impact of this development on the existing rural services.

**The SLRA therefore opposes the proposed development on the grounds that it fails to demonstrate how it will comply with *paras (a) and (d)* of Policy SP1 *Strategic Objectives* or what provision it has made to contribute to improvements in the local infrastructure in accordance with Policy IMP1 *Infrastructure Provision* in the Draft Local Plan.**

13 November 2018

## Appendix 1

### Results of opinion survey of residents conducted by Sandyhurst Lane Residents' Association (in association with Kennington Community Forum)

Q1. The vehicular access proposed is dangerous and unsuitable.										
Strongly agree		Agree		Neutral		Disagree		Strongly disagree		TOTAL
Number	%	Number	%	Number	%	Number	%	Number	%	
51	89.5%	3	5.3%	2	3.5%	1	1.8%	0	0.0%	57
Strongly agree & agree				Neutral		Disagree & strongly disagree				
Number		%		Number	%	Number		%		
54		94.7%		2	3.5%	1		1.8%		

Q2. Sandyhurst Lane is not suitable for the resultant increase in vehicular traffic.										
Strongly agree		Agree		Neutral		Disagree		Strongly disagree		TOTAL
Number	%	Number	%	Number	%	Number	%	Number	%	
49	86.0%	6	10.5%	0	0.0%	2	3.5%	0	0.0%	57
Strongly agree & agree				Neutral		Disagree & strongly disagree				
Number		%		Number	%	Number		%		
55		96.5%		0	0.0%	2		3.5%		

Q3. If the proposal is approved, vehicular access should be via the Eureka Park development, not Sandyhurst Lane.										
Strongly agree		Agree		Neutral		Disagree		Strongly disagree		TOTAL
Number	%	Number	%	Number	%	Number	%	Number	%	
47	82.5%	4	7.0%	3	5.3%	3	5.3%	0	0.0%	57
Strongly agree & agree				Neutral		Disagree & strongly disagree				
Number		%		Number	%	Number		%		
51		89.5%		3	5.3%	3		5.3%		

Q4. If the proposal is approved, it should include a generous landscaped buffer between the site and the proposed Eureka Park development, as required in the draft Local Plan (Policy S20 (b)).										
Strongly agree		Agree		Neutral		Disagree		Strongly disagree		TOTAL
Number	%	Number	%	Number	%	Number	%	Number	%	
49	86.0%	7	12.3%	1	1.8%	0	0.0%	0	0.0%	57
Strongly agree & agree				Neutral		Disagree & strongly disagree				
Number		%		Number	%	Number		%		
56		98.2%		1	1.8%	0		0.0%		

<b>Q5. The type of dwellings proposed are not in character with the surrounding area.</b>										
Strongly agree		Agree		Neutral		Disagree		Strongly disagree		TOTAL
Number	%	Number	%	Number	%	Number	%	Number	%	
34	59.6%	10	17.5%	10	17.5%	2	3.5%	1	1.8%	57
<b>Strongly agree &amp; agree</b>				<b>Neutral</b>		<b>Disagree &amp; strongly disagree</b>				
Number		%		Number		%		Number		%
44		77.2%		10		17.5%		3		5.3%

<b>Q6. The development and the traffic associated with it will result in an unacceptable increase in the level of environmental noise.</b>										
Strongly agree		Agree		Neutral		Disagree		Strongly disagree		TOTAL
Number	%	Number	%	Number	%	Number	%	Number	%	
46	80.7%	6	10.5%	3	5.3%	1	1.8%	1	1.8%	57
<b>Strongly agree &amp; agree</b>				<b>Neutral</b>		<b>Disagree &amp; strongly disagree</b>				
Number		%		Number		%		Number		%
52		91.2%		3		5.3%		2		3.5%

<b>Q7. The local infrastructure (medical facilities, schools, public transport, etc) is already under severe strain and unable to support the demands which will result from this development.</b>										
Strongly agree		Agree		Neutral		Disagree		Strongly disagree		TOTAL
Number	%	Number	%	Number	%	Number	%	Number	%	
46	80.7%	7	12.3%	0	0.0%	3	5.3%	1	1.8%	57
<b>Strongly agree &amp; agree</b>				<b>Neutral</b>		<b>Disagree &amp; strongly disagree</b>				
Number		%		Number		%		Number		%
53		93.0%		0		0.0%		4		7.0%