



Appeal reference number: APP/E2205/W/19/3220880

Ashford Borough Council Planning Application number 18/00413/AS

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

**Appeal: Further objection comments
3rd October 2019**

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 346 dwellings. The mission statement of the Association is *"Protecting the rural character of Sandyhurst Lane and the adjoining area"*.

In addition to its opposition to the Planning Application, as set out in its earlier Consultation response dated 14th April 2018, the SLRA **OPPOSES** this Appeal against the Planning Committee decision for the reasons stated below.

Character and location (Refusal 1)

In refuting this Refusal, the Appellant relies heavily on positive statements made in the Planning Officer's report to the Planning Committee on detail issues relating to the landscape and property character in the area, without acknowledging the established settlement edge.

Historically this urban/rural boundary was formalised when Ashford was selected as a Sustainable Community and the limits of the Greater Ashford Development Framework (GADF) established - the north western boundary being Sandyhurst Lane.

This *de facto* boundary was acknowledged in the 2016 Boundary Review when the LGBCCE responded to representations from the SLRA and realigned the Downs West rural ward boundary to be to the south east of Sandyhurst Lane and to include all the properties on either side of Sandyhurst Lane within the Downs West borough ward and the rural parish of Westwell and the Eastwell ward of Boughton Aluph & Eastwell parish. This change came into effect at the local elections on 5th May 2019.

In their **Report on the Examination of the Ashford Local Plan - 2030** (Jan 2019), Para 137, the Inspectors reject sites S47, S48 and S49 along the A20 Corridor as being outside of established settlements and unsustainable and state *"In light of the housing requirement and supply, there is no justification for the delivery of housing in unsuitable and unsustainable locations"*.

The SLRA believes that, as the Adopted Ashford Local Plan now demonstrates a valid 5 year housing land supply without the inclusion of this site, no arguments exist to justify any breach of the established settlement edge boundary and consequent creeping urbanisation. THE REFUSAL SHOULD BE UPHELD.

Sustainability (Refusal 2)

Policy HOU5 in the Local Plan sets clear criteria and guidelines to be met for Windfall Sites.

The SLRA believes the evidence presented in the Officer's Report to the Planning Committee on access to local services was misleading. The Table below seeks to correct this.

Facility (nearest highlighted)	Road Dist	Walk		Cycle		Walk + Bus time from nearest stop
		Dist	Time	Dist	Time	
Medical & Health						
Bus stops	1.1	0.6/1.1	7/14	-		-
Easy Smile Dental Practice (<i>Private only</i>)	1.8	0.9	5	0.9	3	N/A
NHS Community Mental Health (<i>Specialist</i>)	1.8	0.9	5	0.9	3	N/A
Trinity House Hospital (<i>Specialist</i>)	1.7	0.8	5	0.8	2	N/A
Chopra & Associates NHS Dental Surgery	1.6	1.6	18	1.6	6	N/A
New Hayesbank GP Surgery	3.4	2.5	31	2.6	8	17 + 5
William Harvey Hospital (A&E)	5.8	5.8	1 hr 12	5.8	20	8 + 34
Charing GP Surgery	8.9	8.9	1 hr 57	8.9	31	10 + 43
Lifestyle						
Bus stops	1.1	0.7/1.1	10/14			
Post Office	1.6	1.6	18	1.6	6	N/A
Convenience Stores, dining & Pub	1.8	0.9	5	0.9	2	N/A
Town Centre /library	5.3	4.1	50	4.1	14	7 + 17
Rail station/bus interchange	5.7	4.9	51	4.8	17	8 + 21
Designer Outlet	6.7	5.4	1hr 7	5.9	19	11 + 27
Entertainment Park, dining & cinemas	3.1	2.1	23	2.1	6	14
Educational						
Bus stop	0.7/1.1	0.6/1.0	9/13			
<i>Infant/primary</i>						
Goat Lees Primary School	1.7	0.8	10	0.8	5*	None
Kennington CE Academy						
Primary School	1.8	1.8	21	1.6	6*	17
Downs View Infants School	1.9	1.9	22	1.7	7*	19
Phoenix Community Primary School	2.2	2.2	25	2.0	6*	18
<i>*Unsuitable for infants/juniors</i>						
<i>Secondary</i>						
Towers Secondary & 6th form School	1.1	1.0	13	1.0	5	None
North Secondary School	3.2	3.1	56	3.1	15	35
Norton Knatchbull Boys	2.9	2.8	55	2.8	15	28
Secondary Grammar (Selection)						
Highworth Girls	3.1	3.0	39	3.0	11	26
Secondary Grammar (Selection)						
Ashford School Prep & Senior	4.5	4.4	49	4.4	15	31
Secondary School (Private)						
Wye School Secondary School	5.8	5.7	1hr 15	5.7	21	59 incl. train

All distances = km, calculated from CENTRE of development using Sandyhurst Lane access

Note :

- *Goat Lees primary school (the only primary school within the 800m walking distance) has now reduced its catchment area to be 200 metres around the school. The school is only a Single Entry Form **with no** space, or prospect, of expansion.*
- *In the Adopted version of the Local Plan the neighbouring site S20, Eureka Park, was increased by 75 to 350 dwellings, but without any further provision of primary school or medical care facilities within easy access.*

As it is demonstrated that this development fails to meet even the most generous interpretation of the HOU5 Windfall Sites sustainability criteria the SLRA believes THE REFUSAL SHOULD BE UPHELD.

Ecology and natural environment (Refusal 3)

Whilst the SLRA does not have the evidence to comment on the relative merits of the arguments relating to loss of habitat and replanting it does seek to meet its mission statement “**to protect the rural character of the area.**”

In the pursuit of this in September 2019 we repeated our survey on November 2017 to see whether there had been any significant changes in members’ views as to the impact of the proposed development on their environment and quality of life. The comparative results are presented in the Table below.

Year	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	%	
2017:	105	99.1%	0	0.0%	1	0.9%	106
2019:	79	100.0%	0	0.0%	0	0.0%	79
Year	Q2. Sandyhurst Lane is not suitable for the resultant increase in vehicular traffic.						
	Strongly agree & agree		Neutral		Disagree & strongly disagree		TOTAL
	Number	%	Number	%	Number	%	
2017:	106	100.0%	0	0.0%	0	0.0%	106
2019:	78	98.7%	0	0.0%	1	1.3%	79
Year	Q3. The proposed dwellings are out of character with the surrounding area.						
	Strongly agree & agree		Neutral		Disagree & strongly disagree		TOTAL
	Number	%	Number	%	Number	%	
2017:	98	92.5%	6	5.7%	2	1.9%	106
2019:	73	92.4%	4	5.1%	2	2.5%	79
Year	Q4. The site is prime agricultural land which should not be built upon.						
	Strongly agree & agree		Neutral		Disagree & strongly disagree		TOTAL
	Number	%	Number	%	Number	%	
2017:	103	97.2%	2	1.9%	1	0.9%	106
2019:	75	94.9%	3	3.8%	1	1.3%	79
Year	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	%	
2017:	104	98.1%	2	1.9%	0	0.0%	106
2019:	77	97.5%	1	1.3%	1	1.3%	79
Year	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	%	
2017:	105	99.1%	1	0.9%	0	0.0%	106
2019:	77	97.5%	1	1.3%	1	1.3%	79
Year	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	%	
2017:	106	100.0%	0	0.0%	0	0.0%	106
2019:	77	97.5%	1	1.3%	1	1.3%	79

The conclusion is that the local community remains very strongly opposed to the proposed development

As it remains the overwhelming view of our members that the rural character of the area should be retained the SLRA argues that the REFUSAL should be upheld.