

Attn. David Smith and Steven
Lee
Ashford Borough Council
Civic Centre
Tannery Lane
Ashford
Kent
TN23 1PL

27 March 2018
Ref: SS/Let/P1429ii

Dear Sirs,

Ashford Borough Council Local Plan Examination 2017 – Issue 2.

This letter has been prepared by ECE Planning on behalf of Millwood Designer Homes Ltd in support of the promotion of Land at Lenacre Hall Farm, Ashford for allocation within the Ashford Local Plan for a residential development.

It responds to the Inspector's Matters and Issues, relevant to our client's site, for Part 1 of the Public Examination of the Ashford Local Plan. ECE's response to the Issues for Part 2 of the Public Examination will be submitted separately.

Before addressing the Issues, we believe it would be useful to provide some context regarding the currently undetermined hybrid planning application at the site at Lenacre Hall Farm (reference: 17/01613/AS) for up to 89 new residential dwellings, with associated access, landscaping, open space and community orchard.

The application is currently 2 months over the Council's statutory timeframe for determination and the applicants believe it is in a position where it can be approved. All statutory consultee responses have been received and a meeting with the Council was held on 1st February 2018 where officers agreed the site was in a sustainable location.

All technical issues relating to transport, access, drainage and flood risk, ecology, heritage, and design have been explored and addressed with no significant objections on these technical matters remaining. There has been no objection with regards to the location of the site in sustainability terms and the Council's policy team has raised no comment on the application. The application currently remains in abeyance on the Council's presumption that the currently unexamined plan provides for an advanced 5 year housing land supply.

Directors

Chris Barker MATP MRTPI Managing Director
Huw James MRTPI
Adam King RIBA

ECE Planning Limited
Registered in England
No 7644833
VAT No 122 2391 54
Registered Office: Amelia House
Crescent Road, Worthing BN11 1QR

It is the applicant's view that despite being in a less insensitive location than over recent proposed allocations and in a sustainable location on the fringe of Ashford, the site should be allocated in the emerging Local Plan and the application approved. It has not achieved this status yet as a result of the flawed Local Plan preparation and evidence base, therefore making the Local Plan unsound.

We are of the view that as currently drafted, the Local Plan is unsound for the following reasons:

- It has not planned for an adequate level of housing growth;
- The strategic aims of the Local Plan to direct development in and around Ashford have not been translated into appropriate site allocations;
- Certain sites, such as A20 corridor sites and Rural allocations are unsuitable and unsustainable. In this regard the plan cannot be considered to represent the most sustainable strategic approach to guiding development in the Borough to meet needs;
- The Boughton Aluph and Eastwell Neighbourhood Plan area has been excluded from consideration through the Local Plan process;
- The technical background evidence base, including the Sustainability Appraisal and Strategic Housing and Employment Land Availability Assessment is flawed and fails to consider suitable sites and reasonable alternatives;
- The housing trajectory is not realistic;
- The Council cannot demonstrate a valid five year housing land supply.

It is considered that the site at Lenacre Hall Farm should have been properly considered through the Local Plan process as a potential allocation to assist the Council in meeting their vision and objectives and reduce the need to allocate isolated, poorly located and therefore unsustainable sites for housing provision. On this basis an allocation of the site at Lenacre Hall Farm for appropriate new residential development would assist the Council in making the Local Plan sound.

Each issue is considered separately across 5 individual letters. We address Issue 2 below.

Issue 2 - Are the spatial vision and objectives for Ashford sound having regard to achieving sustainable development and the trends and challenges in the Borough?

The vision for the Borough seeks to focus development at and around the centre of Ashford as the most sustainable approach to development. The vision states:

3.6 Ashford Borough will meet its housing and employment needs, and take account of the needs of investors, through the provision of new high quality development forming attractive places, with the necessary supporting infrastructure and services, and in sustainable and accessible locations that take account of the Borough's environmental constraints.

The Vision is translated into a set of objectives under Policy SP1 - Strategic Objectives. This policy seek to direct development to accessible and sustainable locations which utilise existing infrastructure, facilities and services (part a) and to promote access to a wide choice of sustainable transport modes and to encourage non-car based travel as far as possible (part e)

Whilst the vision and objectives are considered largely appropriate, the Council has failed to translate the vision into detailed policies. As underlined above, the Council states that development will be located in sustainable and accessible locations. As set out in our previous representations (Representations on Ashford Local Plan–Main Changes to Local Plan 2030, August 2017), it is considered that rural site allocations and the A20 corridor allocations cannot be considered to be sustainably located in this respect.

In contrast, the site at Lenacre Hall Farm is considered to be well located in sustainability terms. A planning application is currently being considered for the site at Lenacre Hall Farm by the Council ref 17/01613/AS. All statutory consultee responses have been received and a meeting with the Council was held on 01.02.18 to discuss the application.

All technical issues relating to transport, access, drainage and flood risk, ecology, heritage, and design (etc) have been explored and addressed with no major objections on these technical matters remaining. There has been no objection with regards to the location of the site in sustainability terms and the Council's policy team has raised no comment on the application.

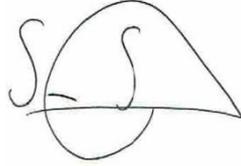
Despite these considerations, the Council has confirmed that they would not be able to support the planning application with an officer recommendation of approval as it currently stands since the site is not allocated within the Local Plan. This is on the basis that the Council are relying on the status of the Local Plan as being 'advanced' to support a five year housing land supply.

Clearly an allocation of the site (for 90 new homes) would aid the Council in meeting their vision and objectives and reduce the need to allocate isolated and poorly located sites for housing provision.

ECE Planning

If you have any further queries or require further information please contact me on 01903 248777.

Yours sincerely
ECE Planning

A handwritten signature in black ink, consisting of a stylized 'S' followed by a large, rounded 'S' that loops back to the left, and a horizontal line extending to the right.

Sam Sykes MRTPI
Associate Planner