

Online Comments Form

Application Details

App No: 22/00571/AS

Location: Land north of Possingham Farmhouse, Ashford Road, Great Chart, Kent (TN26 1JR)

Proposal: Outline application for the development of up to 655 residential dwellings (including 30% affordable dwellings) to consider access, layout and scale with all other matters reserved.

Person and Comment Details

Name: Environmental Protection Team

Address: Civic Centre, Tannery Lane Ashford kent TN24 1PL

Action: Commenting

Created On: 13/05/2022 17:35:43

Comments

Case Summary

Application Ref: 22/00571/AS

Application Type: Outline Planning Permission

Site Address: Land north of Possingham Farmhouse, Ashford Road, Great Chart, Kent (TN26 1JR)

Parish: Great Chart with Singleton

Adjoining Parish: None

Ward: Weald Central Ward

Description of Works: Outline application for the development of up to 655 residential dwellings (including 30% affordable dwellings) to consider access, layout and scale with all other matters reserved.

Status: Deposited (ie valid and registered)

Council Decision: N/A

Outline application for up to 655 residential dwellings. The following conditions are advised:

General

We note that the development includes residential dwellings. To promote the move towards sustainable transport options and to take account of cumulative impacts of development on air quality we would request the application of a condition to provide electric vehicle charging facilities on driveways etc;

H016 – Electric car charging

Prior to the first occupation of the dwelling/each dwelling with a designated car parking space/first use of the

premises hereby approved, at least 1 per dwelling.] All Electric Vehicle charger points shall be provided to Mode 3 standard (providing up to 7kw) and SMART (enabling Wifi connection). The charging point shall thereafter be retained available, in a working order for the charging of electric vehicles. Approved models are shown on the Office for Low Emission Vehicles Homecharge Scheme approved chargepoint model list: <https://www.gov.uk/government/publications/electric-vehicle-homecharge-scheme-approved-chargepoint-model-list>.

Reason: To take into account the cumulative impacts of development on air quality and to encourage the use of sustainable transport modes including incorporation of facilities for charging plug-in vehicles in accordance with Local Plan policy ENV12.

We note the scale of the development and accordingly would request the application of the following condition;

CEMP Prior to the commencement of the development a Code of Construction Practice shall be submitted to and approved in writing by the Local Planning Authority. The construction of the development shall then be carried out in accordance with the approved Code of Construction Practice and BS5228 Noise Vibration and Control on Construction and Open Sites and IAQM guidance on controlling dust on construction sites unless previously agreed in writing by the Local Planning Authority. The code shall include,

- An indicative programme for carrying out the works
- Measures to minimise the production of dust on the site(s)
- Measures to minimise the noise (including vibration) generated by the construction process to include the careful selection of plant and machinery and use of noise mitigation barrier(s)
- Maximum noise levels expected 1 metre from the affected façade of any residential unit adjacent to the site(s)
- Design and provision of site hoardings
- Management of traffic visiting the site(s) including temporary parking or holding areas
- Provision of off road parking for all site operatives
- The location of temporary vehicle access points to the site(s) during the construction works
- The arrangements for public consultation and liaison during the construction works

Reason: To protect the amenity of local residents in accordance with Policy EN1 of the Local Plan.

Noise – Properties will be located along the main A28 and near the secondary school. A noise impact assessment will be required along with potential mitigation measures for the identified properties.

We note that the proposed development and its future occupants may be affected by noise from A28, connecting roads, the secondary school and potentially other sources such as commercial premises and plant (including air source heat plants). As such we would request the application of the following condition;

EP02 - Sound Levels - Residential

Prior to the commencement of development above foundation level, a scheme for protecting the dwellings / development hereby approved from noise from A28, connecting roads, the secondary school and potentially other sources such as commercial premises and plant (including air sourced heat pumps) shall be submitted to and approved in the Local Planning Authority. The approved protection measures shall thereafter be completed before the approved dwellings / development are occupied, and thereafter shall be retained as effective protection.

Reason: In order to protect the occupiers of the dwellings from undue disturbance by noise.

Land contamination

Depending on the previous use of the site, there is the potential for land contamination. The following conditions are advised:

We note the prior uses of the site, and the potential for contamination that may pose a risk to the environment and public. We would therefore request that the following condition is applied in order to ensure that contamination is subject to assessment and remediation where required.

EP15 – Contamination (Land or groundwater)

Prior to the commencement of the development, a scheme to deal with contamination of land and/or groundwater shall be submitted to and approved in writing by the Local Planning Authority and no development shall commence until the measures approved in that scheme have been implemented. The investigation report shall be conducted and presented in accordance with the guidance in CLR11 “Model Procedures for the Management of contaminated land” published by the Environment Agency. The scheme shall include all of the following measures unless the Local Planning Authority dispenses with any such requirement specifically and in writing:

- A desk-top study carried out by a competent person to identify and evaluate all potential sources and impacts of land and/or groundwater contamination relevant to the site. The requirements of the Local Planning Authority shall be fully established before the desk-top study is commenced and it shall conform to any such requirement. A full copy of the desk-top study and a non-technical summary shall be submitted to the Local Planning Authority without delay upon completion.
- A site investigation shall be carried out by a competent person to fully and effectively characterise the nature and extent of any land and/or groundwater contamination, and its implications. The site investigation shall not be commenced until: A desk-top study has been completed, satisfying the requirements of point (1) above. The requirements of the Local Planning Authority for site investigations have been fully established, and The extent and methodology have been submitted to and agreed in writing by the Local Planning Authority. A full copy of a report on the completed site investigation shall be submitted to and approved in writing by the Local Planning Authority without delay upon completion.
- A written method statement for the remediation of land and/or groundwater contamination affecting the site shall be submitted to and agreed in writing by the Local Planning Authority prior to commencement, and all requirements shall be implemented and completed to the satisfaction of the Local Planning Authority by a competent person. No deviation shall be made from this scheme.
- A full copy of the completion report confirming the objectives, methods, results and conclusions of all remediation works shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To control pollution of land or water in the interests of the environment and public safety.

As with all developments on sites where there has been previous activity/development there is a potential for

unexpected contamination to be found during the works. As such we would ask that the following condition is applied;

EP16 - Reporting of Unexpected Contamination

Part 1

If unexpected contamination is found at any time when carrying out the approved development it must be reported in writing to the Local Planning Authority. An investigation and risk assessment must be undertaken and where remediation is necessary a remediation scheme must be prepared in accordance with the requirements of Part 2.

Part 2

Following completion of the remediation scheme a verification report that demonstrates the effectiveness of the remediation carried out must be prepared and submitted for approval in writing by the Local Planning Authority.

Reason: To ensure that risks from land contamination to the future users of land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

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Application Details

App No: 22/00571/AS

Location: Land north of Possingham Farmhouse, Ashford Road, Great Chart, Kent (TN26 1JR)

Proposal: Outline application for the development of up to 655 residential dwellings (including 30% affordable dwellings) to consider access, layout and scale with all other matters reserved.

Person and Comment Details

Name: Mark James

Address: Development Partnership Manager Ashford Borough Council Civic Centre, Tannery Lane Ashford Kent TN23 1PL

Action: Commenting

Created On: 28/04/2022 13:44:43

Comments

Please accept these comments as Ashford Borough Council's Housing Services' initial comments on this outline application for 655 homes, just outside of the Chilmington Area Action Plan. Under Local Plan policy, the site lies within the hinterlands area as identified and defined in Policy HOU1 in the borough council's Local Plan.

Therefore, the policy compliant position means there will be an expectation of 30% affordable housing being delivered within this scheme and we are pleased to see this reflected by the applicant. Consistent with the policy, 10% of the total dwellings should be made available for affordable or social rent, and 20% of the total dwellings made available for affordable home ownership (of which 10% of the total dwellings should be shared ownership).

The application suggests that 655 homes are coming forward on the site. Therefore there would be an expectation that 197 homes would be made available for social housing. Consistent with the policy, 66 of these homes would be made available for social or affordable rent, and 131 of the homes would be made available for an affordable home ownership product – 66 of which must be shared ownership homes. The remaining 65 would either shared ownership, or an affordable home ownership product, to be agreed with the development partnership manager within the authority.

We note that this application has a very high proportion of flats within the social/affordable rent allocation – currently proposed as 20 x 1-bed and 26 x 2-bed flats. We would prefer to see an allocation of 2 bedroom houses (currently there are none) as well as 3 bedroom houses (currently there are 17 which is good), with fewer 2 bedroom flats.

The amount of 1-bed flats is also very high in proportion to the other sizes of property – we would be concerned around the ability of any RP to manage the large number of 1-bed homes in such close proximity and would ask that this be revisited. Additionally, RPs may be unhappy with the amount of 1 beds, which traditionally are harder to manage than properties with two or more bedrooms.

While it is true to say that a snapshot of the current breakdown on the housing register shows more 1-bed need than 2s or 3s, the issue of management has to be considered and is critical to creating a sense of place and a balanced community. We have a greater need for 3 bed homes than 2 bed homes, and there are currently 111 needing 4 bed or larger, so the provision of 3-bed and 4-bed homes is welcome.

Where they may also be a major issue in the proposals is the numbers of 1-bed flats proposed in the affordable home ownership quota. RPs have expressed concern about the lack of buoyancy in the market for shared ownership flatted units, particularly 1-bed units, so we hope that the developer may agree that far fewer flatted units, preferably none, are included in the s106 element. Currently there are 39 x 1-bed and 52 x 2-bed flats, which is not going to be acceptable to any RP taking the site on, additionally there are no 2-bed houses within the shared ownership proposed. We would like to see that the units will be small-to-medium sized, so as to stay within reach of potential first-time buyers.

We would expect the properties to meet the Nationally Described Space Standards. In the case of any 1-bed homes that two bed spaces are provided. In the case of any 2-bed homes proposed we would expect four bed spaces to be provided and in the case of 3-bed homes we would expect five bed spaces to be provided. Finally, in the case of any 4-bed homes we would ask that eight bed spaces are provided. We note from the application form that no indication has been given at this stage as to the size of the units.

We would, though, ordinarily expect the affordable housing units to be spread throughout the site rather than positioned in just a cluster. This is integral to creating a mixed and balanced community, which is why the high concentration of flats is of concern. Most importantly, we would also expect the affordable housing properties to be visually integrated into the site and not discernible from the open market dwellings – this is essential to the levelling up of tenures and the removal of social housing stigma, as referenced in the new Social Housing White Paper.

In line with Policy HOU14 of the local plan, 20% of all dwellings should be M4(2) standard, i.e. accessible and adaptable. The onus is on the applicant to indicate the specific plots that will be provided within this standard.

As this site proposes 655 homes there is also a requirement to provide 7.5% of the affordable rent homes as M4(3) wheelchair dwelling units. This would equate to 5 dwellings on this site – again houses would be preferable and at the appropriate point the Council would identify plot numbers and indicate any households who might require one of these dwellings should permission be granted in order to ascertain whether the homes are required as M4(3)a, or M4(3)b.

The council's position regarding DPA waivers has been adopted at Cabinet in October 2019. This sits within the council's affordable housing delivery plan. The Head of Housing's proposed policy position in a designated protected area is to mirror the position outside of a designated protected area and allow unrestricted staircasing to one hundred percent (100%) equity value of a dwelling, save for affordable housing proposals in a rural exception site (coming forward under HOU2 of the Ashford Local Plan to 2030.



Planning Help
Case Officer
Planning and Development Unit
Ashford Borough Council
Civic Centre
Tannery Lane
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TN23 1PL

**Heritage
Environment, & Waste GT**

Invicta House
County Hall
MAIDSTONE
ME14 1XX

Phone: 03000 413448
Ask for: Ms Wendy Rogers
Email: wendy.rogers@kent.gov.uk

4 May 2022

SENT BY EMAIL

Re: 22/00571/AS - Land north of Possingham Farmhouse Ashford Road Great Chart

Thank you for your letter consulting us on the above outline planning application for development of up to 655 residential dwellings with associated works.

The site of proposed development lies in an area with multi-period archaeological potential. Prehistoric and Roman remains have been found in the general area, especially to the east, and several ancient routeways cross this area with potential for prehistoric and later farmsteads. There is also some potential for modern archaeology associated with the Ashford airfield, with a runway traversing the site and potential for associated cultural remains. In view of the archaeological potential I recommend the following condition is placed on any forthcoming consent:

- AR5 Prior to commencement of development the applicant, or their agents or successors in title, will secure the implementation of*
- i archaeological field evaluation works in accordance with a specification and written timetable which has been submitted to and approved by the Local Planning Authority; and*
 - ii following on from the evaluation, any safeguarding measures to ensure preservation in situ of important archaeological remains and/or further archaeological investigation and recording in accordance with a specification and timetable which has been submitted to and approved by the Local Planning Authority*

Reason: To ensure that features of archaeological interest are properly examined and recorded and that due regard is had to the preservation in situ of important archaeological remains.

and

Prior to occupation, the applicant, or their agents or successors in title, will secure the implementation and completion of a programme of archaeological post excavation and publication work in accordance with a written specification and timetable which has been submitted to and approved by the Local Planning Authority.

Reason: To ensure that results of archaeological investigation are properly assessed and disseminated in accordance with NPPF

I hope these comments are helpful.

Yours sincerely

Wendy Rogers
Senior Archaeological Officer
Heritage Conservation



ECOLOGICAL ADVICE SERVICE

TO: *Alex Stafford*

FROM: *Luke Wallace*

DATE: *16 May 2022*

SUBJECT: *22/00571/AS / Land north of Possingham Farmhouse, Great Chart*

The following is provided by Kent County Council's Ecological Advice Service (EAS) for Local Planning Authorities. It is independent, professional advice and is not a comment/position on the application from the County Council. It is intended to advise the relevant planning officer(s) on the potential ecological impacts of the planning application; and whether sufficient and appropriate ecological information has been provided to assist in its determination. Any additional information, queries or comments on this advice that the applicant or other interested parties may have must be directed in every instance to the Planning Officer, who will seek input from the EAS where appropriate and necessary.

We have reviewed the ecological information submitted in support of this outline application and advise that additional information is sought from the applicant prior to determination of the planning application. We cannot comment on badgers as the report has been redacted.

Habitats

The predominate habitat on-site is intensively farmed arable land, with little biodiversity interest. The only on-site habitat with reasonable biodiversity interest consists of some boundary vegetation (with mature oak trees) and the wet ditch (potentially). Of note, the ecology report notes the ditch could potentially harbour the priority species 'three-lobbed crowfoot'.

The report recommends that a survey of the ditch is carried out should impacts be unavoidable. The indicative site plan shows that impacts to the ditch cannot be avoided and, regardless of what the final design is, it is unlikely that any development at this site can avoid impacts to the ditch. As such, we advise the wet ditch is subject to surveys for priority plant species, in conjunction with protected species surveys (discussed below). These should be provided prior to determination of the application.

Only recreational pressure has been identified as a potential impact on the nearby ancient woodland, with sufficient open space within the development being proposed as a solution to

relieve recreational pressure. We query if there is sufficient open space within the indicative plans to adequately relieve pressure on ancient woodland habitat. As such, we recommend that the final design includes more quality open space for recreational activities.

We also highlight that a likely increase in cat predation has been omitted from the potential impacts (although there is little that can be implemented to mitigate against this impact).

Protected Species

Whilst we are satisfied with proposals regarding reptiles, breeding birds and hazel dormice, which can be suitably addressed with precautionary approaches for the construction phase, the report notes that some protected species surveys are likely to be required. This includes Great Crested Newt (GCN) and water vole.

Five off-site waterbodies have been identified within 250m of the site, with the report stating that presence/absence surveys for GCN are needed. Alternatively, a counter-signed District Level Licence could be provided. Regardless, we highlight that protected species status/mitigation should be provided prior to determination of the application, in alignment with paragraph 99 of the ODPM 06/2005.

Additionally, the ecology report states that if impacts to the wet ditch cannot be avoided, a water vole survey will need to be undertaken. As mentioned above, the indicative site plan shows that impacts cannot be avoided and regardless, it is highly likely that any final design cannot avoid impacts to the ditch. Therefore, we advise that the ditch is surveyed, and results provided prior to determination of the application.

Another protected species consideration is the impact of development's lighting upon foraging and commuting bats. A sensitive lighting plan for the operational development will need to be implemented and, as such, we advise this is conditioned with any granted planning permission. We can provide example condition wording once the further information (above) has been provided.

Biodiversity Net-Gain

Under section 40 of the NERC Act (2006), paragraph 174 of the NPPF (2021) and the Environment Act (2021), biodiversity must be maintained and enhanced through the planning system. Additionally, in alignment with paragraph 180 of the NPPF 2021, the implementation of enhancements for biodiversity should be encouraged.

As the approximate number of units and general design layout is known, an outline biodiversity net-gain assessment (using the Defra metric) can be provided at this stage. However, given that the site is predominantly low ecological value arable land, it is our view that biodiversity net-gain can be achieved, in accordance with the indicative site plan (although this will be heavily dependent on the establishment methods and management of the proposed on-site habitats). Therefore, we advise that this assessment can be conditioned and provided at the detailed application stage.

Once it has been shown that the development can achieve a biodiversity net-gain, enhancement measures (such as integrated Swift nest boxes) should be proposed.

Luke Wallace
Biodiversity Officer

This response was submitted following consideration of the following documents:
Preliminary Ecological Appraisal (Rev P01). Lloydbore. March 2021.



ECOLOGICAL ADVICE SERVICE

TO: *Faye Tomlinson*

FROM: *Emma England*

DATE: *23 August 2023*

SUBJECT: *22/00571/AS / Land north of Possingham Farmhouse, Great Chart*

The following is provided by Kent County Council's Ecological Advice Service (KCC EAS) for Local Planning Authorities. It is independent, professional advice and is not a comment/position on the application from the County Council. It is intended to advise the relevant planning officer(s) on the potential ecological impacts of the planning application; and whether sufficient and appropriate ecological information has been provided to assist in its determination. Any additional information, queries or comments on this advice that the applicant or other interested parties may have must be directed in every instance to the Planning Officer, who will seek input from the EAS where appropriate and necessary.

SUMMARY – ADDITIONAL INFORMATION REQUIRED

We have reviewed the ecological information submitted in support of this application and advise that additional information is sought from the applicant prior to determination of the planning application. The submitted ecological impact assessment is incomplete and does not adequately assess cumulative impacts on ecological receptors from nearby developments. The additional information sought includes:

- An assessment of cumulative impacts for all important ecological receptors;
- Ditch survey data for great crested newts;
- Complete survey data for hazel dormice;
- Complete survey data for bats;
- Complete survey data for breeding birds;
- A mitigation/compensation strategy that considers all necessary ecological receptors e.g., great crested newt, hazel dormice, bats, breeding birds, badgers in relation to cumulative impacts, recreational pressures on and off-site and complete survey data;
- Full transparency regarding the Biodiversity Metric Calculation Spreadsheet in Excel format and visibility of the plans upon which the calculations were based.

Great Crested Newts

We note that further surveys on-site have been recommended to determine the potential impacts of proposals on great crested newts (GCN). These further surveys (carried out in accordance with the latest accepted standard practice) and any necessary mitigation/compensation measures proposed need to be provided prior to determination in line with paragraph 99 of the ODPM 06/2005. We note that 2022 represented a particularly hot and dry summer and so water levels present in the ditches in the summer of 2022 may not be representative of an average year. We note a number of recent GCN records within 1.5km of connective habitat to the site.

Where surveys indicate that GCN could be impacted by proposals, the applicant will need to decide prior to determination, what route to take for GCN; traditional licensing or District Level Licensing (DLL). If the former, a full mitigation strategy will have to be proposed to demonstrate that mitigation for impacts are achievable, and then evidence of licence acquisition can be conditioned. Alternatively, a countersigned DLL impact assessment and conservation payment certificate (IACPC) should be submitted to the local planning authority prior to determination of the application¹. Following that, evidence of the full conservation payment can be conditioned if planning permission is granted.

Hazel Dormouse

We note that final survey data in relation to hazel dormouse has not been submitted and those surveys completed have not been conducted in full accordance with current survey guidelines. It is understood that final survey data is required to understand dormouse use of the areas to the north and west of the site.

We note that an assessment of the potential cumulative impact of proposals to hazel dormouse as a result of development in the surrounds has not been considered. We further note that a mitigation strategy for dormouse has not been proposed.

To be in line with paragraph 99 of the ODPM 06/2005, all survey data (carried out in accordance with the latest accepted standard practice), and necessary mitigation/compensation measures need to be provided prior to determination.

Breeding Birds

Lloyd bore recommended breeding bird surveys in its preliminary ecological appraisal submitted with the application. However, Corylus Ecology has argued that breeding bird surveys are not necessary as the site will not be above local importance for breeding birds. However, both Lloyd bore and Corylus Ecology indicate that farmland bird species such as skylark will be impacted by proposals.

Skylark and other farmland bird species such as linnet are red listed species of conservation concern due to massive population declines². Many farmland bird species (including linnet and skylark) are also listed under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 as Species of Principal Importance (aka. Priority Species) for conservation. Section 40 of the NERC Act 2006 places a general duty on all public authorities, including the local planning authorities, to conserve and enhance biodiversity. In this regard, Natural England guidance 'Wild birds: advice for making

¹ [Great crested newts: district level licensing for local planning authorities - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/271121/gcns-dll-guidance.pdf)

² [bocc-5-a5-4pp-single-pages.pdf \(bto.org\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/271121/bocc-5-a5-4pp-single-pages.pdf)

planning decisions', published 14 January 2022³, states "you must have regard for the conservation of Section 41 species as part of your planning decision".

It is our opinion that as proposals have the potential to negatively impact upon a number of species listed as both Species of Principal Importance under Section 41 of the NERC Act 2006 and red listed species under Birds of Conservation Concern Volume 5⁴, breeding bird surveys should be carried out in advance of determination. Breeding bird surveys would provide an indication of the number of different species making use of the site, their conservation importance and provide an idea of the number of territories that could be impacted. This information should be used to assess the potential cumulative impacts of proposals in the context of nearby developments, and the complete picture used to inform necessary mitigations/compensations for these species.

We advise that we consider the current mitigations proposed for breeding birds are likely to be inadequate. We note that the site is large, ~24ha in size, and no mitigation has been proposed for the loss of skylark habitat, and that it is unknown how many skylark territories could be lost due to the lack of survey data. There is the further potential for in-combination effects in the local area due to nearby developments.

Corylus Ecology state that *"the suitability of the Site will be maintained and enhanced for breeding birds through:*

- *The creation and enhancement of the wildflower meadow and boundary features; planting will include native food plants for a range of bird species and invertebrates. Full details to be included at detailed design stage and LEMP.*
- *Bird Boxes will be positioned on trees around the boundaries of the Site. The boxes will be positioned at suitable locations on retained tree. Locations and numbers of boxes to be confirmed at detailed design stage. Boxes to be installed include:*
 - *Vivara Pro Woodstone Seville Bird Boxes*
 - *Schwegler 1B tit bird boxes*
 - *1ZA Schwegler Wren Roundhouse"*

However, we note that at least some of the proposed boxes may not be targeted at red or amber listed species of conservation concern/ those listed on Section 41 of the NERC Act as Species of Principal Importance for conservation/ those notable species likely to be currently found on-site. Further, it is not clearly stated how, or if any farmland bird species losses will be addressed within proposals. We therefore suggest that breeding bird mitigation is completely inadequate for the species assemblage likely to be currently making use of the site.

We request that breeding bird survey data (carried out in accordance with the latest standard practice⁵), be provided in advance of determination, and that this be clearly used to produce a tailored and appropriate mitigation/compensation strategy for breeding birds

³ [Wild birds: advice for making planning decisions - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/102227/wild_birds_advice_for_making_planning_decisions.pdf)

⁴ [Birds of Conservation Concern | BTO - British Trust for Ornithology](https://www.birdsconservation.org.uk/)

⁵ [Survey methodology | Bird Survey Guidelines](https://www.birdsconservation.org.uk/~/media/1277766/1277766.pdf)

making use of the site. This may entail a requirement for off-site compensation for lost habitat.

Badgers

Operational mitigation measures to address potential impacts to badgers have not been clearly identified in the submitted ecological report by Corylus Ecology. These measures need to be clearly outlined in the report and reflected in design plans as appropriate.

Bats

The Lloyd bore report indicates that the habitat around the edges of the site was classified as of moderate suitability for foraging and commuting bats as bat activity surveys of one visit per month between April and October were recommended. However, the Corylus Ecology report states that boundary habitats were classified as being of low suitability for foraging and commuting bats.

Current guidelines indicate that low suitability habitat is defined as: *“Habitat that could be used by small numbers of commuting bats such as gappy hedgerow or unvegetated stream, but isolated, i.e., not very well connected to the surrounding landscape by other habitat. Suitable, but isolated habitat that could be used by small numbers of foraging bats such as a lone tree (not in a parkland situation) or a patch of scrub.”*

Current guidelines indicate that moderate suitability habitat is defined as: *“Continuous habitat connected to the wider landscape that could be used by bats for commuting such as lines of trees and scrub or linked back gardens. Habitat that is connected to the wider landscape that could be used by bats for foraging such as trees, scrub, grassland or water.”*

We would suggest that the site better fits the description of moderate suitability habitat as the boundary hedgerows are not isolated from the wider landscape. The linkages to the wider landscape are corroborated by the presence of dormice in the hedgerows and aerial imagery that shows the hedgerows and ditches link to woodland in the wider surrounds.

Current survey guidelines indicate that for moderate suitability habitat, transect/spot count/timed search surveys should be carried out once per month (April to October) in appropriate weather conditions for bats to be active. At least one of the surveys should comprise a dusk and pre-dawn survey within one 24-hour period. In addition to these visits, automated/static detector surveys should be carried out, with data collected on five consecutive nights per month (April to October) in appropriate weather conditions for bats to be active.

We consequently conclude that the survey effort for commuting and foraging bats at the site is incomplete (with no results provided) and the methodology proposed appearing inadequate. We request that surveys for commuting and foraging bats be carried out in accordance with current guidelines for moderate suitability habitat. The results of the surveys, in addition to the potential cumulative effects from nearby developments should then be considered to inform what the potential impacts of the development (including from increased lighting) could be on commuting and foraging bats, and whether it will be possible to avoid/mitigate impacts to bats in designs.

Recreational Pressures

We note that proposals form part of a wider development and cumulative impacts in relation to recreational pressures on the wider countryside have not been clearly acknowledged or addressed in the submitted Corylus Ecology report. We note that the area set aside as greenspace on-site is small, and that it will be required to not only provide open space for people, but also provide mitigation for species and habitats affected by the development. It is not clear from submitted plans that the greenspace available will be able to provide the full suite of functionality requested of it. Further clarification is requested.

Biodiversity Net Gain

We are unable to assess the statements made with regards to biodiversity net gain without being able to review the Biodiversity Metric Calculation Spreadsheet in Excel format, and any plans/planting schedules upon which the calculations were based. We request that these documents be made available for review.

We would like to remind the applicant's ecologist that biodiversity net gain rules in relation to additionality⁶ must be *clearly* addressed within submitted calculations, and all the rules of the metric adhered to. Any habitat set aside for protected species mitigation can only contribute up to no net loss of biodiversity. We advise that two different metrics are submitted, with one detailing the compensation measures for protected species being included only – to clearly show what has been included but not beyond the equivalent of No Net Loss.

Emma England **Biodiversity Officer**

This response was submitted following consideration of the following documents:

Corylus Ecology (March 2023) Biodiversity Net Gain Report for Possingham Farm, Chilmington Green.

Corylus Ecology (April 2023) Ecological Impact Assessment Report for Possingham Farm, Chilmington Green.

Clague Architects (Undated) Site Layout Plan Rev F. Proposed Development at Possingham Farm, Chilmington Green, Ashford.

N (July 2021) Landscape Parameter Plan. Open Space Plan. Possingham Farm, Chilmington Green, Ashford, Kent.

Lloydbore (March 2021) Preliminary Ecological Appraisal Rev P01. Possingham Farm, Chilmington Green, Ashford.

Water Environment Ltd (October 2022) Technical Note: Nutrient Neutrality Statement. Possingham Farm, Chilmington Green.

⁶ [Biodiversity Net Gain FAQs - Frequently Asked Questions | Local Government Association](#)



Ashford Borough Council
Planning Department
Civic Centre
Tannery Lane
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TN23 1PL

FAO: Alex Stafford

BY EMAIL ONLY

Economic Development

Invicta House
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Maidstone
ME14 1XX

Phone: 03000 415101
Ask for: Vicky Thistlewood
Email:
Victoria.thistlewood@kent.gov.uk

17 May 2022

Your Ref: AS/22/00571
Our Ref: K/E/AS/22/00571 VT

Dear Alex

Planning Application: AS/22/00571 Provision and Delivery of County Council Community Services:

We refer to the above planning application which concerns proposed residential development at **Land north of Possingham Farmhouse, Ashford Road, Great Chart, Kent** and comprising: **655 new households**.

The County Council has assessed the implications of this proposal in terms of the delivery of its community services and is of the opinion that it will have an additional impact on the delivery of its services. These impacts will require mitigation, either through the direct provision of infrastructure or the payment of an appropriate financial contribution.

The Planning Act 2008 and the Community Infrastructure Levy Regulations 2010 (the CIL Regulations) (Regulation 122) require that requests for development contributions of various kinds must comply with three specific legal tests:

1. Necessary,
2. Related to the development, and
3. Reasonably related in scale and kind

These tests have been duly applied in the context of this planning application and give rise to the following specific requirements (the evidence supporting these requirements is set out in the attached Appendices).

Request Summary

	Per Applicable House (392)	Per applicable flat (158)	Total (excluding *)	Project
Primary Education	£6,800.00	£1,700.00	£2,934,200.00	Towards new education places at the new 2FE Primary school at Court Lodge and/or within the Planning Group and neighbouring Planning Group.
Primary Education Land	£2,363.92	£590.98	£1,020,031.48	Proportionate contribution towards a new primary school site at Court Lodge or alternative location in the planning group or neighbouring Planning Group.
Secondary Education	£5,176.00	£1,294.00	£2,233,444.00	Towards the provision of new secondary places at Chilmington Green and/or within the Planning Group
<p>*'Applicable' excludes: 1 bed units of less than 56 sqm GIA, and any sheltered accommodation. Please confirm whether the 105No. 1bedflats are under 56sqm GIA.</p>				
	Per Dwelling (655)	Total	Project	
Community Learning	£16.42	£10,755.10	Contributions requested towards additional equipment and resources for Adult Education Centres locally	
Youth Service	£65.50	£42,902.50	Contributions requested towards additional resources for the Ashford Youth Service to enable outreach work in the vicinity of the development.	
Library Service	£55.45	£36,319.75	Contributions requested towards additional Library equipment, stock, services including digital infrastructure, shelving and resources for the new borrowers at Libraries in the Ashford Urban Area.	
Social Care	£146.88	£96,206.40	Specialist Housing Provision in the District, adaptation of community facilities, technology and equipment to promote independence in the home, multi sensory facilities	

			and changing place facilities in the vicinity of the development.
	All Homes built as Wheelchair Accessible & Adaptable Dwellings in accordance with Building Regs Part M 4 (2)		
Broadband:	<p>Condition: Before development commences details shall be submitted for the installation of fixed telecommunication infrastructure and High Speed Fibre Optic (minimal internal speed of 1000mb) connections to multi point destinations and all buildings including residential, commercial and community. The infrastructure installed in accordance with the approved details during the construction of the development, capable of connection to commercial broadband providers and maintained in accordance with approved details.</p>		
	<p>Reason: To provide high quality digital infrastructure in new developments as required by paragraph 112 NPPF.</p>		
Highways	<i>Kent Highway Services will respond separately</i>		

Please note that these figures:

- are to be **index linked by the BCIS General Building Cost Index from April 2020 to the date of payment** (Apr-20 Index 360.3)
- are valid for 3 months from the date of this letter after which they may need to be recalculated due to changes in district council housing trajectories, on-going planning applications, changes in capacities and forecast rolls, projects and build costs.
- Bonds may be required where the applicant wishes to pay education contributions in phased payments.

Justification for infrastructure provision/development contributions requested

The County Council has modelled the impact of this proposal on the provision of its existing services and the outcomes of this process are set out below and in the attached appendices.

Education

Kent County Council is the Statutory Authority for education and is the Strategic Commissioner of Education Provision.

Primary Education

The impact of this proposal on the delivery of the County Council's services is assessed in Appendix 1.

The proposal gives rise to additional primary school pupils during occupation of the development. This need, cumulatively with other new developments in the vicinity, can only

be met through the provision of additional places at the propose 2FE Primary school at Court Lodge and/or within the Planning Group or neighbouring Planning Group.

This proposal has been assessed in accordance with the KCC Development Contributions Guide methodology of *'first come, first served'* assessment; having regard to the indigenous pupils, overlain by the pupil generation impact of this and other new residential developments in the locality.

Build Contribution

The County Council requires a financial contribution towards construction of the new places at **£6800 per 'applicable' house** and **£1700 per 'applicable' flat** ('applicable' means: all dwellings except 1 bed of less than 56sqm GIA –**please confirm whether the 105No. x 1 bed flats proposed are below this threshold**).

Land Contribution – Appendix 1a

The County Council also requires proportionate contributions towards the Primary School land acquisition cost at **£2364.920 per 'applicable' house** and **£590.98 per 'applicable' flat**.

The site acquisition cost is based upon current local land prices and any section 106 agreement would include a refund clause should all or any of the contribution not be used or required. The school site contribution will need to be reassessed immediately prior to KCC taking the freehold transfer of the site to reflect the price actually paid for the land.

Please note this process will be kept under review and may be subject to change (including possible locational change) as the Local Education Authority must ensure provision of sufficient pupil spaces at an appropriate time and location to meet its statutory obligation under the Education Act 1996, and as the Strategic Commissioner of Education provision in the County under the Education Act 2011.

KCC will commission additional pupil places required to mitigate the forecast impact of new residential development on local education infrastructure generally in accordance with its Commissioning Plan for Education Provision 2022-26 and Children, Young People and Education Vision and Priorities for Improvement 2018-2021.

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Secondary School Provision

The impact of this proposal on the delivery of the County Council's services is assessed in Appendix 1.

A contribution is sought based upon the additional need required, where the forecast secondary pupil product from new developments in the locality results in the maximum capacity of local secondary schools being exceeded.

The proposal is projected to give rise to additional secondary school pupils from the date of occupation of this development. This need can only be met through the provision of new accommodation at the proposed Chilmington Green Secondary School and/or places within

the Planning Groups and will be provided and delivered in accordance with the Local Planning Authority's Infrastructure Delivery Plan (where available); timetable and phasing.

The County Council requires a financial contribution towards construction of the new school at **£5176.00 per 'applicable' house** and **£1294.00 per 'applicable' flat** ('applicable' means: all dwellings except 1 bed of less than 56sqm GIA).

Please note this process will be kept under review and may be subject to change as the Local Education Authority will need to ensure provision of the additional pupil spaces within the appropriate time and at an appropriate location.

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Community Services – Appendix 2

Community Learning

KCC provides community learning facilities and services for further education in line with KCC policies as set out in its [Strategic Statement Increasing Opportunities, Improving Outcomes](#) (adopted Spring 2015). Community Learning and Skills (CLS) helps people moving to a new development overcome social isolation and encourages community cohesion, as well as improving skills in a wide range of areas.

There is an assessed shortfall in provision for this service: the current adult participation in both District Centres and Outreach facilities is in excess of current service capacity, as shown in Appendix 2, along with the cost of mitigation.

To accommodate the increased demand on KCC Community Learning, the County Council requests **£16.42 per dwelling** towards the cost of providing additional equipment and resources for Adult Education Centres locally.

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Youth Service

KCC has a statutory duty to provide Youth Services under section 507B of the Education Act 1996. This requires KCC, so far as reasonably practicable, to secure sufficient educational leisure-time activities and facilities to improve the well-being of young people aged 13 to 19 and certain persons aged 20 to 24.

To accommodate the increased demand on the Kent Youth Service, the County Council requests **£65.50 per dwelling** towards additional resources for the Ashford Youth Service to enable outreach work in the vicinity of the development.

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Library Service

KCC is the statutory Library Authority. Under the Public Libraries and Museums Act 1964, KCC has a statutory duty to provide 'a comprehensive and efficient service'. The Local Government Act 1972 also requires KCC to take proper care of its libraries and archives.

Borrower numbers are in excess of capacity, and bookstock in the Ashford Borough at 734 items per 1000 population is below the County average of 1134 and both the England and total UK figures of 1399 and 1492, respectively.

To mitigate the impact of this development, the County Council will need to provide additional services, equipment, and stock to meet the additional demand generated by the people residing in these Dwellings.

The County Council, therefore, requests **£55.45 per household** to address the direct impact of this development, and the additional services, equipment and stock will be made available locally at libraries in the Ashford urban area, as and when the monies are received.

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Adult Social Care

The impact of this proposal on the delivery of the County Council's services is assessed in Appendix 3.

Kent County Council is the Statutory Authority for Adult Social Care. The proposed development will result in additional demand upon Adult Social Care Services (ASC), including older persons and adults with Learning/Neurodevelopmental/Physical Disabilities and Mental Health Conditions. Existing care capacity is fully allocated, with no spare capacity to meet additional demand arising from this and other new developments.

To mitigate the impact of this development, KCC Adult Social Care requires:

- a proportionate monetary contribution of **£146.88 per household** (as set out in Appendix 3) towards specialist care accommodation, assistive technology systems and equipment to adapt homes, adapting Community facilities, sensory facilities, and Changing Places locally in the Borough.
- The **Department for Levelling Up, Housing and Communities** identified in June 2019 guidance *Housing for older and disabled people*, that the need to provide housing for older & disabled people is critical. **Accessible and adaptable housing** enables people to live more independently and safely, providing safe and convenient homes with suitable circulation space, bathrooms, and kitchens. Kent Adult Social Care requests these dwellings are built to **Building Reg Part M4(2) standard** (as a minimum) to ensure that they remain accessible throughout the lifetime of the occupants, meeting any changes in the occupant's requirements.

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Broadband: Fibre to the premise/gigabit capable

The NPPF (para 114) and The Department for Digital, Culture, Media and Sport requires full fibre connection to new developments being gigabit capable fibre optic to the premise connection for all.

Please include a Planning Condition to provide 'fibre to the premise' (FTTP) broadband connections to all premises of gigabit capacity:

Planning Condition:

Before development commences details shall be submitted for the installation of fixed telecommunication infrastructure and High-Speed Fibre Optic (minimal internal speed of 1000mbps) connections to multi point destinations and all buildings including residential, commercial and community. The infrastructure installed in accordance with the approved details during the construction of the development, capable of connection to commercial broadband providers and maintained in accordance with approved details.

Reason:

To provide high quality digital infrastructure in new developments as required by paragraph 114 NPPF.

Developers are advised to make early contact with broadband providers, as there may be a long lead in time for cable installation and associated infrastructure.

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Implementation

The County Council is of the view that the above contributions comply with the provisions of CIL Regulation 122 and are necessary to mitigate the impacts of the proposal on the provision of those services for which the County Council has a statutory responsibility. Accordingly, it is requested that the Local Planning Authority seek a section 106 obligation with the developer/interested parties prior to the grant of planning permission. The obligation should also include provision for the reimbursement of the County Council's legal costs, surveyors' fees and expenses incurred in completing the Agreement, and County monitoring fee of £500 for each trigger within the Agreement. We would be grateful if you could share at your earliest convenience a draft copy of any section 106 agreement or UU prior to its finalisation.

Would you please confirm when this application will be considered and provide us with a draft copy of the Committee report prior to it being made publicly available. If you do not consider the contributions requested to be fair, reasonable, and compliant with CIL Regulation 122, it is requested that you notify us immediately and allow at least 10 working days to provide such additional supplementary information as may be necessary to assist your decision-making process in advance of the Committee report being prepared and the application being determined.

We look forward to hearing from you with details of progress on this matter.

Yours sincerely

Vicky Thistlewood

Vicky Thistlewood
Development Contributions
Kent County Council

Cc Hodson Developments Ltd
KCC, Education & Communities,
File

Appendices:

The following Appendices contain the technical details of the County Council's assessment process.

1. Education Assessment
 - 1a. School Land Contribution Assessment
2. Communities Assessment
3. Social Care Requirement

KCC developer contribution assessment for Primary Education

District:	Ashford	1-bed:	105
Site:	Land north of Possingham Farmhouse, Ashford Road, Great Chart, Kent	Houses:	392
Plan ref:	AS/22/00571	Flats:	158
Date:	27/04/2022	Total units:	655

Current and forecast pupils on roll for schools within

Ashford South planning group

DfE no.	School	2020-21 (A)	2021-22 (A)	2022-23 (F)	2023-24 (F)	2024-25 (F)	2025-26 (F)
3909	Ashford Oaks Primary School	408	415	410	403	399	404
2060	Beaver Green Primary School	409	412	398	387	374	375
2093	Chilmington Green Primary School						
2282	Great Chart Primary School	420	422	416	407	401	402
6919	John Wallis CE Academy	335	371	314	298	287	293
3299	John Wesley CE and Methodist Primary School	445	450	443	430	407	407
3743	St. Simon of England RC Primary School	205	205	204	200	199	199
Current and forecast pupils on roll (excluding the expected pupil product from new developments)		2,222	2,275	2,185	2,125	2,067	2,080
Required capacity to maintain 5% surplus capacity		2,339	2,395	2,300	2,237	2,176	2,190

Current and forecast capacity for schools within

Ashford South planning group

DfE no.	School	2020-21 (A)	2021-22 (A)	2022-23 (F)	2023-24 (F)	2024-25 (F)	2025-26 (F)
3909	Ashford Oaks Primary School	420	420	420	420	420	420
2060	Beaver Green Primary School	420	420	420	420	420	420
2093	Chilmington Green Primary School						
2282	Great Chart Primary School	420	420	420	420	420	420
6919	John Wallis CE Academy	420	420	420	420	420	420
3299	John Wesley CE and Methodist Primary School	450	450	450	450	420	420
3743	St. Simon of England RC Primary School	210	210	210	210	210	210
Current and forecast capacity (1)		2,340	2,340	2,340	2,340	2,310	2,310

(1) including expansion projects at **existing schools** that have successfully passed through statutory processes but may not yet be complete

Expected pupil product from new developments within

Ashford South planning group

Planning reference	Development	Houses	Flats	Primary product
AS/21/02058	Purchase Farm, Goldwell Lane, Great Chart, Ashford, Kent, TN26 1JS	40	0	11
AS/21/01654	Ashford International Sports and Social Club, Beaver Road, Ashford, Kent, TN23 7SG	0	12	1
AS/21/01335	Site B, Blue Barn Equestrian Centre, Blue Barn Farm, Ashford Road, Great Chart, Ashford, Kent, TN23 3DH	25	0	7
AS/21/01067	Blue Barn Equestrian Centre, Blue Barn Farm, Ashford Road, Great Chart, Ashford, Kent, TN23 3DH	43	0	12
AS/20/01318	Prima Recycling Ltd, Ninn Lane, Great Chart, Ashford, Kent, TN23 3DA	6	0	2
AS/18/00733	Land adjacent The Barn, Chilmington Green Lane, Great Chart, Kent, TN23 3DP	8	0	2
AS/18/01861	Land at Playing Fields and Linden Grove Primary School, Stanhope Road, Stanhope, Kent	117	54	37
AS/18/01550	The Gables, Mock Lane, Great Chart, Ashford, Kent, TN23 3DS	0	14	1
AS/18/01508	Recreation Ground between Halstow Way & Noakes Meadow, Ashford, Kent TN23 4EX (S106)	0	11	0
AS/18/00748	Land North east of Toke Farm and east of Minden Cottage Ashford Road Great Chart Kent	12	0	3
AS/17/01674	Former Powergen Site Victoria Road Ashford Kent	0	7	0
New developments within the planning area		251	98	76
This development		392	158	121

Assessment summary

Detail	2020-21 (A)	2021-22 (A)	2022-23 (F)	2023-24 (F)	2024-25 (F)	2025-26 (F)
Surplus / (deficit) capacity (excluding the expected pupil product from new developments)	1	-55	40	103	134	120
Expected pupil product from new developments	76	76	76	76	76	76
Surplus / (deficit) capacity including the expected pupil product from new developments	-75	-131	-36	27	58	44
Expected pupil product from this development	121	121	121	121	121	121
Surplus / (deficit) capacity including the expected pupil product from new developments and this development	-196	-252	-157	-94	-63	-77
Expected pupil product from this development that on current plans for school provision cannot be accommodated	121	121	121	94	63	77

Background notes:

Pupil forecasts 2021 employed from September 2021. Incorporating roll data from Schools Census Autumn 2020. Data from the Health Authority includes pre-school children born up to 31st August 2020. Forecasts use trend data over the previous three years.

Expected pupil product from new developments within the planning area

Where a section 106 agreement has been secured for a development that includes education contributions (indicated by code S106 in brackets), the expected pupil product from that development has been shown as zero. This indicates that the pupil product need arising from the development has been mitigated by the developer.

Capacity and forecast data for Chilmington Green PS is (not shown) in the above table because this new school is fully funded by developer contributions in order to mitigate the pupil product arising from the Chilmington development. The expected additional future capacity is therefore not considered to be available to this assessment.

KCC developer contribution assessment for Secondary (Years 7-11) Education

District: Ashford	1-bed: 105
Site: Land north of Possingham Farmhouse, Ashford Road, Great Chart, Kent	House: 792
Plan ref: AS/22/00571	Flats: 158
Date: 27/04/2022	Total units: 655

Current and forecast pupils on roll for schools within

Ashford North non-selective and Ashford selective planning groups

DfE no.	School	2020-21 (A)	2021-22 (A)	2022-23 (F)	2023-24 (F)	2024-25 (F)	2025-26 (F)	2026-27 (F)	2027-28 (F)
4092	Highworth Grammar School	1,062	1,079	1,107	1,100	1,100	1,095	1,089	1,087
6918	John Wallis CE Academy	1,077	1,120	1,109	1,137	1,134	1,118	1,125	1,126
4246	North School	880	1,071	1,073	1,110	1,116	1,105	1,118	1,112
4528	Norton Knatchbull School	981	963	998	1,009	1,010	1,000	996	995
4196	Towers School	1,129	1,241	1,262	1,321	1,322	1,307	1,319	1,310
4007	Wye School	901	897	925	941	936	921	921	913
Current and forecast pupils on roll (excluding the expected pupil product from new developments)		5,730	5,971	6,074	6,218	6,198	6,146	6,179	6,153
Required capacity to maintain 5% surplus capacity		6,032	6,285	6,393	6,545	6,524	6,469	6,504	6,476

Current and forecast capacity for schools within

Ashford North non-selective and Ashford selective planning groups

DfE no.	School	2020-21 (A)	2021-22 (A)	2022-23 (F)	2023-24 (F)	2024-25 (F)	2025-26 (F)	2026-27 (F)	2027-28 (F)
4092	Highworth Grammar School	1,110	1,140	1,140	1,140	1,110	1,080	1,050	1,050
6918	John Wallis CE Academy	1,100	1,125	1,125	1,125	1,100	1,075	1,075	1,075
4246	North School	990	990	1,020	1,050	1,050	1,050	1,050	1,050
4528	Norton Knatchbull School	1,269	1,296	1,296	1,296	1,269	1,242	1,215	1,215
4196	Towers School	480	480	480	480	450	450	450	450
4007	Wye School	5,947	6,055	6,111	6,141	6,054	5,972	5,890	5,890
Current and forecast capacity (1)									

(1) including expansion projects at existing schools that have successfully passed through statutory processes but may not yet be complete

Expected pupil product from new developments within

Ashford North non-selective and Ashford selective planning groups

Planning reference	Details	Houses	Flats	Secondary product
AS/21/02038	Newlands Farm, Charing Heath Road, Charing, Ashford, Kent, TN27 0AL	5	0	1
AS/21/02036	Broadfield, Church Hill, Charing, Ashford, TN27 0BU	4	0	0
AS/22/00367	Dehambrook, at West Hill, Charing Hill, Charing, Kent	2	0	0
AS/22/00279	Land on the west side of Headcorn Road, Biddenden, Kent	1	0	0
AS/22/00249	Hemwood Car Park, Hemwood, Ashford, Kent	0	14	1
AS/22/00131	Mineral Depot, Canterbury, Wiltshire Road, Kennington, Ashford, Kent, TN24 9QP	127	18	26
AS/22/00136	Liberty Barn, Canterbury Road, Brabourne, Kent	1	0	0
AS/21/02216	The Old Flour Mills, East Hill, Ashford, Kent	0	29	1
AS/21/02206	Barn in field rear of 22, Loyds Green, Wittersham	1	0	0
AS/21/02181	Hill Farm, Ravenswood, Stoddard Church Road, Charing, Ashford, TN27 0NU	1	0	0
AS/21/02146	Land at Eureka Business Park, Trinity Road, Boughton Aluph, Kent	374	0	75
AS/21/02058	Purchase Farm, Godwell Lane, Great Chart, Ashford, Kent, TN26 1JS	40	0	8
AS/21/01826	Lot 10 Redwood, Tenterden Road, Rolvenden	8	0	0
AS/21/01688	Deborah, Woodchurch Road, Shadoxhurst, Ashford, Kent, TN26 1LE	12	0	0
AS/21/01656	Land west of Copse Hall, Biddenden Road, Smeardon	1	0	0
AS/21/01654	Ashford International Sports and Social Club, Beaver Road, Ashford, Kent, TN23 7SG	0	12	1
AS/21/01569	Houses Miles, The Street, Great Chart, Ashford, Kent	4	0	1
AS/21/01406	Lot 10 Tyle House Farm & Mount Pleasant Stocks Rd Wittersham	26	0	1
AS/21/01361	Land North East of 74, North Street, Biddenden, Kent	50	0	3
AS/21/01325	Site B, Blue Barn Equestrian Centre, Blue Barn Farm, Ashford Road, Great Chart, Ashford, Kent, TN23 3DH	25	0	5
AS/21/01294	Land between 85-110 Front Road, Woodchurch	40	0	8
AS/21/01292	Wye College land and buildings Site Wye 3, Otteragh Road, Wye, Kent	40	0	4
AS/21/01293	Farmer A D A S offices, Otteragh Road, Wye, Ashford, Kent, TN25 5EL	20	0	8
AS/21/01135	Land west of Headcorn Farm, Warehorne Road, Warehorne	6	4	0
AS/21/00605	Boughton Court, Church Lane, Boughton Aluph, Ashford, Kent, TN23 4EU	1	0	0
AS/21/01067	Blue Barn Equestrian Centre, Blue Barn Farm, Ashford Road, Great Chart, Ashford, Kent, TN23 3DH	43	0	9
AS/21/00927	Land between Boame House and Summerhill Cottages, Ashford Road, High Halden, Kent	28	0	1
AS/21/00765	Wiler Farm, Luckford Lane, Smeardon, Ashford, TN27 8QW	2	0	0
AS/21/00790	Land between Woodchurch Lane and Appledore Road, Tenterden, Kent	145	0	7
AS/21/00750	55 Habbodon Avenue, Ashford, Kent, TN24 8BN	12	8	3
AS/21/00730	Coombe Wood Business Park, Tenterden Road, Biddenden, Ashford, Kent, TN27 8BH	4	0	0
AS/21/00712	Stone Green Nurseries, Puckley Road, Betheredon	5	0	0
AS/21/00681	Land south east of Old Barn, Betheredon Road, Shadoxhurst, Kent	10	0	1
AS/21/00627	Land rear of 7 to 14, Hamers Way, Egerton, Kent	13	0	1
AS/21/00624	Land south east of Farm, Appledore Road, Woodchurch, Kent	12	4	0
AS/21/00575	The Bamboos, Bookhanger Lane, Kennington, Ashford, Kent, TN25 4AH	5	0	1
AS/21/00126	Land south east of, Ashford Road, Kingsnorth, Kent	15	0	3
AS/20/01752	Pepper Farm House, 20 Pepper Road, Wittersham, Tenterden, TN20 7PD	23	0	1
AS/21/00028	The Incha Press, Lower Queens Road, Ashford, Kent, TN24 9HN	60	75	16
AS/20/01600	Land adjacent Four Winds, New Road, Egerton, Kent	15	0	1
AS/20/01318	Prima Recycling Ltd, Wren Lane, Great Chart, Ashford, Kent, TN23 3DA	6	0	1
AS/20/01048	Elton Farm, Elton Lane, Ashford, Kent, TN27 0SQ	1	0	0
AS/20/00975	Lot 10 Well House, 4 Court Lodge Road, Appledore	5	0	0
AS/20/00955	Messingham Farm, Pilgrims Way, Brabourne, Ashford TN25 5UJ	3	0	1
AS/20/00947	1 to 11 New Remts, Ashford, TN21 1LE	0	3	0
AS/20/00868	Redhorse House, Hamstead Road, Hamstead, Ashford, Kent, TN26 2EB	2	0	0
AS/20/00711	Swanton House, Elwick Road, Ashford, Kent, TN23 1NN	0	30	2
AS/20/00408	Land Parcel 38 Former Rowcroft and Templar Barracks site, Templar Way, Ashford, Kent	19	16	5
AS/20/00362	Land at Goddard Lane, Hopton, Ashford	11	0	2
AS/20/00339	Abbotsfield, Lees Rd, Brabourne, Ashford, Kent TN25 6AN	1	0	0
AS/20/00623	Moat Farm, Hoons Green, Wittersham, Tenterden Kent TN30 7PR	1	0	0
AS/20/00604	Land south west of Restoration Ground Road and north and east, Smallhythe Road, Tenterden	5	0	0
AS/20/00312	Noakes Farm, Buckton, Ashford TN25 29S	5	29	0
AS/20/00313	Land east of Little Rye, Pilgrims Way, Charing, Kent	3	0	1
AS/20/00154	Land to the west of Calveley Lane, Aldington, Kent	33	0	7
AS/20/00194	High Tree Lodge, Buck Street, Chiddingfold, Ashford, TN25 4AT	15	0	5
AS/18/01816	Land North of Farnham, Blind Lane-Merham Kent	7	0	1
AS/19/01742	Plot 2, Former Wye College Pig Unit, Amarg Road, Wye	1	0	0
AS/19/01785	Eleven Acres Shaw, Redbrook Street, Woodchurch, Kent	4	0	0
AS/19/01701	Land east of Ham Street Bypass and south west of, Brocksman Lane, Bilsington	100	0	20
AS/19/01679	Land north of Farley Close, Woodchurch Road, Shadoxhurst, Kent	18	0	1
AS/19/01617	Bridge House, Chart Road, Ashford, Kent, TN23 3HT	0	34	2
AS/19/01597	Homes Plus, Beaver Road, Ashford, Kent, TN23 7QB	9	149	9
AS/19/01476	Newtown Railway Works, Newtown Road, Ashford, Kent, TN24 0PN (S106)	0	197	0
AS/19/01307	Site of former Ashford Hospital N H S Trust land between 3 and 23 Chart Road, Ashford, Kent	9	0	2
AS/19/01232	Land south-west of junction of, Bullfinch Avenue, Fishery, Smeardon, Ashford	0	38	2
AS/19/01207	Elton Court (Exclusion) Centre, Smeardon Road, Biddenden, Ashford, Kent, TN27 8DT	2	0	0
AS/19/01201	London Beach Golf Club, Ashford Road, St Michaels, Tenterden, Kent, TN30 6HX	3	0	0
AS/19/00997	Land between Doctors Surgery and 80, The Street, Appledore, Kent	12	0	1
AS/19/00753	Land between The Barn, Chillingham Green Lane, Great Chart, Kent, TN23 3DP	8	0	2
AS/19/00834	Land at Orchard Farm, Canterbury Road, Kennington, Kent (S106)	25	0	0
AS/19/00025	Land between railway line and, Willeborough Road, Kennington, Kent (S106)	518	170	0
AS/18/01861	Land at Playing Fields and Linden Grove Primary School, Stanhope Road, Stanhope, Kent	117	54	26
AS/18/01840	The Rosemary, Park Street, Ashford, Kent	0	13	0
AS/18/01822	Land at Court Lodge, Pound Lane, Kingsnorth	830	30	188
AS/18/01801	Land between Peppers and Oakleigh, Church Road, Smeath, Kent	31	0	6
AS/18/01550	The Galley, Moor Lane, Great Chart, Ashford, Kent, TN23 3PS	0	14	1
AS/18/01552	Ashford Golf Complex, Beags Lane, Betheredon, Ashford, Kent, TN23 3BZ	10	0	20
AS/18/01508	Recreation Ground between Hobdow Way & Noakes Meadow, Ashford, Kent TN23 4EX (S106)	0	11	0
AS/18/01168	Brundrett House, Tarnsey Lane, Ashford, TN23 3PN	0	144	7
AS/18/00748	Land North east of Oak Farm East of Hopton Cottage, Ashford Road Great Chart Kent	12	0	2
AS/18/00759	Land to the South of Sockfield House Ashford Road St Michaels Tenterden (S106)	30	0	0
AS/18/00652	Land south of Park Farm East Hamstead Bypass Kingsnorth Kent (S106)	328	25	0
AS/18/00644	Land to the North of 36 Marys Close and East of Ashford Road Hamstead Kent (S106)	80	0	0
AS/18/00594	Site of Former Knapdale Works Newtown Road Ashford	1	52	0
AS/18/00321	Phase 2 Old Clockhouse Green, Canterbury Road, Challock (S106)	19	0	0
AS/18/00062	Land between Ransley East and Greenacre, Ashford Road, High Halden (S106)	39	0	0
AS/18/00098	Warehorne Park, Wiltshire Avenue, Smeardon, Ashford (S106)	400	0	0
AS/18/00029	Land South of Swan Hoel, Maidstone Road, Charing (S106)	135	0	0
AS/18/00056	Land between A2070 and Railway north of, Warehorne Road, Hamstead, Kent TN26 2JR (S106)	70	0	0
AS/17/01926	Land rear of Charing Motors Ltd, Northdown Service Station, Maidstone Road, Charing, Kent	17	0	3
AS/17/01674	Former Powergen Site Victoria Road Ashford Kent	0	7	0
AS/17/01511	Godinton House, Godinton Road, Ashford	29	0	6
AS/17/00538	Farmer Precinct 13, Ashford Road, High Halden	3	6	0
AS/17/01118	Prince Albert, 199 New Street, Ashford	0	14	1
AS/17/00952	Land East of Hope House, Ashford Road, High Halden (S106)	28	0	0
AS/17/00567	Farmer Wye College, High Street, Wye (S106)	13	25	0
AS/17/00505	New Tree Park Homes, Maidstone Road, Charing	20	0	4
AS/17/00258	Land at rear of Boar Cottage Farm, North Street, Biddenden (S106)	45	0	0
AS/16/01841	Land between The Hollies and Park Farm Close, Woodchurch Road, Shadoxhurst (S106)	12	0	0
AS/16/01722	Land between Himehill Road and, Hyde Road, Willeborough, Kent (S106)	186	4	0
AS/16/01412	Saint Heights, land between Aldington Fresh Foods and Brockhursts Roman Road, Aldington	11	0	2
AS/16/01271	Courtenay Church Hill, Betheredon, Ashford	15	0	1
AS/16/01198	Farmer Highways Depot, Ashford Road, High Halden (S106)	25	0	0
AS/16/01157	Farmer Pledges Hill and South Kent College Site and land south of junction of Beaver Road (S106)	0	116	0
New developments within the planning area		4,638	1,305	499
This development		392	158	86

Assessment summary

Details	2020-21 (A)	2021-22 (A)	2022-23 (F)	2023-24 (F)	2024-25 (F)	2025-26 (F)	2026-27 (F)	2027-28 (F)
Surplus / (deficit) capacity (excluding the expected pupil product from new developments)	-85	-236	-262	-404	-470	-497	-614	-586
Expected pupil product from new developments	499	499	499	499	499	499	499	499
Surplus / (deficit) capacity including the expected pupil product from new developments	-84	-730	-762	-903	-969	-997	-1,113	-1,086
Expected pupil product from this development	86	86	86	86	86	86	86	86
Surplus / (deficit) capacity including the expected pupil product from new developments and this development	-670	-646	-676	-919	-1,055	-1,083	-1,199	-1,172
Expected pupil product from this development that can be accommodated	86	86	86	86	86	86	86	86

Background notes:

Pupil forecasts 2021 employed from September 2021. Incorporating roll data from Schools Census Autumn 2020. Data from the Health Authority includes pre-school children born up to 31st August 2020. Forecasts use trend data over the previous three years.

Expected pupil product from new developments within the planning area

Where a section 106 agreement has been secured for a development that includes education contributions (indicated by code S106 in brackets), the expected pupil product from that development has been shown as zero. This indicates that the pupil product need arising from the development has been mitigated by the developer.

Appendix 1A

Education

Site Name	Land north of Possingham Farmhouse, Ashford Road, Great Chart
Reference No.	AS/22/00571
District	Ashford

	Houses	Flats	Total
Unit Numbers	392	158	550

Primary Education			
		Per house	Per flat
<i>Primary pupil generation rate</i>		0.28	0.07
New Primary Pupils generated from this development			121
New Primary School build contribution			
	per Pupil	per House	per Flat
<i>New Build Rate</i>	£24,286	£6,800	£1,700
Contribution requested towards New Primary School Build			£2,934,200.00
New Primary School site contribution			
Residential Land Price per acre for Ashford			£700,000
	Pupils	Hectares	Acres
<i>2FE Primary School</i>	420	2.05	5.06555
	per Pupil	per House	per Flat
<i>Land Rate</i>	£8,442.58	£2,363.92	£590.98
Total = Primary School Site area x Residential Land Value x (Number of pupils generated by development/Number of pupils in New Primary School) = 5.06555 x 700000 x (120.82 / 420)			
Contribution requested towards New Primary School Site			£1,020,032.92
Total Primary Education Build and Land contribution			£3,954,232.92

Notes

Costs above will vary dependant upon land price at the date of transfer of the school site to KCC

Totals above will vary if development mix changes and land prices change

APPENDIX 2

KCC Communities

Development Contributions Assessment

Site Name	Land north of Possingham Farmhouse, Ashford Road,
Reference No.	AS/22/00571
District	Ashford
Assessment Date	04/05/2022
Development Size	655

COMMUNITY LEARNING & SKILLS	
	Services
Current Service Capacity	1,824
LESS Current adult participation in Ashford district	1,915
Initial capacity shortfall/surplus (Year ending 2019)	-91
New adult participation from this development	23.51 clients
Will service capacity be exceeded?	YES
Contributions requested from this development	<u>£16.42 per dwelling</u>
<i>655 dwellings from this proposal</i>	<u>£10,755.10</u>
Contributions requested towards additional equipment and resources for Adult Education Centres locally	

YOUTH SERVICE		
	Centre and Hub based Services	Outreach and Targeted Services
Current Service Capacity	1,640	883
LESS Current youth participation in Ashford district	1,723	928
Initial capacity shortfall/surplus (Year ending 2019)	-82	-44
New youth participation from this development	32.75 clients	
Will service capacity be exceeded?	YES	
Contributions requested from this development	<u>£65.50 per dwelling</u>	
<i>655 dwellings from this proposal</i>	<u>£42,902.50</u>	
Contributions requested towards additional resources for the Ashford Youth Service to enable outreach work in the vicinity of the development.		

LIBRARIES	
Libraries assessed for this development	Library Stock and Services
Current Service Capacity	15,089
LESS Current library participation in Ashford district	15,844
Initial capacity shortfall/surplus (Year ending 2019)	-754
New borrowers from this development	191 borrowers
Will service capacity be exceeded?	YES
Contributions requested from this development	<u>£55.45 per dwelling</u>
<i>655 dwellings from this proposal</i>	<u>£36,319.75</u>
Contributions requested towards additional Library equipment, stock, services including digital infrastructure, shelving and resources for the new borrowers at Libraries in the Ashford Urban Area.	

Net contributions requested for KCC Communities' Services

£89,977.35

KCC Social Care, Health and Wellbeing

Development Contributions Assessment over the planning period 1/1/2017 to 31/12/2037

Site Name	Land north of Possingham Farmhouse, Ashford Road, Great Chart
Reference No.	AS/22/00571
District	Ashford
Assessment Date	04/05/2022
Development Size	655

Net Social Care contributions requested:

Social Care and Health Services (Section A, B, C and D)

£96,204.63

Kent County Council has statutory responsibilities to provide a variety of services that support and care for vulnerable adults across the county. As the number of vulnerable adults increases, the funding available to the Council to provide supporting services falls. Adult Social Care services are a core function of the Council that have been undergoing major transformation for the last decade. The modern focus of the services is to support adults to live fulfilling and independent lives, ensuring adults receive the right care when they need it but are also supported to get back on their feet when it is appropriate and possible.

The current and future focus of Social Care and Health is on the projects below that offer a preventative approach to providing care. Based on an agreed set of service delivery models, an annual assessment of the impact of new and existing housing on these services has been carried out. Only the financial impacts relating to new housing are displayed. The proportionate costs of providing additional services for clients generated from the proposed development are set out below:

Note: Client numbers are rounded for display purposes but costs are based on unrounded figures

A. ASSISTIVE TECHNOLOGY

Assistive Technology systems are delivered to vulnerable adults in their own homes allowing them to live with the confidence that help is available when they urgently need it.

1. Forecast Assistive Technology clients generated from this development	7 client(s)
2. Forecast Assistive Technology clients generated from ALL proposed developments in the District (up to 2038)	224 clients
3. Overall Cost to all proposed development of increasing capacity for 224 clients by 2031 (@ £4.16 per dwelling)	£84,123.52

B. ADAPTING COMMUNITY FACILITIES

Adapting Community Facilities to be accessible for those with both mental and physical disabilities means vulnerable adults can access other support services and facilities safely and comfortably.

1. Forecast SC capital needs clients generated from this development	79 client(s)
2. Forecast Assistive Technology clients generated from ALL proposed developments in the District (up to 2038)	2,427 clients
3. Overall Cost to all proposed development of increasing capacity for 2,427 clients by 2031 (@ £85.71 per dwelling)	£1,733,227.62

C. SENSORY FACILITIES

Sensory facilities use innovative technology to provide a relaxing or stimulating environment for people of all ages with sensory impairment conditions. The facilities may be used to calm stress and anxiety, or to encourage sensory development and social engagement.

1. Forecast SC clients with physical and/or learning disabilities generated from this development	31 client(s)
2. Forecast Assistive Technology clients generated from ALL proposed developments in the District (up to 2038)	971 clients
3. Overall Cost to all proposed development of increasing capacity for 971 clients by 2031 (@ £30 per dwelling)	£606,660.00

D. CHANGING PLACE

Changing Places have additional features than standard accessible toilets to meet the needs of people with a range of disabilities and their carers. These toilets are usually located in or near a popular public area to ensure suitable facilities are available for use by vulnerable adults when necessary.

1. Forecast SC clients with physical and/or learning disabilities generated from this development	8 client(s)
2. Forecast Assistive Technology clients generated from ALL proposed developments in the District (up to 2038)	243 clients
3. Overall Cost to all proposed development of increasing capacity for 243 clients by 2031 (@ £27 per dwelling)	£545,994.00

Note: These projects will be delivered once the money is collected except where the implementation of the proposed project(s) relies upon pooled funds, then the project will commence as soon as practicable once the funding target has been reached.



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TN23 1PL

Flood and Water Management

Invicta House
Maidstone
Kent
ME14 1XX

Website: www.kent.gov.uk/flooding
Email: suds@kent.gov.uk
Tel: 03000 41 41 41
Our Ref: ABC/2022/089850
Date: 16 May 2022

Application No: 22/00571/AS

Location: Land north of Possingham Farmhouse, Ashford Road, Great Chart, Kent (TN26 1JR)

Proposal: Outline application for the development of up to 655 residential dwellings (including 30% affordable dwellings) to consider access, layout and scale with all other matters reserved.

Thank you for your consultation on the above referenced planning application.

Kent County Council as Lead Local Flood Authority have the following comments:

Having reviewed the information submitted we are generally accepting of the principles proposed for dealing with surface water, namely a system which attenuates the water in 2 basins each with a restricted discharge to the surrounding ditch network at a combined rate equating to 4l/s/Ha.

However we do have some concerns which we would like clarified/enacted prior to recommending approval:

- The site is split into 2 catchments with quoted corresponding developable areas of 7.277Ha and 9.19Ha and it is these areas that have been used to calculate the greenfield run off rates.

However on checking the microdrainage results supplied the above areas do not correspond with the areas utilised in the calculations these being 4.587Ha and 5.4Ha

Given the impermeable nature of the site we would ask for clarification to be provided as to why this area has decreased as we would expect for the majority of surface water to convey to the drainage network. Conversely if it can be demonstrated that the surface water from the non developed areas does not enter the positively drained system we would expect for this area to be reflected in the green field run off calculations

Ultimately we wish to make sure that the surface drainage system is designed such that the volume of water entering the system does not exceed it's designed capacity or that the discharge rate from the developed site is not excessive.

- As of 19 February 2016, the Environment Agency published new guidance on how to use climate change allowances in flood risk assessments. The guidance can be found at: <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

The new allowances for peak rainfall intensities have implications for drainage design and should be included within any drainage strategy prepared to accompany a planning application.

As LLFA, KCC will require that the design accommodates the 1 in 100 year storm with a 20% allowance for climate change and an additional analysis undertaken to understand the flooding implication for a greater climate change allowance of 40%.

This analysis must determine if the impacts of the greater allowance are significant and exacerbate any flood risk. The design may need to be minimally modified but may also need additional mitigation allowances, for example attenuation features or provision of exceedance routes. This will tie into existing designing for exceedance principles.

Until the above items above have been dealt with to our satisfaction we would ask that a holding objection be put in place.

This response has been provided using the best knowledge and information submitted as part of the planning application at the time of responding and is reliant on the accuracy of that information.

Yours faithfully,

Neil Clarke

Sustainable Drainage Team Leader
Flood and Water Management



Ashford Borough Council

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Tannery Lane
Ashford
Kent
TN23 1PL

Highways and Transportation

Ashford Highway Depot
4 Javelin Way
Ashford
TN24 8AD

Tel: 03000 418181

Date: 25 April 2022

Our Ref: MH

Application - 22/00571/AS

Location - Land north of Possingham Farmhouse, Ashford Road, Great Chart, Kent (TN26 1JR)

Proposal - Outline application for the development of up to 655 residential dwellings (including 30% affordable dwellings) to consider access, layout and scale with all other matters reserved.

Thank you for the consultation on the above planning application. Unfortunately, the necessary Transport Assessment and Travel Plan information has not been submitted as part of the required supporting documents with this planning application and therefore this planning application should not have been validated as it appears to not meet the local validation requirements. Kent County Council (KCC) Highways and Transportation are therefore unable to comment on this proposal until such a time as all the required information is submitted. This includes the proposed access arrangements (as no capacity assessments have been undertaken of the proposed access points) and the internal road layout details.

Regrettably, the applicant did not seek pre-application advice from KCC Highways and Transportation in order to scope out the required transport details to be submitted as part of any planning application.

Should this information not be forthcoming KCC Highways and Transportation will have no option other than to recommend refusal on a lack of appropriate information for assessment.

Notes:

No detailed house layout plans have been submitted with this planning application so layout cannot be an approved matter.

Yours Faithfully

Director of Highways & Transportation

*This is a statutory technical response on behalf of KCC as Highway Authority. If you wish to make representations in relation to highways matters associated with the planning application under consideration, please make these directly to the Planning Authority.



Ashford Borough Council

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Highways and Transportation

Ashford Highway Depot
4 Javelin Way
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TN24 8AD

Tel: 03000 418181

Date: 23 August 2022

Our Ref: MH

Application - 22/00571/AS

Location - Land north of Possingham Farmhouse, Ashford Road, Great Chart, Kent (TN26 1JR)

Proposal - Outline application for the development of up to 655 residential dwellings (including 30% affordable dwellings) to consider access, layout and scale with all other matters reserved.

Thank you for the consultation on the Transport Assessment as dated 15th July 2022 on the Ashford Borough Council planning web-site. Unfortunately the scope of the Transport Assessment has not been agreed with Kent County Council Highways and Transportation. A Travel Plan also has still not been submitted to date. I have the following comments on the Transport Assessment:

Local Facilities

The site cannot be considered to be sustainable until Chilmington Green is built out and provides all of the approved facilities such as the District Centre, primary and secondary schools and the various commercial and leisure uses. Until all these facilities are built out travel to key facilities will be outside of the Chilmington Green area and will be by private car due to lack of any formal pedestrian and cycle routes, public transport routes and the excessive distance to Ashford Town Centre. Other nearby villages such as Shadoxhurst and Bethersden do not provide key local facilities and there are no designated footway / cycleways to these villages.

Public Transport

There are currently no bus services serving the Chilmington Green site, and a half-hourly bus service between the site and Ashford Town Centre should have been provided by the developer, Hodson at 100 occupations at Chilmington Green. The existing 2 bus service runs approximately every two hours between Ashford and Tenterden but this is not considered frequent enough to achieve any meaningful modal shift and the existing bus stops are not accessible on foot from the application site as there are no footways along the A28.

Road Safety

Crash data needs to be sourced from KCC's crash data team and not Crashmap as Crashmap is out of date and does not cover the most recent 5 year period.

Development Proposals - Site Access

Stage 1 Road Safety Audits together with Designers Responses have not been undertaken for the proposed access points into the site.

The access point onto Access C Avenue Extension will also require a right hand turn lane as a minimum to prevent right turning traffic backing up to the Access C roundabout.

Vehicle tracking of both access points is required for a 12 metre long bus (not 9.795 metres as currently shown) and a 16.5 metre long articulated vehicle.

The suggested primary road corridor is not compliant with Local Transport Note 1 / 20 in that separated footway / cycleways should be provided adjacent to the primary road.

Trip Generation

The TRICS parameters used to estimate the proposed trip generation from the development are incorrect and should not include the following:

- 1) Suburban area (this site is not considered to be suburban in location)
- 2) Population range of between 125,000 and 250,000 within 5 miles (due to the population characteristics of Ashford)

Traffic Impact

No details have been provided as to when the 2022 traffic surveys took place together with the raw data sheets to validate the submitted spreadsheets and junction modelling results.

An assessment year of 2032 is required (year of application plus 10 years) as this is a strategic site with potential traffic impacts on M20 Junction 9. No details of committed developments have been supplied for the 2032 future assessment year and no TEMPRO growth figures have been provided so KCC are unable to confirm the suitability of the 2032 base traffic figures in the appendices.

Further highway capacity assessments are also required to assess the impact of the development on the local highway network based on the likely traffic flows from the development. This includes the following:

- 1) A28 Great Chart Bypass / Access A Roundabout
- 2) A28 Great Chart Bypass / Ashford Road priority junction
- 3) A28 Great Chart Bypass / Tithe Barn Lane Roundabout
- 4) A28 corridor between the Matalan and Drovers Roundabout (a VISSIM model will be required to assess the impact of the development on journey times and delay with and without the A28 improvement works as these have not been forthcoming to date by the applicant)
- 5) The Avenue / Chilmington Green Road crossroads junction
- 6) A28 Ashford Road / Old Surrender Manor Road priority junction
- 7) Chilmington Green Road / Tally Ho Road priority junction (this will need to take into account the proposed roundabout junction being promoted by the Court Lodge site)
- 8) Chilmington Green Road / Ashford Road, Kingsnorth priority junction (this will need to take into account the proposed staggering of the junction being promoted by the Kingsnorth Green site)

I therefore recommend that this application is refused for the following reasons:

- 1) The proposal, located remote from services, employment opportunities and being unlikely to be well served by public transport, is contrary to the aims of the National Planning Policy

Framework (paragraphs 29 – 41) which seeks to support reductions in green house gas emissions, reduce congestion and minimise journey lengths.

2) The proposed development is likely to generate an increase in pedestrian and cycle traffic on a highway lacking adequate footways and cycleways with consequential additional hazards to all users of the highway.

3) The proposals fails to assess the impact of the development on the local highway network, so it cannot be considered that the development will not result in a severe capacity impact on the local highway network and potential safety implications from increased congestion.

Notes:

No detailed house layout plans have been submitted with this planning application so layout cannot be an approved matter.

Yours Faithfully

Director of Highways & Transportation

*This is a statutory technical response on behalf of KCC as Highway Authority. If you wish to make representations in relation to highways matters associated with the planning application under consideration, please make these directly to the Planning Authority.



Ashford Borough Council

Civic Centre
Tannery Lane
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TN23 1PL

Highways and Transportation

Kroner House

Eurogate Business Park
Ashford

TN24 8XU

Tel: 03000 418181

Date: 21 July 2023

Our Ref: MH

Application - 22/00571/AS

Location - Land north of Possingham Farmhouse, Ashford Road, Great Chart, Kent (TN26 1JR)

Proposal - Outline application for the development of up to 655 residential dwellings (including 30% affordable dwellings) to consider access, layout and scale with all other matters reserved.

Thank you for the consultation on the Transport Assessment Addendum as dated 8th June 2023 on the Ashford Borough Council planning web-site. I have the following comments on the Transport Assessment Addendum:

Local Facilities

The site cannot be considered to be sustainable until Chilmington Green is built out and provides all of the approved facilities such as the District Centre, primary and secondary schools and the various commercial and leisure uses. To date only approximately 300 houses are occupied and the only facility that is currently open is the Chilmington Green Primary School and this is currently not safely accessible from the application site by walking or cycling. The only facility that will be accessible by walking or cycling is the Chilmington Green Secondary School which is currently due to open in September 2024.

Furthermore the applicant has recently submitted a Section 106A application to amend the trigger points for the delivery of the District Centre to 2,700 dwellings rather than 1,250 dwellings and The Hamlet to 3,500 dwellings rather than 1,400 dwellings as currently required in the existing Section 106 Agreement.

Until all these facilities are built out travel to key facilities will be outside of the Chilmington Green area and will be by private car due to lack of any formal pedestrian and cycle routes, public transport routes and the excessive distance to Ashford Town Centre. Other nearby villages such as Shadoxhurst and Bethersden do not provide key local facilities and there are no designated footway / cycleways to these villages. Because of the lack of these local facilities this will encourage unsustainable travel patterns from the outset and by the time any significant development at the District Centre is built out future residents will have got used to using their private motor vehicles.

Public Transport

There are currently no bus services serving the Chilmington Green site, and a half-hourly bus service between the site and Ashford Town Centre should have been provided by the developer, Hodson at 100 occupations at Chilmington Green. However this service has still not been provided to date. Furthermore the applicant is also now seeking to defer the delivery of the initial bus service to serve the Chilmington Green site to 2,684 dwellings through the recent Section 106A application. The existing 2 bus service that calls along the A28 runs approximately every two hours between Ashford and Tenterden but this will shortly be withdrawn by the bus service operator, Stagecoach South East so there will be no bus services calling along the A28 apart from daily school services. The site is therefore not accessible by public transport (bus or rail provision).

The applicant has not come up with any detailed proposals for this site to have its own bus service in order to provide links to the wider Chilmington Green development and also further afield such as Ashford Town Centre.

Road Safety

An up to date crash search has been completed however the full data output sheets need to be submitted for review by KCC Highways and Transportation so that KCC can see if there is a particular pattern in any of the crash locations.

Development Proposals - Site Access

Stage 1 Road Safety Audits together with Designers Responses have not been undertaken for the proposed access points into the site.

The access point onto Access C Avenue Extension will also require a right hand turn lane as a minimum to prevent right turning traffic backing up to the Access C roundabout. This is because this access will have more than 500 vehicle movements and is required to prevent right hand turning traffic backing up to the Access C roundabout which could cause inherent highway safety issues.

Trip Generation

The TRICS parameters used to estimate the proposed trip generation from the development are incorrect and should not include the following:

- 1) Suburban area (this site is not considered to be suburban in location)
- 2) Population range of between 125,000 and 250,000 within 5 miles (due to the population characteristics of Ashford)

An up to date TRICS assessment is required to compare with the proposed trip rates for the Possingham Farm site as set out in the Transport Assessment Addendum.

Journey Purpose

The use of 2021 National Travel Survey is not accepted by KCC Highways and Transportation as this was during a time of COVID related lockdowns with a significant number of employees working at home. 2011 census data should be used as this is considered more representative of typical travel patterns. The current data as set out in Table 5.2 says that only 11% of vehicle trips in the AM peak will be commuter related which is far too low and not realistic given that employees will use a private motor vehicle to travel to work. This data should be compared also to previous National Travel Survey data.

Trip Distribution

The presence of grammar schools in Ashford means that 25% of secondary aged children will go to grammar schools rather than Chilmington Green secondary school. It should therefore only be assumed that 65% of secondary aged children will go to Chilmington Green secondary school and the rest will travel elsewhere in Ashford.

Given that the applicant has submitted a S106A application to defer the delivery of the District centre at this stage the proposed food retail store is unlikely to be open for when any houses are occupied on this site. Therefore it must be assumed that 100% of food retail trips will be external to the site. This is likewise for non-food, leisure and personal business land uses.

Assessment of Proposed Development

Given the significant discrepancies identified above the traffic impact assessments are not acceptable to KCC Highways and Transportation as this has downplayed the likely true impact of the development northbound along the A28 corridor.

KCC does not agree that if the impact of the proposed development is less than 5% on a specific junction then it does not need to be modelled. The A28 is a highly sensitive traffic corridor and even a 2% increase in traffic flows through a junction for example will lead to significant more queuing and delay as all of the junctions are already operating in excess of capacity. KCC has produced a rebuttal note regarding the current S106A application in terms of the current capacity issues along the A28 corridor. This note demonstrates that there is no capacity within the network during weekday peak highway periods at present and certainly not to accommodate the forecast traffic demand from the Chilmington Green development in the future in advance of highway mitigation. Regrettably the applicant is now stating that they cannot source a bond to give KCC the financial security to deliver the A28 works. KCC will not deliver the scheme without this bond in place and therefore must object to any application on site going forward which would have a significant impact on travel times, delay and congestion along the A28 corridor.

It is KCC's view that the following junctions / corridors needs to be assessed given that KCC does not agree with the journey purpose and trip distributions as set out in the Transport Assessment:

- 1) Junction D - Sandy Lane / Ashford Road / Avenue Extension
- 2) Junction 1 - Great Chart Bypass / Chilmington Avenue
- 3) Junction 2 - Ashford Road / Great Chart Bypass
- 4) Junction 3 - Great Chart Bypass / Tithe Barn Lane
- 5) VISSIM Model of the whole A28 Chart Road corridor between the Matalan and Drovers Roundabouts. This needs to include the A28 in its current arrangement and then the A28 improvement scheme that will be delivered between Matalan and Tank Roundabouts.
- 6) Junction 5 - The Avenue / Chilmington Green Road

Even though KCC does not agree with the traffic impact assessment as currently undertaken it is clear that the impact on the Matalan roundabout is severe with significant increases in queuing and delay on the Chart Road North arm in the AM and PM peak and Great Chart Bypass in AM peak. The ARCADY model of the Matalan roundabout is also incorrect in that it shows very little queuing on Brookfield Road, Great Chart Bypass and Chart Road South arms. This is not the case as demonstrated in the queue survey table in KCC rebuttal note as shown below which shows significant queuing on the Great Chart Bypass, Brookfield Road and Chart Road North East arms in both AM and PM peak periods.

Table 2.1: Matalan Roundabout – Recorded Max Queue Lengths (2013 Vs 2023)

Time	2013 Survey				2023 Survey			
	Chart Rd (NW)	A28 Great Chart	Brookfie Id Rd	Chart Rd (NE)	Chart Rd (NW)	A28 Great Chart	Brookfie Id Rd	Chart Rd (NE)
AM Peak								
0700-0730	2	3	4	0	5	12	20	3
0730-0800	3	26	10	8	7	33	24	10
0800-0830	6	30	10	0	10	33	24	17
0830-0900	6	30	19	2	8	33	23	15
0900-0930	1	9	4	3	8	32	20	5
0930-1000	1	3	10	3	7	25	11	3
PM Peak								
1600-1630	7	6	8	8	10	17	24	5
1630-1700	4	5	16	15	10	23	16	5
1700-1730	5	5	7	15	9	33	24	17
1730-1800	2	12	14	10	10	33	23	12
1800-1830	0	3	6	10	10	8	15	4
1830-1900	1	9	13	4	5	8	9	2

I therefore recommend that this application is refused for the following reasons:

1) The proposal, located remote from services, employment opportunities and not being well served by public transport, is contrary to the aims of the National Planning Policy Framework (paragraphs 105, 110 and 112) which seeks to support reductions in green house gas emissions, reduce congestion and minimise journey lengths., KCC's Local Transport Plan and Ashford Borough Council's Local Plan policy SP1, which seeks to focus development at accessible and sustainable locations and 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.

2) The proposed development is likely to generate an increase in pedestrian and cycle traffic on highways lacking adequate footways and cycleways with consequential additional hazards to all users of the highway. The proposal is therefore contrary to the aims of the National Planning Policy Framework (paragraph 112), KCC's Local Transport Plan and is contrary to Ashford Borough Council's Local Plan policies TRA5 and TRA6 which seeks to promote walking and cycling links to wider footway and cycleway network.

3) The proposals will have a severe impact on the A28 corridor resulting in increased travel times, delay and congestion. This will lead to increased driver frustration and subsequent risk to highway safety. The proposal is therefore contrary to the aims of the National Planning Policy Framework (paragraph 111), KCC's Local Transport Plan and is contrary to Ashford Borough Council's Local Plan policy TRA7 which states that proposals which would generate levels and types of traffic movements, beyond that which local roads could reasonably accommodate in terms of capacity and road safety will not be permitted.

Notes:

No detailed house layout plans have been submitted with this planning application so layout cannot be an approved matter.

Yours Faithfully

Director of Highways & Transportation

*This is a statutory technical response on behalf of KCC as Highway Authority. If you wish to make representations in relation to highways matters associated with the planning application under consideration, please make these directly to the Planning Authority.



Alex Stafford
Planning Department
Ashford Borough Council

By email

Public Protection

PROW & Access Service
Invicta House, MAIDSTONE
ME14 1XX

Phone: 03000 413331
Ask for: Kate Beswick
Email: kate.beswick@kent.gov.uk

18th May 2022

Dear Alex

Location – Land north of Possingham Farmhouse, Ashford Road, Great Chart TN26 1JR

Proposal – Outline application for the development of up to 655 residential dwellings (including 30% affordable dwellings) to consider access, layout and scale with all other matters reserved.

Thank you for the opportunity to comment on the above application. Public Byways AW292, AW245 are directly affected by the site and Public Footpaths AW239, AW237 and AW220 either abut or are in close proximity to the proposed development. The locations of these paths are indicated on the attached extract of the Network Map. The Network Map is a working copy of the Definitive Map. The existence of the Public Right of Way (PROW) is a material consideration.

As a general statement, KCC's Public Rights of Way and Access Service is keen to ensure that their interests are represented with respect to our statutory duty to protect and improve Public Rights of Way (PROW) in the County, with reference to the Rights of Way Improvement Plan. Specifically, these relate to quality of life, supporting the rural economy, tackling disadvantage and safety issues, and providing sustainable transport choices.

KCC PROW have no objection to the application but **request by condition** that a PROW scheme of management is submitted and approved by ourselves prior to the commencement of any work, and that all PROW works are completed and approved by ourselves prior to first occupation. This would go some way to alleviate our concerns regarding the management of the scheme, given the developers management of the Chilmington Green site with regard to PROW to date.

The PROW Management scheme must include each Public Right of Way affected, to cover pre-construction, construction and completion over the phasing schedule. All details to be approved by KCC PROW and Access Service prior to commencement of any works if permission is granted.

KCC PROW require that the applicant takes a holistic approach to the development, considering the PROW network together with the Highways strategy proposals to ensure connectivity.

Section 106 funding - KCC PROW and Access Service would also advise that a financial contribution, in the form of Section 106 Agreement funding should be allocated to mitigate the loss of amenity, increased use and subsequent improvements that will be required in the wider network as the area is developed and to ensure connectivity to the main Chilmington Green development, schools, facilities etc. The increase in investment and policy from both central and local government towards a modal shift away from short car journeys should focus this project to provide a sustainable development for the future. The PROW network should not be seen as providing only leisure routes, but routes that with investment can provide high-quality Active Travel routes for employment and school commuting. (Ref. the works to the PROW routes within Chilmington, in partnership with Ashford Borough Council to ensure pedestrian and cycling connections). The routes for s106 funding would include Public Footpaths AW239, AW220, AW237. Costings for improvements to be provided.

Byway Open to all Traffic AW292

This runs from its junction with Ashford Road to connect with BOAT AW245, with user rights for pedestrians, equestrians, cyclist and non-mechanised vehicles. The proposed crossing of the Byway by the main access road therefore needs to be appropriate (controlled) to ensure public safety, given the access road will serve cars and bus services. Proposed surfacing, width (5m minimum) details of entry and exit from site, the junction with AW245, and signage to be detailed in the above-mentioned PROW Scheme of Management. The route must be within a wide, open green corridor with natural surveillance and good visibility at all junctions.

Byway Open to all Traffic AW245

This runs from Bethersden Road in the south to Chilmington Green Road, on the eastern boundary of the development site and within the site according to the various plans provided. The alignment should therefore be confirmed. The Byway carries user rights for pedestrians, equestrians, cyclist, and non-mechanised vehicles and will be crossed by the news Access Road to Chilmington Green; a crossing as detailed above will therefore be necessary, to be approved by KCC PROW and Access. The link on to AW292 must be definite not “potential” as described on the Access Parameter Plan / Design Parameters. The route should be improved on the whole length with an all-weather surface suitable for all vehicle use; as above proposed surfacing, width (5m minimum) details of entry and exit from site, the

junction with AW245, the junction with Chilmington Green Road / Bethersden Road and signage to be detailed in the above-mentioned PROW Scheme of Management.

Public Footpaths AW220 / AW237/ AW239

The above pedestrian routes will see increase of use and again provide connectivity across the wider network. As mentioned above, s106 funding will be requested for improvements to the routes as mitigation. We would also advise consideration is given to the viability of upgrading these PROW (particularly AW239), as a means of providing Active Travel walking and cycling between residential dwellings to the west of the site to education facilities, employment hubs and local amenities in the east as part of the greater expansion of the area.

Implementation and Delivery – Active Travel access is essential from the outset of any work commencing to enable both new and existing users to access amenities both within and off site (schools and community facilities). There can be no disruption or potential danger to public use of the network; any delay to the upgrading and/or construction of Rights of Way, cycle routes and other related works to the public right of way networks, would only increase the already significant impact on new and existing residents. All of these require commitment to Active Travel, connectivity of developments, sustainable transport, and the protection of and enhancement of the local area rural character. This point must be ensured through **condition**, to avoid potential conflict and repeat of difficulties experienced during the Chilmington Green build out.

Comments are made in reference to the following planning policy.

- **National Planning Policy Framework (February 2019) Section 91**
Planning policies and decisions should aim to achieve healthy, inclusive, and safe places which:
 - a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages
 - b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of clear and legible pedestrian routes, and high-quality public space, which encourage the active and continual use of public areas; and
 - c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.

- **National Planning Policy Framework (February 2019) Section 98**

Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.

- **National Planning Policy Framework (February 2019) Section 104**

Planning policies should:

d) provide for high quality walking and cycling networks and supporting facilities such as cycle parking (drawing on Local Cycling and Walking Infrastructure Plans)

- **National Planning Policy Framework (February 2019) Section 110**

Within this context, applications for development should:

a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use.

c) create places that are safe, secure, and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards.

And

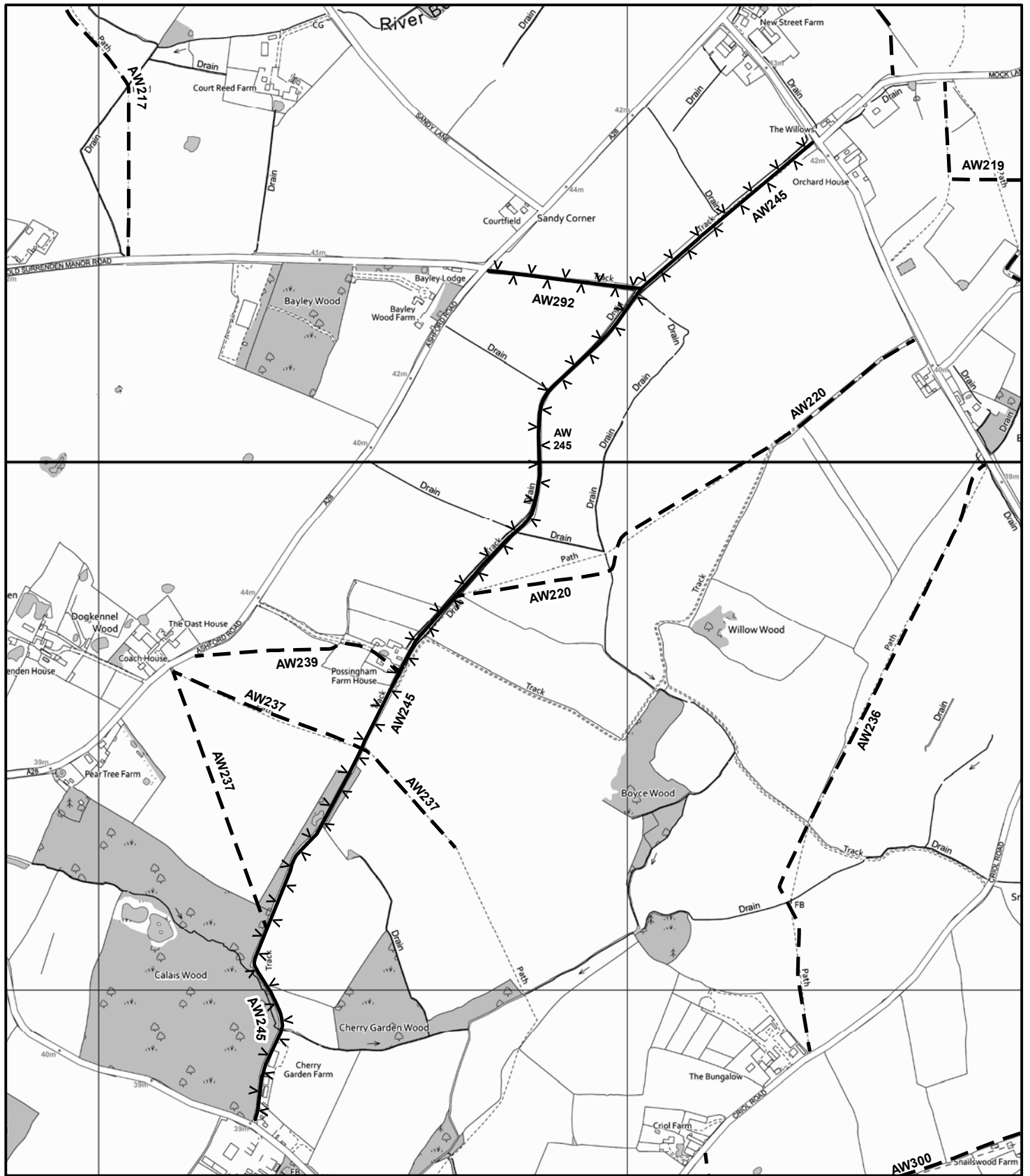
- **Kent County Council Rights of Way Improvement Plan 2018 – 2028**
- **Ashford Borough Council Local Plan Policies : TRA5 / TRA6 / TRA8 / ENV5 / IMP1**

This response is made on behalf of Kent County Council Public Rights of Way and Access Service. The views expressed should be considered only as the response of the County Council in respect of Public Rights of Way and Countryside Access matters relating to the application.

Yours sincerely

Kate Beswick

Rights of Way and Countryside Access Improvement Plan Officer
Public Rights of Way and Access Service



- — Footpath
- | — Bridleway
- ∨ — ∨ Restricted Byway
- ⌘ — ∨ Byway Open to All Traffic
- — Point path number or status changes
- ■ ■ Boundary of area covered by 1:2500 scale Network Map
- ▨ Area covered by 1:2500 scale Network Map

**EXTRACT OF THE WORKING COPY OF THE
DEFINITIVE MAP OF PUBLIC RIGHTS OF WAY
FOR THE COUNTY OF KENT**

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Produced by the KCC Public Rights of Way and Access Service

Created by:

Text

Checked by:

Text

Issue Date:

20/02/2020

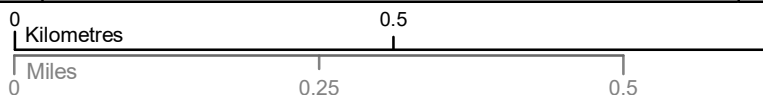
Reference:

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1:10,000





Alex Stafford
Planning Department
Ashford Borough Council

By email

Public Protection

PROW & Access Service
Invicta House, MAIDSTONE
ME14 1XX

Phone: 03000 413331
Ask for: Kate Beswick
Email: kate.beswick@kent.gov.uk

18th May 2022

Dear Alex

Location – Land north of Possingham Farmhouse, Ashford Road, Great Chart TN26 1JR

Proposal – Outline application for the development of up to 655 residential dwellings (including 30% affordable dwellings) to consider access, layout and scale with all other matters reserved.

Thank you for the opportunity to comment on the above application. Public Byways AW292, AW245 are directly affected by the site and Public Footpaths AW239, AW237 and AW220 either abut or are in close proximity to the proposed development. The locations of these paths are indicated on the attached extract of the Network Map. The Network Map is a working copy of the Definitive Map. The existence of the Public Right of Way (PROW) is a material consideration.

As a general statement, KCC's Public Rights of Way and Access Service is keen to ensure that their interests are represented with respect to our statutory duty to protect and improve Public Rights of Way (PROW) in the County, with reference to the Rights of Way Improvement Plan. Specifically, these relate to quality of life, supporting the rural economy, tackling disadvantage and safety issues, and providing sustainable transport choices.

KCC PROW have no objection to the application but **request by condition** that a PROW scheme of management is submitted and approved by ourselves prior to the commencement of any work, and that all PROW works are completed and approved by ourselves prior to first occupation. This would go some way to alleviate our concerns regarding the management of the scheme, given the developers management of the Chilmington Green site with regard to PROW to date.

The PROW Management scheme must include each Public Right of Way affected, to cover pre-construction, construction and completion over the phasing schedule. All details to be approved by KCC PROW and Access Service prior to commencement of any works if permission is granted.

KCC PROW require that the applicant takes a holistic approach to the development, considering the PROW network together with the Highways strategy proposals to ensure connectivity.

Section 106 funding - KCC PROW and Access Service would also advise that a financial contribution, in the form of Section 106 Agreement funding should be allocated to mitigate the loss of amenity, increased use and subsequent improvements that will be required in the wider network as the area is developed and to ensure connectivity to the main Chilmington Green development, schools, facilities etc. The increase in investment and policy from both central and local government towards a modal shift away from short car journeys should focus this project to provide a sustainable development for the future. The PROW network should not be seen as providing only leisure routes, but routes that with investment can provide high-quality Active Travel routes for employment and school commuting. (Ref. the works to the PROW routes within Chilmington, in partnership with Ashford Borough Council to ensure pedestrian and cycling connections). The routes for s106 funding would include Public Footpaths AW239, AW220, AW237. Costings for improvements to be provided.

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junction with AW245, the junction with Chilmington Green Road / Bethersden Road and signage to be detailed in the above-mentioned PROW Scheme of Management.

Public Footpaths AW220 / AW237

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Implementation and Delivery – Active Travel access is essential from the outset of any work commencing to enable both new and existing users to access amenities both within and off site (schools and community facilities). There can be no disruption or potential danger to public use of the network; any delay to the upgrading and/or construction of Rights of Way, cycle routes and other related works to the public right of way networks, would only increase the already significant impact on new and existing residents. All of these require commitment to Active Travel, connectivity of developments, sustainable transport, and the protection of and enhancement of the local area rural character. This point must be ensured through **condition**, to avoid potential conflict and repeat of difficulties experienced during the Chilmington Green build out.

Comments are made in reference to the following planning policy.

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Planning policies and decisions should aim to achieve healthy, inclusive, and safe places which:
 - a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages
 - b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of clear and legible pedestrian routes, and high-quality public space, which encourage the active and continual use of public areas; and
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d) provide for high quality walking and cycling networks and supporting facilities such as cycle parking (drawing on Local Cycling and Walking Infrastructure Plans)

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And

- **Kent County Council Rights of Way Improvement Plan 2018 – 2028**
- **Ashford Borough Council Local Plan Policies : TRA5 / TRA6 / TRA8 / ENV5 / IMP1**

This response is made on behalf of Kent County Council Public Rights of Way and Access Service. The views expressed should be considered only as the response of the County Council in respect of Public Rights of Way and Countryside Access matters relating to the application.

Yours sincerely

Kate Beswick

Rights of Way and Countryside Access Improvement Plan Officer
Public Rights of Way and Access Service



**Kent
Police**

Protecting and serving the people of Kent

Planning Officer
Ashford Borough Council
Civic Centre
Tannery Lane
Ashford
TN23 1PL

E-mail: carin.andrews@kent.police.uk

Date: 11th May 2022

Ref: 22/00571/AS/CA.1/AS-251

Dear Planning Officer,

Thank you for the opportunity to comment regarding:

Application Ref: 22/00571/AS
Location: Land north of Possingham Farmhouse, Ashford Road, Great Chart, Kent (TN26 1JR)
Proposal: Outline application for the development of up to 655 residential dwellings (including 30% affordable dwellings) to consider access, layout and scale with all other matters reserved.

We have considered this application regarding Crime Prevention Through Environmental Design (CPTED) in accordance with the National Planning Policy Framework (NPPF). Design and Access Statements (DAS) should demonstrate the design helps create an accessible and safe environment while minimising crime and disorder and fear of crime. Secured by Design (SBD) is the official UK Police flagship initiative combining the principles of designing out crime with physical security, found at www.securedbydesign.com.

Applicants/agents should consult a local Designing Out Crime Officer or qualified specialist to help design out crime, fear of crime, Anti-Social Behavior (ASB), nuisance and conflict at the earliest opportunity. In addition, we strongly encourage that the applicant bases the design on the SBD Homes 2019 guide for specifications for doorsets, windows, lighting, perimeter security and other suitable specifications. We recommend the applicant attains an SBD certification, which is free of cost, to show commitment to crime prevention and community safety. We would also be grateful if you could draw the applicant's attention to the Kent Design Guide, which will also assist them with Crime Prevention and Community Safety.

Design and Access Statement (DAS) should demonstrate the seven attributes of CPTED. CPTED addresses: **Access and Movement:** Places with well-defined routes, spaces and entrances that provide for convenient movement without compromising security; **Structure:** Places that are structured so that different uses do not cause conflict; **Surveillance:** Places where all publicly accessible spaces are overlooked; **Ownership:** Places that promote a sense of ownership, respect, territorial responsibility and community; **Physical Security:** Places that include necessary, well-designed security features; **Activity:** Places where the level of human activity is appropriate to the location and creates a sense of security at all times and **Management and Maintenance:** Places that are designed with management and maintenance in mind, to discourage crime in the present and future.

The applicant/agent has not addressed crime prevention, nor have they demonstrated the seven attributes of CPTED. If this planning application is given approval, we would like to request that a condition be included as part of the planning approval to ensure that Crime Prevention is

addressed effectively in this proposal and for the future outline proposal. If a planning condition is not made at this point the opportunity to fully address designing out for crime will fail.

If a **condition** is to be used, we would like to suggest:

The development hereby permitted shall incorporate measures to minimise the risk of crime. No development shall take place until details of such measures, according to the principles and physical security requirements of Crime Prevention through Environmental Design (CPTED) have been submitted to and approved in writing by the Local Planning Authority. The approved measures shall be implemented before the development is occupied and thereafter retained.

Reason for the condition: *In the interest of Security, Crime Prevention and Community Safety and to address our statutory duties under Section 17 of the Crime and Disorder Act 1998.*

If approved, site security is required for the construction phase. There is a duty for the principal contractor "to take reasonable steps to prevent access by unauthorised persons to the construction site" under the Construction (Design and Management) Regulations 2007. The site security should incorporate plant, machinery, supplies, tools and other vehicles and be site specific to geography and site requirements.

Our comments are designed to show a clear audit trail for Designing Out Crime, Crime Prevention and Community Safety and to meet our and Local Authority statutory duties under Section 17 of the Crime and Disorder Act 1998. We welcome a discussion with the applicant/agent about site specific designing out crime. If the points above are not addressed, they can affect the development and local policing. In addition, the Strategic Planning Department was made aware of this application in case they wish to submit their comments.

This information is provided by Kent Police Design Out Crime Team and refers to situational crime prevention. This advice focuses on CPTED and Community Safety regarding this specific planning application.

Yours sincerely,

Carin Andrews

Designing Out Crime Officer
Public Protection and Partnerships Command
PVP Central Coordination Department

Online Comments Form

Application Details

App No: 22/00571/AS

Location: Land north of Possingham Farmhouse, Ashford Road, Great Chart, Kent (TN26 1JR)

Proposal: Outline application for the development of up to 655 residential dwellings (including 30% affordable dwellings) to consider access, layout and scale with all other matters reserved.

Person and Comment Details

Name: Parish Clerk Kingsnorth Council

Address: Kingsnorth Parish Council Kingsnorth Recreation Centre Field View Kingsnorth Kent TN23 3NZ

Action: Objecting

Created On: 12/05/2022 15:31:35

Comments

Object – The Parish Council notes that there is no Traffic Assessment on the portal or the document list. Without this we cannot comment on the implications for our Parish and the application should not have been validated. The consultation period is not valid until the relevant documentation is provided. Please remove the application from the portal. It is also not included in the Local Plan.



National Highways Planning Response (NHPR 21-09) Formal Recommendation to an Application for Planning Permission

From: Regional Director
Operations Directorate
South East Region
National Highways
planningse@nationalhighways.co.uk.

To: Ashford Borough Council (FAO Case Officer: Alex Stafford)
planning.comments@ashford.gov.uk

CC: transportplanning@dft.gov.uk
spatialplanning@nationalhighways.co.uk

Council's Reference: 22/00571/AS

Location: Land North of Possingham Farmhouse, Ashford Road, Great Chart, Kent, TN26 1JR

Proposal: Outline planning application for the development of up to 655 residential dwellings (including 30% affordable dwellings) to consider access, layout and scale with all other matters reserved.

National Highways Ref: 94796 #17528

Referring to the consultation on a planning application referenced above dated 25 April 2022, in the vicinity of the M20 at Junction 9 that forms part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is that we:

- ~~a) offer no objection (see reasons at Annex A);~~
- ~~b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – National Highways recommended Planning Conditions & reasons);~~
- c) recommend that planning permission not be granted for a specified period (see reasons at Annex A);**
- ~~d) recommend that the application be refused (see reasons at Annex A)~~

Highways Act 1980 Section 175B is/is not relevant to this application.¹

This represents National Highways formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should the Local Planning Authority not propose to determine the application in accordance with this recommendation they are required to consult the Secretary of State for Transport, as set out in the [Town and Country Planning \(Development Affecting Trunk Roads\) Direction 2018](#), via transportplanning@dft.gov.uk and may not determine the application until the consultation process is complete.

Signature: 	Date: 25 August 2022
Name: Kevin Bown	Position: Spatial Planning Manager National Highways
National Highways Bridge House, 1 Walnut Tree Close, Guildford GU1 4LZ	

Annex A National Highway's assessment of the proposed development

National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

Recommendation:
that planning permission not be granted for a specified period:
Reasons:

We will be concerned with proposals that have the potential to impact on the safe and efficient operation of the SRN, in this case, particularly within the vicinity of the M20 at Junction 9.

We require further information to be provided by the applicant on this application in order that an informed decision can be made in relation to the potential impacts of the

¹ Where relevant, further information will be provided within Annex A.

development on the strategic road network. In particular, the following comments should be passed onto the applicant:

Trip Rates and Trip Generation

We agree with the forecast number of vehicular trips as presented in Table 5.2. of the submitted Transport Assessment. For the avoidance of doubt, this is 406 two-way trips in the AM Peak, and 357 two-way trips in the PM Peak period.

Development Traffic Flows

We have examined the traffic flow diagrams presented in Appendix D in the context of the forecast vehicle movements presented in Table 5.2 of the TA. This has revealed that the development flows in the flow diagrams do not accord with the flows in the table, as illustrated below:

	AM PEAK 08.00-09.00			PM PEAK 17.00-18.00		
	IN	OUT	TOTAL	IN	OUT	TOTAL
TA Methodology - Table 5.2	105	301	406	237	120	357
Flow Diagrams - Appendix D	106	188	294	243	92	335

The traffic flow diagrams must be revised to show the correct development traffic flows.

ACTION: The traffic flow diagrams presented in Appendix D of the TA need to be revised to show the correct vehicular development traffic flows. This is 406 two-way trips in the AM Peak, and 357 two-way trips in the PM Peak period.

Trip Distribution & Assignment

We note that the forecast distribution/assignment of development trips has not been fully justified. Further, the trip distribution and assignment assessment must be expanded to cover the M20 J9, to allow us to understand the degree of impact on the SRN.

ACTION: The proposed development trip distribution/assignment must be fully justified and extended to take into account M20 J9.

Traffic Modelling Assessments

Capacity assessment at M20 J9 has not been undertaken. As set out below, this may be required in due course.

ACTION: Upon the identification and agreement of the degree of impact on the SRN, capacity analysis at M20 J9 may be required in accordance

with DfT Circular 02/2013. We will advise as to detailed requirements should this transpire to be the case.

Traffic flows

Depending on the degree of traffic impact on the SRN, a traffic assessment of the impacts of the proposed development on M20 J9 may be required. In this instance, baseline traffic data from an appropriate source will need to be sourced and submitted to us for review and approval.

ACTION: Dependent on the degree of traffic impact on the SRN, capacity analysis of the M20 J9 may be required. In this eventuality, the applicant will need to source appropriate baseline traffic data for the M20 J9 junction and submit to us for approval.

Committed Developments

As stated above, depending on the degree of traffic impact on the SRN, capacity analysis may be required. Should this be the case, the applicant will need to engage with the LPA to agree which committed developments and planned transport improvements should be considered alongside the proposed development.

This information will then need to be presented to us for review.

ACTION: In the event that highway capacity analysis is required, a list of committed developments needs to be obtained from the LPA and submitted to us for approval.

Personal Injury Accident Analysis

The presented accident analysis does not include the SRN at M20 J9.

Depending on the degree of traffic impact on the SRN, a detailed STATS 19 accident analysis may be required for sections of the SRN. This would need to be carried out for the latest 5-year period for which accident data is available.

ACTION: Depending on the degree of traffic impact on the SRN, a highway safety assessment may be required for specified sections of the SRN. This would need to utilise STATS 19 data for the latest 5-year period for which accident data is available.

Conclusion

The above represents our *initial* requirements. It is possible that further matters may need to be addressed in due course.

Given the above, it is currently not possible to determine whether the application would have an unacceptable impact on the safety, reliability and/or operational efficiency of the SRN (the tests set out in DfT Circular 02/2013 [particularly paras 8 to 11] and MHCLG NPPF2021 [particularly paras 110 to 113]). This response details the steps that need to be taken in order to resolve this issue.

In light of the above, National Highways currently recommends that planning permission not be granted (other than a refusal if the Council so wishes) for a period of three months from the date of this response to allow the applicant to resolve the outstanding matters.

This recommendation can be replaced, renewed, or reviewed during the three-month period, or at its end, dependent on progress made with regards to the outstanding matters.



National Highways Planning Response (NHPR 21-09) Formal Recommendation to an Application for Planning Permission

From: Regional Director
Operations Directorate
South East Region
National Highways
planningse@nationalhighways.co.uk

To: Ashford Borough Council (FAO Case Officer: Alex Stafford)
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CC: transportplanning@dft.gov.uk
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Council's Reference: 22/00571/AS

Location: Land North of Possingham Farmhouse, Ashford Road, Great Chart, Kent, TN26 1JR

Proposal: Outline planning application for the development of up to 655 residential dwellings (including 30% affordable dwellings) to consider access, layout and scale with all other matters reserved.

National Highways Ref: 94796


Referring to the consultation on a planning application referenced above dated 25 April 2022, in the vicinity of the M20 at Junction 9 that forms part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is that we:

- ~~a) offer no objection (see reasons at Annex A);~~
- ~~b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – National Highways recommended Planning Conditions & reasons);~~
- c) recommend that planning permission not be granted for a specified period (see reasons at Annex A);**
- ~~d) recommend that the application be refused (see reasons at Annex A)~~

Highways Act 1980 Section 175B is/is not relevant to this application.¹

This represents National Highways formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should the Local Planning Authority not propose to determine the application in accordance with this recommendation they are required to consult the Secretary of State for Transport, as set out in the [Town and Country Planning \(Development Affecting Trunk Roads\) Direction 2018](#), via transportplanning@dft.gov.uk and may not determine the application until the consultation process is complete.

Signature: 	Date: 24 February 2023
Name: Kevin Bown	Position: Spatial Planning Manager National Highways
National Highways Bridge House, 1 Walnut Tree Close, Guildford GU1 4LZ	

Annex A National Highway's assessment of the proposed development

National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

Recommendation:
that planning permission not be granted for a specified period:
Reasons:

We will be concerned with proposals that have the potential to impact on the safe and efficient operation of the SRN, in this case, particularly within the vicinity of the M20 at Junction 9.

We require further information to be provided by the applicant on this application in order that an informed decision can be made in relation to the potential impacts of the

¹ Where relevant, further information will be provided within Annex A.

development on the strategic road network. In particular, the following comments should be passed onto the applicant:

Trip Rates and Trip Generation

We agree with the forecast number of vehicular trips as presented in Table 5.2. of the submitted Transport Assessment. For the avoidance of doubt, this is 406 two-way trips in the AM Peak, and 357 two-way trips in the PM Peak period.

Development Traffic Flows

We have examined the traffic flow diagrams presented in Appendix D in the context of the forecast vehicle movements presented in Table 5.2 of the TA. This has revealed that the development flows in the flow diagrams do not accord with the flows in the table, as illustrated below:

	AM PEAK 08.00-09.00			PM PEAK 17.00-18.00		
	IN	OUT	TOTAL	IN	OUT	TOTAL
TA Methodology - Table 5.2	105	301	406	237	120	357
Flow Diagrams - Appendix D	106	188	294	243	92	335

The traffic flow diagrams must be revised to show the correct development traffic flows.

ACTION: The traffic flow diagrams presented in Appendix D of the TA need to be revised to show the correct vehicular development traffic flows. This is 406 two-way trips in the AM Peak, and 357 two-way trips in the PM Peak period.

Trip Distribution & Assignment

We note that the forecast distribution/assignment of development trips has not been fully justified. Further, the trip distribution and assignment assessment must be expanded to cover the M20 J9, to allow us to understand the degree of impact on the SRN.

ACTION: The proposed development trip distribution/assignment must be fully justified and extended to take into account M20 J9.

Traffic Modelling Assessments

Capacity assessment at M20 J9 has not been undertaken. As set out below, this may be required in due course.

ACTION: Upon the identification and agreement of the degree of impact on the SRN, capacity analysis at M20 J9 may be required in accordance

with DfT Circular 02/2013. We will advise as to detailed requirements should this transpire to be the case.

Traffic flows

Depending on the degree of traffic impact on the SRN, a traffic assessment of the impacts of the proposed development on M20 J9 may be required. In this instance, baseline traffic data from an appropriate source will need to be sourced and submitted to us for review and approval.

ACTION: Dependent on the degree of traffic impact on the SRN, capacity analysis of the M20 J9 may be required. In this eventuality, the applicant will need to source appropriate baseline traffic data for the M20 J9 junction and submit to us for approval.

Committed Developments

As stated above, depending on the degree of traffic impact on the SRN, capacity analysis may be required. Should this be the case, the applicant will need to engage with the LPA to agree which committed developments and planned transport improvements should be considered alongside the proposed development.

This information will then need to be presented to us for review.

ACTION: In the event that highway capacity analysis is required, a list of committed developments needs to be obtained from the LPA and submitted to us for approval.

Personal Injury Accident Analysis

The presented accident analysis does not include the SRN at M20 J9.

Depending on the degree of traffic impact on the SRN, a detailed STATS 19 accident analysis may be required for sections of the SRN. This would need to be carried out for the latest 5-year period for which accident data is available.

ACTION: Depending on the degree of traffic impact on the SRN, a highway safety assessment may be required for specified sections of the SRN. This would need to utilise STATS 19 data for the latest 5-year period for which accident data is available.

Conclusion

The above represents our *initial* requirements. It is possible that further matters may need to be addressed in due course.

Given the above, it is currently not possible to determine whether the application would have an unacceptable impact on the safety, reliability and/or operational efficiency of the SRN (the tests set out in DfT Circular 02/2013 [particularly paras 8 to 11] and MHCLG NPPF2021 [particularly paras 110 to 113]). This response details the steps that need to be taken in order to resolve this issue.

In light of the above, National Highways currently recommends that planning permission not be granted (other than a refusal if the Council so wishes) for a period of three months from the date of this response to allow the applicant to resolve the outstanding matters.

This recommendation can be replaced, renewed, or reviewed during the three-month period, or at its end, dependent on progress made with regards to the outstanding matters.

The above text was included in a Holding Recommendation forwarded to the Council and applicant on 25 August 2022. As at 24 February 2023, a response had not been received by national Highways.

Therefore the Holding Recommendation period is extended for a further 6 months ending 24 August 2023.

NEW: Standing advice to the local planning authority

The Climate Change Committee's [2022 Report to Parliament](#) notes that for the UK to achieve net zero carbon status by 2050, action is needed to support a modal shift away from car travel. The NPPF supports this position, with paragraphs 73 and 105 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 104 and 110 advise that appropriate opportunities to promote walking, cycling and public transport should be taken up.

Moreover, the build clever and build efficiently criteria as set out in clause 6.1.4 of [PAS2080](#) promote the use of low carbon materials and products, innovative design solutions and construction methods to minimise resource consumption.

These considerations should be weighed alongside any relevant Local Plan policies to ensure that planning decisions are in line with the necessary transition to net zero carbon.

From: Kevin Bown <

Sent: 04 August 2023 12:09

To: Planning Help [REDACTED]

Subject: National Highways response (our ref 94796 #20682) re application 22/00571/AS Land north of Possingham Farmhouse, Ashford Road, Great Chart, Kent

[CYBER SECURITY WARNING] This email is from an external source - please avoid clicking links or opening attachments from external senders unless you are certain it is safe to do so. Please remember your Cyber Security training and report suspicious emails.

For attention of:	Faye Tomlinson
Your Reference:	22/00571/AS
Site:	Land north of Possingham Farmhouse, Ashford Road, Great Chart, Kent (TN26 1JR)
Proposal:	Outline application for the development of up to 655 residential dwellings (including 30% affordable dwellings) to consider access, layout and scale with all other matters reserved.
National Highways' Reference:	94796 #20682

Dear Ms Tomlinson

Thank you for your email of 20 July 2023 reconsulting National Highways regarding the above application; seeking a response no later than 10 August 2023.

National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

Please find attached our formal National Highways Planning Response (NHPR) comprising a Holding Recommendation (HR). You will see it sets out our concerns and requirements and we have copied this email to the applicant's agent (Ian Dix at SLR) for their attention and response in due course.

If any party has any queries regarding our response, please contact us via planningse@nationalhighways.co.uk.

Regards

Kevin Bown BSc(Hons) MPhil CMS MRTPI Spatial Planner

Spatial Planning Team, South East Region Operations Directorate

National Highways | Bridge House | 1 Walnut Tree Close | Guildford | GU1 4LZ

Tel: 0300 470 1046 (patches through via Teams) **Mob:** 07833 441649

Web: www.nationalhighways.co.uk

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National Highways Limited | General enquiries: 0300 123 5000 | National Traffic Operations Centre, 3 Ridgeway, Quinton Business Park, Birmingham B32 1AF | <https://nationalhighways.co.uk> | info@nationalhighways.co.uk

Registered in England and Wales no 9346363 | Registered Office: Bridge House, 1 Walnut Tree Close, Guildford, Surrey GU1 4LZ

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National Highways Planning Response (NHPR 22-12) Formal Recommendation to an Application for Planning Permission

From: Christine Allen
Regional Director
Operations Directorate
South East Region
National Highways
PlanningSE@nationalhighways.co.uk

To: Ashford Borough Council (FAO Case Officer Faye Tomlinson)
planning.comments@ashford.gov.uk

CC: transportplanning@dft.gov.uk
spatialplanning@nationalhighways.co.uk

Council's Reference: 22/00571/AS

Location: Land North of Possingham Farmhouse, Ashford Road, Great Chart, Kent, TN26 1JR

Proposal: Outline planning application for the development of up to 655 residential dwellings (including 30% affordable dwellings) to consider access, layout and scale with all other matters reserved

National Highways Ref: 94796

Referring to the consultation on a planning application dated 25 April 2022 referenced above, in the vicinity of the M20 at Ashford, Kent that forms part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is that we:

- a) ~~offer no objection (see reasons at Annex A);~~
- b) ~~recommend that conditions should be attached to any planning permission that may be granted (see Annex A – National Highways recommended Planning Conditions & reasons);~~
- c) **recommend that planning permission not be granted for a specified period (see reasons at Annex A);**


~~d) recommend that the application be refused (see reasons at Annex A)~~

Highways Act 1980 Section 175B is not relevant to this application.¹

This represents National Highways' formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should the Local Planning Authority not propose to determine the application in accordance with this recommendation they are required to consult the Secretary of State for Transport, as set out in the [Town and Country Planning \(Development Affecting Trunk Roads\) Direction 2018](#), via transportplanning@df.gov.uk and may not determine the application until the consultation process is complete.

The Local Planning Authority must also copy any consultation under the 2018 Direction to PlanningSE@nationalhighways.co.uk.

Signature: 	Date: 04 August 2023
Name: Kevin Bown	Position: Spatial Planner
National Highways Bridge House, 1 Walnut Tree Close, Guildford GU1 4LZ	

Annex A National Highways' assessment of the proposed development

National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

Recommendation: that planning permission not be granted for a specified period

It is recommended that the application should not be granted permission for a period extending until 3 November 2023; unless in the meantime all queries and requirements raised by National Highways are fully resolved and this Holding Recommendation is

¹ Where relevant, further information will be provided within Annex A.

replaced. This does not fetter the Council's ability, if they so wish, to either refuse the application or agree an extension of time beyond 3 November.

Reasons

We will be concerned with proposals that have the potential to impact on the safe and efficient operation of the SRN, in this case, particularly within the vicinity of the M20 motorway at junction 9.

We require further information to be provided by the applicant on this application in order that an informed decision can be made in relation to the potential impacts of the development on the strategic road network. In particular, the following comments should be passed onto the applicant:

Throughout this response **ACTION points** for the applicant are highlighted in **underlined bold**.

Background

Our original round of responses to this application in 2022 required the applicant to assess the potential impacts of the development on the SRN. The response required the applicant to:

- Provide a highway safety assessment, depending on degree of traffic impact on the SRN
- Traffic flow diagrams to be revised
- Trip distribution/assignment to be fully justified and extended to include M20 junction 9

Capacity analysis at M20 junction 9 may be required, dependent on outcome of the above. The applicant would need to source appropriate baseline traffic data and obtain list of committed developments from LPA.

Most Recent Consultation

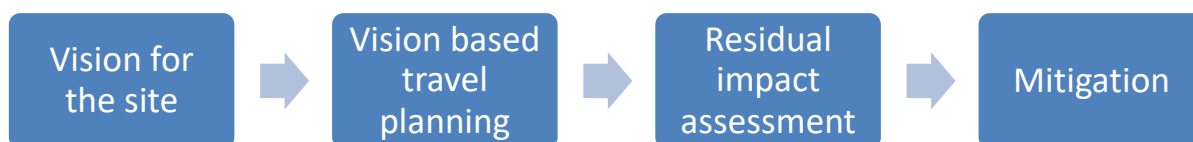
We were consulted on 8 June 2023 by Vectos (Applicant's transport consultants). The email from Vectos included a Transport Assessment Addendum (TAA) for review which had been produced in response to our previous comments. The same TAS was uploaded onto the application webpage on 8 June 2023.

It will be noted that since our formal response in August 2022, Circular 01/2022 has come into effect. The submitted TAA is a substantial document (dated May 2023) and is in effect a new full TA report. The TAA contains an updated policy section, but there

is no reference to Circular 01/2022. Hence this critical element of the newly updated document is incorrect, and the document submitted is not in accordance with the Circular. The proposed development is also of a significant size – some 655 dwellings.

Hence, in our opinion, taking all factors into account, the policies set out in Circular 01/2022 are applicable.

The following diagram sets out an indicative process and evidence base to be provided relative to the Circular.



With reference the circular, we require the vision for the development. This should describe the aims of the development in terms of transport and explain how the aims are in line with the circular. We expect development promoters to enable a reduction in the need to travel by private car and prioritise sustainable transport opportunities, ahead of capacity enhancements and new connections on the Strategic Road Network.

For residential-led developments, due consideration should be given to home and street layouts, broadband infrastructure, safe and secure cycle parking, and access to local amenities and open space in support of these aims, while mobility or micro mobility hubs should be provided in larger schemes. In addition, high-powered and open-access EV charge points should be installed where developments include on-street or communal parking to support the government’s objective to end the sale of new conventional petrol and diesel cars/vans by 2030 and HGVs by 2040, and its commitment to decarbonise transport by 2050.

There is a need for reference and adherence to be made to Department for Transport Circular 01/2022.

Once the vision and supporting approach are agreed upon, it would be appropriate to move onto an assessment of residual transport impacts. This should be undertaken in line with the circular, particularly paragraphs 47-54. The analysis must relate to the development quantum as per the planning application.

Where an assessment indicates that a development would have an unacceptable safety impact or the residual cumulative impacts on the Strategic Road Network would be severe, the developer must identify when, in relation to the occupation of the development, transport improvements become necessary.

These issues need to be satisfactorily resolved before we comment further on previously the raised issues on traffic flow diagrams, trip distribution/assignment and capacity analysis. This is to avoid abortive work by all parties.

Other Matters

At such time the degree of traffic impact on the SRN is agreed, it will be possible to determine the need or otherwise for further assessment. Such assessment may include (but not necessarily be limited to) the following:

- Highway Capacity Analysis in accordance with DfT Circular 01/2022 to determine the need or otherwise for highway mitigation
- Consideration of Committed/Local Plan developments
- Collision Analysis

We will be able to confirm detailed requirements in due course.

The above represents our *current* requirements. As the analysis progresses, it is possible that further requirements may emerge.

Conclusion

Given the above, it is currently not possible to determine whether the application would have an unacceptable impact on the safety, reliability and/or operational efficiency of the SRN (the tests set out in DfT Circular 01/2022 and MHCLG NPPF2021 [particularly paras 110 to 113]). This response details the steps that need to be taken in order to resolve this issue.

In light of the above, National Highways currently recommends that planning permission not be granted (other than a refusal if the Council so wishes) for a period expiring on 3 November 2023 to allow the applicant to resolve the outstanding matters.

This recommendation can be replaced, renewed, or reviewed during the three-month period, or at its end, dependent on progress made with regards to the outstanding matters.

Standing advice to the local planning authority

The Climate Change Committee's [2022 Report to Parliament](#) notes that for the UK to achieve net zero carbon status by 2050, action is needed to support a modal shift away from car travel. The NPPF supports this position, with paragraphs 73 and 105 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 104 and 110 advise that appropriate opportunities to promote walking, cycling and public transport should be taken up.

Moreover, the build clever and build efficiently criteria as set out in clause 6.1.4 of [PAS2080](#) promote the use of low carbon materials and products, innovative design solutions and construction methods to minimise resource consumption.

These considerations should be weighed alongside any relevant Local Plan policies to ensure that planning decisions are in line with the necessary transition to net zero carbon.



National Highways Planning Response (NHPR 22-12) Formal Recommendation to an Application for Planning Permission

From: Christine Allen
Regional Director
Operations Directorate
South East Region
National Highways
PlanningSE@nationalhighways.co.uk

To: Ashford Borough Council (FAO Case Officer Faye Tomlinson)
planning.comments@ashford.gov.uk

CC: transportplanning@dft.gov.uk
spatialplanning@nationalhighways.co.uk

Council's Reference: 22/00571/AS

Location: Land North of Possingham Farmhouse, Ashford Road, Great Chart, Kent, TN26 1JR

Proposal: Outline planning application for the development of up to 655 residential dwellings (including 30% affordable dwellings) to consider access, layout and scale with all other matters reserved

National Highways Ref: 94796

Referring to the consultation on a planning application dated 25 April 2022 referenced above, in the vicinity of the M20 at Ashford, Kent that forms part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is that we:

- a) ~~offer no objection (see reasons at Annex A);~~
- b) ~~recommend that conditions should be attached to any planning permission that may be granted (see Annex A – National Highways recommended Planning Conditions & reasons);~~
- c) **recommend that planning permission not be granted for a specified period (see reasons at Annex A);**

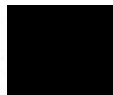
d) ~~recommend that the application be refused (see reasons at Annex A)~~

Highways Act 1980 Section 175B is not relevant to this application.¹

This represents National Highways' formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should the Local Planning Authority not propose to determine the application in accordance with this recommendation they are required to consult the Secretary of State for Transport, as set out in the [Town and Country Planning \(Development Affecting Trunk Roads\) Direction 2018](#), via transportplanning@df.gov.uk and may not determine the application until the consultation process is complete.

The Local Planning Authority must also copy any consultation under the 2018 Direction to PlanningSE@nationalhighways.co.uk.

Signature: 	Date: 03 November 2023
Name: Kevin Bown	Position: Spatial Planner
National Highways Bridge House, 1 Walnut Tree Close, Guildford GU1 4LZ	

Annex A National Highways' assessment of the proposed development

National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

Recommendation: that planning permission not be granted for a specified period

It is recommended that the application should not be granted permission for a period extending until 2 February 2024; unless in the meantime all queries and requirements raised by National Highways are fully resolved and this Holding Recommendation is

¹ Where relevant, further information will be provided within Annex A.

replaced. This does not fetter the Council's ability, if they so wish, to either refuse the application or agree an extension of time beyond 3 November.

Reasons

We will be concerned with proposals that have the potential to impact on the safe and efficient operation of the SRN, in this case, particularly within the vicinity of the M20 motorway at junction 9.

We require further information to be provided by the applicant on this application in order that an informed decision can be made in relation to the potential impacts of the development on the strategic road network. In particular, the following comments should be passed onto the applicant:

Throughout this response **ACTION points** for the applicant are highlighted in **underlined bold**.

Background

Our original round of responses to this application in 2022 required the applicant to assess the potential impacts of the development on the SRN. The response required the applicant to:

- Provide a highway safety assessment, depending on degree of traffic impact on the SRN
- Traffic flow diagrams to be revised
- Trip distribution/assignment to be fully justified and extended to include M20 junction 9

Capacity analysis at M20 junction 9 may be required, dependent on outcome of the above. The applicant would need to source appropriate baseline traffic data and obtain list of committed developments from LPA.

Most Recent Consultation

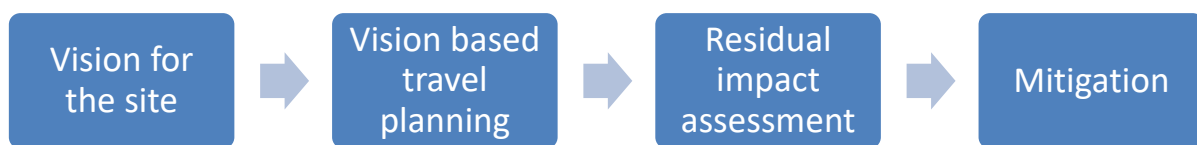
We were consulted on 8 June 2023 by Vectos (Applicant's transport consultants). The email from Vectos included a Transport Assessment Addendum (TAA) for review which had been produced in response to our previous comments. The same TAS was uploaded onto the application webpage on 8 June 2023.

It will be noted that since our formal response in August 2022, Circular 01/2022 has come into effect. The submitted TAA is a substantial document (dated May 2023) and is in effect a new full TA report. The TAA contains an updated policy section, but there

is no reference to Circular 01/2022. Hence this critical element of the newly updated document is incorrect, and the document submitted is not in accordance with the Circular. The proposed development is also of a significant size – some 655 dwellings.

Hence, in our opinion, taking all factors into account, the policies set out in Circular 01/2022 are applicable.

The following diagram sets out an indicative process and evidence base to be provided relative to the Circular.



With reference the circular, we require the vision for the development. This should describe the aims of the development in terms of transport and explain how the aims are in line with the circular. We expect development promoters to enable a reduction in the need to travel by private car and prioritise sustainable transport opportunities, ahead of capacity enhancements and new connections on the Strategic Road Network.

For residential-led developments, due consideration should be given to home and street layouts, broadband infrastructure, safe and secure cycle parking, and access to local amenities and open space in support of these aims, while mobility or micro mobility hubs should be provided in larger schemes. In addition, high-powered and open-access EV charge points should be installed where developments include on-street or communal parking to support the government's objective to end the sale of new conventional petrol and diesel cars/vans by 2030 and HGVs by 2040, and its commitment to decarbonise transport by 2050.

There is a need for reference and adherence to be made to Department for Transport Circular 01/2022.

Once the vision and supporting approach are agreed upon, it would be appropriate to move onto an assessment of residual transport impacts. This should be undertaken in line with the circular, particularly paragraphs 47-54. The analysis must relate to the development quantum as per the planning application.

Where an assessment indicates that a development would have an unacceptable safety impact or the residual cumulative impacts on the Strategic Road Network would be severe, the developer must identify when, in relation to the occupation of the development, transport improvements become necessary.

These issues need to be satisfactorily resolved before we comment further on previously the raised issues on traffic flow diagrams, trip distribution/assignment and capacity analysis. This is to avoid abortive work by all parties.

Other Matters

At such time the degree of traffic impact on the SRN is agreed, it will be possible to determine the need or otherwise for further assessment. Such assessment may include (but not necessarily be limited to) the following:

- Highway Capacity Analysis in accordance with DfT Circular 01/2022 to determine the need or otherwise for highway mitigation
- Consideration of Committed/Local Plan developments
- Collision Analysis

We will be able to confirm detailed requirements in due course.

The above represents our *current* requirements. As the analysis progresses, it is possible that further requirements may emerge.

Conclusion

Given the above, it is currently not possible to determine whether the application would have an unacceptable impact on the safety, reliability and/or operational efficiency of the SRN (the tests set out in DfT Circular 01/2022 and MHCLG NPPF2021 [particularly paras 110 to 113]). This response details the steps that need to be taken in order to resolve this issue.

In light of the above, National Highways currently recommends that planning permission not be granted (other than a refusal if the Council so wishes) for a period expiring on 3 November 2023 to allow the applicant to resolve the outstanding matters.

This recommendation can be replaced, renewed, or reviewed during the three-month period, or at its end, dependent on progress made with regards to the outstanding matters.

3 November 2023 Update

We do not appear to have received a response to our concerns and requirements as set out above and submitted to the Council and copied to the applicant's agent on 4 August 2023.

Therefore, we are obliged to extend our Holding Recommendation for a further period, expiring on 3 February 2024. This does not fetter the Council if it wishes to determine the application by way of a refusal or to agree an extension of time for a different period.

This recommendation can be replaced, renewed, or reviewed during the three-month period, or at its end, dependent on progress made with regards to the outstanding matters.

Standing advice to the local planning authority

The Climate Change Committee's [2022 Report to Parliament](#) notes that for the UK to achieve net zero carbon status by 2050, action is needed to support a modal shift away from car travel. The NPPF supports this position, with paragraphs 73 and 105 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 104 and 110 advise that appropriate opportunities to promote walking, cycling and public transport should be taken up.

Moreover, the build clever and build efficiently criteria as set out in clause 6.1.4 of [PAS2080](#) promote the use of low carbon materials and products, innovative design solutions and construction methods to minimise resource consumption.

These considerations should be weighed alongside any relevant Local Plan policies to ensure that planning decisions are in line with the necessary transition to net zero carbon.

Date: 27/04/2022

Primary Care Team

Alex Stafford
Planning and Development
Civic Centre
Tannery Lane
Ashford
Kent
TN23 1PL

Kent House
81 Station Road
Ashford
Kent
TN23 1PP

Email: kmccg.pcestates@nhs.net

Our Ref: 22/00571

Dear Alex,

Letter reference: Land north of Possingham Farmhouse, Ashford Road, Great Chart, Kent (TN26 1JR)

NHS Kent and Medway Group (CCG) has delegated co-commissioning responsibility for general practice services in East Kent and is the body that reviews planning applications to assess the direct impact on general practice.

I refer to the above outline planning application which concerns the proposed residential development comprising up to 655 dwellings.

The CCG has assessed the implications of this proposal on delivery of general practice services and is of the opinion that it will have a direct impact which will require mitigation through the payment of an appropriate financial contribution.

In line with the Planning Act 2008 and the Community Infrastructure Levy Regulations 2010 (the CIL Regulations) (Regulation 122) requests for development contributions must comply with the three specific legal tests:

1. Necessary
2. Related to the development
3. Reasonably related in scale and kind

We have applied these tests in relation to this planning application and can confirm the following specific requirements. **The calculations supporting this requirement are set out in Appendix 1.**

	Total Chargeable units	Indicative Total (See Appendix 1)	Project
General	655	£565,920	Towards refurbishment,

Practice			reconfiguration and/or extension of Woodchurch Surgery and/or Headcorn Surgery and/or towards new general practice premises development in the area
----------	--	--	---

The obligation should also include the provision for the re-imbusement of any legal costs incurred in completing the agreement.

Justification for infrastructure development contributions request

This proposal will generate approximately 1572 new patient registrations when using an average occupancy of 2.4 people per dwelling. The proposed development falls within the current practice boundaries of Woodchurch Surgery and Headcorn Surgery.

There is currently limited capacity within existing general practice premises to accommodate growth in this area. The need from this development, along with other new developments, will therefore need to be met through the creation of additional capacity in general practice premises. Whilst it is not possible at this time to set out a specific premises project for this contribution we can confirm that based on the current practice boundaries we would expect the contribution to be utilised as set out above. Any premises plans will include the pooling of S106 contributions where appropriate.

In addition to the above we request that any S106 agreement regarding a financial contribution recognises the following:

- Supports the proactive development of premises capacity with the trigger of any healthcare contribution being available linked to commencement or at an early stage of development.
- Allows the contribution to be used towards new general practice premises in the area serving this population (should GP Estates Strategy identify future requirement) and not just limited to the practices detailed above.
- Allows the contribution to be used towards professional fees associated with feasibility or development work for existing or new premises.

General practice premises plans are kept under regular review as part of the GP Estates Strategy and priorities are subject to change as the CCG must ensure appropriate primary medical care service capacity is available as part of our commissioning responsibilities. Planning for growth in general practice is complex; physical infrastructure is one element but alongside this workforce is a critical consideration both in terms of new workforce requirements and retirements. Any plans developed need to support delivery of sustainable services for the future.

The CCG is of the view that the above complies with the CIL regulations and is necessary in order to mitigate the impacts of the proposal on the provision of general practice services.

Please note that for any s106 contributions secured by the CCG, the legal agreement should detail NHS England and Improvement (NHSE/I) as the recipient of the funding.

I would be grateful if you could advise me of the Council's decision in due course, should you require any further information, or points of clarification in the meantime please contact me using the above email address.

Yours sincerely

Sent via email

Sarah Avery
Project Manager of Primary Care - Strategic Planning and Primary Care Estates

Appendix 1

The CCG uses a formula for calculating s106 contributions which has been used for some time and is calculated as fair and reasonable. This calculation is based the number of proposed units multiplied by the assumed occupancy multiplied by £360.

Where the application identifies unit sizes the following predicted occupancy rates will be used.

1 bed unit @ 1.4 persons
2 bed unit @ 2 persons
3 bed unit @ 2.8 persons
4 bed unit @ 3.5 persons
5 bed unit @ 4.8 persons

Where the unit sizes are not identified then an average occupancy of 2.4 persons will be used until the dwelling mix is confirmed.

The calculations for this development are:

The application does not detail unit sizes; the calculation below should be updated once the dwelling mix is confirmed at a later date. **The above table should be included in a S106 agreement to calculate the contribution based on actual unit sizes and predicted occupancy using the table above.**

655 units X 2.4 average occupancy = 1,572 people
1,572 people X £360 = £565,920

Online Comments Form

Application Details

App No: 22/00571/AS

Location: Land north of Possingham Farmhouse, Ashford Road, Great Chart, Kent (TN26 1JR)

Proposal: Outline application for the development of up to 655 residential dwellings (including 30% affordable dwellings) to consider access, layout and scale with all other matters reserved.

Person and Comment Details

Name: Ramblers Sue Past

Address: 32 Park Wood Close Kingsnorth ASHFORD Kent TN23 3NQ

Action: Commenting

Created On: 26/05/2022 00:08:29

Comments

"Thank you for consulting the Ramblers on this application, in respect of any impact it might have on the Public Rights of Way network, with my apologies for this submission being outside of the commenting deadline,

The Chilmington Green development currently in progress has already had a significant impact on the local PROW network, with a number of routes being temporarily closed or diverted during ongoing or proposed construction. The requirements for protecting each PROW to be affected by the planned developments were clearly established at the initial stages of the Chilmington Masterplan but this additional application will, if approved, necessitate further restrictions that may not have been clearly identified in advance.

In this context it is of concern to find numerous discrepancies within the application documents referencing the two PROW Byways Open to All Traffic AW292 and AW245 [shown as green dashed lines on the plans]. Both these routes have the same legal protection as the PROW Public Footpaths adjacent to the site [shown as purple dashed lines]

Of particular concern is that Public Byway AW292 is not the northern boundary of the site.

Within the site location and design plans it is clear that AW292 is clearly within the development site, not on the north boundary as delineated by the red line at Sandy Corner .

But in the text of the application:

- Design Statement Part 1 (29892A_700_Rev B)

p18: " No Public Right of Ways (sic) cross the site although PROWs/bridleways (sic) do run along the northern (AW292) and eastern boundary(AW2450

p57: "The illustrative masterplan for the Site allows for the retention of PROW AW292 which crosses the site east to west along the north boundary.

However, elsewhere, in the Landscape and Visual Impact Appraisal May 2021 the site boundary is repeatedly identified as being at the line of AW292 opposite Old Surrenden Manor Road.

A revised set of plans should be provided.

Also on p57 of the Design Statement, again referring to AW292

“With only one road crossing this existing path (sic)”

Most significantly the Access and Movement Parameter Plan (29892A_50H) clearly shows that it is the primary route corridor for vehicles, cycles and pedestrians that crosses the Byway before continuing further to the north to join the proposed new road from ‘Sandy Corner’.

The proper arrangements for accommodating the Public Right of Way at this point need to be agreed with and authorised by the KCC PROW Service before any work commences.

Additionally, In the Landscape and Visual Impact Appraisal, p14 3.4 AW292 is referred to as being “ subject to a stopping up order” (May 2021). The actual status is a (Prohibition of Traffic) Temporary Order, which is substantially different.

The granting of Planning Permission does not give automatic authority for the obstruction, closure or diversion of any PROW within or adjacent to the site without full consultation with and authorisation from the KCC PROW and Access Service. It is noted that the Applicants consider themselves to be in a position to commence work promptly if the application is successful, but prior to the commencement of any work, including the erection of fencing to delineate the site boundary, or the construction of the primary access route referred to above, the Applicants should fully engage in consultation with the KCC PROW and Access Service, to ensure absolute clarity and compliance with the legal status of the routes affected.

Further comment from Ramblers is reserved for the consultation on any PROW Orders which are forthcoming.

Thank You

From: Shadoxhurst Community Speed Watch & Utility Teams

5th May 2022

To: Ashford Borough Council Planning

Attn: Alex Stafford, Case Officer

Ref: ABC Planning Ref 22/00571/AS: Land North of Possingham Farmhouse

Objection Comments on Road Access Safety

Primary access to the Site is from the new road from the A28 opposite Old Surrenden Manor Rd. This is shown as being some 90 m from the Chilmington Access C Roundabout on the A28, originally consented under the CG outline application.

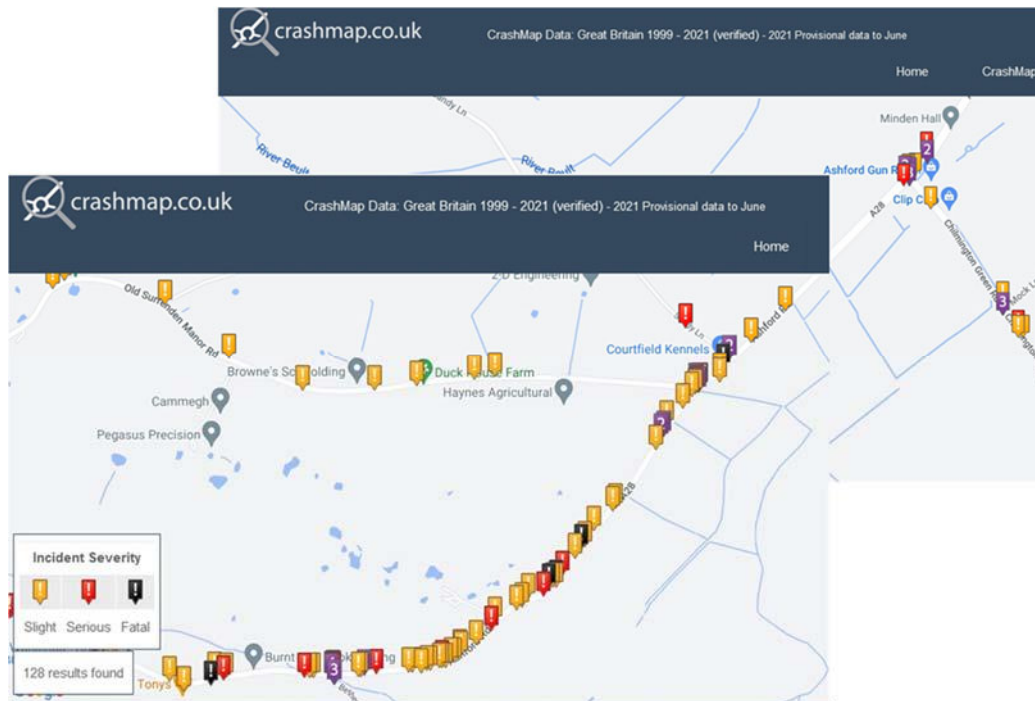
A secondary access on to the A28 is also proposed along the western boundary of the site; this has no provision in the overall A28 development plan and there is no indication in the application that any studies have been carried out.

It is understood that no consultations have taken place with KCC Highways including appropriate Safety Studies of the additional access on a stretch of road with a significant accident history. Whilst speed restrictions have been added in recent years there is much anecdotal evidence of speeding through both the 40 mph and 50 mph sections – the 2ndary access lies in a 50 mph control zone.

There is an absence of any Traffic Safety Study in the present application, ditto any agreement to the proposed access and highway modifications; these should be addressed as an essential element for consideration. We understand that no pre-application consultations have taken place with the highway authority and thus far no Transport Assessment or Travel Plan submitted for consideration.

The application presumes a primary access is via the future Chilmington Southern Link Road for which no Section 278 & 36 agreements have be implemented!

A summary of accident statistics from KCC shown below should suffice to raise concerns over the proposed secondary site access in particular



Roger Hills
Co-ordinator
Shadoxhurst Community Speed Watch



Peter Finnis
Team Leader
Shadoxhurst Utilities Team



From: Shadoxhurst Community Speed Watch & Road Safety

7th August 2022

To: Ashford Borough Council Planning

Attn: Alex Stafford, Case Officer

Ref: ABC Planning Ref 22/00571/AS: Land North of Possingham Farmhouse

Critique of Possingham Transport Assessment & Appendices

Whilst the subject application is for Outline Approval only, much of the data and assumptions presented is of questionable relevance.

In no specific order of priority:

- 👉 The TA and its Appendices show '2022 base data' for A28 with no indication of its origin and scope. Additionally, the core assumption of '2011 Local Travel to Work' base data has to be of questionable validity in 2022?
- 👉 The existing East-West Chilmington Green Road is scheduled to be closed and replaced by the new Southern Link Road to new CG Access C Roundabout on the A28
- 👉 Significant new morning peak hour traffic will be generated locally by the new Secondary School; there is no evidence that consideration of this has been included?
- 👉 No clearly identified traffic data for the key CG E/W Road or predictions for current and upcoming developments, notably Chilmington Secondary School and South Ashford sites to the East (e.g. Court Lodge), is presented. **As a consequence, the submitted analyses potentially understate actual current traffic flows E<>W and make no provision for significant planned and unplanned future growth on the project Southern Link Road**
- 👉 Identified as 'nearby' – but with up to 1 km walking distance - bus stops on A28 are inaccessible safely by pavement and road crossing; no mitigation provisions are proposed.
- 👉 The currently scheduled Chilmington bus stops have yet to be created and no timetable for their operation is available; the claimed walking distances in the TA are significantly understated for much of the 1km long 655 dwelling scheme.
- 👉 Access distances to 'basic services' are mis-stated and adjusted, as above, with the accepted norm of 800 m for walked stretched to 2km, 'easy' cycling starts in range of 5-8 km and the walk/cycle to station given at 4.8km would be in excess of 4 miles from mid-site!
- 👉 Supporting TRICs analysis is derived from debatable base criteria with its average traffic comparison data at less than 30% of the proposed scheme (188 dwellings vs 655) and reference sites having little locational relevance to the Possingham context
Interesting in the travel analysis:
 - ? 9% of the trips to/from the site are by rail (?), only 3% by bus and, sadly for the local taxi trade, 0% by taxi.
 - ? With only 2% of trips by bicycle and 4% on foot, we have residual 76% by private motor vehicles; so much for sustainable access!
- 👉 Selective **Road Safety Statistics** from CrashMap.co.uk show a significantly different view of accident history compared with the unfiltered data in our previous objection of 5th May.
- 👉 An **independent Stage 1 Road Safety Audit should be provided**, as previously on parallel planning applications on CG and associated developments.
- 👉 The claimed '**available infrastructure and easy-access facilities**' exist on paper but not reality and will most unlikely be available for a development to be implemented "**as soon as approved**" as stated in the application. The claimed '**road improvements**', subject to legal agreements under the main Chilmington scheme, have not materialised by default of the present Applicant and no clear credible timetable for their completion is publicly available.

Traffic Generation and Modelling.

Traffic generation is a Material Consideration and potential negative impact during construction is a significant concern for adjacent settlements, such as Shadoxhurst. The overall CG and South Ashford development programme was, in theory, scheduled for phased implementation, although there doesn't seem to be any ongoing updated timetable. The random imposition of a major new unprogrammed phase is likely to impose serious overloading to local 'rat runs' without considered traffic management, at present sadly lacking from the overall development plan.

Importantly, how would Possingham construction timing and peaks coincide with the adjacent Southern Area sites, potential road modifications at Stubbs Cross to Court Lodge, etc?

It is to be hoped that KCC Highways can provide a more detailed critique of the shortcomings of the traffic analysis and overall area modelling, particularly the requirements for analysis of the impact of Possingham on the overall A28 VISSIM model.

Sustainable Access

[NPPF \(2018\) Chapter 9 addresses Sustainable Transport](#) and this provides additional clarity compared to NPPF 2012 in that impacts on the transport network now explicitly relate to highway safety as well as capacity and congestion. NPPF 2018 therefore now includes 'highway safety' as a reason for refusal and the severity test is now limited to impacts on the 'road network'. It will be for local and highways Authorities to decide what constitutes an unacceptable or severe impact; our contention is that the Safety Case is incomplete, with significant flaws, and requires further clarity and rework prior to approval of the present scheme.

Walking, cycling and public transport accessibility continue to be themes running through the documents, requiring priority to be given to pedestrian and cycle movements, as well as access to high quality public transport. Despite frequent reference through the Applicant's TA to these objectives, the Travel Analysis in TA Table 5.2, as referenced above, would seem to contradict achievement of reasonable levels of Sustainability.

TA para 2.10 chooses to disregard the generally accepted norm of 800 m walking distance to "basic day to day services and offers "*sustainable amenities to be at 2km walking distance and up to 8 km cycling*"

[Transport Assessment Table 5.2 Anticipated Multi-Modal Trips](#)

Bicycle 2% / On foot 4% / Bus 3% / Private motor (all) 81% / Taxi 0%

Rail is quoted at 9% notwithstanding a 5.5 – 6 km journey from the site to the nearest station!

Conclusions

Whilst this is an outline application only, the present Transport Assessment largely ignores the essential interfaces with adjacent CG & South Ashford schemes and fails to adequately and correctly address essential Safety & Sustainability criteria.

It should be referred for rework prior to consideration of approval.

Roger Hills
Co-ordinator
Shadoxhurst Community Speed Watch



Peter Finnis

Land at Possingham Farm, Great Chart 22/00571/AS

Objection from Shadoxhurst Parish Council



Whilst the application covering description limits the scope to Access, Location and Scale, the Planning Statement and supporting documents also introduce consideration of:

- Landscape and Visual Impact
- Ecological and Biodiversity Enhancements
- Surface Water Flood Risk

Topics such as Transport Assessment – key to consideration of Access & location – and Stodmarsh Nutrient Neutrality Statement – a mandatory requirement from ABC in Planning submissions – are missing and should be submitted for review within the present application.

Compliance with ABC Plans & Policies – Local Plan & CGAAP

The application is predicated on its claim to be “a logical extension to the Chilmington Southern Fringe Character Area” but fails totally to respect the ‘urban to rural transition’ design criteria embedded in the CGAAP, in particular

	Design Criteria ↗	Chilmington CGAAP Southern Character Area	22/00571/AS	
	Housing Density dph	10 max	52 average	
	Max Storey no	2	4	

As an ‘extension to Chilmington’ then the Adopted CG Area Action Plan and its Policies must be assumed to apply; notably CG22 Phasing, Delivery & Implementation and its 3rd article is particularly relevant to our objection: *“A degree of overlap between one main phase and another may be acceptable, providing it can be demonstrated that the previous phase of the development has been ‘substantially completed’.”* Whilst the CGAAP allows for flexibility, the present application provides no evidence that any of the justifying criteria for this are met. **Adding an extension to a development which has yet to be designed, let alone built, decies the claimed “rational logic” and should alone be cause to reject this application.**

The Planning Statement relies an outdated Ashford Growth Area diagram (2009) which suggests that *“Chilmington Green Development could extend to the west (that is to include the application site) is still relevant”*; whereas the final revised version appears as ‘Ashford Urban Area Diagram in Appendix 9 of the Adopted Local Plan to 2030 and the future growth indicator has moved to the east of SAGC.

ABC’s Policy HOU5 is key to consideration of a ‘windfall site adjoining or close to existing built-up settlement confines’; albeit that the adjoining phase of the nascent Chilmington exists only as an outline approval, with no timeline set for its construction and occupation. HOU5 defines that each of 6 main and 6 sub criteria need to be satisfied; whilst several of these criteria fall outside the scope of this limited Outline application, the overall balance is **FAIL**

Importantly, we question whether the location meets the requirements for Windfall sites in the Countryside as adjoining or close to the existing built-up confines of the defined list of settlements of which (Urban) Chilmington is not included. The built confine boundaries of the 3 nearest settlements – Great Chart, Shadoxhurst and Bethersden – are more than 2 km away and thus are neither adjoining nor close to! It is our considered view, policy HOU5 does not apply.

Accessibility to Services. A summary tabulation is presented below; a more detailed version is submitted in the HOU5 Objection by our Utilities Team

Key Day-to-Day Service	Distance km ¹	Safe to Walk?	Bus Access
Primary Health Care	9 & 19 ²	NO	None direct
Shop / Post Office	3+	NO	None direct
Pharmacy	3 / 5+	NO	No / 2 hourly
Supermarket	5-6	NO	2 hourly
Railway Station	5-6	NO	2 hourly
Schools: Primary & 2ndary	1.5 / 1	YES	n/a
Dentist / Hospital	3+ / 10	NO	None direct

Notes: 1- Distances measured from approx. centre of development | 2- NHS CCG advice 27 April 2022

Primary Health Care. The NHS CCG proposes

- 👉 Headcorn Surgery at 16+ km, Bus to Ashford, Train to Headcorn, and
- 👉 Woodchurch Surgery, only 9 km bus (approx. 2 hr intervals) with change at Ashford or Tenterden.

Effectively private car or expensive taxi for all. Finish Chilmington with a Health Centre before any new development!

Road Access & Traffic. At the time of writing, no Traffic Assessment has been presented as supporting document. Our Road Safety Team has submitted a Preliminary Objection which includes summary accident data for the A28 where a secondary access is proposed. Primary access would be from the CG Southern Link Road for which detail and agreements with KCC remain unresolved and potential design conflicts are apparent.

Precedents set from previous Planning & Appeal Decisions. The recent 2 applications refused by ABC and Appeals dismissed by Planning Inspectorate (13 May 2022) for proposed developments at Blue Barn, just 1 km to the North-West, sets some very relevant opinions which support Objection to Possingham Farm. Again, a detailed analysis has been submitted by our Utilities Team and a summary is presented below.

Refusal Criteria	Blue Barn	Possingham Farm
Location & Accessibility HOU5 a/b/c/d	👉	👉
A28 Highway & Access Safety Lack of Traffic Analysis & Highway Pre-consultation Dependence on non-sustainable transportation	👉	👉
Suburbanisation of rural land without attendant infrastructure, conflict with local policies which seek to protect the landscape	👉	👉
Policy ENV1 of the Local Plan requires new development to identify and seek opportunities to incorporate and enhance biodiversity. No net gain proposals offered (BB is negative)	👉	👉
No demonstration of Stodmarsh HRA compliance	👉	👉
Current housing land supply claims discounted as overall adverse impacts outweigh benefits	👉	👉

Waste Water & Stodmarsh. Stodmarsh submission compliance criteria apply; the application chooses not to address this and we have clarified with ABC Planning Policy Team that all applications require Nutrient Neutrality submission, to the latest March 2022 Natural England guidance. This application is not therefore, in our view, valid and should not have been validated.

Environment, Ecology & Biodiversity. Whilst the present application is for a limited scope Access, Layout and Scale - with other key aspects as reserved matters, a Preliminary Eco Appraisal has been presented and this warrants comment as it specifically states NOT TO BE USED TO SUPPORT PLANNING and that additional detailed subject studies are required in the case of Planning. It is our concern that this application should include a more development-specific Environmental Management Plan, encompassing the significant biodiversity and ecology enhancements proposed.

"Overall, ecological enhancements will provide in excess of 10% Biodiversity Net Gain"; Sales Talk, evidence please!

The Environment Act 2021 will in time legally mandate a 10% net gain when associated with all developments through amendments to make net gain a condition of planning permission.

Every development (with a few minor exceptions) will need to demonstrate the ability to achieve biodiversity net gain. And, if it can't, it should be refused and not deferred to 'Reserved Matters'.

The EIA Screening carried out by ABC in 2020 concluded that the scheme is not subject to an EIA. As the Application insists on being considered as an extension to CG then the CG EIA and established ES apply and exclusion is a contravention of the cumulative effects clause in the applicable legislation.

Landscape & Visual Impact (LVIA). The claim that the dwellings conform to '*Kentish Vernacular*'(?) and '*incorporating vibrant local character*'(?) is largely contradicted by the Landscape & Visual Impact Appraisal in which the limited visualisations of the development on the selected landscape viewpoints are minimal to the point of meaningless.

ABC's Landscape SPD categorises the landscape as "Large open prairie style arable fields with gentle slopes" and although Possingham Farm is not specifically identified, its east / south / SW boundary is characterised by rare hedgerow trees and continuous ancient laid hedges with oak.

Again, the Planning Statement, "*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.*"

The impact of 3 & 4 storey buildings on this landscape will not be muted and it is totally out-of-character.

Conclusion.

Shadoxhurst Parish Council consider that the proposed development would be a dramatic feature that will have long lasting effects on the phased and previously agreed development of South Ashford and threatens to urbanise the rural nature of the land around our parish. If it is part of Chilmington, we are adamant that the outline permission already granted through public enquiry be built out and this land should not be given consideration at least in the lifetime of the current Local Plan 2030. If it is not part of Chilmington, it is still too large, and the impact needs to be assessed in line with the future completed Chilmington community.

Shadoxhurst Parish Council 08/06/2022

From: Shadoxhurst Utilities Team 28th May 2022
To: Ashford Borough Council Planning Dept
Attn: Alex Stafford, Case Officer
ABC Ref: 22/00571/AS Outline Application for Possingham Farm 'extension' to Chilmington Green
2nd Addendum to non-compliance with Adopted Action Plans & Policies

Consideration of ABC Policy HOU5

Overview

The present application is limited to the consideration of 'Access, Layout and Scale'; the following comments focus on compliance of the proposed development with these criteria against ABC's Policy HOU5

Policy HOU5 in the Ashford Local Plan addresses Residential Windfall Development in the Countryside, specifically "*Proposals for residential development adjoining or close to the existing built-up confines*"; the applicant's detailed consideration of HOU5 is dealt with in Planning Statement articles 5.20 and 7.9-7.24.

Article 8.2 of the Planning Statement Summary & Conclusions acknowledges HOU5, together with Policy SP1 (LP Framework Policy), as the embodiment of the ABC Local Plan principles, aims and objectives in this case.

Analysis of compliance with HOU5 criteria

Policy HOU5 is predicated on the proviso that each of six main and 6 sub criteria are met. The present Outline Planning application is limited to consideration of "access, layout and scale, with all other matters reserved"; these are dealt with in HOU5 a/b/c/d and the following comments focus on these criteria.

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,*

The 'Planning Statement' (para 2.2) describes its proposals "*for a sensitively designed development that creates a logical and rational extension to the Chilmington Green Development*". The most significant non-compliances with HOU5a include:

- 👉 wide disregard for the specifics of the Chilmington Green Area Action Plan as currently adopted; the CGAAP would require to be reviewed, reconsulted and reissued for this claim to be valid
- 👉 the flawed claim in 6.12 & 6.13 that the Ashford Growth Area (2009) diagram which suggests that "*Chilmington Green Development could extend to the west (that is to include the application site) is still relevant*"; in fact, after several intervening changes the final revised version appears as 'Ashford Urban Area Diagram in Appendix 9 (p352) of the Adopted Local Plan to 2030 and the future growth indicator has moved to the east of SAGC.
- 👉 at 655 dwellings, the proposed scheme is larger than each of the adjacent rural settlements of Bethersden, Shadoxhurst and more than double the size of the core Great Chart village on the West of the A28; Hodson @ Possingham offers housing densities up to 100 times that of its rural neighbours and 6 times that of the transition edge of Chilmington – this is an URBAN DESIGN as the Planning Statement confirms.

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, and*

HOU5 d) *The development is located where it is possible to maximise the use of public transport, cycling and walking to access services,*

Table 1 (OVERLEAF) provides a graphical comparison, against each of the 'basic day-to-day services', of how Possingham Farm scheme largely fails to meet the definition of criteria b) and d). Table 1 acknowledges:

- the newly available Primary School plus Secondary School targeted for Q3 2024; however, capacity availabilities to service the developing catchment are not looked at in the Planning Statement.
- those limited infrastructure and service elements which are under completion or for which there is clear detailed planning approval + committed completion programme; e.g. whilst a supermarket is shown in CG concept there are no indications if/when it will be operating and it is discounted

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. The absence so far of any Traffic Assessment, including an update to the overall A28 and local area traffic modelling, precludes any evaluation and the application cannot be considered valid until this provided and deemed satisfactory.

HOU5 e) – Natural Environment & Heritage Assets considerations are outside the scope of the present application and are therefore not considered here.

HOU5 f) is essentially concerned with Design Quality and its compliance within the local context; only 2 of the 6 sub-criteria – items iii & iv - are relevant here:

iii. includes requirement for an appropriately sized and designed landscape buffer to the open countryside

The development 'extends' the projected CG Southern Character Area which currently exists only as a concept on paper and for which no definitive timetable is available for its build completion.

The Southern Fringe Character Area is designed to soften the transition of built development into the countryside, achieved through low density (10 dph) dwellings; this is contradicted by the **proposed average density of 53 dph**.

iv. is consistent with local character and built form, including scale, bulk and materials used

Of particular concern is 'scale' where the scheme anticipates 3 & 4 storey buildings as a core component of its 'Urban Design' concept.

Relevant to both iii) above and iv) is the statement in Design Strategy article 5 "Ecological Enhancements in the Landscape: The proposals will change an area of agricultural landscape into a semi-urbanised area with areas of greenspace".

Conclusions

The 'Planning Statement' (¶ 2.2) describes its proposals "for a sensitively designed development that creates a logical and rational extension to the Chilmington Green Development".

We respectfully suggest that a logical and rational extension should come after the completion of the phase(s) it is 'extending' and SUBJECT to

- completion and availability of all essential infrastructure and services
- a detailed review and update, if considered appropriate, of the Local Plan and CG Area Action Plan
- full compliance with adopted Policies & Plans.

The analysis of access to key services highlights a most serious area of concern re Primary Health Services; the Clinical Commissioning Group letter of 27th April proposes two options at 9 & 16+ Km, neither with direct or viable public transport options and with no consideration of the respective site capabilities to expand and absorb the patient load.

- All Patients will be totally car dependent and this has to be unacceptable.
- Until Chilmington / South Ashford can physically deliver new Primary Care capacity to meet local growth needs then any "extension to CG/SA" should not be considered.

Of the 13 'day-to-day services' categories considered in Table 1 (Att.1), only 2 – primary and secondary schools – potentially satisfy the easy (and safe) walking distance criterion.

Acknowledgement: My thanks to the many Team contributors for their research and inputs

Peter Finnis



Attachments















1: Access to Services (Table 1)

2: Extracts on HOU5 criteria non-compliances from PINS Appeals Dismissal 'Blue Barn'



?RURAL CHARACTER?

Table 1: Access to Day-to-Day Services

Service	Location	Km ¹	Safe to Walk?	Bus Route
Shop / Post Office	Stubbs Cross Singleton	3 3		
Supermarket	Various	6 +		
Doctor ²	Woodchurch Headcorn	9 16-19		
Hospital	Ashford	9-10		Approx 2 hr + Changes
Pharmacy	Singleton Ashford various	3 5+		X Approx 2 hr
Dentist	Singleton Ashford	3 5+		X Approx 2 hr
Primary Schools	Chilmington Bethersden	1-1.5 5	✓ X	N/A X
Secondary Schools	Chilmington (planned) Tenterden	0.5-1 13	✓ X	N/A School Service
Railway Station	Ashford	5-6		Approx 2 hr
Church	Great Chart	2.5		Approx 2 hr
Sports Ground	Great Chart	3		Approx 2 hr
Village Hall	Great Chart	3		Approx 2 hr
Pub	Great Chart / Bethersden	3 / 5		Approx 2 hr

Notes: 1- Distances measured from approx. centre of development | 2- NHS CCG advice 27 April 2022

Attachment 2 to HOU5 non-compliance comments, Possingham Farm
Extracts from PINS Appeals Dismissal Decision Blue Barn (13th May 2022)

11. Policy HOU5 of the Local Plan allows for windfall residential development outside settlement boundaries where it adjoins or is close to the built up confines of, amongst other settlements, Ashford, and meets a number of criteria relating to the scale of development, accessibility, highway safety, impact on the natural environment, landscape and neighbouring amenity.

13. In terms of accessibility Policy HOU5 requires residential windfall development to be within easy walking distance of day to day services and/or sustainable methods of transport to access a range of services, and should be located where it is possible to maximise the use of public transport, cycling and walking to access services.

17. The village of Great Chart lies to the north east of the A28. However, it is only accessible down a country lane that has no footways and is unlit. It is also approximately 1km away and has only limited facilities and services. I consider it unlikely that occupants on the appeal sites would choose to walk or cycle to Great Chart rather than take the car because of the impediments to doing so.

*18. I conclude that given these barriers to the use of sustainable forms of transport, it is likely that most trips generated by development on the appeal sites would be by motor car. Although the appeals sites are close to the emerging residential quarter at Chilmington Green, both developments would suffer from poor accessibility and **would therefore conflict with Policies SP1, SP2, TRA5 and HOU5 of the Local Plan**, which requires residential windfall development in the countryside to be accessibly located and well connected to the wider movement network.*

ABC Application Refs 21/01067/AS & 21/01335/AS

PINS Refs APP/E2205/W/21/3283310 & APP/E2205/W/21/3285844

From: Shadoxhurst Utilities Team
 To: Ashford Borough Council Planning Dept
 Attn: Alex Stafford, Case Officer
 ABC Ref: 22/00571/AS Outline Application for Possingham Farm 'extension' to Chilmington Green

19th May 2022

Addendum to non-compliance with Adopted Action Plans & Policies

Precedent from Planning Appeal Dismissals at nearby Blue Barn

Overview

Two outline applications for development at Blue Barn, to the NW of the proposed site of the Possingham Farm scheme, in Goldwell Lane opposite Chilmington Phase 1, both originally refused by ABC in autumn 2021, have just had their Appeals dismissed (13th May 2022).

Whilst the Blue Barn schemes are of a different scale and nature to Possingham, many of the points raised by the PINS Inspector are relevant to the current 22/00571/AS and these are summarised below.

Appeal refs APP/E2205/W/21/3283310 & 3285844

Blue Barn Applications 21/01067 & 01335/AS represent 65 total dwellings vs 655 for Possingham Farm.



Comparison

The key comparison criteria, recognising the reserved matters context of all applications under scrutiny, derived from the PINS report identified the following main issues:

- ↗ the location of new development having regard to spatial policy and accessibility;
- ↗ the character and appearance of the area, including its landscape qualities;
- ↗ highway safety, with regard to parking provision;
- ↗ biodiversity;
- ↗ effect of the lack of housing land supply
- ↗ Stodmarsh HRA

The following table presents a summary of the Blue Barn & Possingham Farm cases respectively

Refusal Criteria	Blue Barn	Possingham Farm
Location & Accessibility HOU5 a/b/c/d	👎	👎
A28 Highway & Access Safety Lack of Traffic Analysis & Highway Pre-consultation Dependence on non-sustainable transportation	👎	👎
Suburbanisation of rural land without attendant infrastructure, conflict with local policies which seek to protect the landscape	👎	👎
Policy ENV1 of the Local Plan requires new development to identify and seek opportunities to incorporate and enhance biodiversity. No net gain proposals offered (BB is negative)	👎	👎
No demonstration of Stodmarsh HRA compliance	👎	👎
Current housing land supply claims discounted as overall adverse impacts outweigh benefits	👎	👎

Conclusions

A selected number of extracts from the Appeal Dismissals Report are presented in Appendix 1; these put more detail into the issues applicable.

Several important conclusions can be drawn from the Blue Barn Appeal Dismissal Decisions that are directly relevant to the present Possingham Farm application and any other proposals which fail to accord with the "*spatial approach to development as set out in the Local Plan*".

Material Planning Considerations against which comparison with Blue Barn justifies valid Objections to Possingham Farm include in particular:

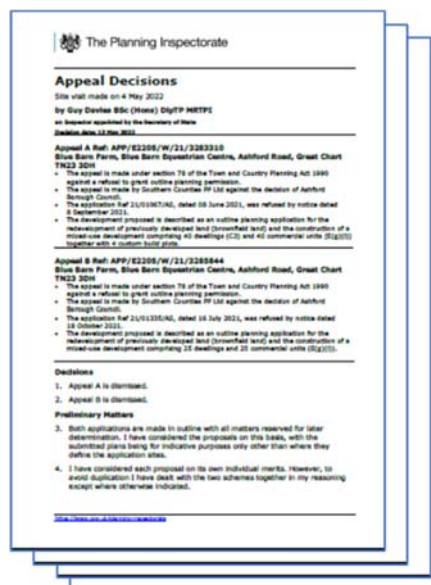
- ↪ **Planning Policies** (including Adopted Local Plan & CGAAP, HOU5, ENV1 & 3a, Stodmarsh HRA, SP1 & 2, TRA4/5/6/7)
- ↪ **Highway Safety Issues**
- ↪ **Impact on Countryside**
- ↪ **Traffic Generation**
- ↪ **Government circulars** notably Biodiversity
- ↪ **Previous Planning Decisions (including Appeal Decisions)**
- ↪ **Design, visual appearance**
- ↪ **Layout and density of buildings** (from Adopted CGAAP)

Arguably the most damning criticism within the Appeals Dismissal is "*I conclude that extending residential led development on to the north side of the A28 Ashford Road would encroach into the rural landscape and would as a result harm its character and appearance. Both developments would therefore conflict with Policies HOU5, EMP1, ENV3a and ENV5 of the Local Plan, which amongst other criteria, seek to protect the landscape.*" For the Possingham Farm context, "*north side of A28*" translates to the "redline boundary of the southern fringe area of CGAAP"

These further Objection Comments based on newly published Appeals Dismissal (13th May) reinforce our previous submission on Non-Compliance with Adopted Plans & Policies dated 8th May 2022 and add further support to our recommendation to REJECT the current application.

Again, my thanks to the many Team contributors for their research and inputs

Peter Finnis



Extracts from PINS Appeal Decisions refs APP/E2205/W/21/3283310 & 3285844: 13th May 2022

Spatial Policy and Accessibility

Policy HOU5 of the Local Plan allows for windfall residential development outside settlement boundaries where it adjoins or is close to the built up confines of, amongst other settlements, Ashford, and meets a number of criteria relating to the scale of development, accessibility, highway safety, impact on the natural environment, landscape and neighbouring amenity.

In terms of accessibility Policy HOU5 requires residential windfall development to be within easy walking distance of day-to-day services and/or sustainable methods of transport to access a range of services, and should be located where it is possible to maximise the use of public transport, cycling and walking to access services.

*In this regard, the appeal sites are separated from services and facilities in Ashford and future facilities planned for Chilmington Green by the A28 Ashford Road, which is a distributor road carrying a considerable quantity of traffic with a speed limit of 40mph in the vicinity of the appeal sites. **50 mph the whole length parallel with Possingham Farm***

The presence of the A28, and quantity and speed of traffic along it, forms a barrier to sustainable forms of transport such as walking or cycling. Ditto Possingham Farm (see above)

*I conclude that given these barriers to the use of sustainable forms of transport, it is likely that most trips generated by development on the appeal sites would be by motor car. Although the appeals sites are close to the emerging residential quarter at Chilmington Green, both developments would suffer from poor accessibility and would therefore conflict with Policies SP1, SP2, TRA5 and HOU5 of the Local Plan, which requires residential windfall development in the countryside to be accessibly located and well connected to the wider movement network. **Ditto Possingham Farm***

Landscape Character

The appeal sites are located within National Character Area 121, Low Weald, and forms part of the Bethersden Farmlands in the Ashford Landscape Character Study 2005. The area is generally flat and made up of a mix of arable and pasture fields, separated by hedges and occasional trees, and interspersed with blocks of woodland..... Scattered in the countryside are occasional farmsteads or isolated dwellings, mostly set in mature gardens. Although not locally or nationally designated for its landscape quality, the area has an attractive rural character and appearance.

In contrast to the rural character of the countryside is the suburban development taking place at Chilmington Green. These two areas are separated by the A28 Ashford Road, which forms a clear boundary between the emerging residential quarter and the countryside.

Introducing residential led development onto either appeal site would result in the suburbanisation of the land, creating the appearance of a housing estate. While the same change is happening at Chilmington Green, that development is a planned extension to Ashford, with attendant infrastructure. Its boundary on the A28 Ashford Road provides a separation between the new quarter and the rural landscape to the north. The proposed developments on the appeal sites would breach this physical and visual boundary, introducing suburban development on the northern side of the road, encroaching into what is otherwise a rural landscape.

Although existing boundary hedging would be largely retained, and landscape buffers could be planted around the periphery of either or both sites, this would only partly mitigate the change in the character and appearance of the sites. Contrary to the Landscape and Visual Impact Appraisals submitted with the appeals, I consider that the suburbanisation of the sites would be apparent notwithstanding such mitigation, in both the short and long term.

The above comments remain relevant for Possingham Farm

Biodiversity

*Policy ENV1 of the Local Plan requires new development to identify and seek opportunities to incorporate and enhance biodiversity. No unilateral undertaking has been submitted to secure biodiversity net gain, nor do I have any information about whether there is a location that could be used to provide off-site biodiversity compensation. Given the lack of biodiversity information, I conclude that the developments would conflict with Policy ENV1 of the Local Plan, by failing to ensure that the developments would result in a net gain in biodiversity. **Ditto Possingham Farm***

Stodmarsh Nature Conservation Sites

The Stodmarsh lakes to the east of Canterbury are designated as a Special Protection Area, Ramsar site, Special Area of Conservation and a Site of Special Scientific Interest. Natural England has advised that excess nitrates and phosphates in water that drains into the lakes is having an adverse effect on the nature conservation value of the designated sites.

New residential development whose wastewater, treated or otherwise, that drains into that area could also have an adverse effect, unless it can be demonstrated that it would achieve nutrient neutrality. If either development proposal were to be connected to waste treatment works in Ashford, then it is likely their wastewater would enter the Stour catchment.

Conclusion

I have concluded that the proposed developments would cause harm by reason of their lack of accessibility and their impact on the rural landscape. As a result, the proposals would fail to accord with the spatial approach to development as set out in the Local Plan.

Harm would also be caused by the absence of sufficient biodiversity gain.

I conclude that the development proposals would conflict with the development plan both individually and in combination.

Balanced against this harm are the benefits that would accrue from the appeal proposals. As well as adding 65 additional residential dwellings to the housing stock in the area, a proportion of these would be affordable or custom built, which would help meet demand for these particular housing needs. The main parties dispute the current housing land supply; regardless of the exact figure, it is agreed that the Council cannot currently demonstrate the 5 year housing land supply required by national policy. In such circumstances, paragraph 11 of the National Planning Policy Framework (the 'Framework') is engaged and says that planning permission should be granted unless policies in the Framework provide a clear reason for refusal, or any adverse impacts would significantly and demonstrably outweigh the benefits.

Although I recognise the benefits of the two schemes in providing housing in an area where there is a deficit of housing land supply, I consider that the harm identified is substantial, and would significantly and demonstrably outweigh the benefits in these cases. I conclude that the conflict with the development plan when taken as a whole is not outweighed by other material considerations, including the 'tilted balance' introduced by paragraph 11 of the Framework. Consequently, I conclude that both appeals should be dismissed.



From: Shadoxhurst Utilities Team

8th May 2022

To: Ashford Borough Council Planning Dept

Attn: Alex Stafford, Case Officer

ABC Ref: 22/00571/AS Outline Application for Possingham Farm 'extension' to Chilmington Green

Objections to non-compliance with Adopted Action Plans & Policies

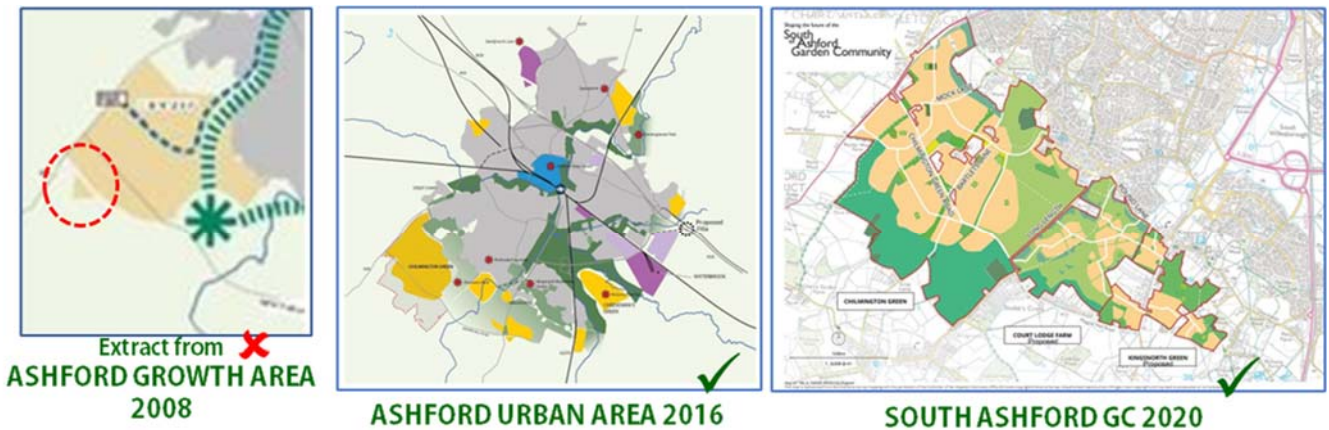
Introduction & Summary of Development

The Design and Planning Statements for this scheme are predicated on the concept of an extension to the Chilmington Southern Character Area and seek to justify this by Figure 2 in the Planning Statement (P14).

Figure 2 and references in paras 6.12, 6.13 & 7.4 purport to provide justification for the Possingham Farm scheme by its reference to "possible direction of post 2021 urban extension"; arguably a pretty convincing support. However, Para 6.12 **incorrectly** states that the "Core Strategy key principles for the Ashford Growth Area as shown below (Figure 2) remain unchanged".

In fact, the graphic presented – Ashford Growth Area diagram - **dating from 2008** and missing the CG Southern Character Area - has now been superseded by later diagrams:

- Firstly, 'Ashford Urban Area 2016', which includes the Southern Fringe Character Area not shown in 2008 and the future extension indication moved across to the SE corner, below Steeds Lane
- Latterly, South Ashford GC, Sept 2020.



The Chilmington Green Area Action Plan (CGAAP) sets down clear definition of developmental constraints, particular for the fringe boundary area and transition to adjoining areas and wider countryside.

IF, regardless of established and validated Plans, an 'extension' is considered allowable then the clearly established Policies, Design Guidance, etc applicable to the adjoining CG area – yet to be built – must apply. These include, but not limited to, Housing Densities & Heights – both of which are totally disregarded in the currently presented scheme.

Whilst the Design Statement claims to respect 'Kentish Vernacular' (?) and shows images of surrounding villages, the Hodson's 3 and 4 storey town and suburban style buildings as proposed totally conflict with the agreed concept for the transition from boundary character area to countryside.



Certainly, whilst there are a limited number of 2.5 & 3 story buildings in the centres of large villages and small towns, they tend to be isolated and not in blocks as envisaged here.

The following notes highlight principal aspects where the proposed scheme deviates from established Policies, plans and guidance; there are many others.

Extracts from Chilmington Green Area Action Plan (CGAAP)

Chapter 5 d) addresses the Southern Fringe Character Area; its location is described in 5.64 & 5.65

5.66 Policy CS5 (c) of the adopted Core Strategy states that the major new urban neighbourhoods should be '*well related to the rural landscape surroundings by the creation of a well designed and defined edge to development and a sensitive transition to adjoining areas and the wider countryside*'. In addition, the Chilmington Green Landscape and Visual Impact Baseline study identifies the southern fringe boundary area as an important and visually prominent part of the wider landscape - an area which requires sensitive treatment.

5.67 In response, design guidance for this Character Area establishes how development should:

- 👉 interact with the countryside to provide an appropriate transition, ensuring that the development sits sympathetically within the landscape, a key objective of the AAP.
- 👉 provide an established edge to Chilmington Green along its southern boundary.

5.69 To soften the transition of the built development into the countryside, **low density housing (or no more than 10 dph) should be delivered along the southern boundary, between 2 and 2.5 storeys in height** with variety in roof heights and forms, so that the scale and built form is integrated sensitively into the landscape.

Importantly, the **Report on the PI Examination into the CGAAP** confirms in Article 38:

"In reaching this conclusion it is pertinent that the CGAAP proposes a band of low density residential development in the Southern Fringe Character Area so as to achieve the "well designed and defined edge to development and a sensitive transition to.... the wider countryside" sought by Core Strategy policy CS5. The stepped increase in residential densities moving north from the southern boundary is an important component in managing the transition between the new urban area and the countryside."

Totally ignoring the above, **the application shows:**

- 👉 **12 parcels with densities varying between 39 & 59 dph with overall average of 52 dph (ref Parcel Densities Parameter Plan)**
- 👉 **24 'areas' including 7 up to 4 storeys and 10 up to 3 storeys (Building Heights Parameter Plan)**

10.81 Ecological and mitigation measures in the area will also complement the planned landscape measures proposed as part of the Southern Fringe Character Area (Policy CG6) which will help mark a suitable transition into the countryside, as well as providing a clear edge to the development.

10.83 A **detailed ecological enhancement and mitigation strategy will be needed to support any planning application** and this will need to be agreed by the council. This strategy will also need to identify the appropriate management arrangements that will be needed to support the different species and habitats present on-site. It will also need to demonstrate the anticipated timeframe required for mitigation and enhancement areas to become properly established in order to genuinely mitigate or compensate impacts resulting from development, in addition to setting out a clear approach to future monitoring to ensure the aims of the strategy are being met. Planning conditions and / or a suitable Section 106 Agreement will be used to define a deliverable management strategy, in the long term.

Policy CG21 within the CGAAP states "An ecological enhancement and mitigation strategy will be needed, to be agreed with the council, prior to the approval of planning permission."

The application only includes a Preliminary Ecological Appraisal which includes clear statements "not to be used to support planning" and lists the specific studies required. No scheme-specific Enhancement & Mitigation Strategy is presented.

However, the Planning Statement, in 7.84. commits to "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."

Note ENV1 is out-of-date with the last government strategies for Biodiversity Net Gain and these should prevail. A strategy should be submitted for review prior to any approval of this application.

Conclusions

The Design Statement Summary informs that "The site is a natural extension to the Chilmington Green Garden Village" but forgets to add that it largely ignores the corresponding policies and design rules that apply.

Moreso, the much reviewed and subsequently adopted Ashford and CG Plans do not envisage and support extension to the SW as incorrectly claimed in the applicant's Planning Statement.

The application shows 7 areas of up to 4 storey housing and 10 areas of up to 3 storey housing; precise unit counts are not available but a rough estimate suggests these cover some 2/3 of the total housing area!

The average Housing Density for the overall scheme is 52 dph; 5 times that envisaged in the GCAAP!

The Design Strategy provides a strange interpretation of 'Kentish Vernacular'; reference to Historic England's excellent guides and the numerous papers on Kent in particular suggest that;

- the inclusion of town and suburban design style examples is inappropriate
- Vernacular concept is defined by HE as "Vernacular houses, by which are meant houses built in the main from locally available materials that reflect custom and tradition more than mainstream architectural fashions, both rural and urban.

The Hodson scheme fails to recognise the core principles of key ABC & CG policies such as CS5, CG21, CG22 and many others

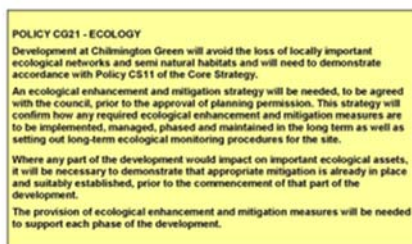
A resounding recommendation to REJECT the current application.

My thanks to the many Team contributors for their research and inputs

Peter Finnis

References:

Chilmington Green Area Action Plan





Development Control Manager
Ashford Borough Council
Civic Centre
Tannery Lane
Ashford
Kent
TN23 1PL

Your ref
22/00571/AS

Our ref
DSA000011089

Date
16/01/2023

Contact
Tel 0330 303 0119

Dear Sir/Madam,

Proposal: Outline application for the development of up to 655 residential dwellings (including 30% affordable dwellings) to consider access, layout and scale with all other matters reserved.

Site: 22/00571/AS: - Land north of Possingham Farmhouse, Ashford Road, Great Chart, Kent TN26 1JR.

Thank you for your letter dated 25/04/2022.

Southern Water has undertaken detailed network modelling of the impact that the additional foul sewerage flows from the proposed development will have on the existing public sewer network.

This indicates that these additional flows will lead to an increased risk of foul flooding from the sewer network. Monitoring of existing flows may be required, this will enable us to establish the extent of any works. Network reinforcement that is deemed necessary to mitigate the impacts identified will be provided by Southern Water.

Southern Water will liaise with the developer in order to review if the delivery of our network reinforcement aligns with the proposed occupation of the development, as it will take time to design and deliver any such reinforcement.

It may be possible for some initial dwellings to connect, pending network reinforcement. Southern Water will review and advise on this following consideration of the development programme and the extent of network reinforcement required.

Southern Water endeavour to provide reinforcement within 24 months of planning consent being granted (Full or Outline) however for more complex applications our assessment of the timescales needed will require an allowance for the following which may result in an extension of the 24-month period:

- Initial feasibility, detail modelling and preliminary estimates.

- Flow monitoring (If required).
- Detailed design, including land negotiations.
- Construction.

Southern Water hence requests the following condition to be applied: Occupation of the development is to be phased and implemented to align with the delivery by Southern Water of any sewerage network reinforcement required to ensure that adequate wastewater network capacity is available to adequately drain the development.

The supporting documents make reference to drainage using Sustainable Drainage Systems (SuDS).

Under certain circumstances SuDS will be adopted by Southern Water should this be requested by the developer. Where SuDS form part of a continuous sewer system, and are not an isolated end of pipe SuDS component, adoption will be considered if such systems comply with the latest Sewers for Adoption (Appendix C) and CIRIA guidance available here:

water.org.uk/sewerage-sector-guidance-approved-documents/

ciria.org/Memberships/The_SuDS_Manual_C753_Chapters.aspx

Where SuDS rely upon facilities which are not adoptable by sewerage undertakers the applicant will need to ensure that arrangements exist for the long-term maintenance of the SuDS facilities. It is critical that the effectiveness of these systems is maintained in perpetuity. Good management will avoid flooding from the proposed surface water system, which may result in the inundation of the foul sewerage system.


Thus, where a SuDS scheme is to be implemented, the drainage details submitted to the Local Planning Authority should:

- Specify the responsibilities of each party for the implementation of the SuDS scheme.
- Specify a timetable for implementation.
- Provide a management and maintenance plan for the lifetime of the development.

This should include the arrangements for adoption by any public authority or statutory undertaker and any other arrangements to secure the operation of the scheme throughout its lifetime.

The Council's technical staff and the relevant authority for land drainage consent should comment on the adequacy of the proposals to discharge surface water to the local watercourse.

We request that should this planning application receive planning approval, the following informative is attached to the consent: Construction of the development shall not commence until details of the proposed means of foul sewerage and surface water disposal have been submitted to, and approved in writing by, the Local Planning Authority in consultation with Southern Water.



This initial assessment does not prejudice any future assessment or commit to any adoption agreements under Section 104 of the Water Industry Act 1991. Please note that non-compliance with Sewers for Adoption standards will preclude future adoption of the foul and surface water sewerage network on site. The design of drainage should ensure that no groundwater or land drainage is to enter public sewers.

It is possible that a sewer now deemed to be public could be crossing the development site. Therefore, should any sewer be found during construction works, an investigation of the sewer will be required to ascertain its ownership before any further works commence on site.

For further advice, please contact Southern Water, Southern House, Yeoman Road, Worthing, West Sussex, BN13 3NX (Tel: 0330 303 0119).

Website: southernwater.co.uk or by email at: SouthernWaterPlanning@southernwater.co.uk

Yours faithfully,

Future Growth Planning Team
Business Channels

southernwater.co.uk/developing-building/planning-your-development



Planning ref
22/00571/AS

Our ref
DSA000011089

Date
16th January 2023

Contact
Tel 0330 303 0119

Dear Sir/Madam,

Southern Water – Your build rates and occupation information

Site Name: Land north of Possingham Farmhouse, Ashford Road, Great Chart, Kent TN26 1JR.

We are contacting you to request information which is required by Southern Water in order to prepare for the connection of your development site (as listed above), to our public sewer network.

In April 2018, water companies in England published their new connection charges (part of the charges are also known as the infrastructure charge). A copy of the Southern Water New Connection Charging Document is available on our website: southernwater.co.uk/media/3305/new-connections-services-charging-arrangements-20_21.pdf

Under the new charging rules, our customers can connect to the closest point of connection, to a pipe of equivalent size or greater. If any reinforcement to the public sewer network is required to enable your connection, this will be provided through the new infrastructure charge. It will take time for us to provide any such network reinforcement. To enable us to plan for this, we require some information.

Action request:

Please provide the details of your anticipated occupation dates and build out rate for the site listed above. This information will support us in planning the required works across our region in readiness for your site to be occupied. If we do not receive this information about the site, we may not be able to progress with the work required to prepare for the connection of your site and your development program. Please note this does not constitute a discharge of any pre-commencement condition that may be attached to your planning consent.



Build Rate & Occupation details

Please fill out the tables below in block capital letters and email this back to us as soon as possible.
Please email the form to: SouthernWaterPlanning@southernwater.co.uk

If the site is not proceeding please email the address above with the site references listed above and a brief description of why it is not going ahead. If you have queries about the information required, please call Developer Services on 0330 303 0119.

Your earliest reply would be much appreciated.

Future Growth Planning Team

Business Channels

southernwater.co.uk/developing-building/planning-your-development

A. Contact Information in case of further queries:

Name of person completing form
Company
Phone number
Email address
Date form completed

B. Site references:

Proposal
Site Name (on letter)
Site Postcode/location
Planning Reference (on letter)
Planning Authority (on letter)
Our reference (on letter)

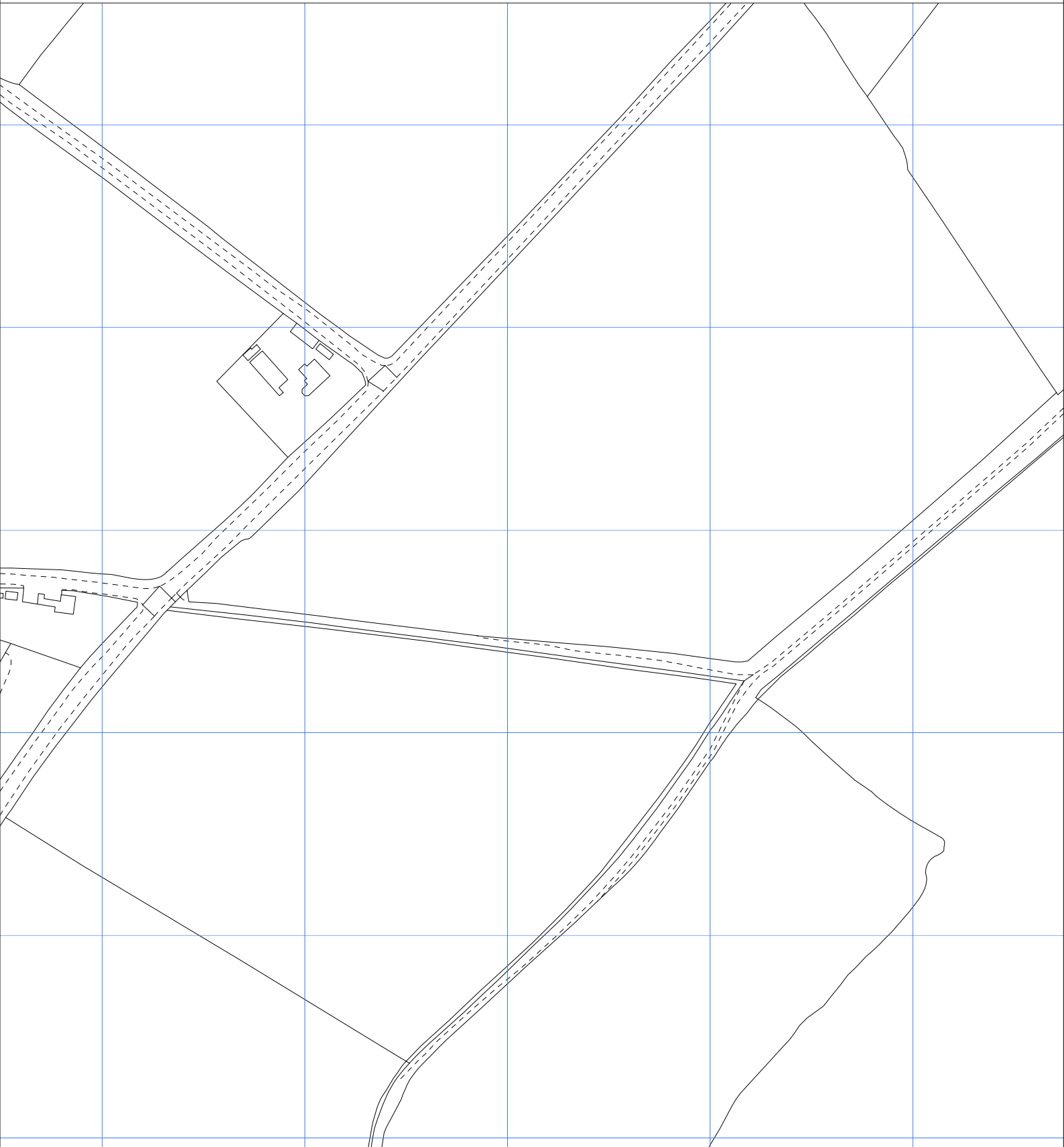
C. Site information:

Proposed start date	/ /
Proposed connection date	/ /
First occupation date	/ /
Forecast completion date	/ /
Proposed date of full occupancy	/ /
Proposed connecting manhole reference number	

Build out period (Per month for each year of development)												
Year	Month											
	1	2	3	4	5	6	7	8	9	10	11	12
20												
20												
20												
20												
20												

If the site had previous use, please describe the type of previous use: e.g. greenfield/brownfield, block of flats, warehouse etc.

SOUTHERN WATER



The positions of pipes shown on this plan are believed to be correct, but Southern Water Services Ltd accept no responsibility in the event of inaccuracy. The actual positions should be determined on site.

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O.S. REF: TQ9640SE

Scale: 1:2500

Screen Print

WARNING: BAC pipes are constructed of Bonded Asbestos Cement

WARNING: Unknown (UNK) materials may include Bonded Asbestos Cement



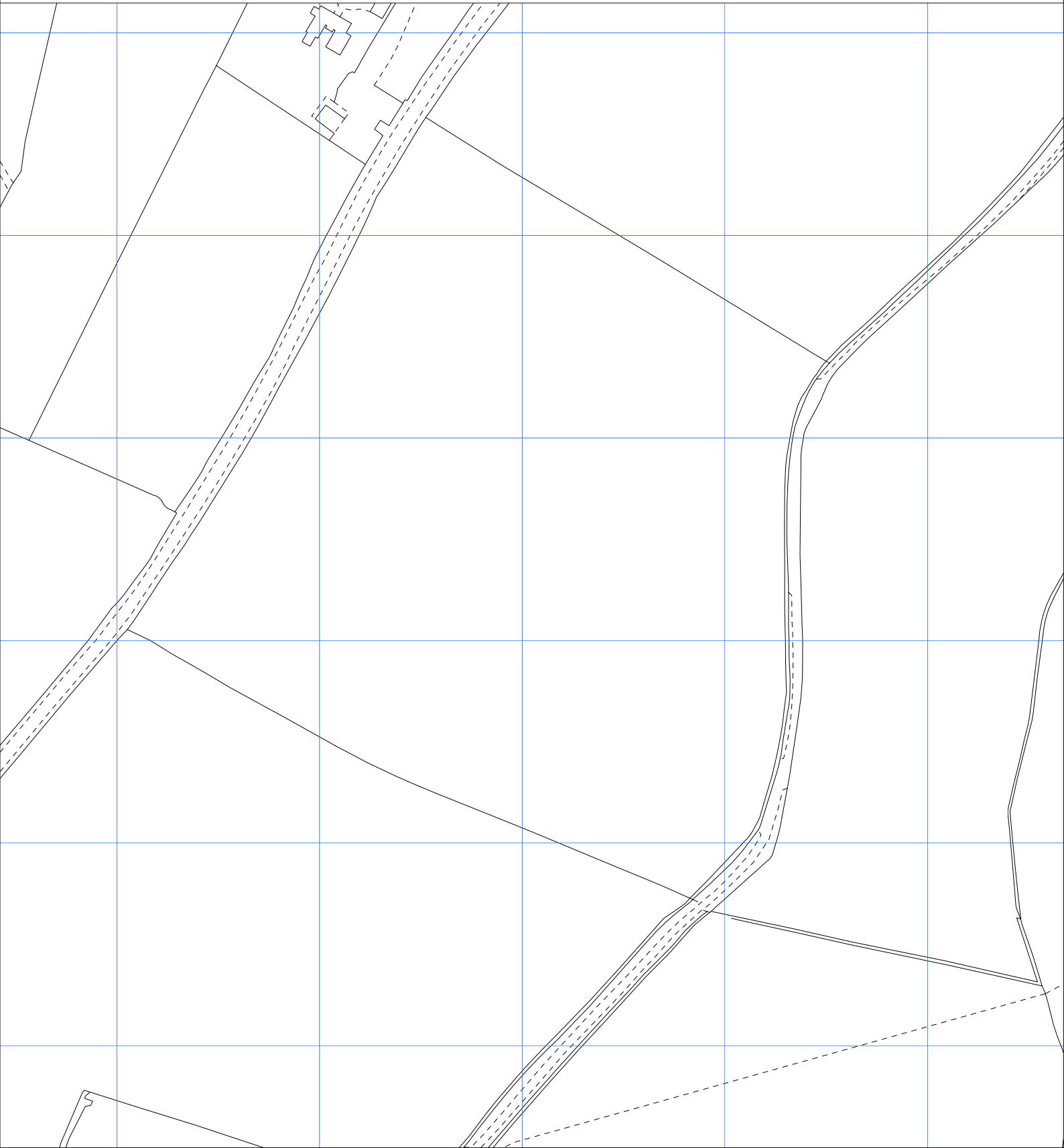
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Date: 1-6-2022

Southern Water MapGuide Browser

Requested By:

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O.S. REF: TQ9639NE

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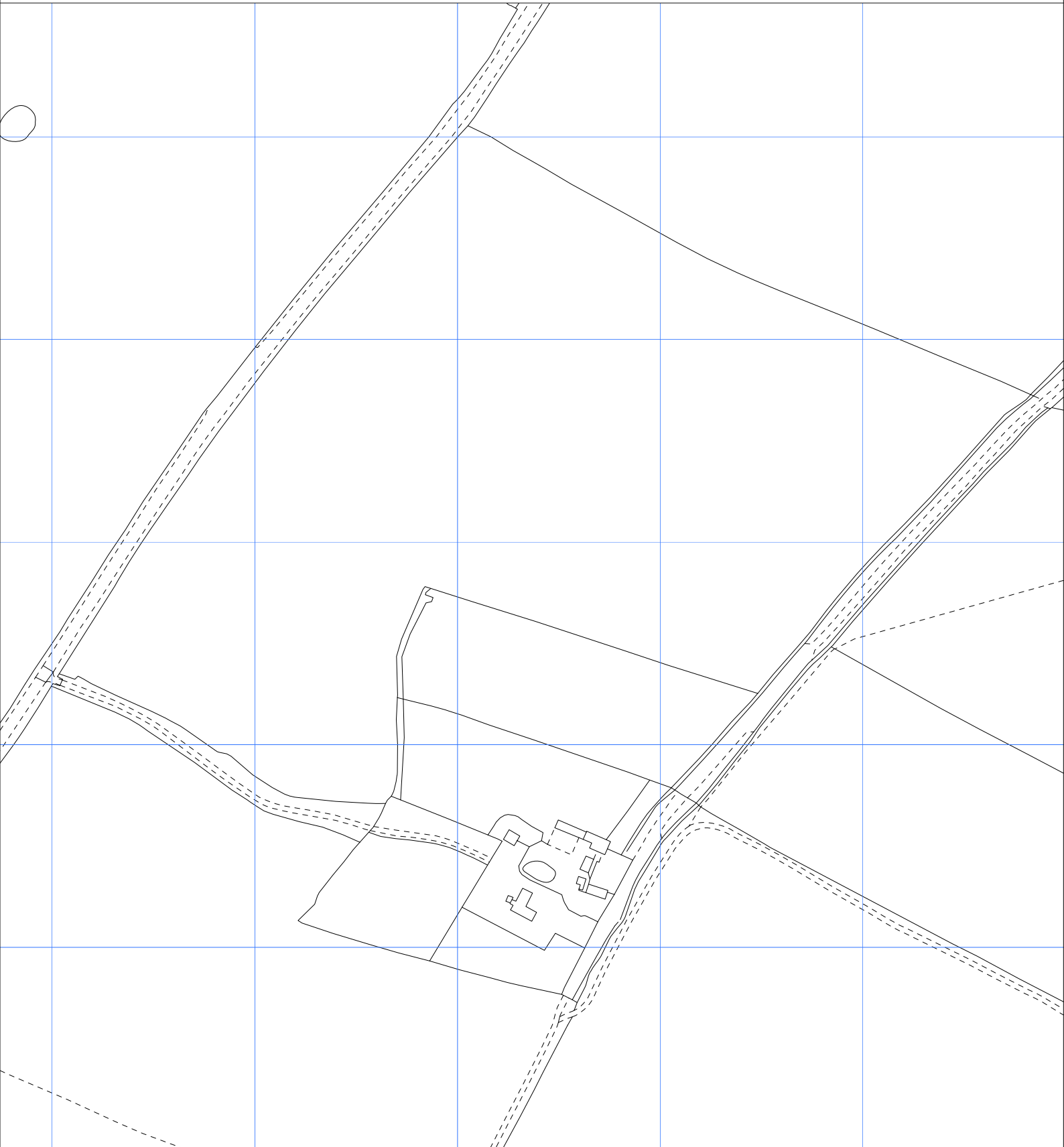
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Printed By: kishoku

Date: 1-6-2022

Southern Water MapGuide Browser

Requested By:





Patron : The 10th. Earl of Guilford

12A Friars Close
Whitstable
Kent
CT5 1NU

The Planning Department,
Ashford Borough Council
Civic Centre,
Tannery Lane,
ASHFORD, Kent,
TN23 1PL.

Our ref.: TQ9640
Your ref. : 22/00571/AS
Date : 14th May, 2022

Dear Sir,

PLANNING APPLICATION 22/00571/AS, LAND NORTH OF POSSINGHAM FARMHOUSE, ASHFORD ROAD, GREAT CHART, KENT (TN26 1JR)

This group wishes to object to the granting of planning permission for the above development.

Our grounds for objection are as follows:

1. We have submitted a request for an unredacted copy of the ecological report¹ and have yet to receive it. On that basis, as we have to date only seen the redacted report which does not give any information about badgers, we consider that there is insufficient information for the planning authority to make a decision.
2. We are aware of badger activity and badger setts within the development area. Having examined the proposals, we do not find any evidence that the badgers have been considered during the compilation of the application.
3. There are no detailed studies of the impact of the proposed development upon the badgers. There is therefore insufficient information for the local authority to determine this application.

Yours faithfully, [REDACTED]

Marion Buckler
Planning Officer for East Kent Badger Group

¹ Lloyd Bore. 2021. Preliminary ecological appraisal. Hodsons Developments. Possingham Farm, Chilmington Green, Ashford. Document ref. 5674-LLB-RP-EC-0001.

From: [Peta Grant](#)
To: [Planning Help](#); [Alex Stafford](#)
Subject: 22/00571/AS Planning Comment from WKPS
Date: 18 May 2022 13:53:19
Attachments: [page1image55032592.png](#)

[CYBER SECURITY WARNING] This email is from an external source - be careful of attachments and links. Please remember your Cyber Security training and report suspicious emails.

22/00571/AS/Outline Land north of Possingham Farmhouse, Ashford Road, Great Chart (TN26 1JR) – Outline application for the development of up to 655 residential dwellings (including 30% affordable dwellings) to consider access, layout and scale with all other matters reserved.

WKPS objects to this application on the following grounds:

1. The proposal is contrary to the approved ABC Local Plan.
2. The site is not included in the Chilmington Green Development Plan.

WKPS urges ABC to refuse this application.

Peta Grant
Secretary to the Planning Committee
Weald of Kent Protection Society

Trebarwith, Standen Street, Iden Green, Cranbrook, Kent TN17 4HP

