

# Kennington Community Forum

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14 March 2018

Lois Jarrett  
Planning and Development  
Ashford Borough Council  
Civic Centre  
Ashford  
TN23 1PL

Dear Ms Jarrett,

**Land east of East Mountain Lane and Canterbury Road, Kennington  
Planning application 18/00236/AS**

***Outline application 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. All matters reserved with the exception of the means of access***

The 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.

The KCF opposes the proposed development as it believes it flawed and non-compliant in a number of respects:

1. It fails to comply with extant NPPF planning policies and procedures in that it has not been proposed or assessed as part of the emerging Local Plan development process. Although the NPPF sets out that there is a presumption in favour of sustainable development there are a number of references throughout the NPPF and PPG, which taken together, are relevant to how this ambition is achieved. These include social, economic and environmental factors; access to infrastructure and services (or the ability to suitably provide such provision); ensuring that development can be delivered and is viable and ensuring that development is phased in an appropriate way. This site has not been assessed for its compliance with these criteria. The development should not therefore be permitted
2. It is an unnecessary opportunistic development. The site was not offered in the original call for sites, but held back and proposed only after the Local Plan public consultation, Council review and submission to the Inspector.

It was not therefore included in any SHELAA or assessed under the Local Plan process.  
It has not been considered or included in any available site estimates.

The provision of sites defined in the emerging Local Plan adequately meets the criteria set out in **SP1 - Strategic Objective** and **Para 3.26 - The Housing Target - *without recourse to the properties offered under this development*** The development should not therefore be permitted

3. The proposed site acknowledges and justifies itself as abutting to, but not part of, any existing or proposed settlement. It proposes the use of high quality (Grade 1 and Grade 2) agricultural land but as such fails to comply with the justification criteria set out in **Policy HOU5 - Residential windfall development in the countryside.** The development should not therefore be permitted
4. Development of the site would adversely impact on the landscape setting of the nearby North Downs AONB contrary to **Policy ENV3a and 3b - Landscape Character and Design.** The development should not therefore be permitted
5. No evidence is provided on how pedestrian and cyclist access from the development to local amenities is provided contrary to **Policies TRA5 - Planning for Pedestrians and TRA6 Provision for Cycling.** The development should not therefore be permitted
6. The capacity of the A28 Canterbury Road to accommodate the additional road traffic from 625 dwellings, a 300 place car park, a park and ride public transport system and a new community centre is unproven. The impact on existing traffic flows along the A28 of extending the restricted speed limit northwards towards Canterbury (as shown in the Access Plan) and the introduction of a roundabout is also unproven. The proposal fails to show how it complies with **Policy TRA7 - The Road Network and Development.** The development should not therefore be permitted
7. Parts of the proposed development site are known to be Zone 2/3 medium/high risk flood areas. The impact of extended non-permeable surfaces through house building, access roads and the provision of a 300 site car park on flood/surface water drainage has yet to demonstrate compliance with **Policy ENV9 – Sustainable Drainage** The development should not therefore be permitted

Yours sincerely,

A C Bartlett MSc MIBA  
Chair, Kennington Community Forum