

Kennington Community Forum

ABC Local Plan to 2030

Response to Submitted Sites, 3 April 2014



Kennington Community Forum has given careful consideration to the sites submitted by owners and developers for potential inclusion in the Local Plan to 2030, and to other documents provided by ABC as part of the evidence base. We have gathered views of local residents through discussion at our public meetings including a Community Planning Workshop in September 2013, articles in our newsletters, direct response from local residents, and conversation on social media. We now wish to submit the following comments as a reflection of the views of residents in Kennington Community Forum's area.

1) General Comments

- a) The Strategic Housing Market Assessment^a prepared for ABC is deeply flawed in relation to the impact on housing needs and employment opportunities of high speed rail services between Ashford and London. Section 2.32 states: "It should be borne in mind that this analysis is based on commuting data from the 2001 Census (the most recently available and nationally complete dataset). As such, local changes in transport links and accessibility over the past decade may have influence these flows. This is particularly likely to be the case with areas such as Ashford and along the north Kent corridor given the influence of the High Speed 1 (HS1) Rail Link. This has significantly improved journey times from Ashford to London". The mantra "London in 37 minutes" has been the mainstay of Ashford Borough Council's promotion of the borough since HS1 opened to domestic traffic in 2009. The impact of this service on housing and employment projections cannot be "based on commuting data from the 2001 Census" and the SHMA must be updated to reflect this significant change by reference to current data.
- b) The Strategic Housing Market Assessment also states, in Section 5.3, "(...) Ashford has seen comparatively (and quite substantially) higher historic growth in population, particularly since the early 1990s. The divergence from population growth levels seen across both Kent and particularly the wider South East is particularly notable with Ashford experiencing on average 1.45% population growth per annum over the past 20 years whilst Kent and the South East have experienced 0.76% and 0.70% respectively". The report does not seek to determine the reasons for population growth in the borough being twice the average for the county and the South East. Further work must be undertaken to document the sources of this "quite substantially higher historic growth", which is of primary importance to the current strategic planning exercise.
- c) We note concerns from residents regarding congested road networks in Kennington and the impact of further development in this area. We draw your attention to traffic models in the *A28 - A251 Link Road, Ashford Feasibility Study Report* commissioned by Kent County Council in 2010, and in particular the following: "The A251 Faversham Road and A28 Canterbury Road are the two key routes serving Ashford from the north and provide direct links to Faversham and Canterbury respectively. (...) The strategic nature of the routes means that they are well utilised during both the AM and PM peak periods and the high traffic flows and existing highway layout result in congestion at key junctions.

This problem will be exacerbated by the future growth in traffic flows that will result from planned development within Ashford over the coming decades”.

2) Sites KE4 - Land east of A28 and KE3 - Land NE of A2070 Willesborough Road

- a) We object to inclusion of these sites in the Local Plan.
- b) These sites were previously considered and rejected under ABC’s Urban Sites and Infrastructure Development Plan Document as a single site **US22b Ashford Cricket & Hockey Club- east of A28**, which proposed 300 houses plus sports facilities on the northern part of this site. This present submission is for a significantly larger number of houses.
- c) The US&I DPD Sustainability Appraisal found that
 - i) “This site forms part of open countryside which is not well-related to the existing urban form in this part of Kennington. It would have a considerable landscape impact which could not be completely mitigated.”
 - ii) “The site has been allocated as a Special Landscape Area in the past and still offers outstanding views towards the base of the Downs. The view of the Downs is extensive and offers a backdrop to the open countryside. (...) and [development] would represent a significant incursion into an area that is only sporadically developed at present.”
 - iii) “Development of the site is likely to be reliant on the delivery of an A28-A251 link road to mitigate the impact of additional traffic generated from the development on the A28 corridor.”

None of these factors has changed since the US&I DPD Sustainability Appraisal and we therefore request that ABC maintains its previous finding that the site is not suitable for development.

- d) The proposed A28 – A251 Link Road on which development of either of these sites would be reliant would have an extremely damaging effect on the environs of Kennington. A study prepared for KCCb put forward a number of route and cost options but concluded that “The issues relating to deliverability likely to stop this project going forward are Highway Authority finance, public opinion and flood risk”. As none of these issues has been mitigated, Sites KE4 and KE3 will be undeliverable.
- e) Almost all the land in site KE4 is graded as Grade 1 or Grade 2 under the Agricultural Land Classification post-1988c which is considered the best and most versatile land under the Agricultural Land Classification. Site KE3 does not appear to have been subject to a detailed post-1988 grading, but it is reasonable to assume that it would be a similar high grade as the adjacent site. Natural England’s **Agricultural Land Classification map London and the South East (ALC007)**^d supports this and shows this area as likely to be Grade 1 agricultural land. NPPF states that “local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality”, and ABC should not consider loss of these sites for agriculture without an exceptionally compelling case, which this submission has not made.

3) Site KE2 - Orchard Farm

- a) We object to inclusion of this site in the Local Plan.
- b) Site KE2 does not appear to have been subject to a detailed Agricultural Land Classification post-1988, but it is reasonable to assume that it would be a similar high grade as the adjacent sites KE4 and KE3. NPPF states that “local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality”, and ABC should not consider loss of this site for agriculture without an exceptionally compelling case, which this submission has not made.
- c) The site is not well-related to the existing urban form in this part of Kennington, and development would represent a significant incursion into an area that is only sporadically developed at present.
- d) Road access to the site is poor, apparently requiring access via adjacent land which is not included in the submission, and it is likely to make this site undeliverable.
- e) There is a significant risk that this could become a relatively large (potentially 150 house at 30 per ha.) but “disconnected” estate with no obvious sense of place.

4) KE1 - Land at Ulley Farm

- a) We object to inclusion of this site in the Local Plan.
- b) Ulley Farm forms a key element of the historic character of the centre of Kennington. Originally “a small manor, within the bounds of this parish, next to Boughton Aluph, having now neither mansion nor any demesnes that can be ascertained belonging to it”^e, it has remained open farmland from mediaeval times. It has an important spatial relationship to St Mary’s Church, local schools, and the properties in Ball Lane and The Street which formed the original core of Kennington village and are now largely within Kennington and Ball Lane Conservation Areas. Development of this site would irrevocably destroy the semi-rural aspect of the centre of Kennington, and have a significantly adverse impact on the character of the area to the disadvantage of current residents.
- c) ABC’s Landscape Character Study^f identifies SG3 Ulley Farmlands as being “undulating mixed farmland with open arable fields, pasture and linear woodland strips” with “long distance views to the North Downs”, and states a Policy Recommendation to “conserve & create”. Development of this land would be contrary to these findings and recommendations.
- d) The proposed site of 11 ha could potentially generate 300 houses at 30 per ha with attendant vehicle movements. The site is only accessible by road from Ball Lane; traffic generated from any development would be routed through adjacent streets which are characteristically narrow, with narrow pavements. Recent introduction of parking restrictions and reinstallation of speed bumps in The Street and Ulley Road indicate the extent of existing safety concerns. This site is therefore not sustainable by reason of traffic generation.
- e) The Sustainability Report commissioned as part of the 2008 Core Strategy^g finds that the “Kennington Circle” within which Ulley Farm lies “is all within areas of high grade agricultural land.” Natural England’s **Agricultural Land Classification map London and**

the South East (ALC007) supports this and shows this area as likely to be Grade 1 agricultural land. NPPF states that “local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality”, and ABC should not consider loss of this site to agriculture without an exceptionally compelling case, which this submission has not made.

- d) Further, the 2008 Core Strategy Sustainability Report states that
 - i) “impacts on sites of conservation importance are predicted to be adverse insofar as the proposed development areas adjoin or incorporate Conservation Areas (for example Kennington)”
 - ii) “Although the bulk of the proposed development area is not within designated landscape areas. Almost all of the Kennington Circle development footprint impacts on the Special Landscape Area to the north of Ashford.”
 - iii) “Further justification for development of Kennington Circle is required if it is to be demonstrated that other sustainability benefits will override the disbenefits associated with the loss of Grade 1 agricultural land in this location. Currently, combined consideration of this and other impacts (including landscape and density considerations) concludes that an alternative location for these 400 dwellings should be sought, potentially integrated with other development areas.”

Acknowledging that the Local Plan to 2030 is a new plan and does not carry forward findings or allocations from the Core Strategy, we concur with these statements in the 2008 Core Strategy Sustainability Report and rejection of this as an appropriate site for development.

5) BBAE1 Ashford Golf Club, Sandyhurst Lane

- a) We do not object to inclusion of this site in the Local Plan, but with reservations.
- b) We understand that 16 acres of land is leased to the Club by ABC, and that ABC will not consider renewal of this lease beyond 2043. The remaining land owned by the Club is insufficient for a viable 18-hole course. At an Extraordinary General Meeting in June 2013 the Club’s members therefore approved a strategy to seek to relocate the course to a new site.
- c) While we regret the loss of green space within our area, we recognise that development of this site, if done with sensitivity and taking into account the needs of adjacent residents, could represent the “least- worst” option for meeting development needs in the immediate area.
- d) However, we have the following reservations:
 - i) The site is not well suited for residential purposes as it is bounded by the M20 to the southern side which is largely above the level of the golf course and is notoriously noisy. Consideration must be given to using this site for commercial employment purposes instead.
 - ii) A substantial buffer zone must be set aside between any new development and existing residential properties adjacent to the site.

- iii) Any development should be arranged so that traffic flows to the A251 Trinity Road, and not to Sandyhurst Lane. This ensures that development is oriented towards the centre of Ashford, and avoids increasing pressure on traffic flows and speeds in Sandyhurst Lane.
- iv) Development of this site must be considered together with BBAE2 Land at Eureka Park and an integrated plan developed to ensure a coherent and effective scheme across both sites.

6) BBAE2 Land at Eureka Park

- a) We do not object to inclusion of this site in the Local Plan, but with reservations.
- b) We note that since outline planning consent for Eureka Park was granted in 1988 the rate of development and of creation of employment has been disappointingly slow; and that at current progress the site will not be complete until 2035. We welcome a more coherent attempt to bring this forward if done with sensitivity and taking into account the needs of local residents.
- c) However, we have the following reservations:
 - i) Development of this site must be considered together with BBAE1 Ashford Golf Club, Sandyhurst Lane and an integrated plan developed to ensure a coherent and effective scheme across both sites.
 - ii) A substantial buffer zone must be set aside between any new development and existing residential properties adjacent to the site.
 - iii) Development of this site must not require further enabling developments in order to succeed: for example, an A28 – A251 Link Road.
 - iv) The developer and ABC must provide more detailed and specific evidence to answer the question “why would an employer move to this site in preference to other towns in the South East which are competing for the same businesses”.

^a Ashford Strategic Housing Market Assessment, Ashford Borough Council, Final Report January 2014, Prepared by GL Hearn Limited

^b A28 – A251 Link Road, Ashford Feasibility Study Report June 2010 (Jacobs Engineering U.K. Limited, ref B1441100))

^c Source: <http://magic.defra.gov.uk>

^d Source: <http://publications.naturalengland.org.uk/publication/141047>

^e Edward Hasted : The History and Topographical Survey of the County of Kent: Volume 7, 1798

^f Ashford Local Development Framework Landscape Character Study, Studio Engelback November 2005

^g Ashford Borough Council: Strategic Environmental Assessment/Sustainability Appraisal of Ashford’s Local Development Framework Core Strategy Sustainability Report, October 2006, Halcrow Group Limited

About the Forum

Kennington Community Forum is an open forum set up to represent the views of people living and working in Kennington and to help communicate those views to Ashford Borough Council and other statutory organisations. It is an independent voluntary group with its own constitution (updated 24 September 2013). The Forum is led by a Core Group comprising the Chair, Treasurer, Secretary, and up to nine other Members and it is also supported by an officer from Ashford Borough Council.

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