

Thank you for the opportunity to address the inquiry.

My name is Steven Davies, I am an Associate Director - Planning with Hobbs Parker Property Consultants based in Ashford. I hold an Honours Degree in Geography and a Diploma in Urban Planning, I have been a Chartered Member of the Royal Town Planning Institute since 1992 and have 36 years experience of working in town planning, both in local government and as a private sector planning consultant, I have predominantly worked within Development Management but have experience of working in both Local plan and Conservation Departments. I have been working in Kent since 1999 and for Hobbs Parker since 2016.

I am instructed by Mrs Cleaves, the owner and occupier of Possingham Farmhouse, the property most directly impacted by these proposals. Hobbs Parker have assisted Mrs Cleaves throughout the emergence of the proposal for the development of the Chilmington Green Masterplan and the subsequent planning applications relative to this, with the aim of ensuring that proposals best safeguarded the setting of her listed building and its surroundings, as well as the ecology of the area.

I have assisted Mrs Cleaves in preparing her objections, firstly to the planning application submitted in 2022 and subsequently with the comments submitted in respect of the appeal lodged against the council's decision to refuse planning permission earlier this year.

Throughout this time I have found Mrs Cleaves to be very conversant with the planning matters associated with the proposal put forward by the appellant and the implications it has on the future setting of her listed property and surrounding area.

The objections are not made against the principle of development, rather that proposals coming forward ensure that the form and scale of development is appropriate for the location and safeguards the quality of the historic and natural environment within which Possingham Farmhouse is sited to ensure this is preserved for the future. In this respect I would stress that the approved Chilmington Green Area Action Plan met with her broad approval.

Unfortunately, the appeal application significantly undermines the appropriateness of the planned approach to development achieved through the Chilmington Green Area Action Plan, ignoring the significant safeguards that it puts in place to ensure the

development is ameliorated within this sensitive location. The area action plan carefully addresses the emerging boundary to the edge of Ashford and contains many safeguards to ameliorate the transition from development to the countryside. It is a fundamental concern that this proposal does not. Rather it will significantly undermine the steps put in place to address this transition, resulting in what will inevitably appear as an incongruously over scaled bolt-on, outside of the landscaped buffering that is already proposed to contain the wider development.

In addition, the development proposed will be far greater in scale, mass and density than the area action plan requires and be set outside of its designed landscape buffer.

The impact of the proposals will therefore be significantly in excess of that envisaged by the area action plan.

It is a strongly held view that if the appeal site is to be developed, it can only be acceptably approached through first a review of the area action plan, to ensure that the relationship of the proposal with the wider development of Chilmington Green are effectively integrated.

The need to deliver housing is recognised, but it must be done in a sensitive way that reflects the character and form of its surroundings. Unfortunately, this proposal significantly undermines the careful approach to the form and character of this area and will significantly detract from the successful integration with the wider development of Chilmington Green by failing to satisfactorily address the impact on landscape, ecology and heritage in an acceptable manner.

Mrs Cleaves would like to highlight specific points within the evidence put forward by the appellant that is considered to highlight that the appropriateness of the development is being overstated by the appellant, and that on closer examination through this Inquiry it will become apparent to the Inspector that the arguments in support of the appeal are limited and do not outweigh the significant harm that it will cause to the overall aims of the NPPF.

It is of vital importance to Mrs Cleaves that appropriate weight is given to the impact of the proposal on Possingham Farmhouse. The appellant's Heritage Assessment is dismissive of the impact on the setting of this listed building. A position that was

accepted by the council in removing reason 6 from further consideration at this appeal. It is though noted that the appellant's Heritage Assessment makes no reference to the Historic Landscape and Built Heritage Appraisal 2011 prepared by Wessex Archaeology and a key document in forming the approach to the Chilmington Area Action Plan. Reference to this document, which includes assessment of both Possingham Farmhouse and the area of land that now constitutes the appeal site, highlights a more considered view of how both should be assessed in term of landscape impact and the setting of the designated heritage asset. In addition, the independent assessment carried out for Mrs Cleaves by Dr Weir of Tor & Co. confirms that the appeal proposal will have a greater impact on the setting of Possingham Farmhouse than either the appellant or council are supposing, and the Inspector is urged to give greater weight to this matter.

The evidence submitted by Mr Tully, in support of Landscape matters, suggests (para 2.2) that "the protection and enhancement of the setting of the listed Possingham Farmhouse to the south east of the site has also been an important consideration in the development of the landscape strategy." However, despite this reassurance it does not demonstrate how this important consideration has been addressed or mitigated. The statement refers to the findings of other landscape assessments, (Studio Engleback 2005) but as with the Heritage Statement fails to reference the 2011 Wessex Archaeology report the findings of which are considered to be relevant to the matters to be consider in this appeal.

In addition, none of the viewpoints that have been assessed by the appellant directly relate to views that take into account the impact on the setting of Possingham Farmhouse. Mrs Cleaves regards the need for site visit essential to take into account the following points.

It should be noted that the evidence presented by the appellant in respect of view 5, the appeal site viewed from byway AW245, identifies an intervening hedgerow that is relatively short and sparse, (para 7.1) allowing open views across the site. The sensitivity of this view is regarded as high. Comparison of this assessment with Mrs Cleaves northern boundary would find an even sparser field hedge allowing significantly more extreme open views across the appeal site. The Inspector is encouraged to view this for himself on his site visit. The implication of this point being that the ability to mitigate the impact of this open view within the appeal site is limited and this will contribute to the detrimental impact on the historic setting of the listed

building within the farm landscape and also result in a significant reduction in amenity to Mrs Cleaves who will be constantly subjected to this impact should the appeal be allowed.

Overall, the magnitude of impact on landscape relative to Possingham Farmhouse is considered to be harmful, with insufficient ability to mitigate this by the provision of boundary landscape buffering within the appeal site to the extent required. The appellant's expectation appears to be to unfairly penalise Mrs Cleaves by expecting her land to provide this mitigation for them.

Even where landscape mitigation is proposed, it is of great concern that the density, scale and bulk of the development proposed would exceed the parameters for built development on the equivalent southern edge of Chilmington Green Area Action Plan. These requirements have evolved following careful consideration of landscape impact and to establish an effective urban to rural transition. Equivalence with the area action plan would require two or two and a half storey development at a density of 10 dwellings per hectare, in comparison the appellants proposal for two and a half and three-storey development at 30-39 dwellings per hectare would result in a significantly more impacting form of development and inevitably result in a hard edge to the built development, wholly out of keeping with the context of the surrounding area.

In the evidence of Mr Collins, their planning witness, para 9.3.23, it is alleged that the treatment of the appeal site is supported by other examples of similarly scaled edge of urban area development. However, it should be noted that the areas identified within Chilmington Green are more centrally located within the core of the development where density and height parameters are, in accordance with the area action plan, less restrictive. The evidence submitted also attempts to justify the scale and form of the development proposed by highlighting other similarly scaled development on sites that are suggested to represent a precedent for demonstrating a change from urban to rural in one step (para 9.3.22). A view that fails to grasp the context of the sites identified, particularly the urban form in these locations compared to the appeal site. Nor does this justification compliment the overall approach to development contained in the Chilmington Green Area Action Plan that seeks to create a gradual change between the rural and urban area. To now accept otherwise to this adopted approach would unacceptably undermine the aims of the area action plan.

Despite the apparent agreement on the approach to ecological matters, the impact on the large badger sett remains of significant concern. The Inspector is urged to view the location of the badger sett when visiting the site and to consider how, given the proximity of the sett to the proposed housing, and with the overall scale of development proposed and the competing requirements, including for housing, open space and drainage infrastructure on the site, it will also be possible to provide a sufficient area of land to mitigate for the badgers. In view of this it is considered that it is unacceptable to regard mitigation as proven or that it can be appropriately dealt with by way of condition.

Finally, the ability to achieve nutrient neutrality through the provision of a wastewater treatment works to serve Chilmington Green is welcome. As the Inspector will appreciate, the delivery of housing across the borough has been severely restricted since the emergence of the nutrient neutrality issues relative to the Stodmarsh Protected sites in 2020. The resultant impact on the delivery of housing is directly related to this matter and not the result of any other failure by the borough council to effectively bring forward their housing allocations, as legally they have been unable to do so.

The recent approval of the water treatment works will hopefully allow for the stalled elements of Chilmington Green to be brought forward. The WwTW has a notional maximum capacity of 2,700 dwellings, but in accordance with the details so far approved, without further approval of measures to store or reuse water on site, the limitations of the discharge rate severely restrict the number of dwellings that can be served. It is understood that the capacity of the treatment works is therefore presently limited to 980 dwellings. It would be reasonable to ensure that the limited capacity currently available is used in the first instance to unlock stalled development rather than used by the appellant to justify further unconsidered development at the very expense of the delivery of allocated sites. On this basis it is considered that limited weight should be given to the presumption in favour of sustainable development due to the benefits of providing housing, where that housing would clearly be at the expense of the delivery of allocated sites. In addition, consideration should be given to how the unlocking of approved development in this way would facilitate the provision of the delivery of infrastructure that are requirements of the area action plan and the planning permission for Chilmington Green.

To summarise for the reasons highlighted it is Mrs Cleaves concern that the whole ethos of the appeal proposal conflicts with the requirements of the NPPF and those in the development plan (HOU5e) that seek to conserve and enhance the natural environment and preserve or enhance any heritage assets in the locality, as well as the guidance from Historic England regarding need to explore ways to maximise enhancement and minimise harm to heritage assets, which Mrs Cleaves does not consider to be the case in respect of her 550 year home.

To conclude there remain significant concerns regarding the impact of the development under consideration and Mrs Cleaves trusts that the matters raised will be robustly examined during the course of the inquiry.