

BOUGHTON ALUPH & EASTWELL PARISH COUNCIL'S RESPONSE TO ASHFORD BOROUGH COUNCIL'S PUBLIC CONSULTATION ON THE "MAIN CHANGES" TO THE LOCAL PLAN 2030
August 2017

VISION (MC2)

1. There is a slight modification in paragraph 3.10 enabling a small shift from focus on new development in 3 specifically named rural service centres, easing this to include new proportionate development in smaller rural settlements, if appropriate, to sustain local communities.
2. Paragraph 3.13 places greater emphasis on sustainability in transport, in use of energy technologies, building design, enhancing green networks and the location and layout of new development including sustainability in drainage and water usage in adaptation to climate change. This increased emphasis is welcome and noticeable throughout the Plan.

POLICY SP1 STRATEGIC OBJECTIVES (MC3)

3. Sections b. and c.

A significant change here is to include separate expanded comment on the importance of conserving each of the natural and the historic environments. In addition, that on the environment adds the importance of improving access to nature, that on the historic environment stresses "distinctive places" with "place-based heritage as a key principle" underpinning design and layout of development.

4. This recognition of the value of each of the natural and the built landscapes underlines and usefully reinforces the model of housing development referred to within the strategic objectives.
5. Both b. and c. refer to "designated" and "non-designated" assets in a way which is constructive and helpful, and recognises that undesignated assets often have particular local value and amenity.

6. Paragraph i.

Reemphasises the importance of sustainable practices in all aspects of development in building resilience to climate change.

STRATEGIC DEVELOPMENT REQUIREMENTS & POLICY SP2 (MC4)

7. This section grows, as in the previous draft, from the core presumption in the NPPF in "favour of sustainable development". It establishes what "sustainable development" means in the context of the Borough, and in addition sets out a new housing target and presents a development plan for 2030.
8. The Main Changes here offer an expanded and more closely argued case to rectify the shortfall in the 5 year housing supply. This is summarised in the section on the Borough's profile which sees two distinct areas needing different characteristics in planning terms, with Ashford as the

most sustainable location to deliver most housing growth and the more sensitive rural area having more restrictive housing growth.

9. This is argued as a proportionate, sustainable development strategy for the Borough with disproportionate growth directed toward rural areas seen as damaging to this sustainable model of housing development.
10. This is to be welcomed as a coherent, rational model conserving the shape of the Borough and, with hope, enabling clearer decision-making in relation to future planning applications.

POLICY SP7- SEPARATION OF SETTLEMENTS (MC85)

11. We welcome the inclusion of this new policy to resist the coalescence or merging of two or more separate settlements or the erosion of a gap between settlements resulting in the loss of individual identity or character.

POLICY S20 - EUREKA PARK (MC26)

12. We note that the number of new dwellings on the Eureka Park site has been increased from 300 to “an indicative capacity of 375 dwellings” plus 20 hectares of commercial development. While a sizeable proportion of this strategic site falls outside of Boughton Aluph and Eastwell Parish, we have serious concerns about the impact of the development on local infrastructure.
13. All residential and commercial traffic created by the development will access the site via Trinity Road and other local roads. We welcome the emphasis on ensuring that traffic movements resulting from development proposals are sustainably managed and the commitment in paragraph 4.234 to providing a Transport Statement/Transport Assessment in accordance with Policy TRA8. This is critical as the new development will put c.750 additional cars plus commercial vehicles on already stretched local roads. Respondents to the Parish Council’s Neighbourhood Plan household survey 2016 flagged more than 9,000 specific traffic and road safety concerns. In particular the volume and speed of traffic on rural lanes that form “rat runs” between major highways, e.g. Wye Road and Sandyhurst Lane, and the impact on road surfaces resulting in dangerous driving conditions. There is also a problem with HGVs using local roads.
14. When considering the commercial development on the site it is essential there is adequate parking provision so that past problems are not repeated with the loss of residential parking amenity at Goat Lees due to an overspill of cars belonging to workers at the Eureka Business Park onto residential roads. Bus service schedules and connections will need to be improved if workers are going to be able to commute to work at Eureka Business Park by public transport.
15. The provision of 375 new dwellings on the parish border accessed via Trinity Road essentially represents a 35%-45% uplift in the local population. It is essential that proper regard be given to the impact on existing residents and local infrastructure and amenities needed to meet such a significant population increase. This includes the adequate provision of school places and health services.

16. We would encourage the development at Eureka Park to be an exceptional site or exemplar which recognises its position within a rural parish and proximity to the Kent Downs Area of Outstanding Natural Beauty (AONB). Development must preserve the parkland setting and biodiversity area within Eureka Park with easy access to the surrounding countryside. We welcome the commitment to a lower average density of residential development and hope this will not be eroded by the 25% increase in the number of new dwellings. In addition, there must be adequate spacing and screening between commercial and residential development to minimise the visual impact of businesses on adjacent homes. Rather than pattern book red brick, high quality design and innovation is encouraged in the development proposals taking inspiration from the award winning architecture of Goat Lees Primary School.
17. We welcome the recognition of the proximity of the Kent Downs AONB at the site's western boundary and the inclusion of a generous landscaped buffer to reduce the impact and provide some visual separation to adjacent properties on Sandyhurst Lane. Again, we would expect this commitment will not be eroded by the requirement to build 25% more new homes.
18. Quality of life for existing and new residents would be significantly enhanced by the resurfacing of the adjacent section of the M20 motorway. There is an issue with traffic noise from the motorway to the south of the parish. Depending on wind direction, motorway traffic can be heard across the Eastwell Estate. Data sourced from the Campaign to Protect Rural England shows daytime average traffic noise of over 60 decibels and in excess of 70 decibels at the southern tip of the parish. This will be a particular issue if, in the future, the Ashford Golf Club site becomes an extension to the residential housing on the Eureka Park site.
19. The latest available Housing Needs Survey conducted by ACRE in the parish in 2015 identified a need for up to 13 affordable homes (4 single people, 4 couples without children, 5 families). Of these 4 are to meet the needs of older people. The response to ACRE survey was very low (19%) and the actual need may be higher, particularly now with higher housing and rental costs. Affordable housing should be blended with other housing stock and landscaped to the same level.
20. The Main Changes refer to a "detailed and inclusive master planning exercise" in respect of the development of Eureka Park (paragraph 4.226). We welcome an inclusive period of consultation as the land is a valued and important amenity for local residents and its development will incur a loss. The Parish Council will have more to contribute at this stage.

POLICY HOU3A – RESIDENTIAL WINDFALL DEVELOPMENT WITHIN SETTLEMENTS (MC50)

21. The clear reference to the built-up confines of settlements is very welcome, and will help to maintain the urban/rural boundary, so preventing Ashford's encroachment into our Parish.

22. Section a.

We would favour the addition of the word 'scale' ("It is of a layout, design, appearance and scale that is appropriate ..."). In the case of our Parish 'appropriate design' would need to take account of proximity of or position within the Area of Outstanding Natural Beauty.

23. Section d.

We think this requirement is particularly significant in view of the connections with Warren Biodiversity Action Plan (BAP) site and other woodlands on the Eastwell Estate which provide biodiversity corridors.

24. Section e.

The rural nature of roads in our Parish needs to be maintained, particularly given extra pressures from development along the M20 corridor and extra housing on Eureka Park site.

Boughton Aluph & Eastwell Parish Council

31 August 2017