

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

Our Ref: MB/14303
12th February 2020

Dear Sir/Madam,

RE: PRE-APPLICATION ENQUIRY – PROPOSED RESIDENTIAL DEVELOPMENT OF LAND SOUTH WEST OF 11, BUTT FIELD ROAD, SINGLETON, KENT COMPRISING NINE NO. BUNGALOWS WITH ASSOCIATED ACCESS, PARKING AND LANDSCAPING

I write on behalf of our client, Kent County Council seeking a pre-application meeting and subsequent written advice in relation to proposals for the residential redevelopment of land south west of 11 Butt Field Road, Ashford. The following documents are submitted as part of this pre-application enquiry:

- Site Location Plan;
- Drawing No. DHA/14303/03 – Proposed Site Layout Plan;
- Pre-Application fee in the sum of £474 (paid under separate cover)

Site & Surroundings

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



planning transport design environment infrastructure

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The site comprises vacant open scrubland located within the urban area of Ashford, 1.3 miles south west of the town centre. 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.

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. 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.

Access into the site is from the south, leading directly onto Longacre Road and the footpath that runs east to west.

Planning History

Former Allocation

The site was allocated for residential development within the now superseded Urban Sites DPD, under Policy U11.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.*

The site allocation has not been carried forward as an allocation in the new Local 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.

Going through the background information and evidence base for the Local Plan, it is not 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.



Outline Planning Application (11/01045/AS)

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.

The application went to Committee on 20th November 2013 as it constituted a major development, comprising more than 10 dwellings. In determining the application, Members sought 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.

The outline approval was issued on 7th May 2014.

Reserved Matters Consent (17/00703/AS)

A Reserved Matters application was submitted on 5th May 2017. A 12 unit scheme was progressed, as a response to the outline informative with regard to density and 'openness' of the plot.

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.

All units were two storey in form and traditional in design, utilising a palette of brick, tile hanging and weatherboarding with pitched tiled roofs.

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

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.

Planning Policy Framework

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. 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



Other material considerations of potential relevance to this site include:

- (3) Affordable Housing SPD
- (4) Residential Parking SPD
- (5) Sustainable Design and Construction SPD
- (6) Sustainable Drainage (SuDs) SPD
- (7) Residential Space & Layout SPD
- (8) National Planning Policy Framework (NPPF)

Proposals Map

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.

Local Plan

Local Plan policies considered relevant to these proposals 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.

- **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 |

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



Proposed Development

Having marketed the original permitted scheme, KCC were unable to secure a purchaser for the site. As a result, they have re-engaged with residential agents to obtain advice on what form and mix of development would prove most attractive to the market and therefore most likely to be deliverable. The advice received is that having regard to the local market, there is likely to be strong demand for bungalows, which are currently in relatively short supply.

This has added benefit in delivering a more spacious and less visually impactful form of development, further addressing the informative placed upon the original outline consent, and also directly contributing towards the supply of single storey housing stock which in turn can assist with meeting the needs of older people. 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.

Whilst the site no longer benefits from an allocation or extant permission, its development is 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.

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.

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;*

The size and layout of the proposed units has had due regard to the Council's residential design guidance and will provide good quality accommodation and amenity for existing and surrounding occupiers, whilst making best use of the site. Whilst no elevational designs have yet been developed, it is envisaged that these will adopt a traditional approach to form, detailing and materials consistent with the approach previously approved and in keeping with the character of the area. The layout and form proposed also provides a direct response to the informative



placed by the Council on the original outline consent, requiring spaciousness of the site to be maximised as part of any development.

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. This scheme now proposes single storey units which will reduce potential impacts even further.

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. Updated ecology surveys, as required, will be undertaken and inform any future application.

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.

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 proposed and previously approved is not considered to be large enough to have any material impact upon local service provision.

- 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. These latest proposals maintain that approach, delivering improvements to local connectivity.

- 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.

In view of the above, it can be seen that a residential scheme on the site would 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.

Parking provision as proposed adheres to the Council's 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. On the accompanying proposed layout, seven dwellings are provided with tandem parking, requiring an additional four unallocated visitor spaces across the site and which are included.

The previous applications were accompanied by the required suite of ecology surveys and going forward at the application stage, this previous work will be reviewed by an ecologist and further survey work carried out as and if required. This will ensure that the scheme continues to include appropriate mitigation.

The previous consent included an approved drainage strategy for both foul and surface water, which was produced having due regard to the Council's Sustainable Drainage SPD. This included a foul connection into an existing sewer to the east and a surface water connection with SuDs storage to the north west. This will form the basis for any amended strategy going forward.



I trust that the above is sufficient to inform a pre-application meeting and provide subsequent written advice, and would be grateful if upon receipt the allocated Officer is able to contact us with suggested meeting dates. Should you have any queries or require any additional information to inform the enquiry, please do not hesitate to contact us.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'MBlythin', with a stylized flourish at the end.

Matthew Blythin
Director

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