

Ashford Borough Council Planning Application number 17/01613/AS

Land at Lenacre Hall Farm, 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 to comment on this application, accurately reflecting the views of residents in our area, we have carried out a survey, inviting residents to give their opinions on a range of relevant factors, and to provide any additional comments. We have received 106 responses, a summary of which can be found in Appendix 1.

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 Planning application

Our objections are based on a number of key themes

TRANSPORT

Sandyhurst Lane is a winding two lane rural road narrowing in places to 5m. Of its 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 route for through traffic, for which it is patently unsuitable, 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 2030) will inevitably lead to even more displacement traffic from Trinity Road using Sandyhurst Lane. 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. The proposed development on land at Lenacre Hall Farm exclusively uses Sandyhurst Lane for vehicular, cycle and pedestrian access to the wider Ashford transport network.

When complete, the proposed development of 89 dwellings will represent a **26% increase** in the total number of dwellings in the Sandyhurst Lane area. This would mean a further increase of up to 250 cars using the Lane and a commensurate increase in pedestrian and cycle traffic.

The Applicant's Transport Statement, which accompanies the planning application, accepts (para 8.11) that this development will **increase peak hour traffic by 24% to 26%**. This is a totally unacceptable and unsustainable increase on top of the already excessive traffic congestion and delays.

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.

The SLRA believes that the Junctions Assessments to derive a 2017 baseline, required by KCC Highways, should be extended to

- include the Sandyhurst Lane/A20 junction at Potters Corner
- include a study of the mix of vehicles and ideally their journey purpose.

In the SLRA survey of residents in the local area, **100% of respondents agreed that Sandyhurst Lane is not suitable for the increase in vehicular traffic which would result from the proposed development.**

The SLRA opposes the proposed development as it fails to demonstrate how it will comply with Policies TRA5 *Planning for Pedestrians* and TRA6 *Provision for Cycling in the Draft Local Plan*.

The SLRA opposes this development on the grounds that 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 development 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/Lenacre Street provides the urban/rural boundary on the northern side of Ashford. If permitted, this development would be on the rural side of this boundary.

This boundary has recently been implicitly confirmed in Policy S20 of the Draft Ashford Local Plan 2030 and explicitly by the Local Government Boundary Commission for England (LGBCE), in their review of electoral arrangements for Ashford Borough Council, 2017, which states:

“We received a number of submissions suggesting that Sandyhurst Lane be included wholly in the Downs West ward. We have therefore made a small modification to the ward boundary between Downs West and Goat Lees to include the entirety of Sandyhurst Lane, Lenacre Street and Eastwell Grange in Downs West.”

*“The submissions we received strongly opposed the inclusion of part of Sandyhurst Lane, Lenacre Street and Eastwell Grange in the Goat Lees ward and cited good local evidence that supported its inclusion in a ward of a more rural than urban nature. **We have therefore amended the boundary between Goat Lees and Downs West to include the whole of Sandyhurst Lane within the Downs West (rural) ward.**”*

In the SLRA survey of residents in the local area, **99% of respondents were opposed to any large scale developments on the north (rural) side of this boundary.** In a wider 2016 survey of Boughton Aluph & Eastwell residents for the Neighbourhood Plan, **91%** of 482 respondents considered it was ‘important’ or ‘very important’ to maintain this urban/rural boundary.

The SLRA opposes this development on the basis that it is contrary to both the spirit and intention of the GADF and the more recent LGBCE recommendation and violates the recognised urban/rural boundary north of Ashford.

The SLRA opposes this development on the basis that it fails to comply with both the objectives and criteria for large development set out in paragraphs

- a. To focus development at accessible and sustainable locations which utilise existing infrastructure, facilities and services wherever possible and makes best use of suitable brownfield opportunities***

and

- b. To protect and enhance the Borough’s historic and natural environment including its built heritage and biodiversity***

of Policy SP1 *Strategic Objectives* in the Draft Local Plan.

LEGITIMACY

The SLRA has a fundamental objection to the submission of this planning application, which flies in the face of the democratic process. The proposed development was originally submitted to Ashford Borough Council (ABC) for consideration for inclusion in the Ashford Local Plan 2030. ABC referred it to Boughton Aluph & Eastwell Parish Council (BA&E PC) for consideration for inclusion in their Draft Neighbourhood Plan.

BA&E PC carried out a comprehensive assessment of the site (SHEELA), in accordance with the procedures adopted by ABC as part of its assessment of sites for the Draft Local Plan. On this basis the site scored -14.

The Applicant claims, in the Planning Statement (para 5.10.4), that an independent re-appraisal, using the same criteria, scored the site at +12 but fails to provide any supporting evidence.

In addition to its SHEELA appraisals in 2016, BA&E also conducted a Neighbourhood Plan survey of its electorate. This showed that the site was the least popular of all the seven sites considered, with 75% of respondents opposed to its inclusion in the Plan. BA&E PC then issued a Decision Letter to the Applicant on 10 January 2017, in which they stated that

“the Parish Council took the view that it is not minded to consider the Lenacre Hall Farm site for land allocation in the Boughton Aluph and Eastwell Neighbourhood Plan”

and

“75% of respondents to our household survey opposed development on your site. As such, we do not believe the Parish Council has a mandate to include it for land allocation in our Neighbourhood Plan.”

As the site is located in a Neighbourhood Plan area, it has not been included by ABC in either the Draft Local Plan or the Major Changes to the Draft Local Plan developed to meet the shortfall in the Five Year Land Supply target demanded by central government.

This site is neither necessary to meet the Borough strategic housing needs, nor those of the Draft BA&E Neighbourhood Plan.

The Applicant seeks to justify this application by claiming, in para 5.10.7 of the Planning Statement, that:

“The Neighbourhood Plan is at an early stage of development however and since no draft version has yet been published, no weight can be attributed to any outputs from the group.”

The SLRA proposes that the Application should be rejected on the basis of its “prematurity” and because it fails to comply with overarching Policies set down in the Draft Local Plan, which the Neighbourhood Plan will need to reflect and adopt in its own planning policies.

COMMUNITY ENGAGEMENT

The Applicant seeks to demonstrate the acceptability of the proposal to the local community by stating the results and conclusions of the public exhibition held on 9th August 2017, reported in the Statement of Community Involvement, submitted as part of the Application.

The SLRA argues its conclusions are unsafe because:

a) as the only organisation which represents the views of ALL the residents of Sandyhurst Lane and its environs, we consider ourselves to be a major “Interested Party”, yet these views were not sought through the SLRA being invited to attend or comment during the “local consultation”.

As a result of this exclusion, the SLRA undertook a consultation of all the properties in the SLRA area and the results, referred to throughout this Response, are shown in Appendix 1 and can be summarised as:

Q1. Sandyhurst Lane/Lenacre Street has long been recognised as a natural boundary of the rural environment. No large scale developments should take place north of this boundary.						
Strongly agree & agree		Neutral		Disagree & strongly disagree		TOTAL
Number	%	Number	%	Number	%	
105	99.1%	0	0.0%	1	0.9%	106
Q2. Sandyhurst Lane is not suitable for the resultant increase in vehicular traffic.						
Strongly agree & agree		Neutral		Disagree & strongly disagree		TOTAL
Number	%	Number	%	Number	%	
106	100.0%	0	0.0%	0	0.0%	106
Q3. The proposed dwellings are out of character with the surrounding area.						
Strongly agree & agree		Neutral		Disagree & strongly disagree		TOTAL
Number	%	Number	%	Number	%	
98	92.5%	6	5.7%	2	1.9%	106
Q4. The site is prime agricultural land which should not be built upon.						
Strongly agree & agree		Neutral		Disagree & strongly disagree		TOTAL
Number	%	Number	%	Number	%	
103	97.2%	2	1.9%	1	0.9%	106
Q5. The proposed street lighting is out of character with the area and will result in unacceptable light pollution.						
Strongly agree & agree		Neutral		Disagree & strongly disagree		TOTAL
Number	%	Number	%	Number	%	
104	98.1%	2	1.9%	0	0.0%	106
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	%	
105	99.1%	1	0.9%	0	0.0%	106
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	%	
106	100.0%	0	0.0%	0	0.0%	106

The SLRA results are reinforced by the earlier Neighbourhood Plan survey, carried out by BA&E in 2016, (in which 482 residents completed the survey, representing close to half of the households in the Boughton Aluph, Eastwell & Goat Lees parish), with the following results:

- a. Three quarters (75%) of respondents felt that BAE1 Lenacre Hall Farm, Sandyhurst Lane (*then* 100+ dwellings), leisure and sheltered housing was unsuitable for development

b. 95% of respondents stated that they would be concerned about increased traffic and congestion when thinking about new housing development in the parish

c. 91% of those interviewed stated that it was important (73% very important and 18% important) to maintain the rural/urban boundary in the parish, specifically along Sandyhurst Lane.

b) The Applicant states that 502 people were invited to attend their Consultation exhibition on 9 August 2017. 34 completed feedback forms and a further 12 responses were received through the website and by email, a total response of 46 (9.2% of invitees). The summary of the Statement of Community Involvement, para 6.1.1, states that 66.6% of respondents agreed that they would like to see high quality housing in the area, equating to 6.1% of invitees. However, half of respondents did so “with reservations”, **i.e. of the total 502 invitees, only 3.1% gave unqualified support.**

The Applicant reports respondent replies to the question on “best use of the site” but neglects to ask for preferences to continue its use as farmland. In the SLRA survey, 103 respondents (97.2%) agreed it should be retained as agricultural land.

The SLRA opposes this Application as it fails to meet the criteria set out in Policy ENV5 Protecting important rural features in the Draft Local Plan.

ENVIRONMENTAL

a) Biodiversity and Landscape

The Lenacre Hall Farm (LHF) site has a wide variety of habitats which create good biodiversity. An ancient woodland, mature well connected hedge rows, rough pasture and several ponds with connecting ditches make this a rich diverse ecosystem. The rough, unmanaged grassland is particularly significant as it is the only one within the area.

A major concern is that the developers fail to take into account any connectivity with Tower wood to the north (which forms the boundary of the AONB) or to the role the Lenacre ancient wood may play with other woodland sites within the vicinity. They view the single row of houses along Lenacre Street as some sort of barrier to wild life when in fact these mature gardens act as an extension to the farmland connecting Tower wood with the farmland ecosystems via trees, hedges, grassed areas and damp borders.

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

“The countryside and landscape on this western edge of Urban Ashford is sensitive. This development will not contribute to ensuring that it will remain rich in wildlife in a viable way. It will contribute to the decline in biodiversity, coherent ecological networks and resilience to current and future pressures in the area in a direct, permanent way.”

“An area of ancient woodland will be isolated from the rural network of corridors etc. The proposed buffer will not be sufficient to protect the viability of the woodland due to the impact of the surrounding gardens, noise, light and chemical pollution. The community orchard looks so small as to be unviable.”

“There will be a loss of ecological habitat to a diverse population of birds and other wildlife”

Local experts believe the habitat surveys presented by the Applicant are flawed in respect of scope, timing and methodology and fail to identify the scale and diversity of the wildlife on this rural site itself and its locality, and the need for species to create a natural “green corridor” between habitats.

“There is insufficient environmental survey data to enable any discussion of the plans, the only on-site survey being one day in September 2016. Before either stage of this application can be considered, the standard procedures for monitoring bat and mammal activity over a whole year or the relevant active months are needed; an impact study on the combined environmental effect of this application along with the current Sandpit application and is needed; a plant survey in spring and summer, to identify any ephemerals and plants that disappear completely after flowering, is needed.”

“The proposed development at Lenacre Hall Farm will affect a natural habitat that supports a diverse population of wildlife including bats, barn owls, buzzards, badgers and grass snakes.”

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 Lenacre Hall 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 there is no environmental master plan in place to assess its contribution to the wider environmental damage of local developments, nor corresponding mitigation proposals in place to ensure its compliance with Policy ENV1 *Biodiversity* in the Draft Local Plan.

b) Landscape and Built Character

The design of the proposed development is at variance with the local built character, which comprises a linear development of detached or semi-detached, low density, three or four bedroomed properties set in a semi-rural environment, providing open rural views to its majority.

The proposed development itself is a clustered, medium/high density mix of smaller 2/3/4 with some larger 5 bedroom properties of unsympathetic design, with limited outdoor living space and car parking provision which will be visible from both the nearby AONB and from most of the existing properties in the area.

In our survey of residents in the local area, **92% of respondents agreed that the proposed dwellings are out of character with the surrounding area.**

There is no reference to lighting in the Design and Access Statement, but the Planning Statement includes several references to a “*sensitive lighting scheme*”, from which we conclude that, in contrast to the surrounding area, this development will include street lighting. Notwithstanding “sensitive” street lighting design, concentrating the unrestricted domestic light spill from 89 properties in such a relatively small “urbanised” area will also be a significant contributor to light pollution.

In our survey of residents in the local area, **98% of respondents agreed that street lighting is out of character with the area and will result in unacceptable light pollution.**

We also have concerns about the amount of noise which is likely to be generated by a compact site of 89 dwellings.

In our survey of residents in the local area, **99% of respondents agreed that the development and the traffic associated with it will result in an unacceptable increase in the level of environmental noise.**

The SLRA is opposed to this Application in that it fails to meet the criteria set down in Paras, a, c), d), e) and f) of Policy HOU5 in the Main Changes to the Local Plan - Residential windfall development in the countryside, and Policy ENV4 Light Pollution and Promoting Dark Skies in the Draft Local Plan.

c) Flood Risk

Policy ENV6 Flood Risk in the Draft Local Plan states:

“Proposals for new development should contribute to an overall flood risk reduction. The sequential test and exception tests established by the National Planning Policy Framework will be strictly adhered to across the Borough, with new development preferably being located in Flood Zone 1. Development will only be permitted where it would not be at an unacceptable risk of flooding itself, and, there would be no increase to flood risk elsewhere.”

The Flood Risk Assessment and Drainage Strategy document which accompanies this planning application states that the site is located in Flood Zone 1 and claims that “the proposed development will have no impact on flood risk elsewhere”.

However, many residents refute this latter claim.

Comments received include:

“Drainage issues will be a big problem due to sloping gardens. Where will the water go? My garden has the lowest point in Lenacre Street. Garden floods with excessive rain fall and generally soaks away into the field.”

“The site naturally slopes towards a pond and a low point in Sandyhurst Lane which can be prone to flooding in times of heavy rain. An increase in hard landscaping and therefore run off will increase the risk of flooding in this location.”

“Surface drainage in this area is already inadequate. In addition, many of the houses do not have mains drainage. The end of our garden is regularly waterlogged in the winter months, and the sloping nature of the proposed site could cause considerable drainage problems in the area”

The SLRA challenges the assumption that the proposed development will have no impact on flood risk in the locality and opposes the proposed development on the grounds that it contravenes Policy ENV6 *Flood Risk* in the Draft Local Plan.

d) Local infrastructure

The SLRA has serious concerns about the ability of local infrastructure to support the additional population associated with the proposed 89 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 and public transport.

In our survey of residents in the local area, **those who already rely on the local infrastructure**, 100% 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 300+ local users.

Of particular concern is the capacity of the local broadband network. The Utilities Statement which accompanies the planning application simply states:

“It is not known whether there are fibre optic cables in the vicinity” (para 2.5.3)

No accompanying evidence is presented by the Applicant on how they will overcome existing capacity constraints to ensure that the development will meet the requirement for new dwellings to access FTTP broadband (fibre to the premises) rather than the existing FTTC (fibre to the cabinet).

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.

22 November 2017

Appendix 1

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

Q1. Sandyhurst Lane/Lenacre Street has long been recognised as a natural boundary of the rural environment. No large scale developments should take place north of this boundary.										
Strongly agree		Agree		Neutral		Disagree		Strongly disagree		TOTAL
Number	%	Number	%	Number	%	Number	%	Number	%	
98	92.5%	7	6.6%	0	0.0%	0	0.0%	1	0.9%	106
Strongly agree & agree				Neutral		Disagree & strongly disagree				
Number		%		Number	%	Number		%		
105		99.1%		0	0.0%	1		0.9%		

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	%	
104	98.1%	2	1.9%	0	0.0%	0	0.0%	0	0.0%	106
Strongly agree & agree				Neutral		Disagree & strongly disagree				
Number		%		Number	%	Number		%		
106		100.0%		0	0.0%	0		0.0%		

Q3. The proposed dwellings are out of character with the surrounding area.										
Strongly agree		Agree		Neutral		Disagree		Strongly disagree		TOTAL
Number	%	Number	%	Number	%	Number	%	Number	%	
80	75.5%	18	17.0%	6	5.7%	2	1.9%	0	0.0%	106
Strongly agree & agree				Neutral		Disagree & strongly disagree				
Number		%		Number	%	Number		%		
98		92.5%		6	5.7%	2		1.9%		

Q4. The site is prime agricultural land which should not be built upon.										
Strongly agree		Agree		Neutral		Disagree		Strongly disagree		TOTAL
Number	%	Number	%	Number	%	Number	%	Number	%	
87	82.1%	16	15.1%	2	1.9%	1	0.9%	0	0.0%	106
Strongly agree & agree				Neutral		Disagree & strongly disagree				
Number		%		Number	%	Number		%		
103		97.2%		2	1.9%	1		0.9%		

Q5. The proposed street lighting is out of character with the area and will result in unacceptable light pollution.

Strongly agree		Agree		Neutral		Disagree		Strongly disagree		TOTAL	
Number	%	Number	%	Number	%	Number	%	Number	%		
89	84.0%	15	14.2%	2	1.9%	0	0.0%	0	0.0%	106	
Strongly agree & agree				Neutral		Disagree & strongly disagree					
Number		%		Number		%		Number		%	
104		98.1%		2		1.9%		0		0.0%	

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	%	Number	%	Number	%		
98	92.5%	7	6.6%	1	0.9%	0	0.0%	0	0.0%	106	
Strongly agree & agree				Neutral		Disagree & strongly disagree					
Number		%		Number		%		Number		%	
105		99.1%		1		0.9%		0		0.0%	

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.

Strongly agree		Agree		Neutral		Disagree		Strongly disagree		TOTAL	
Number	%	Number	%	Number	%	Number	%	Number	%		
98	92.5%	8	7.5%	0	0.0%	0	0.0%	0	0.0%	106	
Strongly agree & agree				Neutral		Disagree & strongly disagree					
Number		%		Number		%		Number		%	
106		100.0%		0		0.0%		0		0.0%	