



LENACRE HALL FARM SITE

Submission from Boughton Aluph and Eastwell Parish Council on planning application:

17/01613/AS Hybrid application for up to 89 new residential dwellings consisting of a full planning application for the development of 21 new residential dwellings, access, drainage and landscaping to the south of the site and outline planning application with all matters reserved except for access for the development of up to 68 new dwellings with associated access, landscaping, open space and community orchard at the land to the north and west of Lenacre Hall Farm, Sandyhurst Lane, Ashford

This application was considered at the Parish Council meeting held on Monday 13 November 2017.

Decision – Objection for the reasons given below.

Boughton Aluph & Eastwell Parish Council is strongly and unanimously opposed to any built development on this site, and is therefore firmly against both parts of the application.

Our objections are on the following counts:

1. We regard the proposal as counter to Ashford Borough Council's (ABC's) Local Plan;
2. It also runs counter to our emerging Neighbourhood Plan and the views of parish residents evidenced by a household survey held in 2016;
3. Any built development on this site will breach the established boundary between built and rural areas. It is a green field site beyond the confines of the settlement;
4. Encroachment into a valued and sensitive landscape;
5. The proposed development is poorly placed in relation to local amenities and services;
6. Congestion in the local road network;
7. Finally, the Planning Application is incomplete in a number of important respects.

1. Conflict with the Local Plan

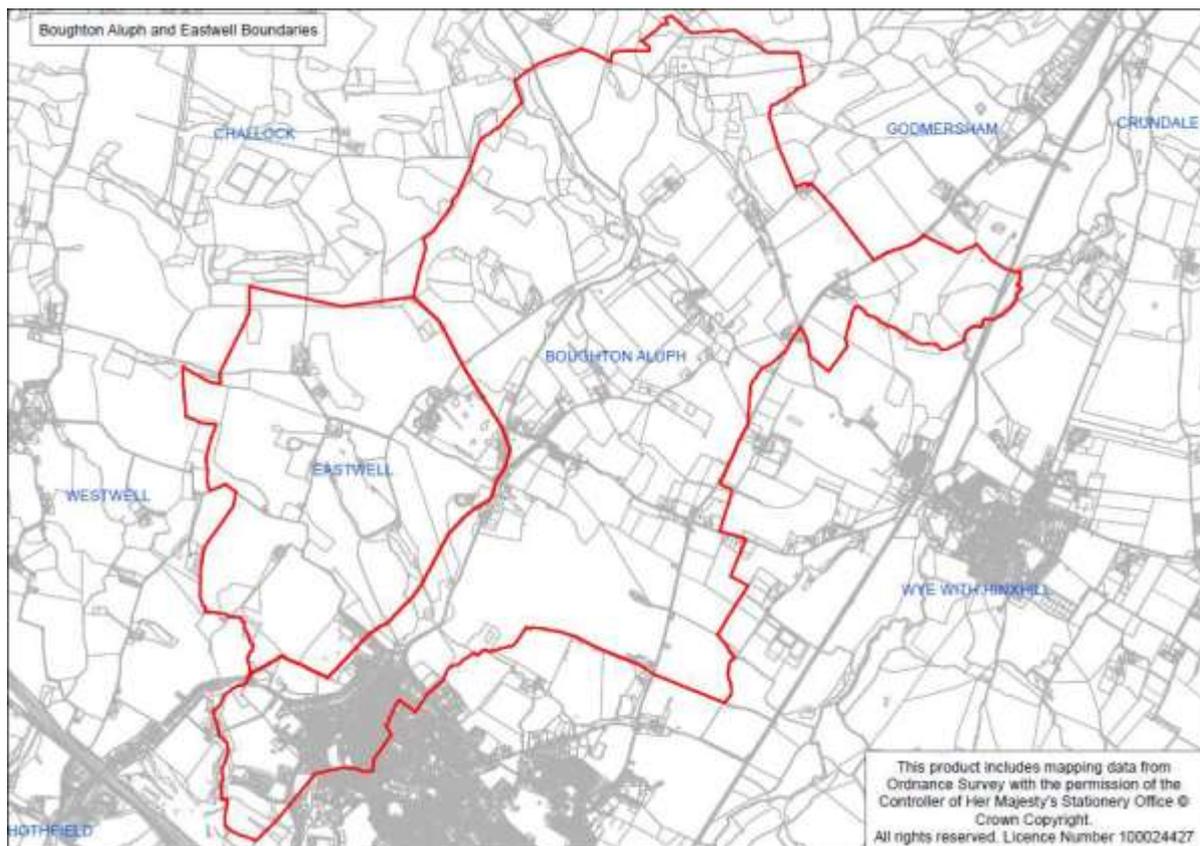
We strongly support Ashford Borough Council's (ABC) Local Plan 2030 and their vision of a sustainable model of housing development across the Borough. We recognise their concern that *the borough's rural area is ... sensitive and too much housing growth would result in an unsustainable model of development by* (Main Changes to the Local Plan 2030, The Borough's Profile, p. 11), for example:

- *Running contrary to the roles and character of different areas by shifting the focus away from where growth and change has previously been planned – and*

where substantial infrastructure has been targeted – to providing a step change of housing levels in the rural area, areas which have grown incrementally and organically over time.

- *Damaging the intrinsic beauty and character of the countryside.*
- *Damaging the nature and the character of the rural settlements with a scale and pace of housing that is not proportionate.*

ABC have produced a comprehensive and carefully-balanced plan for the Borough that seeks to avoid piecemeal and fragmentary development. Within this plan they have discounted Lenacre Hall Farm as a potential site for development.



2. Conflict with the emerging Parish Neighbourhood Plan

Although the Parish Neighbourhood Plan is still in preparation, a site assessment and a parish-wide survey have both been completed, and both carry substantial implications for the proposal (see below).

The Parish is in many ways a micro-segment of the Borough, with roughly 10% of its land area as urban/suburban core in the south west (with roughly 90% of the population) leading outwards towards the 90% of rural countryside with a village, hamlets and more isolated farms and the remaining population. The parish, unusually, straddles the boundary between dense urban and rural, and the changes made in the Local Government Boundary Commission's recent recommendations (2017) recognise this. As with the Borough we

believe development within the Parish should be carefully balanced, proportionate and avoidant of the piecemeal. In the case of Lenacre Hall Farm, the detailed site assessment conducted as part of the Neighbourhood Plan concluded that the site is not suitable for potential development.

The site assessment was consonant with the results of the parish-wide survey. The survey was returned by nearly 50% of parish households, and results in relation to Lenacre Hall Farm were very clear, with 75% of the 482 responses seeing the site as unsuitable for development – a significantly higher figure than that for any of the other 6 sites under consideration. More generally, a major theme of responses was the value which local people attach to the distinction between built and rural areas, with considerable concern about the possibility of breaches of the boundary. The number of responses to this survey was more than ten times the number of those gathered by Millwood Designer Homes (MDH) through their public consultation where over 500 people were invited and only 46 responses received.

In addition, there has already been substantial development within the parish, and there is further building scheduled. The section in 2011 Census: Parish population (Business Intelligence Statistical Bulletin, March 2013) recorded that between 2001-2011 (of parishes in Kent) *Boughton Aluph Parish saw the highest percentage increase in population with +126% which equates to an extra 1,391 people*, a significant impact on social balance. The Eureka Park strategic site SP20 is proposed for a mix of commercial (around 20h) and residential development with an indicated addition of 375 dwellings - a 34% increase in the total number of parish dwellings. Should the Ashford Golf Club choose to relocate this is likely to add further residential dwellings.

In these ways the Parish has quite recently accommodated substantial development and population increase, and will be doing so again in the near future (without this site).

3. The boundary between built-up and rural areas

The Lenacre Hall Farm site is, in our view, indisputably rural. This is vividly illustrated by the series of photographs that form most of Part 4 of the Historic Environment Desk-Based Assessment submitted by MDH – striking exemplars of historic Kent rural landscape, embodying precisely *the intrinsic character and beauty of the countryside* that the National Planning Policy Framework enjoins decision-takers to take account of (NPPF, 2012, Paragraph 17).

Inaccurately, MDH describe the site as:

surrounded by residential development to the north east, east and south with a sports and social club to the west that is proposed as a Sports Hub (Planning Statement 2.2, our emphasis).

In fact, the site is far from surrounded. To the west and north-west is open country. The sports and social club (which is to the south west) consists of open land with a single

building at its far end. The 'residential development' to the north east – Lenacre Street - is a rural lane, built on one side only, and directly abutting the North Downs Area of Outstanding Natural Beauty (AONB) and the historic Eastwell Park which lies at the heart of our parish. Indeed, this lane only separates Lenacre Hall Farm from the AONB by less than 100 metres. The only edge of the site which is bounded by a depth of built development is the south and south-east.

The position of Lenacre Street is presented within the Planning Statement Downs as a pretext for the proposed development:

Lenacre Street forms an important part of the built up area of Ashford and bounded by both Lenacre Street and Sandyhurst Lane, the application site is an acceptable location for residential development (5.5.11)

Although Lenacre Street is designated as a 2011 built-up area on the Defra magic map, the description of it as 'an important part of the built up area of Ashford' is a very considerable stretch. It is of a quite different order of development to that on the south-east of the site. To imply that this might make the site an acceptable location for residential development is extremely misleading.

The latest (2016) Local Government Boundary Review recognises Lenacre Street as best-placed within a specifically rural ward (Ashford Rural West). The Boundary Review also reinforces Sandyhurst Lane as the boundary between built-up and rural by additionally including the housing on both sides of the section of road which runs along the edge of the site as part of the same explicitly rural ward. Both this section of road and Lenacre Street pre-existed the development of Goat Lees, and are recognised as having their primary historic and communal ties with Boughton Aluph and Eastwell.

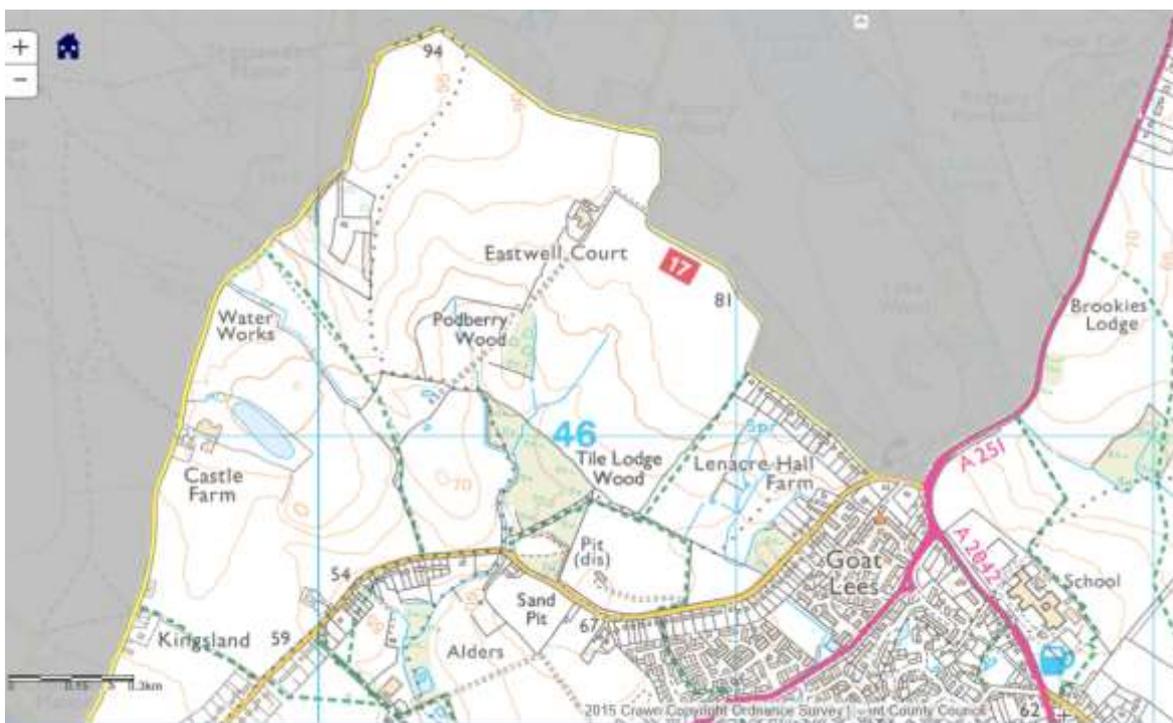


On the above map the red line indicates the new ward boundary

4. The valued and sensitive landscape area

Sandyhurst Lane traditionally marks a transition from urban to countryside. In a parish where there has traditionally been a boundary between urban and rural the possible blurring of that urban edge is a matter of high concern. In the Neighbourhood Plan survey more than 90% of respondents were concerned about the development of Ashford encroaching into the parish. Similar numbers thought it important to maintain the existing rural/urban boundary, respondents also felt strongly (92% said it was important) to be able to walk from their home into the countryside, with a heavy majority (88%) using the local countryside for walking.

The proposed site lies within the setting of the Kent Downs AONB. Policy HOU5 advises *Where a proposal lies is located within or in the setting of an AONB, it will also need to demonstrate that it is justifiable within the context of their national level of protection and conserves and enhances their natural beauty.* In the particular context of our parish we believe this proposed development is not justifiable.



On the above map, the grey area represents the AONB

This is a sensitive site within the Stour Gap Landscape Character Area which is pinched between two lobes of the AONB. It is directly within the setting of the right lobe and is bounded by the Eastwell Estate to the north and east, playing fields to the west, areas of ancient woodland to the south (this is also on the Priority Habitat Inventory for deciduous woodland) and north-west (Podberry and Tile lodge Wood) and with Tower Wood to the west. The site abuts the local wildlife site of Tile Lodge Wood. In general the character of the site is open with long views to the south and the west. The land has been used for grazing and the small fields are suggestive of more ancient farmland than the now prairie style

fields to the north and west. There are hedgerows and woodland edges, 4 drains running north-east to south-west and 3 small ponds. This is a mixed habitat allowing a number of species to thrive. A much-used footpath, with good views, runs along the northern side. An adjacent patch of ancient woodland will be enclosed by the development and lost.

The site is valued by those within the parish and in a wider context is valued as a boundary edge for urban development to the north east of the town of Ashford. For both it provides visual amenity, a green open breathing space from urban development and the reassurance of clear demarcation between urban and rural. Given the substantial amount of planned development within the parish we again argue that development on this site is redundant and the loss of this valued space would significantly change the character of the local area. We do not believe that development on this particular site is in the broader or more local public interest.

5. The problem of amenities and services

Within the Planning Statement sections 7.2.11 – 7.2.25 make the case for regarding the proposals as satisfying the conditions for residential windfall development in the countryside, as set out in Policy HOU5 of the emerging Local Plan. (It is worth noting that at times the planning application deems the site to be in the countryside, at other times adjacent to part of the built up area of Ashford). These conditions include:

- a. The scale of the development proposed is proportionate to the level of service provision currently available in the nearest settlement and commensurate with the ability of those services to absorb the level of development currently available in combination with any planned allocations in this Local Plan and committed development.*

We suggest that this development does not meet these conditions. Given the level of local planned development in an area where services are already stretched this site is not proportionate in scale, and indeed is redundant. Current services would be overwhelmed. Nor does it meet the condition of being *within easy walking distance of basic day to day services in the nearest settlement*. Unfortunately, taking the most direct routes by foot, the centre of the Lenacre Hall Farm site is a full kilometre from the nearest shop selling everyday staples such as milk and bread, and half a kilometre from the nearest bus stop.

There are also significant problems regarding health and education services. There is no GP surgery in the parish, and the closest practice is only able to take restricted numbers of new patients (and this situation will be exacerbated by further building at Eureka Park). The knock-on effects on secondary health services would also be problematic, with both the local hospital and Community Mental Health Services (based in Eureka Place) under severe strain. Similarly, the local Primary School can only offer restricted places, with no room on site for expansion.

6. Local road network and congestion

Policy HOU5 Residential windfall development in the countryside reads:

- b. The development is able to be safely accessed from the local road network and the traffic generated can be accommodated on the local and wider road network without adversely affecting the character of the surrounding area*

At present there is considerable congestion at both ends of Sandyhurst Lane (on to the A20 and the A251) at peak times. Boughton Aluph and Eastwell Parish Council fully support the considerations raised in Sandyhurst Lane Residents' Association submission in relation to this site. A major development of this size will because of the nature of Sandyhurst Lane inevitably `adversely affect the character of the surrounding area`.

7. Gaps in the Application

There are several serious gaps in the application. Perhaps the most important lie in the area of ecological impact, where Kent Ecological Advice Service (echoed by consultation responses from Kent Wildlife Trust and Jane Hall) identify six points where information is inadequate. To take one example from these, under 7.8.1 of the Planning Statement there is a reference to a *Dormice Survey (forthcoming)*, and the Preliminary Ecological Survey which accompanies the application indicates that the site includes suitable habitat for dormice, and recommends that *Dormice surveys should take place over a number of months* (4.26). This does not seem to have happened. The possibility of dormouse presence, acknowledged in the preliminary survey, is reinforced by the recent evidence of dormouse habitation at a nearby site (the Former Sandpit, 0.7 kilometres from the centre of the Lenacre Hall Farm site). The absence of further investigation of dormice (and in respect of the other five points raised by Kent Ecological Advice Service) is puzzling.

Another aspect of the proposal where further information is needed concerns water drainage. The application envisages installation of Sustainable Urban Drainage Systems (SUDS). However, Southern Water indicate that such systems are only sustainable if they are managed and maintained, and see the provision of information about this (for example, who will be responsible? what plans are there for maintenance?) as necessary to prevent risks of flooding. They also raise concerns about drainage more generally.

Kent Police note a lack of information about consideration of crime prevention within the application, and note that the MDH have not contacted the local Crime Prevention Design Advisor for consultation.

From the Parish Council's point of view, the missing elements within the application are very much of secondary importance, since we, and the residents whom we represent, are firmly opposed in principle to any built development of this rural site. However, we are surprised to see such substantial gaps within such a major application.

Conclusion

Any building development at Lenacre Hall Farm will breach the established boundary – Sandyhurst Lane – between built and rural areas. The possibility of encroachment into the rural landscape here is a matter of great concern to residents throughout Boughton Aluph & Eastwell Parish (the quantity and nature of objections reflects the intensity and spread of this concern). Rather than a piecemeal development which fits poorly both the landscape and the local amenities and services, we greatly favour the systematic and strategic approach presented within the ABC Local Plan.

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