

planning
transport
design
environment
infrastructure

Planning Feasibility Report for Land Adjacent to Great Chart
Primary School, Ashford

February 2020
MB/LJ/14303



Contents

1	INTRODUCTION	2
1.1	Purpose of this Report.....	2
1.2	The Site.....	2
2	PLANNING HISTORY	4
2.1	Former Allocation	4
2.2	Outline Planning Application (11/01045/AS).....	4
2.3	Reserved Matters Consent (17/00703/AS)	5
3	PLANNING POLICY CONTEXT.....	7
3.1	Overview.....	7
3.2	Proposals Map.....	7
3.3	Local Plan	7
3.4	Other Material Considerations.....	10
	National Planning Policy Framework	10
	Supplementary Planning Guidance.....	10
4	PLANNING CONSIDERATIONS	14
4.1	Principle of Development.....	14
4.2	Housing Mix & Tenure.....	16
4.3	Design and Layout.....	17
4.4	Highway Impacts and Vehicle Parking	20
4.5	Ecology and Biodiversity	20
4.6	Flood Risk & Drainage	21
4.7	Footpath.....	23
5	CONCLUSION	24
5.1	Summary	24
5.2	Recommendations	24

Appendix 1 Design Feasibility – Site Layout Options

1 Introduction

1.1 Purpose of this Report

1.1.1 DHA Planning have been appointed by Kent County Council to advise on the planning prospects of developing land adjacent to Great Chart Primary School in Ashford for residential purposes. This report follows a previous planning consent for residential development, which has since expired.

1.1.2 This Planning Appraisal provides:

- (a) An overview of the site, its context and its relevant planning history;
- (b) A summary of the planning policy context to the site; and
- (c) An appraisal of the planning prospects.

1.2 The Site

1.2.1 The site in question measures 0.43 hectares in area and is shown edged red in the aerial photograph below.



Appraisal Site (edged Red)

1.2.2 The site comprises vacant open scrubland located within the urban area of Ashford, 1.3 miles south west of the town centre. At the time of DHAs last visit (2017), the site comprised an unkempt area of land, with a number of mature

trees to its boundaries. A mature hedgerow provided a definite boundary between the site and the adjacent primary school playing fields to the west. A footpath runs along the southern boundary of the site, running east to west. Three estate roads run up to the boundary of the site and are then blocked off by close boarded fencing.

- 1.2.3 The site falls wholly within the urban area of Ashford. It is surrounded on three sides by residential development, with Great Chart Primary School forming the western boundary. The surrounding area of Great Chart and Singleton is predominantly residential in character, whilst local shops and other community services including village hall and surgery are found just beyond the school to the west.
- 1.2.4 Land to the north, east and south is in residential use, comprising the residential streets of Butt Field Road, Bishops Green and Longacre Road respectively. This is predominantly two storey in form, with some three storey flatted development to the south.
- 1.2.5 An unadopted footpath runs along the site's southern boundary, joining an existing public right of way to the west which runs along the rear of properties fronting onto Longacre Road to the east.
- 1.2.6 Access into the site is from the south, leading directly onto Longacre Road and the footpath that runs east to west. This footpath leads westwards onto a Public Right of Way that in turn continues westwards towards the school, and southwards, west of the properties at Longacre Road.

2 Planning History

2.1 Former Allocation

- 2.1.1 The site was allocated for residential development within the now superseded Urban Sites DPD, under Policy U11. This policy referred to an indicative capacity of 20 dwellings and required development to:
- a) provide the main vehicle access point from Longacre Road;
 - b) retain, and enhance if necessary, the existing mature tree boundary along the western boundary that adjoins the school playing fields;
 - c) create pedestrian links through the site that continue the pathways in the area and link to the nearby local centre; and,
 - d) be designed in a way that does not adversely impact on the amenity of the neighbouring occupiers.
- 2.1.2 Ashford have very recently adopted their new Local Plan, which supersedes the previous policy and the previous allocation. The appraisal site has not been carried forward as an allocation in the new Plan, albeit it remained in the Strategic Housing and Employment Land Availability Assessment (SHELAA) 2016/17 and was noted as being allocated with planning permission and scored favourably. The site (ref SIS1) was noted as being available, suitable, achievable and deliverable and is included on the list of sites remaining in the assessment.
- 2.1.3 Going through the background information and evidence base for the Local Plan, it is not therefore clear why it wasn't taken forward as an allocation. It is assumed that it wasn't considered necessary in view of the permission that was in place at the time.

2.2 Outline Planning Application (11/01045/AS)

- 2.2.1 The outline consent secured the principle of redevelopment of the site for the provision of up to 14 residential dwellings. Access was considered in detail, with all other matters reserved for future consideration.
- 2.2.2 The application was accompanied by an illustrative masterplan, indicating how the site could suitably be developed to accommodate the maximum quantum of development sought, but no detailed layout, elevations or floorplans for the dwellings were formally approved as part of the outline consent. These were instead to be considered as part of a subsequent Reserved Matters application.
- 2.2.3 The illustrative layout submitted showed access from Longacre Road to the south, utilising an existing access road.
- 2.2.4 The outline application was accompanied by a Design and Access Statement, Ecology Scoping Report, Reptile Survey & Report, Great Crested Nest Survey & Report, and Arboricultural Survey & Report.

- 2.2.5 The application went to Committee on 20th November 2013 as it constituted a major development, comprising more than 10 dwellings. There was an initial delay in determining the scheme due to an application to register the site as a Village Green, which was not successful. The Committee Report set out the proposals' accordance with policy, however the decision was deferred in order to seek a reduction in the maximum number of units. Subsequent correspondence outlined that there was no sound planning justification to reduce the number of dwellings, and therefore 14no. units were considered appropriate for the site, however Members did seek the inclusion of an informative to require any subsequent Reserved Matters scheme to deliver a more spacious feel to the site. This informative included on the decision notice states:

The Council's Planning Committee consider that the illustrative layout accompanying this outline application results in a development that is too dense and which would be detrimental to the character of the area. Any application for approval of reserved matters resulting from this outline permission should include a mix of dwelling types and sizes which creates a significantly more spacious layout than that shown in the illustrative layout so as to complement the character of the surrounding area.

- 2.2.6 The development proposal went again to Planning Committee in January 2014, where Members resolved to grant planning permission, subject to the completion of a Section 106 agreement.
- 2.2.7 The outline approval was issued on 7th May 2014, meaning that the last date for submission of Reserved Matters in accordance with condition 1 of the decision notice was 7th May 2017 (i.e. three years from the date of permission).

2.3 Reserved Matters Consent (17/00703/AS)

- 2.3.1 A Reserved Matters application was submitted on 5th May 2017, two days prior to the expiry of the outline consent.
- 2.3.2 DHA were instructed by Kent County Council as Planning Agent for the application in March 2017. Given the timing of the instruction relative to the expiry date and, the informative imposed on the outline consent and the level of objection and political sensitivities that surrounded the original outline application, it was advised that a 12 unit scheme be progressed to mitigate risk and ensure a consent remained extant. This provided a clear and direct response to the outline informative with regard to density and 'openness' of the plot.
- 2.3.3 The detailed scheme approved comprised six 3-bedroom semi-detached houses and six 4-bedroom detached houses. Each house benefitted from parking provision commensurate with the levels prescribed by the Council's adopted parking standards, with eight of the units having a garage or car barn. Four visitor parking bays were to be provided along the internal access road.
- 2.3.4 All units were two storey in form and traditional in design, utilising a palette of brick, tile hanging and weatherboarding with pitched tiled roofs.
- 2.3.5 The submitted and approved drainage strategy comprised a connection to the existing surface water sewer to the north of the site, via the adjacent school playing field, also in KCC's control. This strategy adopts a Sustainable Urban

Drainage (SUDs) approach and was deemed deliverable, unlike connecting into the nearby Singleton Stream as referenced in the then applicable allocation policy. A foul connection into the existing sewer network in Bishops Green to the east was also proposed.



Approved Site Layout

- 2.3.6 No objections were received from the Parish Council and the application was approved under delegated powers on 8th August 2017, meaning that planning permission expired on 8th August 2019 in line with the original outline consent.

3 Planning Policy Context

3.1 Overview

- 3.1.1 Section 38(6) of the Planning and Compulsory Act advises that planning applications should be determined in accordance with development plan policy unless material considerations indicate otherwise.
- 3.1.2 The Development Plan currently in force for the Council comprises:
- (1) Ashford Local Plan 2030 (February 2019);
 - (2) Chilmington Green Area Action Plan (July 2013) – not applicable to this site
- 3.1.3 Other material considerations of potential relevance to this site include:
- (1) Affordable Housing SPD
 - (2) Residential Parking SPD
 - (3) Sustainable Design and Construction SPD
 - (4) Sustainable Drainage (SuDs) SPD
 - (5) Residential Space & Layout SPD
 - (6) National Planning Policy Framework (NPPF)

3.2 Proposals Map

- 3.2.1 The adopted Proposals Map confirms that the site lies within the Ashford urban area, but does not apply any other allocation or policy designation to the site.

3.3 Local Plan

- 3.3.1 Local Plan policies that will need to be taken into consideration if a planning application is forthcoming include those listed below. Further commentary is provided on the policies deemed most relevant:

- **SP1** – Strategic Objectives
- **SP2** – The Strategic Approach to Housing Delivery

This confirms that in order to meet the Council's housing requirements, there will be a need for suitable windfall proposals in addition to committed schemes and allocations. The majority of new housing is to be in Ashford and its periphery, as the most sustainable location in the Borough. Windfall housing development will be permitted where it is consistent with the spatial strategy and is consistent with other policies of the Local Plan, in order to ensure that sustainable development is

delivered.

- **SP6** – Promoting High Quality Design
- **HOU1** – Affordable housing

This policy sets the threshold for provision of affordable housing as schemes of 10 units or more, and sites of 0.5 hectares or more. The appraisal site falls within the Ashford Hinterlands area (Zone B), where a total 30% provision is required on sites, comprising 10% affordable/social rent and 20% affordable home ownership products (including a minimum 10% shared ownership). Exceptions to this requirement will be allowed if supported by an independently verified viability assessment.

- **HOU3a** – Residential Windfall Development within Settlements

This policy states that residential development and infilling of a scale that can be satisfactorily integrated into the existing settlement will be acceptable within the built-up confines of Ashford, subject to a number of criteria:

- a) It is of a layout, design and appearance that is appropriate to and is compatible with the character and density of the surrounding area;
- b) It would not create a significant adverse impact on the amenity of existing residents;
- c) It would not result in significant harm to or the loss of, public or private land that contributes positively to the local character of the area (including residential gardens);
- d) It would not result in significant harm to the landscape, heritage assets or biodiversity interests;
- e) It 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;
- f) It does not need substantial infrastructure or other facilities to support it, or otherwise proposes measures to improve or upgrade such infrastructure;
- g) It is capable of having safe lighting and pedestrian access provided without a significant impact on neighbours or on the integrity of the street scene; and,
- h) It would not displace an active use such as employment, leisure or community facility, unless meeting the requirements of other policies in this Plan.

- **HOU12** – Residential Space Standards Internal

This policy requires new residential development to comply with the

Nationally Described Space Standards.

- **HOU14** – Accessibility Standards

At least 20 percent of all 'new build' homes shall be built in compliance with building regulations part M4 (2) as a minimum standard. In 'new build' properties which are affordable, a proportion of wheelchair accessible homes complying with building regulations part M4 (3b) will be required.

- **HOU15** – Private External Open Space

For houses, as a starting point, the private garden area should be calculated as the width of the dwelling (m) x 10m. This standard can be flexible providing it can be adequately demonstrated that alternative solutions provide a sufficient area of usable private outdoor space which contributes positively to the character and appearance of the area and ensures a high standard of living conditions can be achieved.

- **HOU18** – Providing a Range and Mix of Dwelling Types and Sizes

Development proposals of 10 or more dwellings will be required to deliver a range and mix of dwelling types and sizes to meet local needs. The specific range and mix of dwellings to be provided should be informed by proportionate evidence that is robust, up to date and provides an assessment of need.

- **TRA3(a)** – Parking Standards for Residential Development

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

1 bed dwelling	1 space per unit
2 bed dwelling	2 spaces per unit
3 bed dwelling	2 spaces per unit
4 bed house	3 spaces per unit

Visitor parking should be provided primarily off-plot in short stay car parks where available OR on-plot at 0.2 spaces per dwelling in major residential schemes where layout permits. Parking to support residential development within the Borough shall follow the design, layout and accessibility guidance contained within the Council's Residential Parking and Design Guidance SPD.

- **ENV1** – Biodiversity

Proposals for new development should identify and seek opportunities to incorporate and enhance biodiversity. In particular, development should take opportunities to help connect and improve the wider ecological

networks.

- **ENV6** – Flood Risk
- **ENV7** – Water Efficiency

All new residential development must achieve as a minimum the optional requirement set through Building Regulations for water efficiency that requires an estimated water use of no more than 110 litres per person per day.

- **ENV9** – Sustainable Drainage

All development should include appropriate sustainable drainage systems (SuDS) for the disposal of surface water, in order to avoid any increase in flood risk or adverse impact on water quality, and to mimic the drainage from the pre-developed site. On greenfield sites, development should discharge at a maximum of 4l/s/ha, or 10% below current greenfield rates for the existing 1:100 storm event, whichever is lower. There must be no increase in discharge rate from less severe rainfall events, with evidence submitted to demonstrate this principle.

SuDS features should always be the preferred option and provided onsite wherever practicable

3.4 Other Material Considerations

National Planning Policy Framework

- 3.4.1 The NPPF provides an overarching policy framework to inform decision making and plan-making, seeking to deliver sustainable development. The following sections are of particular relevance here:

- (1) Section 2 – Achieving sustainable development;
- (2) Section 4 – Decision-making;
- (3) Section 5 – Delivering a sufficient supply of homes;
- (4) Section 9 – Promoting Sustainable Transport;
- (5) Section 11 – Making effective use of land;
- (6) Section 12 – Achieving well-designed places;
- (7) Section 14 – Meeting the challenge of climate change, flooding and coastal change; and
- (8) Section 15 – Conserving and enhancing the natural environment.

Supplementary Planning Guidance

Residential Parking & Design Guidance SPD

- 3.4.2 This SPD was published and adopted in October 2010 and reflects a general shift away from maximum parking standards, particularly in suburban and rural areas where there are generally limited on street parking restrictions.
- 3.4.3 Toolkit 1 of the document sets out typologies for different character areas, including 'Suburban' areas which would apply to the application site, where developments should design for need and include no or very limited on-street parking controls, creating a self-policing residential environment.
- 3.4.4 In these areas, two parking spaces should be provided for two, three and four bedroom houses, with both spaces allocated for three and four bedroom properties and at least one space allocated for two bedroom houses. Where provision is made in the form of tandem spaces, an additional 0.5 unallocated spaces per dwelling should be provided.
- 3.4.5 Garages are not counted towards parking provision and are treated as an additional resource. However, where car barns are provided which do not provide the level of enclosure offered by garages, these can be counted towards meeting the provision standards, as they are not likely to be used for general storage as is often the case with garages.
- 3.4.6 Toolkit 2 provides street and parking space design guidance and includes a street typology for a '(Side)street'. Here, the design focus should be on 'relaxed/quiet' and include a 4.8 metre wide road with 1.8 metre wide footpath. On street parking can be provided within this street design, which, subject to tacking for refuse vehicles, does not need to be of a constant width. Parking space and car barn design standards and dimensions are also provided within this document.

Sustainable Drainage (SuDS) SPD

- 3.4.7 This document was adopted by ABC in October 2010, and offers a reiteration of the previously adopted Core Strategy Policy CS20, providing guidance to developers on meeting the requirements set out in the policy.
- 3.4.8 The site is not previously developed and therefore constitutes a greenfield site. The SPD sets out that a site of this nature will be encouraged to meet 4 l/s/ha AIWMS greenfield run-off standards, but as a minimum will be required to avoid any net increase in run-off rates. Developers should establish what the actual greenfield runoff rate is, or, failing this, a 'rule-of-thumb' of 6 l/s/ha shall be used.

Residential Space & Layout SPD

- 3.4.9 This Borough Council adopted this document in October 2011. The SPD sets out the Council's minimum standards for living space and layout for both privately and publicly funded residential developments in order to comply with CS9 of the Core Strategy. The guidance sets out the following standards for external spaces:

Minimum sizes for individual private open spaces (not overlooked from the road or other public spaces) - flats and houses - Essential minimum standards.			
Number of Bedspaces	Minimum depth of balconies	Minimum area of private outdoor space per flat (balcony, roof garden or ground level patio or open space).	Minimum depth of private garden area for houses (the width will normally be the width of the dwelling).
2 bedspaces	1.5m	5m ²	10m
3 bedspaces	1.5m	6m ²	10m
4 bedspaces	1.5m	7m ²	10m
5 bedspaces	1.5m	8m ²	10m
6 bedspaces	1.5m	9m ²	10m

3.4.10 In March 2015 the Government produced Nationally Described Standards for minimum internal space for new residential developments. These National Standards replace the internal space requirements of the SPD.

3.4.11 The standard requires that:

- (a) the dwelling provides at least the gross internal floor area and built-in storage area set out in the table below (m²);
- (b) a dwelling with two or more bedspaces has at least one double (or twin) bedroom;
- (c) in order to provide one bedspace, a single bedroom has a floor area of at least 7.5m² and is at least 2.15m wide;
- (d) in order to provide two bedspaces, a double (or twin bedroom) has a floor area of at least 11.5m²;
- (e) one double (or twin bedroom) is at least 2.75m wide and every other double (or twin) bedroom is at least 2.55m wide;
- (f) any area with a headroom of less than 1.5m is not counted within the Gross Internal Area unless used solely for storage (if the area under the stairs is to be used for storage, assume a general floor area of 1m² within the Gross Internal Area);
- (g) any other area that is used solely for storage and has a headroom of 900- 1500mm (such as under eaves) is counted at 50% of its floor area, and any area lower than 900mm is not counted at all;
- (h) a built-in wardrobe counts towards the Gross Internal Area and bedroom floor area requirements, but should not reduce the effective width of the room below the minimum widths set out above. The built-in area in excess of 0.72m² in a double bedroom and 0.36m² in a single bedroom counts towards the built-in storage requirement;
- (i) the minimum floor to ceiling height is 2.3m for at least 75% of the Gross Internal Area.

Number of bedrooms(b)	Number of bed spaces (persons)	1 storey dwellings	2 storey dwellings	3 storey dwellings	Built-in storage
1b	1p	39 (37) *			1.0
	2p	50	58		1.5
2b	3p	61	70		2.0
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	
4b	5p	90	97	103	3.0
	6p	99	106	112	
	7p	108	115	121	
	8p	117	124	130	
5b	6p	103	110	116	3.5
	7p	112	119	125	
	8p	121	128	134	
6b	7p	116	123	129	4.0
	8p	125	132	138	

4 Planning Considerations

4.1 Principle of Development

- 4.1.1 As set out within this report, the appraisal site previously benefitted from an adopted residential allocation for an indicative yield of 20 dwellings and extant detailed planning permission for 12 units. Unfortunately, the planning permission has since expired without being implemented.
- 4.1.2 The newly adopted Local Plan does not allocate the site for housing, meaning the previous allocation no longer applies. As such, the correct planning position of the site is unallocated 'white' land within the urban area, free from any specific policy designation.
- 4.1.3 Notwithstanding the removal of the allocation and loss of the planning permission, development of the site is generally supported by policy as a matter of principle. The Local Plan introduces a strategy which prioritises development within Ashford, given it is the most sustainable location, further supported by the NPPF. The previous allocation and permission further illustrate this and whilst they themselves no longer apply and a different development plan is now in place, the underlying planning considerations remain pertinent.
- 4.1.4 To the best of our knowledge, at least since allocation and submission of the first application, the site has remained secure with no public access, illustrated by the past failed Village Green application. Whilst therefore the site is undeveloped, it does not form any formal or functional open space and is not designated as such. On this basis, it is not considered that an objection could reasonably be sustained on grounds of loss of open space or landscape impact and this view is supported by the conclusions previously reached by the Council.
- 4.1.5 Although the current Local plan does not allocate the site, the site is included and assessed within the SHELAA and scores favourably, remaining in the assessment as it was deemed suitable, achievable, deliverable and available. There has been no change in circumstance since this assessment, or previous decisions reached by the Council to now conclude any differently.
- 4.1.6 The existing Local Plan is clear in Policy SP2 in confirming that there is a reliance on windfall sites being delivered to meet the Council's housing requirements and this is further highlighted by the inclusion of Policy HOU3a, which specifically allows for windfall development within the urban area. Given this policy provision, it is prudent to consider how development of the site would perform against its criteria:

a) It is of a layout, design and appearance that is appropriate to and is compatible with the character and density of the surrounding area;

This would be subject to final design, however the previous detailed consent for 12 units demonstrates that a scheme of that scale and form has previously been deemed acceptable in terms of local character and there is no change in circumstance to reach a different conclusion. In view of the original outline consent, there is some prospect that a denser scheme,

possibly with smaller units, could also be considered appropriate in this regard.

- b) It would not create a significant adverse impact on the amenity of existing residents;*

The previously approved detailed scheme for 12 units was deemed acceptable with regard to potential impact upon neighbouring amenity and demonstrated that although existing houses, particularly to the east, are situated close to the design, it is possible through design and layout to mitigate any impacts in respect of potential overlooking or loss of privacy.

- c) It would not result in significant harm to or the loss of, public or private land that contributes positively to the local character of the area (including residential gardens);*

Although currently undeveloped land within the urban area, the site performs no formal function and is not considered to be of any notable amenity or landscape value. For this reason, the site has previously been allocated for development and past applications approved and there has been no change in circumstance or material change in condition of the site to reasonably reach a different view now.

- d) It would not result in significant harm to the landscape, heritage assets or biodiversity interests;*

There are no designated or non-designated heritage assets on or close to the site that could be considered affected by development of the land. The site is not designated for any particular landscape or biodiversity value and in determining the previous applications, impacts in this regard were deemed acceptable. Ecology is considered in more detail below.

- e) It 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;*

In accordance with the original site allocation policy, access for the now expired consent was taken directly from Longacre Road to the south. As that consent illustrates, this access was considered satisfactory in highway capacity and design terms and there is no reason to form any different conclusion now, albeit any new application would need to be subject to fresh Transport Assessment work given the time that has passed and to understand any changes in the wider highway network since the granting of the original outline consent.

- f) It does not need substantial infrastructure or other facilities to support it, or otherwise proposes measures to improve or upgrade such infrastructure;*

The scale of development envisaged and previously approved is not considered to be large enough to have any material impact upon local service provision. If a scheme came forward of ten units or more, it is likely

to be subject to requests for financial contributions via a s106 agreement in relation to service provision such as health and education and these would need to be considered and assessed at that time based on the evidence provided. At present, there is no Community Infrastructure Levy in place in Ashford.

- g) It is capable of having safe lighting and pedestrian access provided without a significant impact on neighbours or on the integrity of the street scene; and,*

As demonstrated by the previously approved scheme, the site is capable of providing safe pedestrian access via Longacre Drive to the south. The previous scheme also provided access into the local footpath network and the existing footpath immediately south of the site which runs east to west, joining the Public Right of Way network to the west. It is understood that this is in the ownership and control of KCC, although this would need to be re-checked as part of any application proposals going forward. This potential link benefits the site, but could also be seen as a wider benefit for existing residents in the area if the surface were improved in any way.

- h) It would not displace an active use such as employment, leisure or community facility, unless meeting the requirements of other policies in this Plan*

There is no active use of the site that would be displaced by its development.

- 4.1.7 In view of the above, it can be seen that a residential scheme on the site could reasonably be said to comply fully with Policy HOU3a and thus comprise a suitable and sustainable windfall development within the urban area. The favourable planning history further strengthens the planning case, although the previous level of opposition to the site should be borne in mind with a stakeholder engagement strategy developed to reflect this.

4.2 Housing Mix & Tenure

- 4.2.1 The previous approval secured consent for 12 no. detached and semi-detached houses. This form of development has been confirmed as acceptable in planning terms and a suitable density for the site. At this level of development and based upon current development plan policy, the site would be subject to affordable housing provision. At the time of the original outline consent, the threshold sat at fifteen units.
- 4.2.2 Informal discussions with RPC land agents has indicated that at this scale, affordable provision would unsurprisingly significantly impact land value and could affect viability. For valuation purposes therefore, a scheme of under ten units would be preferred. However, given the previous consent, a new application for under ten units could be deemed deliberate underdevelopment by the Council and would potentially need to be justified in viability terms. Given the site is greenfield, it is not certain that such a case could be constructed and suitably evidenced.

- 4.2.3 There is however potential to justify a lesser scheme through the provision of bungalows, which by their nature require larger footprints and therefore lower densities. This could be seen as a legitimate and reasonable response to the previous recorded concerns of the Council over the impact of development on the openness of the site and also a means of contributing towards the Borough's older persons' housing need.
- 4.2.4 The Council's Strategic Housing Market Assessment (SHMA) identifies a significant proportionate increase in the 60+ age group, with national policy confirming the need for Council's to appropriately plan for their housing needs. A bungalow scheme in a sustainable location, albeit without formally limiting occupation to older persons only, could be presented as one such contribution and potentially received more favourably locally and politically than a larger scheme.
- 4.2.5 Advice received from RPC indicates that a nine unit bungalow scheme would be preferable in valuation terms to the previously consented scheme given current affordable housing policy and given the above, it is therefore recommended that this is pursued with Ashford initially.

4.3 Design and Layout

- 4.3.1 Three schemes have been prepared with input from RPC on unit size and mix (**Appendix 1**).
- (1) Option 1 provides two pairs of semi-detached two-bedroom bungalows fronting the eastern side of the internal access road, three detached bungalows fronting the western side (2 no. 2-bedroom and 1 no. 3-bedroom) and two detached 3-bedroom bungalows at the end of the site. Each property benefits from car barn provision for at least one vehicle.



- (2) Option 2 is the same as option 1 with the exception of the two pairs of semi-detached bungalows on the eastern side of the site. In this option, these houses are laid out back to back, with one pair fronting the footpath to the south and the other facing northwards. Each pair is served by surface tandem parking to the front.



- (3) Option 3 includes the same layout as Option 2, but here the parking for the four units is provided to the rear comprising a row of four tandem spaces, and a four-bay car barn along the eastern site boundary.



4.3.2 It is understood that Option 1 is the preferred option from a marketing and sales perspective and this also provides a good active frontage through the site on both sides of the road. This option does however deliver a slightly

uncomfortable relationship with neighbouring two storey property to the east, with opportunities for direct overlooking into the gardens and windows of the proposed bungalows given the distances and orientation. As the proposed dwellings are single storey, potential impacts from the site upon existing residential amenity are addressed.

- 4.3.3 Option 2 improves upon this slightly through delivering a more angled view of the proposed properties, but views into the proposed gardens remain. Parking provision in Option 2 is also not as attractive for prospective purchasers as it is all uncovered and for two of the units, not directly adjacent to their property and delivers a less favourable outlook for plots 6 and 8.
- 4.3.4 Option 3 best mitigates potential overlooking as the proposed units are further away and intervening screening is afforded by the proposed car barn on the eastern elevation. This option introduces an active frontage to the footpath to the south, but the parking layout is less optimal for the potential elderly and/or infirm occupiers, being located to the rear of each property.
- 4.3.5 At this stage no elevational design work has been undertaken. However, the previous consent gives a useful steer on the type of design and material palette previously considered acceptable whilst the context of the surrounding area means that the site is relatively unconstrained in architectural design and character terms in any event.
- 4.3.6 The options proposed have had due regard to the Council's residential space and layout guidance, including in respect of garden sizes and floorspace. Any subsequent detailed scheme will need to do likewise and illustrate how the scheme proposed is compliant.

4.4 Highway Impacts and Vehicle Parking

- 4.4.1 Highway impacts of development of the site for up to 14 dwellings has previously been confirmed as acceptable. There has been no change in circumstance in the intervening period to consider any different conclusion to be arrived at, particularly if the proposal is for a lesser number of dwellings.
- 4.4.2 Parking provision on the three options presented here adhere to the Council's own adopted parking guidance. In accordance with the SPD and suburban locations, each dwelling requires two parking spaces, both of which can be allocated as proposed here. Where spaces are tandem, an additional 0.5 spaces per dwelling are required to contribute to nearby unallocated flexible on-street resource. In all three options, seven dwellings are provided with tandem parking, requiring an additional four unallocated visitor spaces across the site and which are included.

4.5 Ecology and Biodiversity

- 4.5.1 A series of ecology surveys have previously been carried out on site, however these are now of some considerable age and beyond re-use for any future planning application.
- 4.5.2 The ecology report submitted with the most recent Reserved Matters application concluded that further surveys were required for bat activity (three surveys, one

per season), whilst a translocation exercise would be required for reptiles. Given the age of this report, any future application will require fresh ecologist input and advice in relation to the scope of surveys required and necessary mitigation. In the event that reptile translocation is still considered necessary, a suitable site will need to be identified and agreement with the landowner reached (this was previously agreed with Vinters Valley Nature Reserve in Maidstone).

- 4.5.3 Legislation is currently being passed that will formally introduce Biodiversity Net Gain as a statutory requirement of development and planning applications. The principle of this is to secure biodiversity enhancements and introduces a more systematic and standardised approach to quantifying impacts and enhancements. Where development is unable to deliver adequate gains on site, off-site payments will be required. Formal adoption of the associated legislation is currently awaited, but subject to timing this could have an impact on proposals at the appraisal site in terms of what they are required to deliver and associated costs of development.

4.6 Flood Risk & Drainage

- 4.6.1 The most recent Reserved Matters application was accompanied by a Flood Risk Assessment and drainage strategy, which was approved and therefore indicates what drainage solution is likely to be deemed acceptable for future development.
- 4.6.2 The approved strategy indicated a gravity foul connection into an existing foul sewer in Bishops Green to the east. Connection will be dependent on obtaining the necessary approvals from Southern Water.
- 4.6.3 The approved surface drainage strategy followed the guidance contained within Ashford's Sustainable Drainage SPD, utilising Sustainable Urban Drainage (SuDs) techniques. Information obtained at the time from the British Geological Survey indicates that infiltration on site is unlikely to be suitable due to low infiltration rates of underlying clay bedrock and a shallow water table. This can though be subject to detailed testing on site at the appropriate time to verify if this is the case or not. Level and sewer location constraints on site also mean that connection to the existing watercourse to the west of the site is not feasible.
- 4.6.4 In response to the constraints on site, the proposed strategy comprises a network of surface water sewers before discharging into an existing 225mm sewer located to the north at a point informed by site level constraints (see figure below).
- 4.6.5 Flows into the existing system would be controlled to the existing greenfield run-off rate of 2 litres/second via a Hydrobrake flow control. Attenuation was to be provided in a storage pipe on the adjacent school land, also in KCC's control. The size of the pipe and storage requirement will need to be calculated to reflect any future new scheme that comes forward. Connection to the existing surface water sewer is dependent upon obtaining the necessary approvals from Southern Water.
- 4.6.6 Previously, the scheme was dependent upon sufficient sewer capacity being available, otherwise the development would have been required to meet the cost of any upgrade works required. Our understanding now however is that any development would be subject to a per-dwelling infrastructure charge to

Southern Water whether the capacity exists or not, and they will be responsible for any upgrade works required.



4.7 Footpath

- 4.7.1 The footpath that runs east to west to the immediate south of the appraisal site is understood to still be within KCC's ownership and control. As part of the previous consent, this was to be formalised and surfaced, providing an improved route to the Public Right of Way to the west and offering enhanced connectivity with local services.
- 4.7.2 Given this formed part of the previous permission, it would be expected that the Council would seek to secure the same again and it would be our recommendation that any scheme does include this, particularly given the allocation is no longer in place and previous consent has since expired.

5 Conclusion

5.1 Summary

- 5.1.1 The appraisal site comprises a parcel of undeveloped land to the east of Great Chart Primary School, within the Ashford urban area. the site has previously benefitted from a housing allocation and detailed planning permission for 12 dwellings. The permission has however since expired, whilst the allocation has not been taken forward into the new Local Plan.
- 5.1.2 Notwithstanding the above, the site is in a highly sustainable location, free from any restrictive designations and the principle of its development for housing is supported by adopted Local Plan Policy HOU3a.
- 5.1.3 Since the previous permission, development plan policy on affordable housing has changed and the threshold reduced from 15 to 10 units. The previous outline application received high levels of local objection and political interest and was approved only on the basis of an informative being added which referred to the need for openness of the site to be maintained. Given this, there is merit in progressing a bungalow scheme in response to the earlier informative, which would also serve to reduce densities owing to the larger footprints and keep development below ten units.
- 5.1.4 Three site layout options have been identified with market input into mix and unit size. The preferred scheme from a market perspective gives rise to some concerns regarding overlooking from existing two storey neighbouring development. Whilst it is therefore recommended this be tested at the pre-application stage, the other two options offer potential alternatives to mitigate this impact if raised by Officers.
- 5.1.5 Any subsequent application will need to be supported by an updated suite of ecology surveys and drainage scheme that follows the previously approved strategy, subject to any further site investigation or capacity checks. If the associated legislation is passed, it may also be necessary for an application to address Biodiversity Net Gain.

5.2 Recommendations

- 5.2.1 Based on the above, it is considered that the site represents a suitable site for housing development, which is supported by policy. It is therefore recommended that the identified preferred nine bungalow scheme be presented to the Council to seek pre-application advice to gauge their position, obtain views on the layout presented and identify the scope for any future planning application.

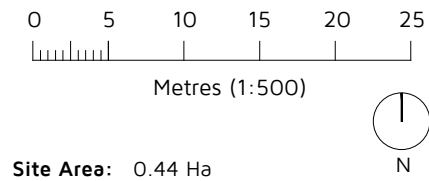
APPENDIX

1





Proposed Site Layout Plan - Option 1
1:500 @ A3



Site Area: 0.44 Ha

- Application Boundary
- Proposed Tree

Schedule of Accommodation

9 Unit Scheme:

3No. 3-Bedroom Detached House @ 103 sqm
(Plots 01,04,05)

2No. 2-Bedroom Detached House @ 75 sqm
(Plots 02,03)

4No. 2-Bedroom Semi-detached House @ 75 sqm
(Plots 06-09)

On-site parking is provided in accordance with 'Kent Design Guide Review IG3 - Residential Parking'.

Rev:	Reason:	Date:
Client:		
KENT COUNTY COUNCIL		
Project:		
LAND OFF LONGACRE ROAD, PRIMARY SCHOOL, ASHFORD, KENT		
Title:		
PROPOSED SITE LAYOUT PLAN OPTION 1		
Drawing No:	Rev:	Scale:
DHA/14303/03		1:500
		Date:
		FEB 2020



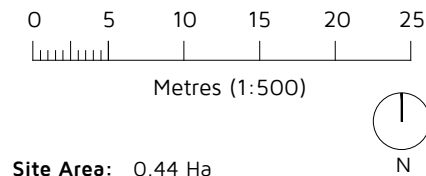
Eclipse House, Eclipse Park, Sittingbourne Road
Maidstone, Kent. ME14 3EN
t: 01622 776226 f: 01622 776227
e: info@dhaplanning.co.uk w: www.dhaplanning.co.uk

No reproduction by any method of any part of this document is permitted without the consent of the copyright holders. Produced for Town and Country planning purposes only.
© Crown Copyright 2019. All rights reserved. Licence Number: 100031961


CAD Reference: DHA_14303_SD01




Proposed Site Layout Plan - Option 2
1:500 @ A3



Site Area: 0.44 Ha

 Application Boundary

 Proposed Tree

Schedule of Accommodation

9 Unit Scheme:

3No. 3-Bedroom Detached House @ 103 sqm
(Plots 01,04,05)

2No. 2-Bedroom Detached House @ 75 sqm
(Plots 02,03)

4No. 2-Bedroom Semi-detached House @ 75 sqm
(Plots 06-09)

On-site parking is provided in accordance with 'Kent Design Guide Review IGN3 - Residential Parking'.

Rev:	Reason:	Date:
Client:		
KENT COUNTY COUNCIL		
Project:		
LAND OFF LONGACRE ROAD, PRIMARY SCHOOL, ASHFORD, KENT		
Title:		
PROPOSED SITE LAYOUT PLAN OPTION 2		
Drawing No:	Rev:	Scale:
DHA/14303/04		1:500
		Date:
		FEB 2020



Eclipse House, Eclipse Park, Sittingbourne Road
Maidstone, Kent. ME14 3EN

t: 01622 776226 f: 01622 776227
e: info@dhaplanning.co.uk w: www.dhaplanning.co.uk

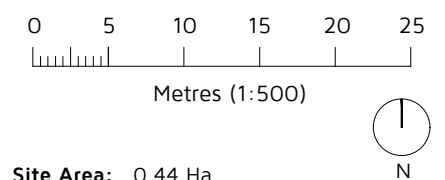
No reproduction by any method of any part of this document is permitted without the consent of the copyright holders. Produced for Town and Country planning purposes only.

© Crown Copyright 2019. All rights reserved. Licence Number: 100031961


CAD Reference: DHA_14303_SD01




Proposed Site Layout Plan - Option 3
1:500 @ A3



Site Area: 0.44 Ha

 Application Boundary

 Proposed Tree

Schedule of Accommodation

9 Unit Scheme:

3No. 3-Bedroom Detached House @ 103 sqm
(Plots 01,04,05)

2No. 2-Bedroom Detached House @ 75 sqm
(Plots 02,03)

4No. 2-Bedroom Semi-detached House @ 75 sqm
(Plots 06-09)

On-site parking is provided in accordance with 'Kent Design Guide Review IG3 - Residential Parking'.

Rev:	Reason:	Date:
Client:		
KENT COUNTY COUNCIL		
Project:		
LAND OFF LONGACRE ROAD, PRIMARY SCHOOL, ASHFORD, KENT		
Title:		
PROPOSED SITE LAYOUT PLAN OPTION 3		
Drawing No:	Rev:	Scale:
DHA/14303/05		1:500
		Date:
		FEB 2020



Eclipse House, Eclipse Park, Sittingbourne Road
Maidstone, Kent. ME14 3EN

t: 01622 776226 f: 01622 776227
e: info@dhaplanning.co.uk w: www.dhaplanning.co.uk

No reproduction by any method of any part of this document is permitted without the consent of the copyright holders. Produced for Town and Country planning purposes only.

© Crown Copyright 2019. All rights reserved. Licence Number: 100031961

CAD Reference: DHA_14303_SD01

A3