



## LENACRE HALL FARM SITE

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

**18/00413/AS The development of 21 new residential dwellings, access, drainage, car and cycle parking and landscaping**

This application was considered at the Parish Council meeting held on Wednesday 11 April 2018.

Decision – **Objection** for the reasons given below.

Boughton Aluph & Eastwell Parish Council continues to be strongly and unanimously opposed to any built development on this site.

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;

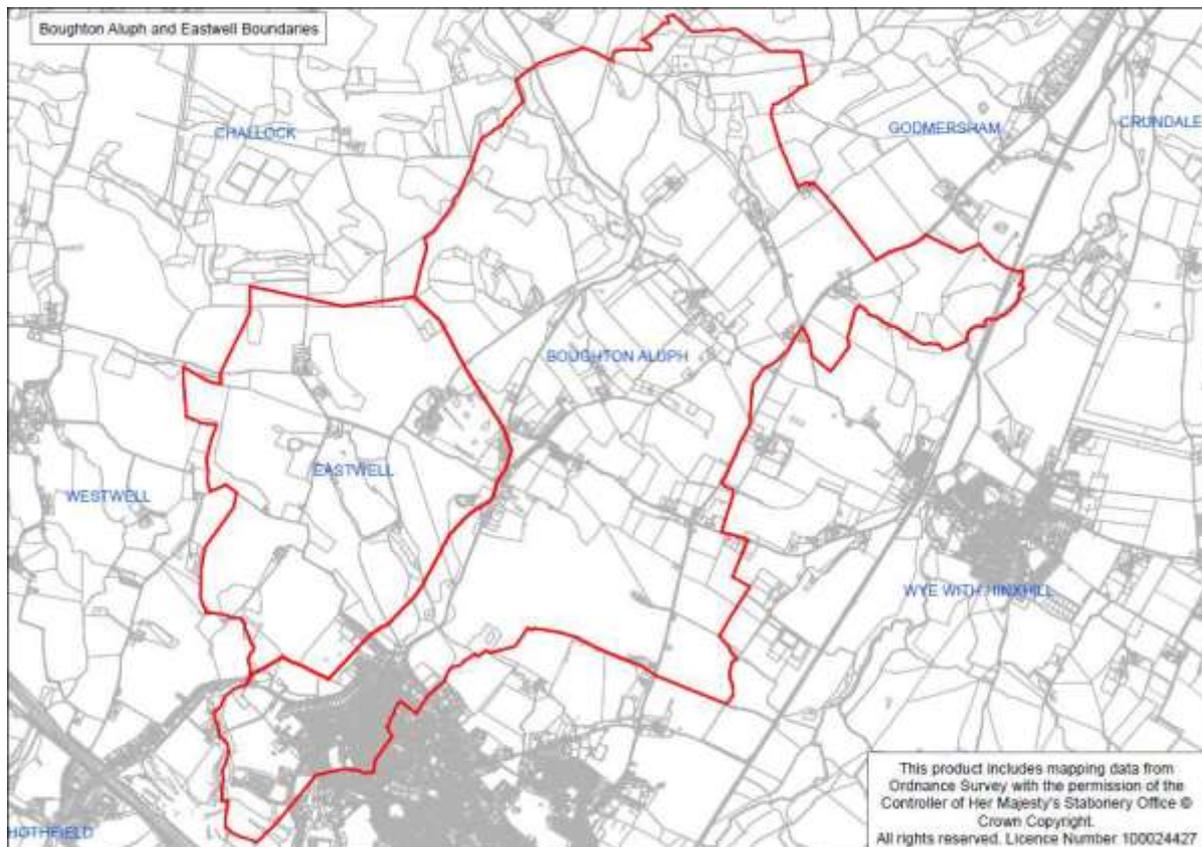
We also have concerns about comments made by the developers (Planning Statement, March 2018, paragraph 3.6) suggesting that they had understood from planning officers that this revised application would be likely to be accepted. Our objection, and the comments explaining it below, are the result of thought and local consultation, and we trust that they will meet with a correspondingly thoughtful and unprejudiced response from Ashford Borough Council.

### 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).

The rural nature of the site is equally evident from the map (eg, that on page 4). Only to the south is there substantial residential development. To the north and the north-west is open country. To the west is a sports and social club, consisting of open land with two buildings at its far end (beyond which are further woods and open land). The North Downs Area of

Outstanding Natural Beauty and the historic Eastwell Park Estate lie to the north east within half a kilometre of the site.

The latest (2016) Local Government Boundary Review reinforces Sandyhurst Lane as the boundary between built-up and rural by including the housing on both sides of the road within a specifically rural ward (Ashford Rural West). This section of road, like Lenacre Street, pre-existed the development of Goat Lees, and is recognised as having its primary historic and communal ties with Boughton Aluph and Eastwell.

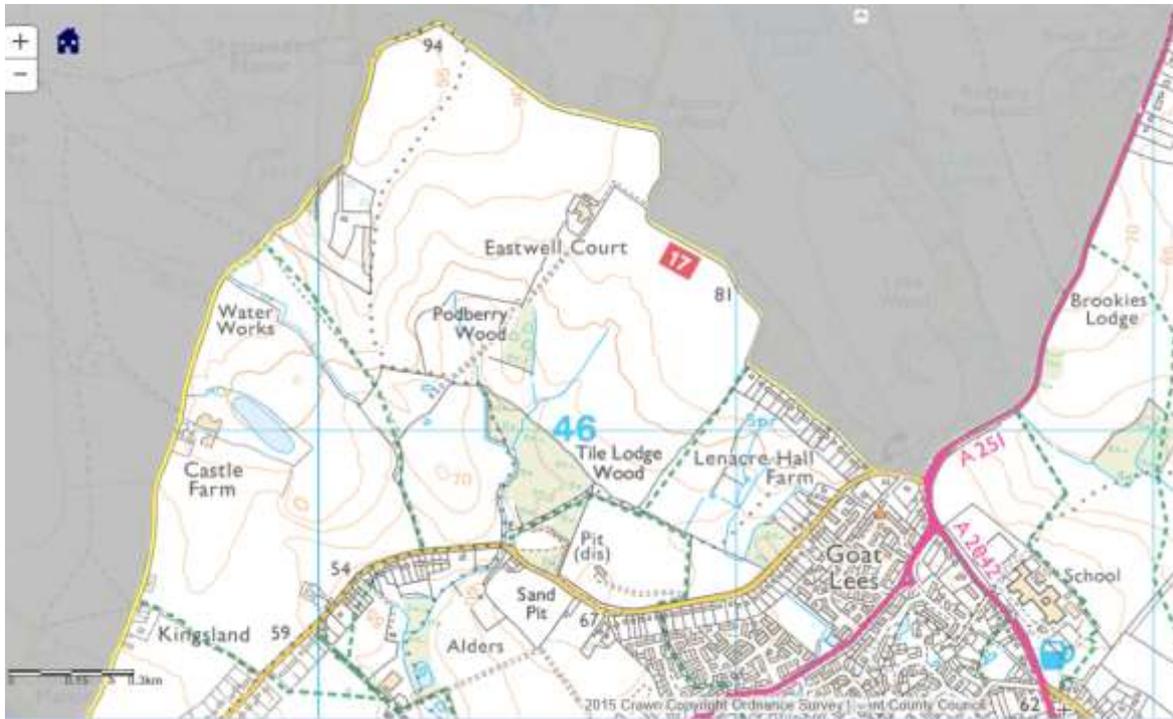


#### 4. The valued and sensitive landscape area

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 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.



This is a sensitive site within the Stour Gap Landscape Character Area, lying between two lobes of the AONB. It is directly within the setting of the right lobe and is close to the Eastwell Estate to the north and east, and bounded by playing fields to the west, areas of ancient woodland to the south west (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 north. The site is close to the local wildlife site of Tile Lodge Wood. In general the character of the site is open with long views to the west and north west.

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 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. 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.

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 the earlier application for this site (17/01613/AS). A development of this size will because of the nature of Sandyhurst Lane inevitably `adversely affect the character of the surrounding area`.

## 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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