

Policy BAE NP6 – Supplementary Evidence sought by Ashford Borough Council

Boughton Aluph and Eastwell Parish Councils have prepared responses to the following additional evidence sought by Ashford Borough Council.

That the requirements of S20 for the amount of housing and commercial space can be met on the remainder of the S20 site (anything that affects delivery of housing numbers or employment space delivery set out in the Local Plan will not be acceptable),

Policy S20 is a strategic policy with a broad indicative subdivision between commercial and housing development. The site at Eureka Park is proposed for a mix of commercial (around 20ha) and residential development (indicative capacity of 375 dwellings).

Neighbourhood Plan Policy BAE NP6 would not prejudice the overall supply of commercial and residential development as

- the scale of commercial and residential development is at this stage broadly framed and indicative (Local Plan Para 3.247 and Policy S20) and already has some inbuilt flexibility - there being no precise floorspace or dwelling requirements,
- the land in Policy BAE NP6 which is reserved for an extension to Eureka Place Local Centre (approximately 1.3ha gross) is of limited size relative to the overall scale of proposed development,
- Policy BAE NP6 allows for commercial development which will generate employment and for housing development.

Policy S20 does not stipulate what type of 'commercial' development should be permitted. Para 3.248 envisages the possibility of broadening the scope of potential uses beyond just B1 office developments – and refers to an example of health care facilities or similar high quality services that complement the wider B1 office elements of the site.

Although Local Plan Para 3.248 states that beyond the existing local centre, retail or leisure uses will not be acceptable (as these should be located in, or closer to, the town centre) this appears to contradict Para 2.187 which recognises that major new developments such as Eureka Park need to have some adaptability built in, citing local centres where land may need to be reserved to help provide for future needs as they emerge. Strategic Policy SP6 supports this aim.

Similarly, Local Plan Policy EMP10 - Local Centres and Villages states:

In local centres and villages, planning permission will be granted for additional shopping and service provision, where proposals are of a scale appropriate to the particular centre.

Policy BAE NP6 already states that development is subject to the scale being suited to the Local Centre, ie conveniently serving the growing demand of the local neighbourhood rather than meeting needs which should be accommodated in the town centre.

The Neighbourhood Plan considers the site in question as an extension to the Local Centre.

The NPPF states that planning policies should plan positively for the provision and use of shared spaces and community facilities and ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community.

There is no national or local policy restriction to the expansion of retail and service needs on land abutting Eureka Place. As illustrated above, Neighbourhood Plan Policy BAE NP6 takes into account the NPPF and generally conforms with Policies S20; S6 and EMP10.

That all other aspects/criteria of S20 are not impacted by the new allocation in your plan and can be implemented as set out,

Neighbourhood Plan Policy BAE NP6 would not adversely impact other aspects/criteria of Policy S20 and generally conforms with all the other criteria of Policy S20.

Some of the Policy S20 criteria are spatially specific to areas not related the reserved land. The site is well connected to pedestrian and cycle routes and Policy BAE NP4 seeks to retain Footpath AE210 as a green corridor to connect the new Eureka Park commercial and residential development to the Local Centre. Vehicular access to the site will be provided from Trinity Road only and parking provision would be on-site to meet at least the minimum parking standards for residential and commercial development set out in Local Plan policies TRA3(a) and TRA3(b). There are no residential properties adjoining the site whose amenities would be adversely affected. Other conditional elements of the policy such as appropriate species and habitat surveys and financial contributions would be part of any planning application for development. Similarly, the proposal could comprise innovative design and, with parking and landscape requirements, it should be possible to achieve a plot ratio of 0.4:1 should this be a requirement for this part of the site.

That there is evidence of the need for the local services set out in your policy and it can be implemented / delivered as part of the overall allocation,

The proposed scale of Eureka Park development will generate additional retail spend and service demands.

The Eureka Place Survey of Business Needs, 2019 (attached) confirms an earlier survey that over half of businesses currently located at Eureka Place envisage the need for extra space for their business over the next 5 or more years given the scale and location of the additional planned commercial and residential accommodation. In addition, 72% consider their customers already experience problems parking in Eureka Place and that 82% think that the parking area will be inadequate as Eureka Park is further developed. As service yard and car parking space are already at a premium, further land is required to meet this demand locally. The Neighbourhood Plan seeks to meet this need for local businesses together with associated parking on a site abutting the existing centre.

There are no GP surgeries or Post Office located in the Neighbourhood Plan area and the Household Survey indicates that these are the most sought after facilities. With further commercial and housing in the area there may be justification for a permanent or visiting surgery.

That the landowner is in support of your policy/proposals for a local centre allocation within the scheme

In their comments on the Regulation 14 Neighbourhood Plan Policy BAE NP6 (dated 22 May 2019) DHA, on behalf of their client Quadrant Estates LLP, supported the retention of existing community uses, shops and businesses in this location. They also agreed that with the wider development of Eureka Park, this area will become a sustainable location for

further shops and services to meet the day-to-day needs of the local community. A subsequent meeting with DHA and Quadrant confirmed their strong support for this policy.