



## **Possingham Farm Planning Statement**

### **Proposed Development of Land at North of Possingham Farmhouse, Ashford Road Great Chart, Kent.**

Outline application for the development of up to 655 residential dwellings (including 30% affordable dwellings) provision of new roads, footpaths, cycleways, installation of appropriate utilities, infrastructure (including Sustainable Drainage System (SuDS), car parking spaces, landscaping, within land north of Possingham Farmhouse, Ashford Road, Great Chart, Ashford.

**Application Submitted by Hodson Developments (Applicant)**

**Dated: March 2022**

## Possingham Farm Planning Statement

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## 1. Introduction

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1.1. This statement is submitted in support of an outline planning application as described below:

*Outline application for the development of up to 655 residential dwellings (including 30% affordable dwellings) provision of new roads, footpaths, cycleways, installation of appropriate utilities, infrastructure (including Sustainable Drainage System (SuDS), car parking spaces, landscaping, within land north of Possingham Farmhouse, Ashford Road, Great Chart, Ashford.*

1.2. The application site is shown edged red on the site location plan and comprises an area of 20ha (49.42 Acres).

1.3. This statement seeks to comment upon the planning merits of this application having regard to national government guidance as set out in the National Planning Policy Framework (NPPF), and associated Planning Practice Guidance (PPG), and the aims and objectives of the adopted Ashford Borough Local Plan 2019 (ABLP19).

1.4. This statement sets out a range of planning proposals which should be considered in determining this application, and should be read in conjunction with the following supporting documentation:

- Outline Parameter Plans,
- Site Location Plan,
- Illustrative Masterplan,
- The Design and Access Statement produced by Clauge Architects,
- Flood Risk Assessment & Surface Water Drainage Strategy produced by Vectos,
- Assess Strategy produced by Vectos,
- The Landscape and Visual Impact Assessment produced by Neil Tully Associates,
- The Preliminary Ecological Appraisal produced by Lloyd Bore,
- The Built Heritage Assessment produced by RPS,
- The Desk Based Archaeological Assessment produced by RPS,

## 2. Development Proposals.

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2.1. This Outline planning application is for the development of up to 655 residential dwellings (including 30% affordable dwellings) the provision of new roads, footpaths, installation of appropriate utilities, infrastructure, Surface Water System (SuDS), car parking spaces, landscaping, within land north of Possingham Farmhouse, Ashford Road, Great Chart, Ashford.

2.2. The proposals are for a sensitively designed development that creates a logical and rational extension to the Chilmington Green Development, completing the 'missing corner' adjacent to the A28. The site will address the A28 creating a new carefully considered approach to the southwest of Ashford.

2.3. The proposals respond to their immediate and wider context to respect the setting and establish a distinctive character of their own. The site is currently agricultural land with the eastern boundary edged by a hedgerow along the A28 Ashford Road and the southern boundary having a mature screen of vegetation centred around the (Grade II) listed building of Possingham Farmhouse. The South-eastern boundary of the site similarly has established mature tree/hedgerow boundary.

2.4. A study of the surrounding settlements has identified the qualities that contribute to the local character. These qualities will provide a framework for the new development to reinforce local distinctiveness and integrate the new development into the existing fabric and context of the area.

2.5. The vision is to create a unique development that is sensitive to its context and uses the Kentish vernacular and a landscape led design approach to create a development that has a true sense of place.

- 2.6. The site provides an opportunity to create a carefully considered approach from the open countryside to the southwest, north towards the new Chilmington Green development and Ashford to the northeast.
- 2.7. The application site is shown edged red on the site location plan and comprises an area of 20ha (49.42 Acres).
- 2.8. The access strategy encourages sustainability by linking the development to the north to the Chilmington Green development and to the new amenities including the District Centre, Local Centres, Primary and Secondary Schools. The primary access to the Site is from the new road from the A28 opposite Old Surrenden Manor Road. A secondary access to the A28 is also proposed along the western boundary of the site.
- 2.9. It is noted that the main roundabout (Access C) has been granted planning permission under Chilmington Green consent (12/00400/AS).
- 2.10. The Phase 2 Infrastructure Highway (The Avenue Extension) from Access C to Chilmington Green Road has been granted full planning permission under consent reference 21/00840/AS. The primary access to Possingham Farm is proposed 90m south of Access C.
- 2.11. The existing AW245 Byway will be respected and a sensitive approach to the design of houses fronting onto this edge is proposed. New pedestrian links to this and the AW220 (outside of the site but to the southwest of the site) will increase pedestrian access to the site and link to the new communities to the north and the existing communities in Great Chart and Chilmington Green.
- 2.12. The current use of crop planting on site will be replaced with a range of habitats that will seek to increase overall biodiversity whilst respecting the existing habitats such as the existing hedgerows and mature tree planting to the site boundaries. Any tree or hedgerow loss encountered in the formation of the site accesses will be mitigated as part of the comprehensive landscaping proposals. New SuDS features will encourage wildlife activity increasing the biodiversity and ecological opportunities.
- 2.13. The development concept sets out four main character areas with distinct features and varied landscaping, building heights, density, architectural styles, and street hierarchy to create a legible development with unique identity whilst incorporating vibrant local character. Character areas have been informed by the site boundaries, as each area addresses a different aspect of adjacent land. As a result, the character areas have been carefully designed to respond to the variety of land uses around the site.
- 2.14. As stated above the application is submitted in outline and seeks approval of the following parameter plans and all other details are to be considered at the detailed design reserved matters application stages.
  - Application Redline Boundary Plan,
  - Access and Movement Parameter Plan,
  - Building Heights Parameter Plan,
  - Building Density Parameter Plan,
  - Land Use Parameter Plan,
  - Landscape Open Space Parameter Plan,
  - Access Points – Vehicular Routes.

### 3. Town and Country Planning (Environmental Impact Assessment) Regulations 2017

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- 3.1. The Applicant submitted a request for a screening opinion and Ashford Borough Council (ABC) confirmed, that whilst the proposals comprise of an infrastructure project falling within category 10b of Schedule 2 of the Town and County Planning (Environmental Impact Assessment) Regulations 2017 and exceeds the thresholds in column 2 of the table in the Schedule, for the reasons set out, an Environmental Impact Assessment is not required.
- 3.2. Within the councils detailed letter dated 18 May 2020, ABC confirmed that the main reasons why an EIA is not required are detailed below (refer to the extracts of the letter in italics):

#### Characteristics and location of development

*The site consists of existing agricultural fields fronting the A28 Ashford Road and is bound on two sides by the Chilmington Green Development.*

*The application site itself extends to 20ha (49.42 Acres).*

*The site is open to the A28 and allows views in. Possingham Farmhouse is located to the south of the site approximately 68 metres at the closest point. The Farmhouse is Grade II listed. An existing byway runs along the eastern edge of the site.*

*The site is located within flood-zone 1 which is defined as having a low probability of flooding, (less than 1 in 1,000 annual probability of river or sea flooding).*

*The site has no specific landscape or ecological designation and is not within the setting of the AONB being some 3.3 miles from the North Downs AONB and 5.7 miles from the High Weald AONB.*

*The site is located within area BF5 of the Chilmington Green Open Arable Landscape Character Area which was assessed in the 2005 Studio Engelback Landscape Character Study with distinctive character in terms of the level wide open fields devoid of hedgerows with expansive views, but an area of weak sense of place and continuity. The area here is deemed to be highly visible with long distance views. Policy recommendations for area BF5 are to restore and create.*

*The site is located over a mile away from the nearest Conservation Area in Great Chart.*

#### The size and design of the whole development

*In terms of the size and design of the whole development the proposal is for up to 600 dwellings with associated car parking. It is proposed that the housing will not exceed 3 storeys in height and will comprise of a mixture of 1 to 5 bed dwellings.*

*It is proposed that the vehicular access will be provided via a new road linking the A28 with Chilmington Green Road and Orchard Boulevard.*

*The size of the development in this location adjoining what will eventually be the existing built-up area of Chilmington Green is not likely to have significant effects in the environment to require an EIA.*

#### Cumulation with other existing development and/or approved development

*This includes consideration of other development in the surrounding area. Of particular note is application 12/00400/AS approved 06 January 2017. This application comprised the following:*

*Outline application for a Comprehensive Mixed-Use Development:*

- *up to 5,750 residential units, in mix of sizes, types and tenures,*
- *up to 10,000 m<sup>2</sup> (gross external floorspace) of Class B1 use,*
- *up to 9,000 m<sup>2</sup> (gross external floorspace) of Class A1 to A5 uses,*
- *Education (including a secondary school of up to 8 ha and up to four primary schools of up to 2.1 ha each),*
- *Community Uses (class D1) up to 7,000 m<sup>2</sup> (gross external floorspace),*
- *Leisure Uses (class D2) up to 6,000 m<sup>2</sup> (gross external floorspace),*

- Provision of local recycling facilities,
- Provision of areas of formal and informal open spaces,
- Installation of appropriate utilities infrastructure as required to serve the development, including flood attenuation works, SUDS, water supply and wastewater infrastructure, gas supply, electricity supply (including substations), telecommunications infrastructure and renewable energy infrastructure,
- Transport infrastructure, including provision of three accesses on to the A28, an access on to Coulter Road / Cuckoo Lane, other connections on to the local road network, and a network of internal roads, footpaths and cycle routes,
- New planting and landscaping, both within the Proposed Developments and on its boundaries, and ecological enhancement works; and
- Associated groundworks.

A number of Reserved Matters applications have subsequently been submitted and approved and works are progressing within the Chilmington Green site area.

In terms of the potential cumulative impacts with other existing development or development not yet began it is acknowledged that the proposed development would be an extension to Chilmington Green in that it would adjoin the boundary of that development site. Notwithstanding this, the proposals in cumulation with other existing development and/or approved development will not result in significant effects on the environment to require an EIA.

The use of natural resources, in particular land, soil, water, and biodiversity.

The site is not located within a mineral's safeguarding area as set out in the 2013 Kent Minerals and Waste Local Plan. Furthermore, the proposals will not result in a significant use of water resources to require an EIA.

There are no statutory designated ecological sites within or nearby to the boundary of the development and therefore, the site does not fall into an ecologically designated 'sensitive area', within the definition of 'sensitive areas' in the EIA Regulations 2017.

The proposals are not likely to have significant effect on the environment through the use of natural resources, in particular land, soil, water, and biodiversity to require an EIA.

The production of waste.

The proposals are not likely to have significant effects on the environment through the production of waste.

Pollution and nuisance.

The construction of the proposed permanent uses for residential purposes and open space will not have a significant effect on the environment by virtue of pollution and nuisances to require an EIA.

The risk of major accidents, and/or disasters relevant to the development concerned including those caused by Climate Change, in accordance with scientific knowledge.

The proposed development will not give rise to the potential for a higher than average number of accidents either during construction or when in operation. The proposals will not result in significant effects on the environment through the risk of major accidents, and/or disasters relevant to the development concerned including those caused by Climate Change, in accordance with scientific knowledge.

The risks to Human health (for example due to water contamination or air pollution).

The nature of the proposed development will not lead to risks of contamination of land or water from the releases of pollutants onto the ground or into surface waters, groundwater. The nature of the proposals for residential use and open space are not likely to result in significant effects on the environment in terms of risk to human health (for example, due to water contamination or air pollution).

#### Location of the development

The site abuts the boundary with the Chilmington Green development site to the north and east, the A28 to the west and countryside to the south. The site is not located in close proximity to the AONB.

The proposals are not likely to result in significant environment effects in respect to the AONB to require an EIA.

There are no statutory designated Nature Conservation Sites near to the site that will be affected.

The site falls within Flood Zone 1 i.e., land with a Low (having a less than 1 in 1,000 annual probability) of flooding.

Possingham Farmhouse to the south of the site is Grade II listed and any development proposals would need to take account of its setting. The nearest Conservation Area (Great Chart) is a significant distance from the site.

In light of the above it is considered that the characteristics and location of development and types of characteristics of the potential impact of development outlined in schedule 3 of the EIA regulations are not likely to have significant effects on the environment by virtue of factors such as size, nature, and location. The proposed development is therefore not environmental impact assessment development and therefore an **Environmental Impact Assessment is not required**.

#### **4. The Site's former Planning History**

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- 4.1. A review of Ashford Borough Council's online planning search 'Planning Information Map Viewer' shows that no previous planning applications have been made on the application site.
- 4.2. In addition, we note that the site is adjacent to the Chilmington Green development which gained outline consent in January 2017 (12/00400/AS) for up-to 5,750 dwellings.

#### **5. Planning Policy Framework:**

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- 5.1. The relevant planning policy framework for the assessment of these development proposals include:
  - a) Planning Practice Guidance (PPG) and National Planning Policy Framework 2018 (NPPF),
  - b) Ashford Local Plan to 2030 - Adopted in February 2019,
  - c) Ashford Borough Council Supplementary Planning Documents (SPDs),
- 5.2. These policies are discussed in detail below.
  - a) Planning Practice Guidance and National Planning Policy Framework 2018**
- 5.3. The revised National Planning Policy Framework (NPPF) was published in February 2019, and sets out the Government's overriding planning policies, and framework on which Council's should produce their Local Plans. The intention of the document is to simplify and streamline the planning process to facilitate an increased growth in sustainable development.
- 5.4. This is expressed in terms of having three dimensions, the economic, the social and environmental. All planning applications need to be assessed against each dimension to ensure that they will deliver sustainable development.

- 5.5. Paragraph 11 confirms that plans and decisions should apply a ‘presumption in favour of sustainable development.’ It adds that for decision-taking this means:
- approving development proposals that accord with an up-to-date development plan without delay; or
  - where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
    - i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
    - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.
- 5.6. The NPPF advises in respect of paragraph (d) ( in footnote 8) that a Council’s policies should be considered to be out of date in the case of applications for housing development “where the local planning authority cannot demonstrate a five year supply of deliverable housing sites (with the appropriate buffer, as set out in paragraph 74); or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years”. The Council has acknowledged ( for example in its evidence to the Planning Inquiry into the refusal of planning permission for residential development of the Appledore Site in Tenterden (REF: APP/E2205/W/21/3284479 ) that it cannot currently demonstrate a 5-year supply of housing land . The so-called ‘tilted balance’ in NPPF para 11(d) is therefore engaged
- 5.7. The Framework policies referred to in paragraph (d) (i) are those relating to habitats sites; Sites of Special Scientific Interest; Green Belt; Local Green Space; Areas of Outstanding Natural Beauty; National Park; Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest ); and areas at risk of flooding or coastal change.
- 5.8. Section 5 of the NPPF is concerned with the supply of homes. Paragraph 59 makes it clear that:
- ‘To support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.’*
- 5.9. Paragraph 70 makes it clear that:
- ‘Where an allowance is made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends.’*
- 5.10. Paragraph 71 states that local planning authorities should support the development of entry-level exception sites, suitable for first time buyers (or those looking to rent their first home), unless the need for such homes is already being met within the authority’s area. These sites should be on land which is not already allocated for housing and should comprise of entry level homes that offer one or more types of affordable housing and be adjacent to existing settlements.
- 5.11. Local Authorities should use their evidence base to ensure that Local Plans meet their full, objectively assessed needs for market and affordable housing in the housing market area. Local Authorities should identify and update annually a supply and specific deliverable site sufficient to provide five years’ worth of housing, against their housing requirements, with an additional buffer of 5% or 20% where there has been a record of persistent under delivery of housing. Paragraph 73 states:
- ‘Strategic policies should include a trajectory illustrating the expected rate of housing delivery over a plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites. Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their housing requirement set out in adopted strategic policies, or against their housing need where the*



strategic policies are more than five years old. The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:

- a) 5% to ensure choice and competition in the market for land; or
- b) 10% where the local planning authority wishes to demonstrate a five-year supply of deliverable sites through an annual position statement or a recent adopted plan, to account for any fluctuations in the market during that year; or
- c) 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply.’

5.12. NPPF Annex 2 Glossary defines Deliverable as:

*‘To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. Sites that are not mayor development, and sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (e.g. they are no longer viable, there is no longer a demand for the type of units or sites have a long-term phasing plans). Sites with outline planning permission, permission in principle, allocated in the development plan or identified on a brownfield register should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.’*

5.13. The NPPF looks to promote sustainable transport, places great importance upon the design of the built environment, promotes effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy and safe living conditions.

5.14. This planning statement will demonstrate how the requirements of the NPPF are met.

#### **b) Ashford Local Plan 2030 – Adopted February 2019**

5.15. The Ashford Borough Local Plan 2030 was adopted on 21 February 2019 and covers the period from 2011 to 2030. The overall housing target for the borough within the period is 16,872 dwellings. Factoring in completions since 2011, this figure is reduced to 13,118 between 2018 and 2030. The overall breakdown of this figure is shown in Table 1 below.

Table 1 – The Overall Housing Profile

<b>Objectively Assessed Need</b>	<b>16,872</b>
Delivered since 2011	3,754
<b>Residual Requirement (2018-2030)</b>	<b>13,118</b>
Extant commitments (previously allocated sites with permission)	3,064
Extant windfalls*	875
Chilmington Green	2,500
Future Unidentified Windfalls	1,000
Local Plan Allocations	5,889
Neighbourhood Plan Areas	216
<b>TOTAL</b>	<b>13,544</b>
Contingency buffer	426

\*Those not started have been reduced by 25% to account for potential non-delivery with the exception of Tilden Gill, Tenterden

5.16. Policy SP2 sets out the Strategic Approach to Housing Delivery and identifies the housing requirements for the Borough between 2018 and 2030. The majority of the housing requirements are provided through extant commitments and proposed allocations, but it is clear that there is a need for windfall sites to come forward to meet the Overall Housing Profile figure of 13,118 dwellings.

5.17. Policy SP1 sets out the Strategic Objectives for the plan and makes it clear that:

*'To deliver the 'vision', a number of strategic objectives have been identified. They form the basis of this Local Plan's policy framework, as well as providing the core principles that planning applications are expected to adhere to.*

- a) *To focus development at accessible and sustainable locations which utilize existing infrastructure, facilities, and services wherever possible and makes best use of suitable brownfield opportunities,*
- b) *To conserve and enhance the Borough's natural environment including designated and undesignated landscapes and biodiversity and promote a connected green infrastructure network that plays a role in managing flood risk, delivers net gains in biodiversity and improves access to nature,*
- c) *To conserve and enhance designated and non-designated heritage assets and the relationship between them and their setting in a way that promotes distinctive places, proportionate to their significance. Place-based heritage will be a key principle underpinning design and spatial form of development,*
- d) *To create the highest quality design, which is sustainable, accessible, safe and promotes a positive sense of place through the design of the built form, the relationship of buildings with each other and the spaces around them, and which responds to the prevailing character of the area,*
- e) *To ensure development is supported by necessary social, community, physical and e-technology infrastructure, facilities, and services with any necessary improvements brought forward in a coordinated and timely manner,*
- f) *To promote access to a wide choice of easy-to-use forms of sustainable transport modes including bus, train, cycling and walking to encourage as much non-car-based travel as possible and to promote healthier lifestyles,*
- g) *To provide a mix of housing types and sizes to meet the changing housing needs of the Borough's population including affordable homes, self-build and custom build properties, specialist housing for older and disable people, accommodation to meet the needs of the Traveller community, spacious, quality family housing and for newly forming and downsizing households,*
- h) *To provide a range of employment opportunities to respond to the needs of business, support the growing population and attract inward investment; and*
- i) *To ensure new development is resilient to and mitigates against the effects of climate change by reducing vulnerability to flooding, promoting development that minimizes natural resources and energy use, reduces pollution, and incorporates sustainable construction practices, including water efficiency measures.'*

5.18. Policy SP2 is stated below:

*'A total housing target of 13,118 net additional dwellings applies for the Borough between 2018 and 2030. In order to achieve this target, additional housing sites are proposed to provide choice and competition in the market up to 2030.'*

*'The housing target will be met through a combination of committed schemes, site allocations and suitable windfall proposals.'*

*'The majority of new housing development will be at Ashford and its periphery, as the most sustainable location within the Borough, based on its range of services and facilities, access to places of employment, access to public transport hubs and a variety of social and community infrastructure available. With this in mind, in addition to existing commitments, new land allocations to deliver 4,872 dwellings are proposed.'*

*'Development in the rural areas will be of a scale that is consistent with the relevant settlement's accessibility, infrastructure provision, level of services available, suitability of sites and environmental sensitivity. With this in mind, in addition to existing commitments, new land allocations to deliver 1,017 dwellings are proposed.'*

*'Windfall housing development will be permitted where it is consistent with the spatial strategy outline above and is consistent with other policies of this Local Plan, in order to ensure that sustainable development is delivered.'*

*'For the purposes of calculating 5-year housing land, the shortfall in housing delivery between 2011 and 2018 shall be rectified over a 7-year period to 2025 at an average of 352 dwellings per annum. Over this period, this figure should be added to the annualized OAN\* requirement to provide an annual housing target of 1240 dwellings plus any relevant buffer. From 2025 onwards, the housing requirement should then reflect the annualized OAN\* requirement plus any relevant buffer.'*

*\*'Objectively Assessed Housing Need'.*

- 5.19. Policy HOU1 Affordable Housing states that the Council will require the provision of affordable housing on all schemes promoting 10 dwellings or more (and on sites of 0.5 hectares or more), with provision being not less than the area specific requirements set out in the following table. All proposals are expected to meet their full affordable housing provision on-site.

Area	Affordable/Social Rented Requirements (% of total dwellings)	Affordable Home Ownership Products (% of total dwellings)	Total affordable housing requirements (% of total dwellings)
Ashford Town (Zone A)	0%	20% (including a minimum of 10% shared ownership)	20%
Ashford Hinterlands (Zone B)	10%	20% (including a minimum of 10% shared ownership)	30%
Rest of Borough (Zone C)	10%	30% (including a minimum of 20% shared ownership)	40%

- 5.20. Policy HOU5 – Residential Windfall Development in the Countryside states:

*'Proposals for residential development adjoining or close to the existing built-up confines of the following settlements will be acceptable:*

*'Ashford, Aldington, Appledore, Bethersden, Biddenden, Brabourne Lees/Smeeth, Challock, Charing, Chilham, Egerton, Great Chart, Hamstreet, High Halden, Hotfield, Kingsnorth\*, Mersham, Pluckley, Rolvenden, Shadoxhurst, Smarden, Tenterden (including St Michaels), Wittersham, Woodchurch and Wye.'*

*\*Existing Kingsnorth village*

*Providing that each of the following criteria is met:*

- a) *The scale of development proposed is proportionate to the size of the settlement and the level, type and quality of day-to-day service provision currently available, and commensurate with any planned allocations in this Local Plan and committed development, in liaison with service providers,*
- b) *The site is within easy walking distance of basic day to day services in the nearest settlement, and/or has access to sustainable methods of transport to access a range of services,*
- c) *The development is able to be safely accessed from the local road network and the traffic generated can be accommodated on the local and wider road network without adversely affecting the character of the surrounding area,*
- d) *The development is located where it is possible to maximise the use of public transport, cycling and walking to access services,*

- e) *The development must conserve and enhance the natural environment and preserve or enhance any heritage assets in the locality; and,*
- f) *The development (and any associated infrastructure) is of a high-quality design and meets the following requirements: -*
  - i. *it sits sympathetically within the wider landscape,*
  - ii. *it preserves or enhances the setting of the nearest settlement,*
  - iii. *it includes the appropriately sized and designed landscape buffer to the open countryside,*
  - iv. *is consistent with local character and built form, including scale, bulk and materials used,*
  - v. *it does not adversely impact on the neighbouring uses or a good standard of amenity for nearby residents,*
  - vi. *it would conserve biodiversity interests in the site and / or adjoining area and not adversely affect the integrity of international and national protected sites in line with Policy ENV1.*

5.21. Other policies that are relevant to the determination of this application are also considered below, and this statement will demonstrate how the requirements of the relevant policies of the Ashford Borough Local Plan 2019 are to be complied with.

### **c) Ashford Borough Council Supplementary Planning Documents (SPDs)**

5.22. Ashford Borough Council has the following Adopted Supplementary Planning Documents (SPDs) that are relevant to the proposals, as listed below:

- i. Affordable Housing SPD,
- ii. Landscape Character SPD;
- iii. Residential Parking SPD;
- iv. Sustainable Design and Construction SPD
- v. Sustainable Drainage (SuDs) SPD;
- vi. Residential Space and Layout SPD;
- vii. Public Green Spaces and Water Environment SPD;
- viii. Dark Skies SPD 2014;
- ix. Fibre to the Premises SPD;
- x. Chilmington Green Design Code SPD;

## **6. Other Material Considerations**

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### **a) The Strategic Housing and Employment Land Availability Assessment**

- 6.1. The land north of Possingham farmhouse (application site) has been considered as part of the Strategic Housing and Employment Land Availability Assessment (SHELAA) dated 2017/2018.
- 6.2. The site has a SHELAA reference no of **GCS5**.
- 6.3. At the time of the assessment, it was stated that ‘the site is not suitable at present but may be in the future’ and ‘The site is isolated from any major housing development and therefore possesses a very limited access to services.’ However, in the long term, once development has commenced on the Chilmington Green area, this site may have potential for development as there are no environmental constraints.’
- 6.4. The site was removed at Part 3 Screening and in summary it was stated that the site is ‘Available, Suitable, Developable, but not achievable.’ This statement is no longer appropriate, and the reasons are discussed in Section 7 (Planning Application Assessment) of this statement.

## **b) Annual Position Statement - 5-year Housing Land Supply Update July 2021 (2021-2026)**

- 6.5. The annual update to the five-year housing land supply (5YHLS) for Ashford Borough up to the 31st July 2021 sets out the calculations and assumptions for housing requirements and the approach taken in calculating the housing land supply. It provided a breakdown of sites contributing to the supply and the evidence required to demonstrate the sites are deliverable.
- 6.6. The following statements are included in the 5YHLS report:

*'The housing land supply calculations are based upon the monitoring year 1st April 2020 – 31st March 2021 but includes site updates up to July 2021. This land supply update therefore covers the period **July 2021 to June 2026.**'*

*'The update shows that the Council is able to demonstrate a housing land supply position of **4.54 years.**'*

*'This figure includes the 5% buffer requirement, as stipulated by Government. In total, the 4.54 position equates to deficit of 664 dwellings to that need to achieve 5.0 years over the next five-year period.'*

*'The five-year requirement is based upon the housing requirement for the Borough established by the Ashford Local Plan 2030 adopted in February 2019. This gave a total 16,872 dwelling figure for plan period of 2011 to 2030, which leads to an annual requirement of 888 dwellings per year.'*

*'The Local Plan 2030 identifies a housing shortfall of 2462 dwellings between 2011 and 2018. To rectify, and claw back, this housing shortfall a seven-year timeframe was established in the Plan (between 2018 and 2025).'*

*'Given that the current five-year housing land supply now runs until 2025, there is only a five-year period in which to 'claw back' the total residual housing shortfall figure from 2011.'*

*'As of July 2021, this housing shortfall figure stands at **2412 dwellings**. This has been derived from the:*

- 2462 dwellings shortfall between 2011 and 2018.
- 8 dwellings shortfall from 2018/2019'
- 142 dwellings shortfall from 2019/2020
- Subtracting the "over-delivery" of 200 dwellings in 2020/2021 (As set out in Housing Delivery & Land Supply PPG Paragraph: 032 Reference ID: 68-032-20190722)

*'This equates to an average additional 'requirement' of 483 dwellings per year, over the next five years, in order to maintain at least a five-year housing land supply figure for the Borough.'*

## **c) Local Development Framework Core Strategy July 2008 (GBD04)**

- 6.7. Although the Local Development Framework Core Strategy July 2008 has now been superseded it is referenced as a background document in support of the Ashford Local Plan 2030. For example, within the 'Distribution of Housing Development' section the following statements are made:

*'Historically, larger scale residential development in the Borough has been targeted towards the town of Ashford. All recent iterations of previous Local Plans, County Structure Plans and the South-East Regional Plan gave clear and distinctive spatial guidance that focused growth towards Ashford and its immediate surroundings whilst applying a policy of limited growth to Tenterden and the main villages in the borough.'*

*'In some instances, such as the Core Strategy 2008, there have been separate and distinctive housing growth targets for Ashford and the 'rest of borough; respectively. This recognised both Ashford town's role as an economic hub in the wider south east region and the Borough, as well as the need to protect the more sensitive nature of the rural area.'*

*'The abolition of regional planning and the introduction of the NPPF and PPG changes the higher-level context fundamentally. There is no longer a higher-level plan that pre-determines the amount of development each part of the Borough should deliver. However, it is clear that, in principle, the strategic spatial objectives of the previous approach are sound in planning terms and represent a policy approach that clearly resonates with the NPPF and its desire to deliver sustainable development.'*

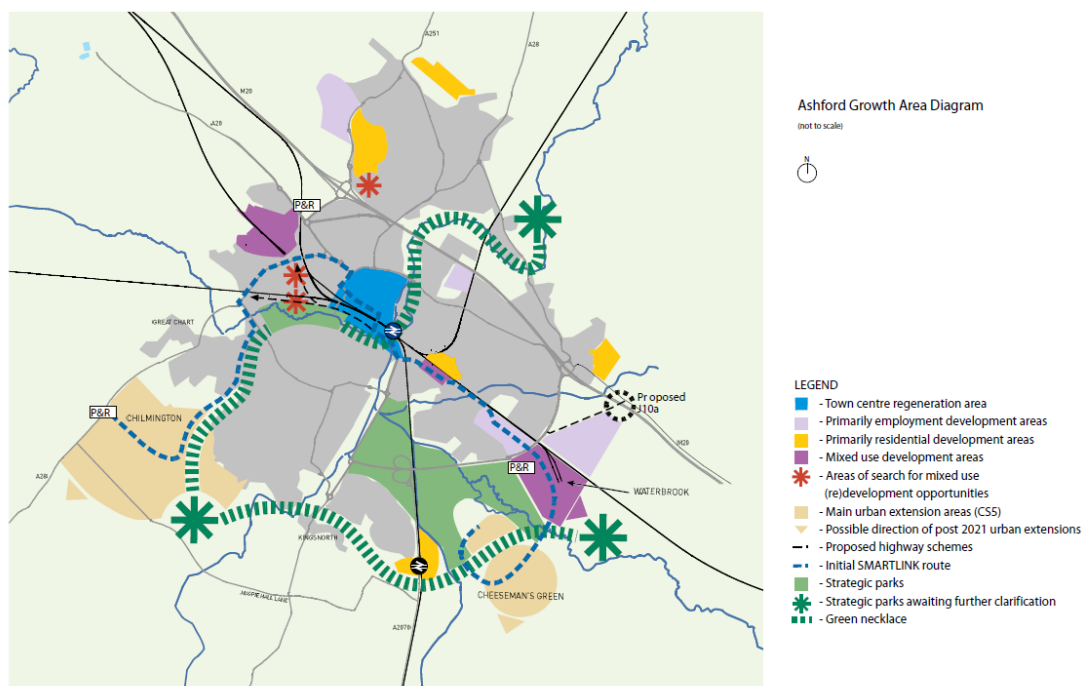
- 6.8. The statements above confirm that the principles and spatial objectives contained in the Core Strategy were still considered to be sound in planning terms and to resonate with NPPF and its desire to deliver sustainable development when the Local Plan was adopted in February 2019. That remains the case
- 6.9. The Chilmington Green (Main Urban Extension) was referenced as CS5 in the Core Strategy and the area is shown in light brown on Figure 2 below.
- 6.10. Policy CS5: Ashford Urban Extensions, identifies two major new developments areas at Chilmington Green/Discovery Park and Cheeseman's Green/Waterbrook. It requires the Chilmington Green area to be planned to accommodate no less than 3,350 dwellings and 600 jobs by 2021 and have the potential for over 7,000 dwellings and about 1,000 jobs in total.
- 6.11. The development of these areas should be planned and implemented in a comprehensive way that is linked to the delivery of key infrastructure. Area Action Plans will be produced to guide the detailed planning of the areas, supplemented where needed by development briefs and design codes.

Policy CS5: Ashford Urban Extensions states:

*'With immediate effect, major new development areas are proposed at Chilmington Green/Discovery Park and Cheeseman's Green/Waterbrook. In addition, a third area will be identified and formally adopted no later than 2014. The location of this area will be established in an early review of the Core Strategy.'*

*'The Chilmington Green/Discovery Park area should be planned to accommodate no less than 3.350 dwellings and 600 jobs by 2021 and has the potential for over 7,000 dwellings and about 1,000 jobs in total.'*

- 6.12. The Core Strategy key principles for the Ashford Growth Area as shown below (Figure 2) and have remained unchanged.



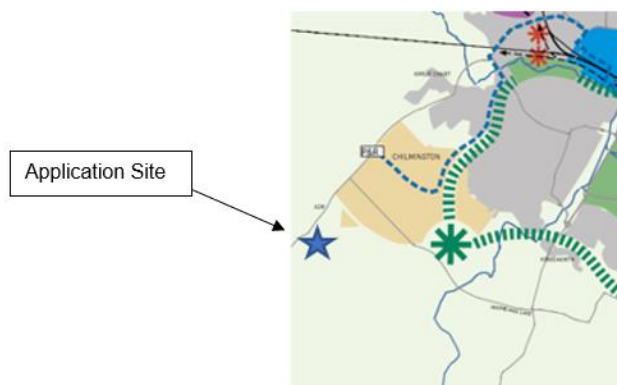
- 6.13. It is also noted that the Ashford Growth Area Diagram clearly shows that the Chilmington Green Development could extend to the west (that is to include the application site ) as indicated by the arrow pointer.
- 6.14. Although the Chilmington Green Area Action Plan adopted on 18th July 2013 only provides for an allocation of up to 5750 for the Action Plan Area which adjoins the Application Site it is evident from paragraphs 4.5 to 4.13 which discuss the quantum of development that the reduction from the 7,000 proposed in the Core Strategy was not based on any specific concerns about capacity constraints or landscape impact but simply reflected the Council's general sense of what could be delivered on that Area. This is not accepted by the Applicant but in any event, there is nothing to suggest however that an acceptable scheme could not be brought forward to accommodate an additional 655 units on the application site to extend the Development at Chilmington Green in the manner contemplated by the Core Strategy. As noted above the 2017/2018 SHELAA confirmed that "this site may have potential for development as there are no environmental constraints."

## 7. Planning Application Assessment

- 7.1. This outline application seeks approval for the development of up to 655 residential dwellings (including 30% affordable dwellings) provision of new roads, footpaths, installation of appropriate utilities infrastructure, car parking spaces, landscaping, and private amenity space, within land north of Possingham Farmhouse, Ashford Road, Great Chart, Ashford.
- 7.2. This section considered the aims and objectives of the national and local government guidance, of which the key issues to considered in determining this application are listed below:
- i. Location and Deliverability,
  - ii. The principle of development in terms of the Ashford Local Plan 2030, specifically Policy HOU5,
  - iii. Principles of Development in accordance with Policy SP1,
  - iv. Principles of Development in accordance with Policy SP2 (Strategic Approach to Housing Delivery),
  - v. 5 Year Housing Supply in Ashford,
  - vi. Affordable Housing needs of the Borough,
  - vii. Other policies contained in the Ashford Local Plan 2030.
  - viii. Stodmarsh Ramsar.

### i. Location and Deliverability

- 7.3. The proposed development site adjoins the Chilmington Green urban extension development (12/00400/AS) to the north-west corner of the site. The proposed development is also connected to the Phase 1 mitigation land as shown on drawing 00122-SK29 Detailed Masterplan Phase 1, approved under planning reference 12/00400/CONA/AS dated 26 September 2017.
- 7.4. The proposed site location is shown as part of the Chilmington Green urban extension area Figure 2 Plan (shown as a light brown arrow) and states in the key 'possible direction post 2021 of urban extensions. The location of the proposed development site was to be included as part of Policy CS5 and brought forward post 2021 (The arrow is directly pointing west to the location of the proposed development).



- 7.5. At the time of the Strategic Housing and Employment Land Availability Assessment (SHELAA) for the proposed site (reference GCS5) stated that the site was available, suitable, and developable but not available.
- 7.6. The Applicant can confirm that the site is now available, and the surrounding infrastructure has been completed. There are no substantial infrastructure requirements to prevent the site from starting as soon as practically possible after the grant of planning permission housing and the scheme will be delivered within five years.
- 7.7. The proposed development site is owned by the applicant and the site would start as soon as practically possible after the grant of planning permission. The site is available for development, is suitable for development, and can provide a valuable contribution to the Councils housing supply, and facilitate a number of economic, social, and environmental benefits.
- 7.8. The site is suitable for development and meets the tests of deliverability as set out in the NPPF.

**ii. Principles of Development in accordance with the criteria of HOU5**

- 7.9. The principles of development in accordance with Policy HOU5 (a to f) are considered in detail below.

**Policy HOU5 a)**

*‘The scale of development proposed is proportionate to the size of the settlement and the level, type and quality of day-to-day service provision currently available, and commensurate with any planned allocations in this Local Plan and committed development, in liaison with service providers;’*

- 7.10. The proposed developments scale is not substantial when considered against the size of the approved Chilmington Green settlement of 5,750 dwelling (11.39% compared to Chilmington Green) and will benefit from the service provisions provided within the Chilmington Green scheme.
- 7.11. The proposed development does not have any restriction on service provisions and is a natural extension to the Chilmington Green scheme. The strategic services are in place and connections to the site are readily available.
- 7.12. As detailed above Policy CS5 Ashford Urban Extensions within the Core Strategy July 2008 stated the following:

**‘Policy CS5: Ashford Urban Extensions’**

*‘The Chilmington Green/Discovery Park area should be planned to accommodate no less than 3,350 dwellings and 600 jobs by 2021 and has the potential for over 7,000 dwellings and about 1,000 jobs in total.’*

- 7.13. It is acknowledged that the Core Strategy has been superseded by the Adopted Local Plan 2030, but the overall numbers of dwellings within the outline consent (5,750 dwellings) and this application site (655 dwellings) equate to a total of 6,405 dwellings which is still below the the overall 7,000 dwellings stated in the Core Strategy. The size of the application site is proportionate for the Site’s location.

**Policy HOU5 b)**

*‘The site is within easy walking distance of basic day to day services in the nearest settlement, and/or has access to sustainable methods of transport to access a range of services;’*

- 7.14. The proposed development connects to the Chilmington Green settlement and will have easy walking distance to the basic day to day services located within the District Centre and Orchard Village Local Centre.
- 7.15. The Access Strategy Parameter Plan and Design and Access Statement show the main pedestrian and cycle path routes that will link in to the existing and proposed routes within the Chilmington Green scheme and surrounding countryside.



- 7.16. The bus service proposals within Chilmington Green will be extended to include the proposed development and this can be provided through a suitable s106 agreement contribution.
- 7.17. During the consultation period and application assessment process, the applicant is willing to discuss the specifics of the section 106 legal agreement and any likely contributions required with the Council.

**Policy HOU5 c)**

*'The development is able to be safely accessed from the local road network and the traffic generated can be accommodated on the local and wider road network without adversely affecting the character of the surrounding area;'*

- 7.18. The development will be safely accessed from the local road network via the proposed Access C Roundabout. There will be a secondary access located on the A28 that will be like the access arrangements provided at the Chilmington Green scheme.
- 7.19. The traffic generated from the development will be assessed on the local and wider road network, but the character of the surrounding area is unlikely to be affected.
- 7.20. The Applicant would like to work with the Highway Authority to agree the appropriate strategy as part of the consultation process. Part of the strategy will be to assess what the application sites impact may be (if any) on the approved A28 improvement scheme. The Applicant confirms that they are willing to look at the opportunities to either bring forward the delivery of the A28 improvements works (currently set at 400 occupations at Chilmington Green) or additional improvements if any negative impacts are identified as part of the transport modelling assessment.
- 7.21. During the consultation period and application assessment process, the Applicant is willing to discuss the specifics of the section 106 legal agreement and any likely contributions required with the Council.

**Policy HOU5 d)**

*'The development is located where it is possible to maximise the use of public transport, cycling and walking to access services;'*

- 7.22. The development will connect in to the existing and proposed cycleways and footpath links providing good connectivity for walking and cycling access to services. The footpath and cycle links will directly access the use of public transport.

**Policy HOU5 e)**

*'The development must conserve and enhance the natural environment and preserve or enhance any heritage assets in the locality;*

- 7.23. The Built Heritage Statement conclusion states:

*'The Site at present does not provide a clear or obvious understanding of the distinct architectural or historic interest of any of the relevant built heritage assets because there is very limited inter-visibility.'*

*'The proposed development is considered to represent a proportionate and appropriate development that suitably responds to the Site's proximity to relevant built heritage assets. The proposed development is considered to incur only a very low degree of harm, at the lowest end of the spectrum of less than substantial harm, to the significance of Possingham Farmhouse through the general erosion of its wider agricultural landscape setting. No potential adverse impacts have been identified in relation to the Lodge Place group of listed buildings.'*

*'This assessment is sufficient with respect to Paragraph 189 of the NPPF to inform a decision on the suitability of the development proposals in regards to Built Heritage. It also demonstrates that the*

*proposed development conforms with section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and relevant and local planning policies.'*

- 7.24. The site landscape proposals look to introduce a buffer strip to the southwest boundary to reinforce the screening and landscape setting in this area. As set out in paragraph 202 of the NPPF this very modest harm must be weighed against the substantial benefit of the provision of 655 homes when the Council has an acknowledged and significant housing shortfall.

**Policy HOU5 f)**

*'The development (and any associated infrastructure) is of a high-quality design and meets the following requirements:*

- i. It sits sympathetically within the wider landscape,*
- ii. It preserves or enhances the setting of the nearest settlement,*
- iii. It includes the appropriately sized and designed landscape buffer to the open countryside,*
- iv. Is consistent with local character and built form, including scale, bulk and materials used,*
- v. It does not adversely impact on the neighbouring uses or a good standard of amenity for nearby residents,*
- vi. It would conserve biodiversity interests in the site and / or adjoining area and not adversely affect the integrity of international and national protected sites in line with Policy ENV1.'*

- 7.25. The Design and Access Statement (DAS) and Landscape and Visual Impact Assessment (LVIA) explain how a landscape led approach has been adopted toward the proposed development, taking account of the topography, existing landscape features, the existing and proposed character of the surrounding area and the site in relation to the wider countryside. The intention is to retain as much of the existing field hedgerows as possible and look to reinforce the landscape feature with the introduction of buffer strips.

- 7.26. The Design and Access Statement 'Landscape Strategy' section states the following.

*'The specific objectives for the detailed landscape strategy are to:*

- Retain the majority of the existing vegetation and boundary trees on and adjacent to the Application Site and to integrate these elements with the parameter masterplan proposals.*
- Enhance existing boundaries of the Site to integrate the Proposed Development into the surrounding countryside.*
- Maximize opportunities for habitat creation and wildlife preservation.*
- Protect the visual amenity of adjoining properties and integrated development into the existing and proposed townscape to the north; and*
- Maintain open areas in appropriate locations in order to maximize the contribution of greenspace to the Proposed Development and the wider visual amenity of the Site.*

*'The overall Landscape Strategy comprised a network of accessible open spaces running through and around the built compartments including a linear park with ponds and amenity recreational areas to the east. A central green spine running north to south throughout the site with greenway links to the western buffer zones, in total enabling a Green Network across the site area which connects with the wider landscape and footpath network to the south and east. This Green Network not only contributes to the creation of a sustainable scheme that can be designed in line with best practice, but it also contributes to creating a setting that is conducive to encouraging healthy living and proving for all activities as part of family life.'*

iii. **Principles of Development in accordance with Policy SP1 (a to i)**

7.27. To deliver the Local Plan 'vision' SP1 states the strategic objectives, which form the policy framework and core principles that planning applications are expected to adhere to.

a. *'To focus development at accessible and sustainable locations which utilize existing infrastructure, facilities and services wherever possible and makes best use of suitable brownfield opportunities.'*

7.28. The proposed development is within a sustainable location and will utilise the infrastructure facilities and services delivered as part of the Chilmington Green Scheme.

7.29. The application site is the missing section of the Chilmington Green 'Garden Village Development'.

b. *'To conserve and enhance the Borough's natural environment including designated and undesignated landscapes and biodiversity and promote a connected green infrastructure network that plays a role in managing flood risk, delivers net gains in biodiversity and improves access to nature.'*

7.30. The Design and Access Statement 'Ecological Enhancements in the Landscape' section states the following.

*'The proposals will change an area of agricultural landscape into a semi-urbanized area with areas of greenspace maintaining corridors to the open countryside.'*

*'It is intended that ecological mitigation will be undertaken through the provision of green space within the development and by structural tree and hedgerow planting and the creation of managed grasslands.'*

*'Where possible the secondary landscape of the development will be designed to provide wildlife habitat, including the use of plants known to be of value to wildlife. The SuDS will provide occasional new wetland habitat, ultimately forming a network within the site and possible habitat links relevant to the wider landscape.'*

*'Other aspects of the development, such as site lighting, will be designed to minimize impacts on wildlife.'*

*'Existing trees and hedgerows surrounding the site will be retained and enhanced with new native (locally indigenous) tree and shrub planting.'*

*'Around the swales, lagoons and throughout the wider areas of open space, log piles and hibernacula will be created to encourage invertebrates, reptiles, and amphibians. Bird and bat boxes will be located on selected mature trees as defined in the Ecological Assessment'*

*'Overall, ecological enhancements will provide in excess of 10% Biodiversity Net Gain across the communal, site wide green spaces. It is also anticipated that individual back garden enhancements will also provide BNG as the development matures.'*

7.31. A Landscape and Visual Impact Appraisal (LVIA) has been prepared by Neil Tully Associates.

7.32. The LVIA considers both effects on landscape and effects on visual amenity. A desktop study has been undertaken to document existing landscape character assessments, landscape designations, relevant policies as well as location of potential visual receptors in relation to the site. This was followed by a site visit where local landscape character was assessed against existing written documentation and a series of viewpoints established and documented with photographs. The following is the summary of the findings.

LANDSCAPE EFFECTS

*'Regarding the landscape character, the site lies within National Landscape Area (LCA) 120 Wealden Greensand with the site set within the developing urban fringe of Ashford. At the local district level, the site falls within landscape character area BF5a 'Chilmington Open Arable with Remnants' which is*

described as being of 'ordinary' quality and of 'medium' to 'low' sensitivity, (Ashford LDF Landscape Character Study, Studio Engleback 2005).'

'Effects on landscape character would remain localised, considering that:

- a) the new development would be sensitive to the emerging built environment and resulting landscape character, representing a natural extension to the Chilmington Green masterplan.
- b) existing landscape features to the boundary are retained and enhanced wherever possible, as well as
- c) new landscape and ecological features are implemented so that site biodiversity is increased and ex-change between the site and other habitats in the site's surroundings is improved. This principle is particular pertinent in respect of the current denuded and degraded nature of the existing hedgerow structure which would be significantly improved by the proposals.

### VISUAL EFFECTS

'Visual effects were assessed from the A28 to the west, and the Public Rights of Way to the east and south. Additional views from the locally high ground at Great Chart Ridge (which defines the visual envelope in this location). Viewpoints were selected as being most typical of those available from the locally accessible area and conform with those undertaken in respect of the Chilmington Green assessment undertaken in 2012, (Grontmij, 'Chilmington Green Urban Extension: Landscape & Visual Impact Assessment for AAP, February 2012')

'Due to the Site's topographical position, existing vegetational cover, and the long-term screening that would be provided by the building out of the Chilmington Green permitted development, visual effects will be largely limited to local views only. Closer views from the byway, AW245, and the Ashford Road, A28 would be the most effected but also have excellent potential for the mitigation of effects. Thus, after mitigation such as careful consideration of building heights, sensitive layout design, and enhanced boundary planting has been considered, and structural planting has reached a level of maturity (at around 15-20 years) any remaining effects are expected to reduce to MINIMAL and SLIGHT ADVERSE or NEUTRAL for views along the byway and in worse case, MODERATE and SLIGHT ADVERSE for the more open views from the A28.'

### CONCLUSION

'Overall, the impact of the proposed development on landscape and visual character is expected to be localised and low. The biggest effect would stem from the change of use from extensive (and denuded) agriculture to residential. This change has detrimental effects in the shorter term (such as the building work involved during the construction phase) but also positive effects in the longer term (15 to 20 years after completion) and upon the maturing of the advanced and structural planting, and through the implementation of ecological features, enhancement of existing vegetation and introduction of additional, native species.'

'The developed site will be viewed as a natural and positive extension to the developing Chilmington Green masterplan, providing a greened and low density setting for travellers approaching Ashford from the south.'

- c. 'To conserve and enhance designated and non-designated heritage assets and the relationship between them and their setting in a way that promotes distinctive places, proportionate to their significance. Place-based heritage will be a key principle underpinning design and spatial form of development.'

7.33. A desk-based Archaeological Assessment dated October 2020 has been prepared for the development which states.

'In terms of designated archaeological asset, no World Heritage Sites, Scheduled Monuments, Historic Wrecks or Historic Battlefields lie within the study site.'

'Given the perceived archaeological potential of the study site and past post-depositional impacts, the proposals are considered unlikely to have a widespread, negative archaeological impact.'

- d. 'To create the highest quality design, which is sustainable, accessible, safe and promotes a positive sense of place through the design of the built form, the relationship of buildings with each other and the spaces around them, and which responds to the prevailing character of the area.'

7.34. The Design and Access Statement states the following;

'Urban Design'

*'The principles established in the spatial strategy have been developed into a suggestion as to how the built form can define these routes and spaces. Key frontages and focal buildings identify routes, frame views and create legibility for the layout.'*

*'These include identification of key viewpoints which in turn gives rise to consideration of focal buildings and key frontages within the development. Though the layering of these design considerations, wayfinding elements can be created based on the unique attributes of the site which helps create a true sense of place.'*

'Character Areas'

*'The development concept sets out four main character areas with distinct features and varied landscaping, building heights, density, architectural styles, and street hierarchy to create a legible development with unique identity whilst incorporating vibrant local character.'*

*'Character areas have been informed by the site boundaries, as each area addresses a different aspect of adjacent land. As a result, the character areas have been carefully designed to respond to the variety of land uses around the site.'*

- e. 'To ensure development is supported by necessary social, community, physical and e-technology infrastructure, facilities and services with any necessary improvements brought forward in a coordinated and timely manner.'

7.35. The timing of the social and community infrastructure will be coordinated with the residential areas of development occupation, thus providing early sub phase completions to each character area.

7.36. It is confirmed that the proposed development will deliver 'fibre to the premises' (FTTP) in accordance with the Councils SPD.

- f. 'To promote access to a wide choice of easy-to-use forms of sustainable transport modes including bus, train, cycling and walking to encourage as much non-car-based travel as possible and to promote healthier lifestyles.'

7.37. The development proposals will be connected to primary and secondary road networks. The applicant will work with the Borough and County Council to consider the developments impact on the existing networks and explore the delivery of mitigation measures to reduce the impact in accordance with **Policy TRA8**.

7.38. The Applicant will consider whether modal shift in favour of public transport can be achieved through existing bus services or improvements to the network as a key determinant of the scheme's sustainability. This will be demonstrated through a Travel Plan, or Assessment.

- g. 'To provide a mix of housing types and sizes to meet the changing housing needs of the Borough's population including affordable homes, self-build and custom build properties, specialist housing for older and disable people, accommodation to meet the needs of the Traveller community, spacious, quality family housing and for newly forming and downsizing households.'

7.39. The proposed development will provide a mix of 1-to-5-bedroom dwellings with 30% affordable housing in accordance with the Local Plan HOU1 policy. The house types will be a different offering to Chilmington Green, providing a variety of new housing products within the new settlement area to meet the housing needs across the borough and will boost housing supply.

*h. 'To provide a range of employment opportunities to respond to the needs of business, support the growing population and attract inward investment; and'*

7.40. All new homes will be provided with Fibre to the Premises (FTTP) which will enable the new residents to work from home. The proposed development will provide employment opportunities throughout the construction phase and once completed local business will benefit from the needs of the new population.

*i. 'To ensure new development is resilient to and mitigates against the effects of climate change by reducing vulnerability to flooding, promoting development that minimizes natural resources and energy use, reduces pollution and incorporates sustainable construction practices, including water efficiency measures.'*

7.41. The proposed development will reduce the risk of flooding as proposed in the Flood Risk Assessment. Building Regulations (based on Part L 2013) provide the current requirements to improve the energy and water efficiency measures of buildings.

7.42. Secure by Design principles will be followed and all dwellings will be built in accordance with Part M4(1) of the building regulations.

7.43. High standards of environmental construction will be implemented which will include compliance with an approved Construction Environmental Management Plan (CEMP).

**iv. Principles of Development in accordance with Policy SP2**

7.44. Policy SP2 states that the majority of new housing developments will be at Ashford and its periphery, as they are the most sustainable location within the Borough, based on its range of services and facilities, access to places of employment, access to public transport hubs and a variety of social and community infrastructure available. The proposed development is situated on the periphery of Ashford and connected to the Chilmington Green urban extension which makes the site a sustainable location within Borough.

7.45. Policy SP2 states that Windfall housing development will be permitted where it is consistent with the spatial strategy and is consistent with other policies of the Local Plan, in order to ensure that sustainable development is delivered. The proposed development is sustainable and meets the requirements of the spatial strategy and the other policies of the Local Plan and will help reduce the housing shortfall.

7.46. Further consideration to the housing shortfall is provided below (5 Year Housing Supply in Ashford)

**v. 5 Year Housing Supply in Ashford,**

7.47. NPPF 'Maintaining supply and Delivery' states:

*Paragraph 73 'Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites. Local planning authorities should identify and update annually a supply of supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies<sup>1</sup>, or against their local housing need where the strategic policies are more than five years old<sup>2</sup>. The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:*

*a) 5% to ensure choice and competition in the market for land; or*

<sup>1</sup> For the avoidance of doubt, a five years supply of deliverable sites for travellers -as defined in Annex 1 to Planning Policy for Traveller Sites – Should be assessed separately, in line with the policy in that document.

<sup>2</sup> Unless these strategic policies have been reviewed and found not to require updating. Where local housing need is used as the basis for assessing whether a five year supply of specific deliverable sites exists, it should be calculated using the standard method set out in national planning guidance.

- b) 10% where the local planning authority wishes to demonstrate a five-year supply of deliverable sites through an annual position statement or recent adopted plan<sup>3</sup>, to account for any fluctuations in the market during that year; or
- c) 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply<sup>4</sup>

Paragraph 74 'A five year supply of deliverable housing sites, with the appropriate buffer, can be demonstrated where it has been established in a recently adopted plan, or in a subsequent annual position statement which:

- a. Has been produced through engagement with developers and other who have an impact on delivery, and been considered by the Secretary of State; and
- b. Incorporates the recommendations of the Secretary of State, where the position on specific sites could not be agreed during the engagement process.'

Paragraph 75 – 'To maintain the supply of housing, local planning authorities should monitor progress in building out sites which have permission. Where the Housing Delivery Test indicative that delivery has fallen below 95% of the local planning authority's housing requirement over the previous three years, the authority should prepare an action plan in line with national planning guidance, to assess the causes of under delivery and identify actions to increase delivery in future years.

- 7.48. The Council have recently published their annual update to the five-year housing land supply (5YHLS) for Ashford Borough up to the 31 July 2021 which confirms that the current housing supply position is 4.54 years, including a 5% buffer.
- 7.49. The shortfall figure stands at 2412 dwellings which equates to an average additional requirement of 483 dwellings per year, over the next five-year period in which to 'claw back' the total residual housing shortfall from 2011.
- 7.50. On page 3 of the 5YHLS annual update report under Section 2 (National Policy and Guidance) the Council has referred to paragraph 73 of the NPPF as follows:

*'(Report Paragraph 2.1) This update follows requirements and guidance set out in the National Planning Framework (NPPF) 2019 and National Planning Policy Guidance (PPG), the requirements of which are summarised below.'*

*'(Report Paragraph 2.2) Para 73 of the NPPF requires local planning authorities to annually identify and update, as a minimum, a five-year supply of housing at specific deliverable sites, which meet the housing requirements set out in the adopted strategic policies. A suitable buffer for the housing supply must also be demonstrated, this being either:*

- a) 5% to ensure choice and competition in the market for land; or
- b) 10% where the LPA wishes to demonstrate a five-year supply of deliverable sites through an annual position statement; or
- c) 20% where there has been significant under delivery of housing over the previous three years (where delivery below 85% of the housing requirement – Housing Delivery Test)

- 7.51. Within the 5YHLS annual update report 'Buffer' section it states the following:

*(Report Paragraph 3.8) 'The requirement for a buffer to be provided on the five-year requirement is set out at paragraph 73 of the NPPF and is based upon the Council's Housing Delivery Test results. As the Council's HDT 2019 stands at 90%\* (and not below 85%), a 5% buffer should therefore be applied.'*

<sup>3</sup> For the purposes of paragraphs 73b and 74 a plan adopted between 1 May and 31 October will be considered 'recently adopted' until 31 October of the following year; and a plan adopted between 1 November and 30 April will be considered recently adopted until 31 October in the same year

<sup>4</sup> From November 2018, this will be measured against the Housing Delivery Test, where this indicates that delivery was below 85% of the housing requirement.

(Report Paragraph 3.9) 'As per Government guidance, the five-year housing supply figure stipulated in this paper is based on the most recent HDT (2020). When a revised HDT is produced by Government in 2021, it may trigger a need to review this calculation. It should be noted that according to Council calculations, the authority is on course to achieve a HDT figure of 100% for years 2018/2019 – 2020/2021 and as such, a 5% buffer is likely to remain for next year (rather than the increased 20% penalty if below 85%).'

- 7.52. The Housing Delivery Test: 2020 Measurement accessible on the GOV.UK website shows that because Ashford have under delivered on homes over three years, the Council should commence with an action plan in accordance with Paragraph 75 of the NPPF. (Extract of the HDT shown below).

ONS Code	Area Name	Number of homes required			Total number of homes required	Number of homes delivered			Total number of homes delivered	Housing Delivery Test: 2020 measurement	Housing Delivery Test: 2020 consequence
		2017-18	2018-19	2019-20		2017-18	2018-19	2019-20			
E07000105	Ashford	753	888	813	2,454	591	881	746	2,218	90%	Action plan

- 7.53. The council was required to produce an Action Plan to identify the pattern of housing delivery in the borough and establish a series of actions to unlock any potential barriers to housing delivery.
- 7.54. The Housing Delivery Action Plan 2021 has been produced to understand the nature and pattern of housing delivery across the borough and identify a series of actions to unlock any potential barriers to housing delivery
- 7.55. In conclusion, the Possingham Farm development proposals will help reduce the housing shortfall by a significant number and assist the authority in meeting their housing target.

**vi. Affordable Housing needs of the Borough,**

- 7.56. The Local Plan 2030 sets out the council's requirements for affordable housing in new residential developments in Policy HOU1. An Affordable Housing Supplementary Planning Document (SPD) is to inform applicants in more detail of what the council will expect to secure in terms of affordable housing provision in new residential development.
- 7.57. The Housing Monitoring Report 2020/2021 states the following:

*'The provision of affordable housing is a priority of the council. Policy HOU1 of the Ashford Local Plan 2030 requires a percentage of affordable housing to be delivered in schemes with 10 dwellings or more.'*

*'165 affordable houses were completed during this monitoring year. Of these, 19.4% of completions were in the Ashford Town viability area, 57.6% in the Ashford Hinterlands viability area and the remaining 23% in the Rest of the Borough viability area.'*

*'The 2020/2021 delivery is higher than the 145 units delivered in 2018/2019 and the 108 units delivered in 2017/2018.'*

*'32 affordable houses were granted permission from either full application or reserved matters in 2020/2021. All the outline applications granted in 2020/2021 apart from at Ashford Golf Complex, Bethersden (18/01592/AS) provide the affordable housing required as set out in policy HOU1. At Ashford Golf Complex, commuted sums have been agreed due to viability issues.'*

*'For the affordable housing indicator, the data is collected for the applications granted permission in 2020/2021 rather than the completions as set out in the description.'*

*'Note: As the Ashford Local Plan was adopted in February, major applications which had completions in the monitoring year are unlikely to be assessed against the recently adopted policy HOU1. Therefore, this monitoring indicator measures the percentage of major applications granted permission rather than completions.'*

- 7.58. It is noted that the affordable housing completions in the monitoring year were not assessed against the adopted policy HOU1, therefore the monitoring indicator measures the percentage of major applications



granted permission. As only 165 affordable houses were completed during the monitoring year and based on the levels of affordable housing completions the past two years it is assumed that the actual completions were lower than predicted.

- 7.59. The development proposals will provide 30% affordable housing i.e., 197 units which complies with Policy HOU1 of the Local Plan 2030.
- 7.60. The affordable housing delivery will be completed in early years of the scheme build out and will assist the Council in meeting the shortfall of affordable houses in the Borough.
- 7.61. The affordable units will be secured through a s106 agreement and provided to the agreed tenure split of 10% Affordable/Social Rent accommodation and 20% affordable home ownership products (including a minimum of 10% shared ownership) in accordance with the requirements of policy HOU1 of the ABLP 2019.
- 7.62. As this application is in outline the housing mix will be agreed with the council's housing department at the reserved matters stage.
- 7.63. In conclusion the proposed development will assist with the affordable housing requirements of the Borough and is a highly significant material consideration and carries substantial weight in the context of the NPPF.

**vii. Other policies contained in the Ashford Local Plan 2030.**

- 7.64. As the development proposals are in outline the applicant confirms that as part of the reserved matters applications details for the housing will provide evidence to state how they met the residential space standards in accordance with **Policy HOU12**, DCLG National Housing Standards, and the Residential Space and Layout SPD.
- 7.65. The reserved matters applications will demonstrate how the residential housing of the development will look to provide a minimum of 20% M4 (2) (Accessible & Adaptable Dwellings). The requirements of **Policy HOU14** could be contained within the s106 agreement or by a suitably worded planning condition.
- 7.66. The reserved matters applications will demonstrate how the proposed minimum private outdoor spaces comply with the standards set out in **Policy HOU15** and the Residential Space and Layout SPD.
- 7.67. The Council's Strategic Housing Market Assessment (SHMA) show that a range of house types and sizes are required to meet the Borough's housing need throughout the plan period. Delivering a range of house types and sizes also helps create and foster sustainable communities, provides resilience to the housing market, increase choice, and widens opportunities for home ownership.
- 7.68. The indicative mix is shown below:

House Type	No of Private Dwellings	Percentage (circa %)	No of Affordable Dwellings	Percentage (circa %)
1 Bed dwelling	46	10%	59	30%
2 Bed dwelling	160	35%	78	40%
3 Bed dwelling	183	40%	50	25%
4+ Bed dwelling	69	15%	10	5%
<b>Total</b>	<b>458</b>	<b>100%</b>	<b>197</b>	<b>100%</b>

- 7.69. The Council's Strategic Housing Market Assessment (SHMA) January 2014 report states that at borough-wide level, the analysis would support policies for a mix of affordable and private housing and the above indicative mix is within the recommended percentages as shown in the table below.

	Private	Affordable
1-bed dwelling	Between 5% to 10%	Between 25% to 30%
2-bed dwelling	Between 30% to 35%	Between 35% to 40%
3 bed dwelling	Between 40% to 45%	Between 25% to 30%
4 bed dwelling	Between 15% to 20%	Between 5% to 10%

- 7.70. The applicant will work with the Council to determine the correct mix based on the context of the site, design considerations and local need.
- 7.71. The applicant confirms that the affordable housing will be pepper potted across the site and the design of the dwellings will be tenure blind.
- 7.72. Fibre to the premises is being provided within the Chilmington Green development therefore the fibre strategic infrastructure is in place and can be easily extended to the proposed development at Possingham Farm. **Policy EMP6** and Fibre to the Premises SPD, will be complied with.
- 7.73. The reserved matters applications will demonstrate how the parking standards comply with the standards set out in **Policy TRA3(a)**.
- 7.74. For the avoidance of doubt the reserved matters will comply with the extract from the local plan below:

*Proposals for residential development elsewhere shall achieve the following minimum parking standards:*

	Suburban and Rural locations
1-bed dwelling	1 space per unit
2-bed dwelling	2 spaces per unit
3 bed dwelling	2 spaces per unit
4 bed dwelling	3 spaces per unit

*Visitor parking should be provided primarily off-plot in short stay car parks where available OR on-plot at 0.2 spaces per dwelling in major residential schemes where layout permits.*

*Parking to support residential development within the Borough shall follow the design, layout and accessibility guidance contained within the Council's Residential Parking and Design Guidance SPD.*

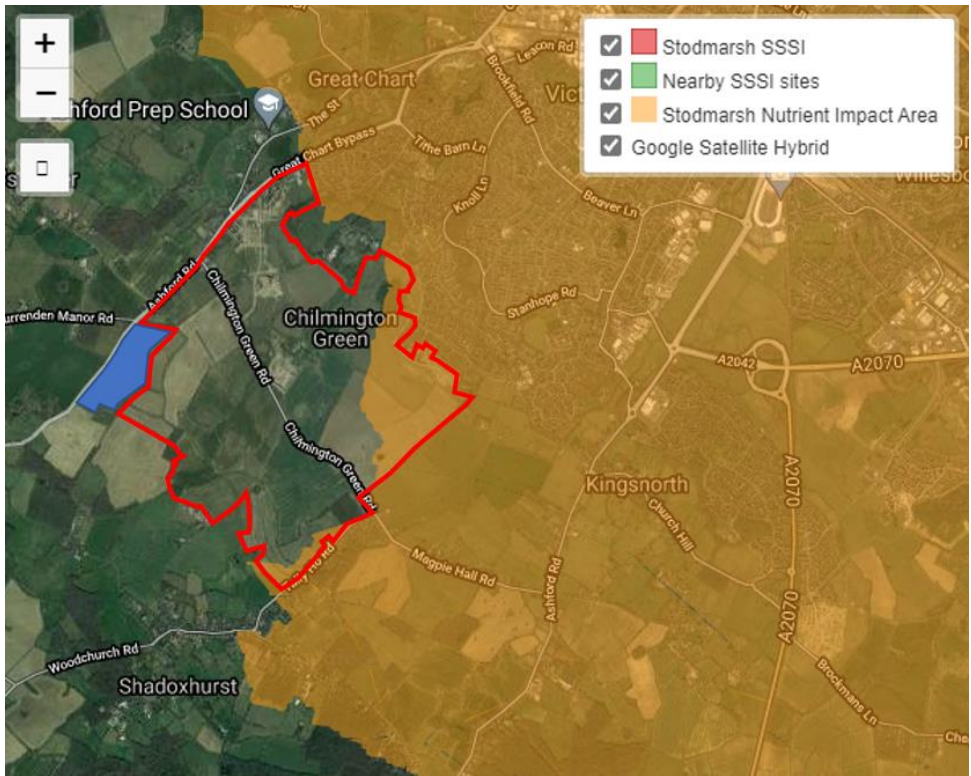
- 7.75. Following the consultation with the Borough, County Council and with relevant bus operators the Applicant would be prepared to agree a suitable s106 contribution to either alter or expand on the existing bus service, to promote the Local Bus Network in accordance with **Policy TRA4**.
- 7.76. The outline pedestrian access parameter plan shows the movement routes and linkage to the Chilmington Green development and the surrounding area. The proposed pedestrian routes will be detailed as part of the reserved matters application and will be designed to provide safe routes of movement and access throughout the proposed development, including connectivity to the existing public rights of way to encourage journeys on foot, all in accordance with **Policy TRA5**.
- 7.77. **Policy TRA6** states that designated cycle routes will be provided within the development proposals that will link up with the existing surrounding network. Refer to the access strategy parameter plan, that indicates the proposed strategic links for cycling.
- 7.78. The development proposals will be connected to primary and secondary road networks. The applicant will work with the Borough and County Council to consider the developments impact on the existing networks and explore the delivery of mitigation measures to reduce the impact in accordance with **Policy TRA8**.

- 7.79. The Applicant will consider whether modal shift in favour of public transport can be achieved through existing bus services or improvements to the network as a key determinant of the scheme's sustainability. This will be demonstrated through a Travel Plan, or Assessment.
- 7.80. Enhancements could include the delivery of bus priority measures, the provision of a new service or the alteration/expansion of an existing service, contributions towards bus related infrastructure and operational subsidy for the service in the early years of occupation of the development. Where S106 contributions are sought, their scale and timing shall be agreed by the Borough and County Councils following consultation with relevant bus operators, prior to the granting of planning permission.
- 7.81. Due to Covid-19 pandemic, travel behaviour has dramatically altered, which includes the increase in home working and the use of web-based conference facilities. These new working practices are likely to remain over the long term which will reduce the future year traffic predictions. Because of the levels of uncertainty regarding the technical assessment requirements the applicant wishes to engage with the Council to agree the parameters for any transport modelling that may be required to support the outline application, and once agreed this will enable the production of the Transport Statement to support the application.
- 7.82. There are no statutory designated ecological sites within or nearby to the boundary of the development and therefore, the site does not fall into an ecologically designated 'sensitive area'.
- 7.83. The proposed development will seek to enhance the biodiversity through the introduction of green fingers connecting the northern and southern boundaries and to the wider ecological areas surrounding the site.
- 7.84. A detailed Biodiversity Net Gain Strategy will be produced and submitted as part of this application in due course. The strategy will use the most up-to date version of Defra's Biodiversity Metric and provide detail of the on-site and/or off-site measures that will be required to deliver a measurable biodiversity net gain, and in accordance with **Policy ENV1**.
- 7.85. The site has no specific landscape or ecological designation and is not within the setting of the AONB being some 3.3 miles from the North Downs AONB and 5.7 miles from the High Weald AONB.
- 7.86. The site is located within area BF5 of the Chilmington Green Open Arable Landscape Character Area which was assessed in the 2005 Studio Engelback Landscape Character Study with distinctive character in terms of the level wide open fields devoid of hedgerows with expansive views, but an area of weak sense of place and continuity. The area here is deemed to be highly visible with long distance views. Policy recommendations for area BF5 are to restore and create.
- 7.87. The proposals will change an area of agricultural landscape into a semi-urbanized area with areas of greenspace maintaining corridors to the open countryside. Where possible the secondary landscape of the development will be designed to provide wildlife habitat, including the use of plants known to be of value to wildlife. The SuDS will provide occasional new wetland habitat, ultimately forming a network within the site and possible habitat links relevant to the wider landscape. The detailed design will consider the requirements contained in **Policy ENV3a**.
- 7.88.** The application site is not within the Dark Zone Area and the reserved matters applications will demonstrate that the external lighting will comply with the Ashford Dark Skies SPD (2014), and **Policy ENV4**.
- 7.89. The site falls within Flood Zone 1 i.e., land with a Low (having a less than 1 in 1,000 annual probability) of flooding, so the proposed site is suitable for residential development.
- 7.90. The application site exceeds 1Ha, therefore a Flood Risk Assessment and Surface Water Strategy is submitted as part of the application.
- 7.91. The Flood Risk Assessment prepared by Vectos Engineering considers the development site proposals and existing constraints had has developed an overall sustainable drainage system (SuDS) to reduce the risk of flooding for the lifetime of the development (taking in to account climate change) in accordance with **Policy ENV6**.

- 7.92. The new residential dwellings will be built to Building Regulations and the water efficiency will meet the minimum requirement of an estimated water use of no more than 110 litres per person per day as stated in **Policy EN7**.
- 7.93. The potable water for Chilmington Green has been recently reinforced and the proposed development will easily be able to connect to the water main.
- 7.94. The Chilmington Green development has completed the first stage of strategic foul water drainage and the sewerage system included a new pumping station approved under planning application 20/01806/AS. The proposed development will be able to connect to the installed foul water system.
- 7.95. Water quality, supply and treatment for the proposed development all comply with **Policy ENV8**.
- 7.96. The development proposals include the sustainable drainage system (SuDs) Flood Risk Assessment and a strategy that details the proposals to dispose of surface water, to avoid any increase in flood risk or adverse impact on water quality, all in accordance with **Policy ENV9**.
- 7.97. The mitigation measures that are set out in the FRA are summarised as follows;
- *By adhering to Ashford Adopted Local Plan 2030 policy ENV9, which stipulates the proposed allowable flow rate from a development should not exceed 4 l/sec/ha for up to the 1 in 100 year return period, there is betterment being provided when compared to the current greenfield runoff rate; the existing 100 year return period runoff rate for the upper catchment of the site is approx. 100 l/sec.*
  - *Surface water runoff generated on site current runs unattenuated to the existing ditch – this, in part, contributes to the surface water flood risk on the site now. As part of the development this unattenuated flow will be removed and replaced with a new private and public drainage system with attenuation applied.*
  - *The existing ditch is to be diverted and reprofiled as a wider ditch with a longer overall length across the site. This will increase current ditch capacity.*
  - *A maintenance regime for the onsite ditch will ensure ditch remains operational for the lifetime of the development.*
  - *All finished flood levels for properties in close proximity will be set as high as is reasonably practical above the ditch levels. The future detailed design and external works design of the development will ensure any onsite exceedance flooding remains onsite and does not pose any risk/damage to properties and emergency access routes.*
- 7.98. The development proposals will promote a shift to reduce the dependence of vehicles and look support other means of low emissions transport. A green travel plan will be prepared to encourage residents to use public transport, walking and cycling and the proposed development will incorporate the infrastructure required to support this proposal, which complies with **Policy ENV12**.
- 7.99. In consideration of Policies **ENV13 and ENV15** a desk-based Archaeological Assessment dated October 2020 has been prepared for the development which states:
- *The assessment provided a review of the site's below-ground archaeological potential and addresses the information requirements of national, regional, and local planning policy.*
  - *In terms of designated archaeological asset, no World Heritage Sites, Scheduled Monuments, Historic Wrecks or Historic Battlefields lie within the study site.*
  - *Based on current evidence, the study site is considered to have a low to moderate potential for Prehistoric and Roman remains, and a low potential for all other past periods of human activity. Should any such evidence be present within the site, it would most likely be of local significance.*
  - *Given the perceived archaeological potential of the study site and past post-depositional impacts, the proposals are considered unlikely to have a widespread, negative archaeological impact.*
  - *The local planning authority is likely to consider that further archaeological mitigation measures are required; it is suggested that these could be followed by planning consent secured by an appropriate worded archaeological planning condition.*

**viii. Stodmarsh Ramsar.**

7.100. The application site sits outside of the nutrient impact zone for the Stodmarsh Ramsar, Special Protection Area and Special Area of Conservation designated site. The application site shown in blue below:



7.101. As residential dwellings are proposed an Appropriate Assessment for the proposed development under the Habitats Regulations, will be submitted to support the planning application in due course. The Applicant would like to discuss the options of how the development can achieve net nutrient neutrality with the Council prior to the submission of the Appropriate Assessment.

7.102. It is understood that the council is working with its partners in central and local government to draw up a mitigation strategy to address any impacts from development and enable schemes to proceed, and the Applicant will work with the council to agree the appropriate mitigation strategy for the development proposals.

## 8. Summary and Conclusion

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- 8.1. This Outline Application provides residential development for up to 655 dwellings (including 30% affordable housing, the creation of a network of roads, footways, cycleways through the site, sustainable drainage, landscaping buffers, public open space, and biodiversity enhancements.
- 8.2. The application site is submitted on the principles, aims and objective of policies SP1 and HOU5 of the Ashford Borough Local Plan 2030. The application looks to windfall development to help the council meet its housing needs. The proposed development is in accordance with the up-to-date elements of the Local Plan and therefore benefits from the presumption in favour of development which is in accordance with the development plan set out in Section 38(6) Town and Country Planning Act 1990.
- 8.3. In any event the site is in a highly sustainable location and will help bridge the shortfall of housing. The Council has acknowledged that it does not have a 5 year housing land supply. The 'tilted balance' in NPPF paragraph 11(d) is therefore engaged. The relevant policies in the NPPF do not provide a clear reason for refusing the development and it cannot be said that there are adverse impacts which would **significantly and demonstrably** outweigh the substantial benefits of the proposal. Planning permission should therefore be granted in accordance with paragraph 11 (d)
- 8.4. The Council have published a Housing Delivery Action Plan 2021 following the publication of the 2020 HDT measurements, which identifies the pattern of housing delivery in the borough and establishes a series of actions to unlock any potential barriers to housing delivery.
- 8.5. The development proposals will help reduce the housing shortfall by a significant number and assist the authority in meeting their housing target.
- 8.6. The proposed development will also assist with the affordable housing requirements of the Borough and is a highly significant material consideration and carries substantial weight in the context of the NPPF.
- 8.7. The site represents a logical extension to the Chilmington Green development, filling in the 'missing corner' between the A28/Ashford Road and Chilmington Green. The development will be sensitively designed to create a transition from the open countryside to the south to the urban areas of Ashford to the north along the A28. By pulling development back in the southwest corner and introducing a parkland landscaped setting the built form will gradually come into view through glimpsed views of distant buildings between tree and hedgerow planting with the development coming closer to the A28 as you move north but always set behind native landscaping. This natural transition is current missing as part of the Chilmington Green scheme.
- 8.8. The site is available and suitable for development and can provide a valuable contribution to the Council's housing supply, and facilitate economic, social, and environmental benefits.
- 8.9. The proposed development site is owned by the applicant and the site would start as soon as practically possible after the grant of planning permission and within five years.