Ashford Local Plan 2042 – Regulation 18 Consultation

Boughton Aluph & Eastwell Parish Council Representation

8 October 2025

Policy Intention 14 – The villages

Boughton Aluph & Eastwell Parish Council strongly object to the inclusion of Boughton Lees within the list of villages classified as suitable for housing allocations within Policy Intention 14 of the Regulation 18 Local Plan.

The settlement lacks basic day to day facilities and access to public transport, cycling and walking to encourage non-car based travel is poor.

The limited facilities and environmental constraints at Boughton Lees have remained consistent since the assessment of settlements suited to residential development adjoining or close to the existing built up confines was made (Settlements Matrix, August 2018).

It is therefore appropriate that the adopted Ashford Local Plan 2030 (Policy HOU5) does not enable residential development at the edge of the built up area with the exception of Local Needs housing (Policy HOU2) provided a number of criteria are met.

The made Neighbourhood Plan defines the built-up confines for Boughton Lees. The countryside to the north and west of the built-up area is entirely within the Kent Downs National Landscape and is either within the Boughton Lees Conservation Area or forms part of its setting. The Neighbourhood Plan also protects public views from the built up area of the village. For these reasons, housing allocations outside the defined built up area of Boughton Lees are not considered to represent sustainable development.

The limited sites which have come forward around Boughton Lees through the Call for Sites exercise represent isolated sites within the countryside, remote from Boughton Lees. Without available sites, and consistent with the strategy in the adopted Local Plan, there is no reason to consider Boughton Lees as an appropriate settlement suitable for housing allocations and inclusion within Policy Intention 14.

Conclusion

Boughton Lees should not be included within the list of villages classified as suitable for housing allocations in the Regulation19 Ashford Local Plan 2042.

North Ashford Area of Search

General Comment

Paras. 2.4.61 - 63 omit to mention the highways constraints in the North Ashford Area of Search. The Parish Council consider the current road network serving the area, including Sandyhurst Lane and the A251 Trinity Road, are at, or close to, capacity at peak times. It is important to note that a significant part of the Eureka Park development is still to add further traffic to the local network. Vehicular access to this site can only be provided from Trinity Road in accordance with Policy S20 of the adopted Local Plan.

In particular, Sandyhurst Lane is narrow and is not served by pavements along its entire length. This is entirely appropriate along much of its north side which remains rural in character. Nevertheless, this makes the lane inappropriate for accommodating significantly more traffic as a consequence of the development of strategic sites served by it.

The Parish Council consider that the cumulative impact of development of any further strategic sites in addition to Eureka Park on Sandyhurst Lane, A251 Trinity Road and the M20 Junction 9 would have adverse consequences on highway safety (including for pedestrians and cyclists) and congestion along these roads and junctions. The traffic impact of any proposed strategic development in this Area of Search must be fully assessed and modelled and be able to demonstrate that there would be no adverse consequences on the already congested and dangerous network.

Housing and Economic Land Availability Assessment (HELAA) Sites within Boughton Aluph & Eastwell Parish

Boughton Aluph & Eastwell Parish Council have assessed the following HEELA sites which have met the Borough Council's criteria to progress to Part 2:

SITE: HELAA/LP42/106 - Land North of Faversham Road, Boughton Aluph

The 1.7 hectare site is proposed for an allocation of 9 dwellings (the promoter proposes bungalows).

The site represents an isolated site within the countryside, remote from Boughton Lees. Allocating this site for housing would be contrary to the NPPF (Para. 84) as it does not meet any of the exceptions which allow isolated residential development in the countryside.

Boughton Lees lacks basic day to day facilities such as local centre/shop or Primary School. The limited facilities which the village possesses cannot be accessed safely on

foot or conveniently on public transport from this site. There is no footpath connection or convenient bus service linking this site to the village and occupants would be likely to require a car to access most services and facilities.

The proposed allocation would result in a cul de sac layout and is promoted for bungalows (presumably to lessen the visual impact). However, such a layout and built form is uncharacteristic of the area. The site is within the Kent Downs National Landscape, part of the Eastwell Park Historic Park, within the setting of a listed building (Kitchen Garden Wall) and an Area of Archaeological Potential. An allocation for 9 dwellings on this site would result in an inappropriate development in this sensitive setting. The proposed access would require the removal of a building which has potential to house protected species (bats).

The Call for Sites Submission is for the same proposal as Planning Application 19/00862/AS - Erection of nine dwellings, and associated garages and access - which was refused by the Borough Council for the following reasons:
'1 The proposal is contrary to policies SP1, ENV1, ENV3b, ENV13, HOU5 and TRA3a of the
Ashford Local Plan 2030, Central Government guidance contained in the National Planning
Policy Framework (February 2019), the AONB Management Plan, Government Circular 06/05, Landscape Character SPD, Residential Parking Design Guidance SPD, and the Boughton Aluph Village Design Statement, and would therefore be contrary to interests of acknowledged planning importance for the following reasons:

1. The proposed dwellings would by virtue of their location outside of the built confines of any identified settlement in the Local Plan, with no overriding justification having been submitted, give rise to unsustainable new homes in the countryside which would result in over reliance on private modes of transport to access everyday shops and services, contrary to the core principles in the Local Plan and the NPPF which seek to promote sustainable development in rural areas and avoid unsustainable new homes in the countryside.

2. The proposed dwellings by virtue of their design and layout would create a visually intrusive form of development which fails to satisfactorily integrate with the prevailing character and appearance of the surrounding area causing significant and unacceptable visual harm to the character and appearance of the countryside and landscape, which would neither conserve or enhance the designated Area of Outstanding Natural Beauty, which is afforded the highest level of protection.

3. In the absence of a robust heritage assessment, the application lacks sufficient information to adequately assess the impact of the proposed development on the heritage assets, namely the Grade II listed 'Kitchen Garden' Wall, the historic parkland, and archaeological remains. The proposed development has the potential to have less than substantial harm (higher end) on the understanding of the significance of the heritage assets. The development of this land, along with its domestication and the consolidation of built development, would unacceptably erode the sites nationally designated importance, adversely affecting the appreciation of the historic function. The public benefit

of providing these dwellings in an unsustainable location does not outweigh the less than substantial harm.

4. The intensification of the existing sub-standard access to the site is unacceptable because the visibility splay to the south cannot be achieved due to the bend in the road, and to the north due to the brick wall, which would be detrimental to highway safety and would pose an unacceptable risk to the safety of road users.

5. In the absence of vehicle tracking plans for vehicles to safely service the proposed development, the proposal would result in refuse vehicle parking/manoeuvres on a classified road, which would be a hazzard to other road users, to the detriment of highway safety.

6. In the absence of a demonstrated on-site parking layout to evidence the proposal would meet vehicle parking standards, the proposal has potential to result in parking on a classified road, which would be detrimental to highway safety and would pose an unacceptable risk to the safety of road users.

7. In the absence of emergence bat surveys, the application lacks information to adequately assess if there would be harm to protected species and ecology, as such, the proposed development has the potential to have a detrimental impact upon protected species and biodiversity, within and around the site and would therefore be harmful to matters of ecological importance.'

Since this refusal the Boughton Aluph & Eastwell Neighbourhood Plan has been made. The Neighbourhood Plan defines the built-up confines for Boughton Lees. The site is well outside the defined boundary and contrary to Policy BAE NP4.

Conclusion

An allocation of this site for housing development would not be consistent with national policy or justified (represent an appropriate strategy). An allocation would not be consistent with the adopted or emerging Local Plan or the Boughton Aluph & Eastwell Neighbourhood Plan and would represent unsustainable development. For the reasons set out above, and consistent with the refusal of Planning Application 19/00862/AS, the Parish Council would strongly object to the inclusion of HELAA/LP42/106 - Land North of Faversham Road, Boughton Aluph, as a housing allocation within the forthcoming Regulation 19 Ashford Local Plan 2042.

SITE: HELAA/LP42/153 – Land North West of Wye Road, Boughton Aluph,

The 0.87 hectare site is proposed for an allocation of 5 dwellings.

The site represents an isolated site within the countryside, remote from Boughton Lees. The crucial test of isolated homes, according to legal judgements, is whether the new buildings are remote from a settlement as opposed to other existing dwellings. Allocating this site for housing would therefore be contrary to the NPPF (Para. 84) as it does not meet any of the exceptions which allow isolated residential development in the countryside.

Boughton Lees lacks basic day to day facilities such as local centre/shop or Primary School. The limited facilities which the village possesses cannot be accessed safely on foot or conveniently on a limited bus service from this site. Wye Road for most of its length, including the section containing the site, lacks pavements for pedestrians, and is notably busy for a road of its size (acting as a 'rat-run'). The site may be less than 5 mins from Kempe's Corner Bus Stop but this is only served by the 514 service, a weekday loop bus that runs from Wye to Ashford town centre with four buses between 10am and 2pm, making this impractical for transport to work, school, leisure and most other purposes.

Occupants would be likely to require a car to access most services and facilities. Similar to Planning Application 19/00862/AS, new dwellings in this location would result in over reliance on private modes of transport to access everyday shops and services, contrary to the core principles in the Local Plan and the NPPF which seek to promote sustainable development in rural areas and avoid unsustainable new homes in the countryside.

A Planning Application (18/00508/AS) on this site for 5 dwellings along with new access, associated parking and a community orchard was withdrawn by the applicant.

Whilst linear development of 3 dwellings opposite the proposed allocation was permitted (Application Number 17/ 00999/AS) it was at a time when the Council was unable to demonstrate a five year supply of deliverable housing sites and the application had to be considered in light of the NPPF's presumption in favour of sustainable development. Such an application does not set a precedent in a plan-led system where allocations should be sustainably located.

The planning system originated in part in order to control the linear sprawl of plotlands along roadsides. The proposed allocation would result in accentuating linear development and the erosion of countryside, and public views of it.

The site is part of the important gap separating Kempes Corner from Boughton Lees. The allocation would be contrary to the principle of preserving the spaces between distinct settlements (adopted Ashford Local Plan Policy SP7 - Separation of Settlements) thereby preserving the essential character of each settlement).

Since this refusal the Boughton Aluph & Eastwell Neighbourhood Plan has been made. The Neighbourhood Plan defines the built-up confines for Boughton Lees. The site is well outside the defined boundary and contrary to Policy BAE NP4.

Conclusion

An allocation of this site for housing development would not be consistent with national policy or justified (represent an appropriate strategy). An allocation would not be consistent with the adopted or emerging Local Plan or the Boughton Aluph & Eastwell Neighbourhood Plan and would represent unsustainable development. For the reasons set out above, and consistent with the refusal of Planning Application 19/00862/AS, the Parish Council would strongly object to the inclusion of HELAA/LP42/153 – Land North West of Wye Road, Boughton Aluph, as a housing allocation within the forthcoming Regulation 19 Ashford Local Plan 2042.

HELAA/LP42/213 - Land south-west of Lenacre Street and north of Sandyhurst Lane

The 9.6 hectare site is proposed for an allocation of 60 dwellings.

The site, in combination with HELAA/LP42/214, was previously promoted through Planning Application 17/01613/AS – a hybrid application for up to 79 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 (the HELAA/LP42/214 site) and outline planning application with all matters reserved except for access for the development of up to 58 new dwellings with associated access, landscaping, open space and community orchard.

The application was withdrawn at the applicant's request following an officer report recommending refusal being contrary to polices HOU5, SP1, SP6 and ENV3a of the Ashford Local Plan 2030 as well as policies BAE NP1 and BAE NP3 of the newly adopted Boughton Aluph and Eastwell Neighbourhood Plan.

The Council's report considered that *'the proposals would involve a large scale residential development on undeveloped land forming part of a strong rural edge that, in its undeveloped state, contributes positively to the landscape setting. The proposals, by virtue of their scale, form and intensity would not sit sympathetically within the wider landscape, would not preserve or enhance the setting of the settlement or be consistent with local character and would result in harm to the character and appearance of the surrounding area. Landscape setting and edge character is an important element of the Neighbourhood Plan that has only recently been adopted.'*

The Parish Council continues to strongly support the officer assessment of this site, particularly the well-defined edge to the Ashford urban area provided by Sandyhurst Lane and the valued landscape setting of the town.

The Neighbourhood Plan states *'Sandyhurst Lane forms a well-defined edge to the Ashford urban area and provides separation between the built form which forms the edge of the settlement of Ashford on one side and open countryside on the other. Lenacre Hall and nearby buildings are located on the north side of the road, but these buildings are limited in number and the rural area to the north provides an attractive and clearly defined setting to Ashford in this location.'*

This statement is supported by the Planning Inspectorate in dismissing an appeal on the HELAA/LP42/214 site against refusal of Application 18/00413/AS (Appeal Ref: APP/E2205/W/19/3220880) in December 2019. The Inspector's decision stated the following in dismissing the case:

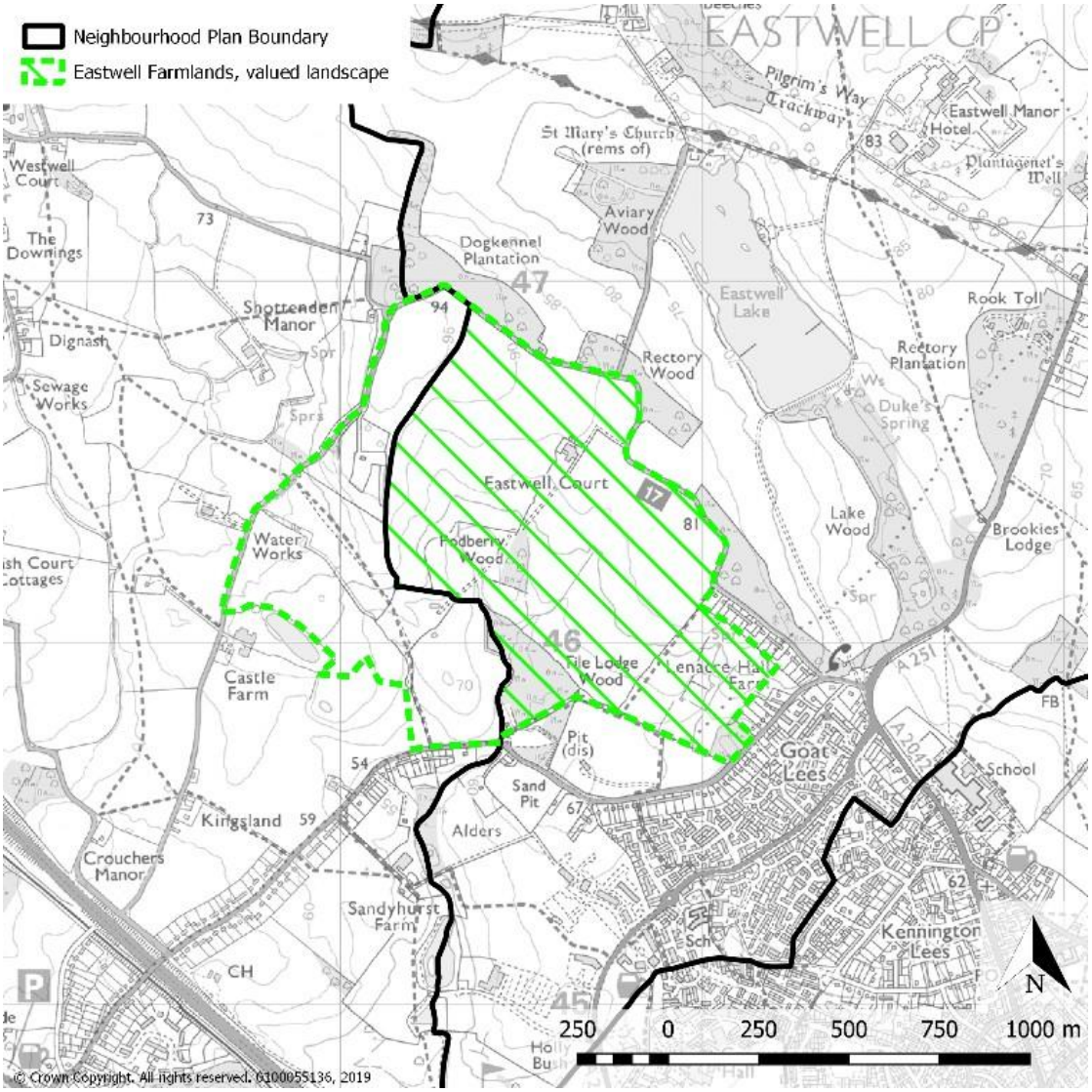
'Sandyhurst Lane provides separation between the built form which forms the edge of the settlement of Ashford on one side and open countryside land on the other. I note that Lenacre Hall and nearby buildings are located on the other side of the road, however these buildings are limited in number and are some distance from the site. Nevertheless, this break provides a clearly legible delineation resulting in an attractive and clearly defined setting to the settlement of Ashford in this location.'

Given the conclusion of the Council and the Planning Inspectorate regarding Sandyhurst Lane and the character of Lenacre Street (fronted only by linear development with long, well landscaped gardens), the proposed development would clearly not represent a 'logical infill development in the gap between development at Lenacre Street and Sandyhurst Lane' as stated by the site promoter.

In addition, the Parish Council strongly supports the Council's conclusion that development of this scale and intensity would not sit sympathetically within the wider landscape, would not preserve or enhance the setting of the settlement or be consistent with local character and would result in harm to the character and appearance of the surrounding area.

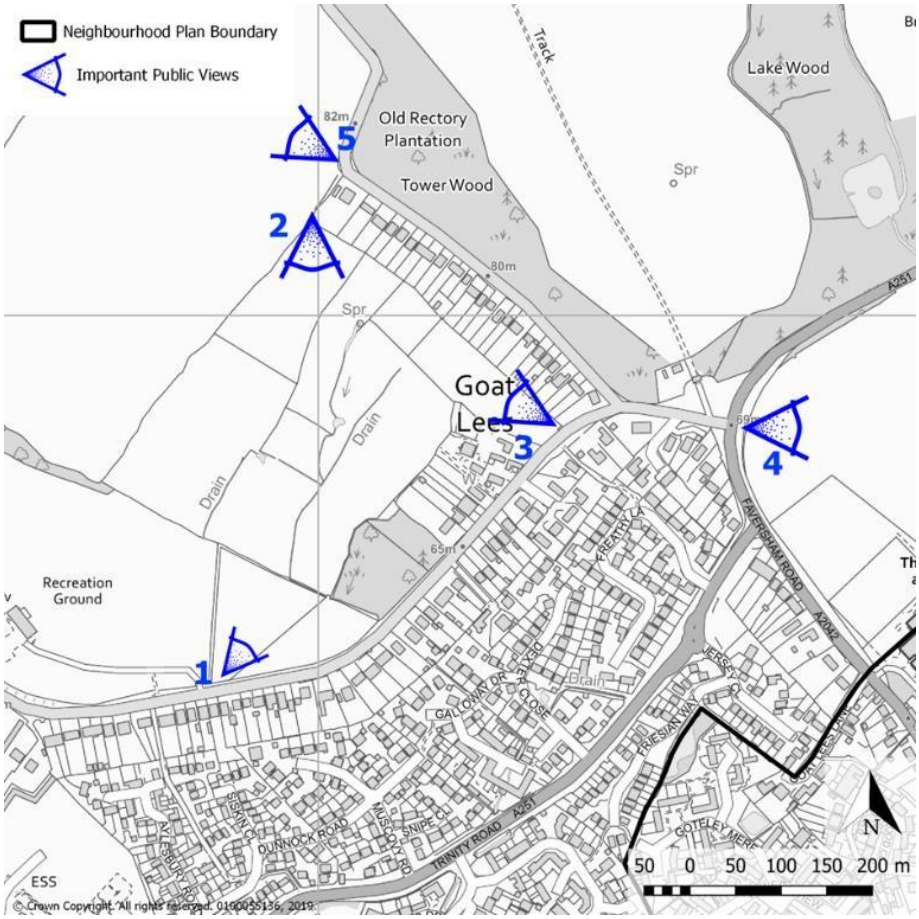
Since the Borough Council's assessment, the Boughton Aluph & Eastwell Neighbourhood Plan has been made with new policies relating to the Eastwell Farmlands landscape and Important Public Views.

The site is situated within the Eastwell Farmlands landscape character area (see Ashford Landscape Character Study, 2005 and Landscape Character Supplementary Planning Document). The area comprises rolling arable and pasture land with medium sized fields generally divided by mature thick hedges (which have in places disappeared leaving remnant mature oaks) and the Studio Engleback study recommends conserving the landscape and creating hedgerow and woodland enhancements. Thus, in the Eastwell Farmlands distinctive character area the emphasis should be on conserving and creating the landscape. The Eastwell Farmlands area immediately abuts the Kent Downs AONB to the north. The rolling arable and pasture land with medium sized fields generally divided by mature thick hedges provides the setting for this part of the AONB. The Neighbourhood Plan designates the area of Eastwell Farmlands valued landscape.



An allocation of this scale and intensity would not retain the landscape character of, and would have a detrimental impact on, the area of Eastwell Farmlands valued landscape contrary to Neighbourhood Plan Policy BAE NP3(b).

The Neighbourhood Plan also identifies Important Public Views of the surrounding countryside from the edge of the built up area which should be maintained.



Development of this site would impact the following Important Public Views:

2 From public footpath AE207 where it enters Lenacre Hall Farm looking South, views across farmland and the Sandyacres Sports and Recreation Open Space and over woodland towards The Warren, Hoads Wood and Godinton Park. And south-easterly towards the Ashford Town skyline.

3 From Sandyhurst Lane, adjacent to Lenacre Hall Farm buildings, looking North West over the farm gate, view across farmland and Eastwell Park Estate. The whole view framed by oak trees.

The illustrative layout submitted with the Call for Sites submission demonstrates that the 60 dwellings proposed within open farmland would be clearly perceived from View 2 and public footpath AE207. The promoter accepts that the most sensitive publicly accessible viewpoints of this site are from this public footpath. Despite setting back the proposed 60 dwellings from this footpath, the existing views would be significantly adversely affected. Whilst the illustrative layout proposes no built development within a narrow corridor north west of View 3, the existing rural view of agricultural buildings and open farmland would be significantly adversely affected by a new access road, bell-mouth junction, visibility splays, signage, lighting and the intensity of car trips and activity.

An allocation of this scale and intensity would therefore not maintain the distinctive views of the surrounding countryside from public vantage and points within, and adjacent to, the built up confines, in particular Important Public Views 2 and 3 designated in the Neighbourhood Plan, contrary to Neighbourhood Plan Policy BAE NP3(d).

Conclusion

An allocation of this site for housing development would not be consistent with national policy to protect and enhance valued landscapes, the Landscape Character Supplementary Planning Document, adopted Local Plan Policy ENV3a or Boughton Aluph & Eastwell Neighbourhood Plan Policy BAE NP3. For the reasons set out above, and consistent with the refusal of Planning Application 17/01613/AS, the Parish Council would strongly object to the inclusion of HELAA/LP42/213 – Land south-west of Lenacre Street and north of Sandyhurst Lane as a housing allocation within the forthcoming Regulation 19 Ashford Local Plan 2042.

HELAA/LP42/214 - Land north of Sandyhurst Lane

The 1.6 hectare site is proposed for an allocation of 15 dwellings.

The site, in combination with HELAA/LP42/213, was previously promoted through Planning Application 17/01613/AS – a hybrid application for up to 79 new residential dwellings consisting of a full planning application for the development of 21 new residential dwellings, access, drainage and landscaping on this site.

The application was withdrawn at the applicant's request following an officer report recommending refusal being contrary to polices HOU5, SP1, SP6 and ENV3a of the Ashford Local Plan 2030 as well as policies BAE NP1 and BAE NP3 of the newly adopted Boughton Aluph and Eastwell Neighbourhood Plan.

A further application for 21 new residential dwellings, access, drainage, car and cycle parking and landscaping was made for the HELAA/LP42/214 site (18/00413/AS) was refused by the Borough Council.

The reasons for refusal are as follows:

'(a) The location of development proposed lying outside the established settlement edge together with its scale would have a significant adverse urbanising impact on the open countryside, out of character with the adjoining rural settlement character. The development would therefore be unacceptably harmful to the visual amenity of the area.

(b) The development would be unsustainable in transport terms as there are no day-to-day facilities within easy walking distance of the site leading to the need for all journeys to access such facilities being made by car.

(c) The development would not conserve and enhance the natural environment and would lead to an unacceptable loss of habitat.

(d) The necessary planning obligation has not been entered into in respect of the list below so that the proposed development is unacceptable by virtue of failing to mitigate its impact and failing to meet demand for services and facilities that would be generated and the reasonable costs of monitoring the performance of the necessary obligations: · affordable housing · primary school expansion · secondary school improvement · libraries

· sports – outdoor pitches · informal/natural space project · children's and young people's play project · allotments provision · strategic parks project · healthcare improvements.'

An appeal was lodged with the Planning Inspectorate against the Council's decision in January 2019. The appeal was dismissed on the 13 December 2019 (Appeal Ref: APP/E2205/W/19/3220880). The Inspector's decision stated the following in dismissing the case:

'Sandyhurst Lane provides separation between the built form which forms the edge of the settlement of Ashford on one side and open countryside land on the other. I note that Lenacre Hall and nearby buildings are located on the other side of the road, however these buildings are limited in number and are some distance from the site. Nevertheless, this break provides a clearly legible delineation resulting in an attractive and clearly defined setting to the settlement of Ashford in this location.

Development on this land would result in a change to the internal character of the site. The introduction of a number of substantial dwellings, along with the likely associated domestic paraphernalia and urban features of the development, such as roads and car parking, would introduce an urban land use to this currently open site. I note that the proposed development would not change the pattern of field boundaries. However, given my findings above that the local character of this site is associated with the mainly undeveloped open land which surrounds on three sides, it can be seen that the proposed development would not sit sympathetically in this landscape.

Furthermore, introducing development on the northern side of Sandyhurst Lane in this location would be harmful to the defined settlement edge described above and consequently to the setting of the settlement of Ashford.

…design and layout of the Appeal proposals are not consistent with the character of the built form on the southern side of Sandyhurst Lane.

Although long distance views would be limited, the appeal scheme would be visible in public views along Sandyhurst Lane and other points particularly in the winter months. The vegetation on the boundary would not be so dense that views would not be possible, particularly when trees are not in leaf. The development would also be visible along the proposed access road. Although in views from the nearby public rights of way there is an existing backdrop of housing, the proposed development would harmfully extend built form into this open landscape.'

The Parish Council continues to strongly support the Borough Council and Planning Inspectorate's assessment of this site, particularly the well-defined edge to the Ashford urban area provided by Sandyhurst Lane and the landscape setting of the town. These considerations apply equally to a site now proposed for 15 dwellings as they do for a planning application for 21 dwellings. The illustrative layout for the promoted site continues to show access from Sandyhurst Lane and an orbital access road with the backs of houses facing Sandyhurst Lane and open countryside.

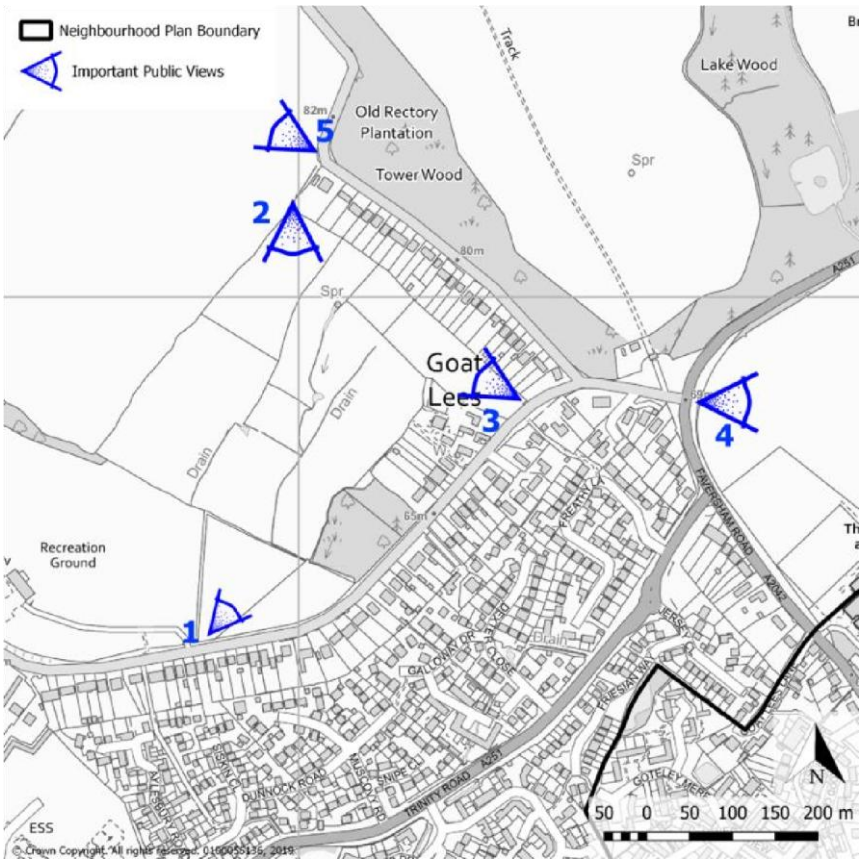
The Neighbourhood Plan states *'Sandyhurst Lane forms a well-defined edge to the Ashford urban area and provides separation between the built form which forms the edge of the settlement of Ashford on one side and open countryside on the other. Lenacre Hall*

and nearby buildings are located on the north side of the road, but these buildings are limited in number and the rural area to the north provides an attractive and clearly defined setting to Ashford in this location.'

In addition, the Parish Council strongly supports the Inspector's conclusion that the landscape provides an attractive and clearly defined setting to the settlement of Ashford and that development would not sit sympathetically within it. A housing development of the scale proposed would be visible in public views along Sandyhurst Lane including the proposed access road, bell-mouth junction, visibility splays, signage, lighting and the intensity of car trips and activity.

Since the appeal, the Boughton Aluph & Eastwell Neighbourhood Plan has been made.

The Neighbourhood Plan identifies Important Public Views of the surrounding countryside from the edge of the built up area which should be maintained.



Development of this site would impact Important Public View 1 from Sandyhurst Lane adjacent to the entrance to Sandyacres Sports and Social Recreation Open Space, looking North East across grassland towards Tower Wood, Lenacre Street, with views over Lenacre ancient woodland.

The illustrative layout submitted with the Call for Sites submission demonstrates that the 15 dwellings proposed within open farmland would be clearly perceived from View 1 and the nearby public rights of way.

An allocation of this scale and intensity would therefore not maintain the distinctive views of the surrounding countryside from public vantage and points within, and adjacent to,

the builtup confines, in particular Important Public View 1 designated in the Neighbourhood Plan, contrary to Neighbourhood Plan Policy BAE NP3(d).

Conclusion

An allocation of this site for housing development would not be consistent with national policy to recognise the intrinsic character and beauty of the countryside setting of Ashford, adopted Local Plan Policy ENV3a or Boughton Aluph & Eastwell Neighbourhood Plan Policy BAE NP3. For the reasons set out above, and consistent with the refusal of Planning Application 18/00413/AS and Appeal Ref: APP/E2205/W/19/3220880, the Parish Council would strongly object to the inclusion of HELAA/LP42/214 - Land north of Sandyhurst Lane as a housing allocation within the forthcoming Regulation 19 Ashford Local Plan 2042.

SITE: HELAA/LP42/127 - Land to the south of 200 and east of 198, Sandyhurst Lane

The 2.35 hectare Former Sand Quarry is proposed for an allocation of 9 dwellings.

The site is situated to the south side of Sandyhurst Lane abutting residential development to north west and the extensive Eureka Park allocation to the south east. The planning application for the Eureka Park site has been approved and brings built development up to the site boundary. As a consequence, this site would be the only undeveloped parcel of land to the southern side of Sandyhurst Lane. The infilling of development within the former quarry would not extend the limits of built development beyond Sandyhurst Lane into the open countryside but rather would reinforce the strongly defined built edge to Ashford town.

Provided a safe new site access for vehicles, cycles and pedestrians onto Sandyhurst Lane can be made, a new footway to connect the site entrance to the existing footways on Sandyhurst Lane is provided, and satisfactory mitigation/compensation required for the loss of the area of acid grassland and other protected species can be achieved, the Parish Council would not object to the allocation of this site within the forthcoming Regulation 19 Ashford Local Plan 2042.

Ashford Golf Course

The Parish Council note that although the Local Plan indicates Potential Future Development at Ashford Golf Course (which lies at the most southerly extent of Boughton Aluph Parish) the site has not come forward for development through the Call for Sites exercise. It is therefore not a site available for development during the Plan period and should not be allocated within the North Ashford Area of Search.

Sites outside Boughton Aluph & Eastwell Parish with impact on the Parish

General Comment

Paras. 2.4.61 - 63 omit to mention the highways constraints in the North Ashford Area of Search. The Parish Council consider the current road network serving the area, including Sandyhurst Lane and the A251 Trinity Road, are at, or close to, capacity at peak times. It is important to note that a significant part of the Eureka Park development is still to add further traffic to the local network. Vehicular access to this site can only be provided from Trinity Road in accordance with Policy S20 of the adopted Local Plan.

In particular, Sandyhurst Lane is narrow and is not served by pavements along its entire length. This is entirely appropriate along much of its north side which remains rural in character. Nevertheless, this makes the lane inappropriate for accommodating significantly more traffic as a consequence of the development of strategic sites served by it.

The Parish Council consider that the cumulative impact of development of any further strategic sites in addition to Eureka Park on Sandyhurst Lane, A251 Trinity Road and the M20 Junction 9 would have adverse consequences on highway safety (including for pedestrians and cyclists) and congestion along these roads and junctions. The traffic impact of any proposed strategic development in this Area of Search must be fully assessed and modelled and be able to demonstrate that there would be no adverse consequences on the already congested and dangerous network.

SITE: HELAA/LP42/224 - Land North of Sandyhurst Lane

The 44 hectare site is proposed for an allocation of 50 - 400 dwellings.

Access to the site is proposed from Sandyhurst Lane. Sandyhurst Lane is narrow and is not served by pavements along its entire length. This is entirely appropriate along its north side which remains rural in character. Nevertheless, this makes the lane inappropriate for accommodating yet more traffic as a consequence of the development of strategic sites served by it.

Key services are located a considerable distance from the site and occupants would be likely to use a car to access most services and facilities. Although the promoter of the site suggests a development of 400 homes would provide community infrastructure provision to meet local needs, this is unlikely to be viable within a scheme of this scale resulting in increased journeys by car.

Adopted Local Plan Policy TRA7 which is likely to be carried forward into the Ashford Local Plan 2042 states that new accesses and intensified use of existing accesses onto the road network will not be permitted if a clear risk of road traffic accidents or significant traffic delays would be likely to result. Proposals which would generate levels and types of traffic movements, including heavy goods vehicle traffic, beyond that which local roads could reasonably accommodate in terms of capacity and road safety will not be permitted. It is

likely that there would be a clear risk of road traffic accidents or significant traffic delays as a result of an additional strategic housing site served by Sandyhurst Lane.

The Parish Council continues to strongly support the well-defined edge to the Ashford urban area provided by Sandyhurst Lane and the landscape setting of the town provided by the rural landscape to the north, including the North Downs National Landscape and its setting. This approach is supported by the Planning Inspectorate in dismissing an appeal against refusal of Application 18/00413/AS (Appeal Ref: APP/E2205/W/19/3220880) in December 2019.

The planning system originated in part to control the linear sprawl of plotlands along roadsides. The proposed linear development along Sandyhurst Lane would result in accentuating linear development and the erosion of countryside, and public views of it.

The proposed site abuts the Kent Downs National Landscape along its northern boundary and development of 400 dwellings is likely to have adverse impacts on the setting of this designated landscape, even with a landscape buffer along this edge.

Conclusion

An allocation of this site for housing development would not be consistent with national policy to minimise adverse impacts on the setting of the National Landscape, the Landscape Character Supplementary Planning Document, or the adopted Local Plan Policies ENV3a and TRA7. For the reasons set out above, and consistent with planning Appeal Ref: APP/E2205/W/19/3220880, the Parish Council would strongly object to the inclusion of HELAA/LP42/224 - Land North of Sandyhurst Lane as a housing allocation within the forthcoming Regulation 19 Ashford Local Plan 2042.

North East Ashford Area of Search

HELAA/LP42/143 - Canterbury Road (A28), Kennington

The 36 hectare site is proposed for an allocation of 650 dwellings close to the south eastern boundary of the Parish.

Outline Planning Application 18/00236/AS for the demolition of existing agricultural buildings and the erection of up to 625 dwellings with public open space, a park and ride, land for an A1 retail unit (up to 280 sqm) and a D1 community centre including doctor's surgery, landscaping and sustainable drainage system and vehicular access point from Canterbury Road was withdrawn by the applicant in September 2020.

Boughton Aluph and Eastwell Parish Council consider the A28 into Ashford to be already congested, particularly at peak times, with queues backing up at the Conningbrook roundabout and the traffic lights into Ashford. Given the existing allocation for 700 dwellings in Local Plan Policy S2 - Land North-East of Willesborough Road, Kennington, the additional traffic movements from 650 dwellings are likely to result in a clear risk

significant traffic delays. Although the promoter of the site suggests a development of 650 homes would provide community infrastructure such as a doctor's surgery, the viability of this proposal within a scheme of this scale is questionable, resulting in increased journeys by car.

Due to the scale of additional trips, Highways England expressed concern about the potential impact of 625 dwellings (Application 18/00236/AS) on M20 Junction 10 and required a detailed assessment of the traffic impacts on the safety and operation of this junction. The also had concerns about the A2070 Orbital Park roundabout:

'Considering the cumulative impact of the proposed development, committed developments and the emerging Local Plan provisions, we are concerned that the additional trips may result in a severe residual impact at this junction.'

For this reason, they required a detailed assessment of the traffic impacts on the safety and operation of this junction.

Adopted Local Plan Policy TRA7 which is likely to be carried forward into the Ashford Local Plan 2042 states that proposals which would generate levels and types of traffic movements, including heavy goods vehicle traffic, beyond that which local roads could reasonably accommodate in terms of capacity and road safety will not be permitted.

It is likely that there would be a clear risk of road traffic accidents or significant traffic delays on the highway network as a result of an additional strategic housing site served by Canterbury Road.

Conclusion

The cumulative impact of an allocation of this site for housing development with the existing allocation for 700 dwellings at Willesborough Road would be likely to result in severe impacts on highway safety and congestion and the Parish Council would strongly object to the inclusion of HELAA/LP42/143 - Canterbury Road (A28), Kennington as a housing allocation within the forthcoming Regulation 19 Ashford Local Plan 2042.

Local Green Space – Call for Sites

The Regulation 18 Ashford Local Plan 2042 consultation calls for the submission of sites suitable for designation as Local Green Spaces.

Boughton Aluph and Eastwell Neighbourhood Plan Policy BAE NP2 – Protection of Local Green Space - designates eight Local Green Spaces as defined on Maps 6-12 within:

LGS Ref No.	Local Green Space Description
1	The Village Green, Boughton Lees
2	All Saints Churchyard, Church Lane, Boughton Aluph
3	St Mary the Virgin Churchyard, Eastwell
4	Green space in front of Eastwell Towers and adjoining flint wall at junction of Sandyhurst Lane and A251 Faversham Road
5	Children's play area and amenity space, Hurst Road, Goat Lees
6	Green space and informal recreational area, Guernsey Way, Goat Lees
7	Green space at junction of A251 Trinity Road, Jersey Close and Friesian Way, Goat Lees
8	Sandyacres Sports and Social Recreation Open Space, Sandyhurst Lane

It is not clear whether for consistency the Borough Council would wish to incorporate these sites within the Local Plan.

The Parish Council seeks consistency of wording to protect such sites between the Regulation 19 Ashford Local Plan 2042 and the made Boughton Aluph and Eastwell Neighbourhood Plan Neighbourhood Plan.