

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 3.

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 3 below.

Issue 3 - Are the strategic objectives and the strategic approach to housing delivery and economic development delivery in terms of distribution and location sound having regard to the needs and demands of the Borough, national policy and Government objectives and the evidence base and preparatory processes? Has the Local Plan been positively prepared?

i) Is the strategy selected for the distribution of housing and economic growth, with the emphasis on Ashford town, justified compared to the reasonable alternatives? What is the proportion of development proposed in the urban and rural areas across the plan period? How sensitive are the rural areas to further growth?

Delivering growth in and around Ashford is considered the most appropriate approach to achieving sustainable development at a strategic level within the Ashford Borough. Clearly this approach would focus development near to where the shops, services, facilities, employment opportunities and sustainable transport options are located. It would further assist in the regeneration of Ashford by providing a greater number of local residents to support local shops and services. Following this approach, the Council should be allocating housing in the BAE Neighbourhood Plan area or considering a strategic housing target for the Neighbourhood Plan Forum to decide on specific site allocation. In so doing, the Council would be working towards the strategic aims of directing growth to the fringes of Ashford.

It is considered however that the approach taken by the Council, to allocate sites at a greater distance from Ashford in isolated communities (such as the A20 corridor and rural sites) is not justified. Such sites, in our previous representations (Representations on Ashford Local Plan—Main Changes to Local Plan 2030, August 2017), are considered to be extremely poorly located.

To date, all of the A20 corridor sites have been subject to significant objections as part of the Consultation on the Main Changes to the 2030 Local Plan including from the local parish councils on the basis of the sustainability of locating development within a rural location, circa 2km from the nearest settlement.

Objections have also been raised by:

- Kent Wildlife Trust and impacts on the Hothfield Common SSSI
- Environment Agency – with regards to the Hothfield Mill site lying within a Source Protection Zone / over a Principal Aquifer.
- Kent Downs AONB Unit – regarding the Hothfield Mill site being adjacent to the AONB and the associated impact.

The Council's latest housing trajectory includes 12 sites in the Rural Area originally identified within the Council's Regulation 19 Draft Local Plan, along with a further 11 sites in the Rural Area identified within the Main Changes to the 2030 Local Plan.

A total of 830 new dwellings are projected to be delivered on these 23 draft allocation sites over this period, representing approximately 12% of the Council's claimed housing supply for the period to 2021/22.

Whilst a low level of rural incremental growth in some locations would be appropriate, the current approach seeks to deliver circa 830 new units on sites located some distance from the main settlement of Ashford. This is a significant level of rural development and we would seriously question how this approach is considered to be consistent with the requirements of the framework in delivering the most appropriate and sustainable strategy for the Borough.

In terms of suitability, it is evident that a number of these sites have been subject to a significant number of objections as part of the public consultation on the Regulation 19 Draft Local Plan including from the CPRE, Southern Water and the Parish Councils. The sites at Hamstreet and Hothfield are subject to concerns from Natural England whilst there are concerns with impacts on the AONB for the site at Charing.

Clearly there are concerns surrounding the proposed rural allocations and in our view, further allocations on such sites would not be justified.

iii) Will the strategy satisfactorily and sustainably deliver the new development and infrastructure needed over the plan period?

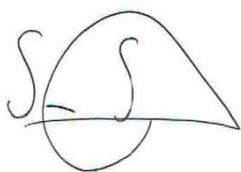
It is considered that the overall strategy to focus development in and around Ashford is sound. However the detail around the delivery of such a vision is not considered to be justified, consistent with government policy or positively prepared as set out above.

In this respect, the Council has taken an ad hoc approach to considering development sites and therefore cannot demonstrate that it has taken the most sustainable approach to housing delivery.

Furthermore, as considered in greater detail under issues 4 and 5, the Council should also be seeking to deliver more housing over the plan period. Subsequently strategic policy SP2 should be amended to reflect what is a more realistic housing need figure.

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, appearing to read 'S Sykes', with a stylized flourish extending to the right.

Sam Sykes MRTPI
Associate Planner