

**LAND AT COMMON ROAD AND  
FRITTENDEN ROAD, SISSINGHURST**

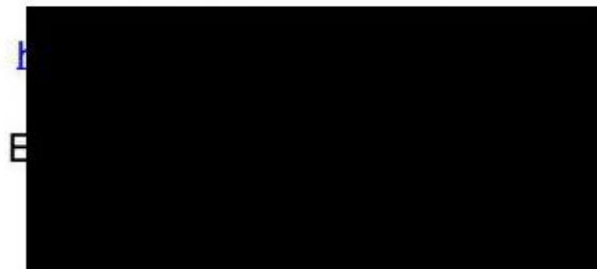
**PLANNING STATEMENT**

**OUTLINE APPLICATION FOR CIRCA 18  
DWELLINGS WITH ASSOCIATED  
SUPPORTING INFRASTRUCTURE**



**DECEMBER 2019**

Invicta Self & Custom Build Ltd



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## APPENDICES

APPENDIX 1	PLANNING REFUSAL NOTICE DATED 5 JULY 2019
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# INTRODUCTION

- 1.1 Invicta Self and Custom Build are seeking outline planning permission for circa 18 dwellings on land bordered by Common Road and Frittenden Road, Sissinghurst.
- 1.2 The historic landowners of the site entered into a land agreement with Invicta following an appeal decision by Gladman Developments on land to the east of Common Road, which had the effect of creating built development on all four sides of the application site.
- 1.3 This Planning Statement supports the planning application, which has been made in outline (with all matters reserved for future consideration save access) for circa 18 dwellings with associated supporting road infrastructure, access, open space and landscaping.
- 1.4 Invicta has previously submitted applications for self/custom-build housing on the site, the most recent of which was refused by Tunbridge Wells Planning Committee in July 2019. This application is a direct response to the application which was refused and the Committee's reasons for refusal.
- 1.5 Invicta has engaged over a sustained period of time through pre-application and post-application discussions with Tunbridge Wells Borough Council. The most recent formal pre-app meeting took place in July 2019 following the refusal of planning permission and the advice received from the case officer and landscape & biodiversity officer in attendance at that meeting have helped inform the scheme design and documentation submitted.
- 1.6 The following documents are submitted in support of the application:
  - Planning Application Forms and Certificates;
  - Plans, prepared by Urban and Rural Architects, comprising:
    - Site Location Plan
    - Existing Site Plan
    - Constraints Plan



- Proposed Illustrative Masterplan
- Plans, prepared by RMB Consultants, comprising:
  - Swept Path Analysis
  - Visibility Splays
  - Access Layout Plan
- Design and Access Statement, prepared by Urban and Rural Architects;
- Outline Landscape Strategy, prepared by CSA Environmental;
- Landscape and Visual Impact Assessment, prepared by CSA Environmental;
- Ecological Assessment, prepared by Aspect Ecology (with appended habitat surveys by Root 3);
- Tree Survey and Plans, by Root 3
- Archaeological Assessment, prepared by Trust for Thanet Archaeology;
- Heritage Statement, prepared by Icenii Projects;
- Transport Statement prepared by RMB Consultants;
- Utilities Statement prepared by RMB Consultants;
- Surface Water Management Strategy
- Foul Water Management Strategy; and
- This Planning Statement





## 2. RELEVANT BACKGROUND

- 2.1 This section provides an overview of the site and its surrounding area, highlights characteristics and factual matters relevant to the application and sets out the recent planning history, which is highly relevant to the application proposal.

### **Description of Site & Sissinghurst Village**

- 2.2 The subject site is situated on the northern edge of Sissinghurst, with the bordering roads of Common Road and Frittenden Road creating a logical defensible boundary to the site to minimize any perceived risk of encroachment into the countryside. The application site extends to a total area of 1.6 hectares.
- 2.3 The site is currently an undeveloped piece of agricultural land and sits adjacent to Sissinghurst Church of England Primary School to the south, built in 2011, and post-war residential properties to the west. A residential development of circa 60 homes is currently nearing completion on the eastern side of Common Road.
- 2.4 The land is relatively flat, with boundary vegetation in the form of hedgerows and trees with additional tree coverage spanning a stretch of the Public Right of Way (PROW) which crosses the site from the eastern boundary to the southern boundary.
- 2.5 There are significant site constraints that restrict the developable area of the site, as follows:
- Perimeter hedgerows of ecological value for dormice and bats that require preservation and enhancement where possible
  - An underground 300mm medium pressure gas main and an underground open reach plant spanning the northern and eastern boundaries of the site, plus a water main running along the eastern boundary of the site, preventing development on and adjacent to the underground infrastructure



- Veteran trees on the southern boundary of the site with root protection areas (RPAs) and buffer zones where development should be ideally be avoided
- A row of trees and aligned public footpath running from the southern boundary of the site across to the eastern boundary
- Two Listed Buildings to the northeast of the site (Crossways and Carpenters Cottage)

2.6 The site lies outside of any Green Belt designation and lies outside of the flood plain. Common Road and Frittenden Road are designated Rural Lanes and do not benefit from footways, whilst the area falls within an area of Potential Archaeological Importance. Sissinghurst is designated as a village within the Council's settlement hierarchy and the site falls outside of the Limits to Built Development designated in the adopted Local Plan.

### **Surrounding Area**

2.7 The public footpath running through the site links to the school and to Sissinghurst Road, to the south. There is a footway along the west side of Common Road to the school entrance and pedestrian access to this footway via the footpath and the school access road. This footway connects to the centre of Sissinghurst and therefore could enable existing and future residents in the locality the opportunity to access the centre and the school via the footpaths running through and beyond the application site.

2.8 The site has good access to local shops, a primary school, church, village hall, recreation ground and public house. Whilst Sissinghurst is classified as a village in the Council's settlement hierarchy, it is considered to have better public transport accessibility than many other villages within the District and constitutes a sustainable location to site residential development. Planning History

2.9 There is no known planning history to the site. The land has been submitted to the Tunbridge Wells Strategic Housing Land Availability Assessment and the Neighbourhood Plan process as a prospective development site for self-build housing.

2.10 A planning appeal decision exists for the land on the eastern side of Common Road. The Inspector's decision on that case concluded the following points:





- Given its location on the edge of the existing village within fairly close proximity to [Sissinghurst] services/facilities, the site is a reasonably sustainable location for the development
- There would be policy conflict as a result of the proposal which would affect the development strategy for the Borough, as well as landscape character and visual amenity impact. However, given the absence of a five-year housing land supply and the status of relevant policies of the development plan for the supply of housing, the considerations that weighed against the development collectively did not significantly and demonstrably outweigh those matters that weighed in the scheme's favour, particularly the delivery of housing

### Site Planning History

- 2.11 Two planning applications have been made previously on the site for self/custom-build housing. Neither application was approved.

Application 18/00262/HYBRID for 9 self/custom-build houses

- 2.12 A hybrid application for 9 self-custom-build houses was submitted in January 2018. The application was ultimately withdrawn due to unresolved issues regarding highway safety and pedestrian connectivity.

Application 19/00205/OUT for 9 self/custom build houses

- 2.13 A resubmission of the hybrid application 18/00262/OUT was made in January 2019. The scheme sought detailed permission for access, internal road infrastructure and communal areas of open space, with outline permission sought for 9 self-custom build plots.
- 2.14 The application attracted 8 letters of support and 4 letters of objection, with Cranbrook and Sissinghurst Parish Council also in support of the scheme. There were a number of technical/environmental consultee responses, which can be summarised as follows:

Consultee	Response	Objection?



Southern Water	Condition and informative requested	No
Kent Police	Comments made re Secure By Design largely concerning future reserved matters applications	No
KCC Developer Contributions	Contributions sought in respect of education and libraries	No
KCC Archaeology	Condition requested	No
KCC Highways	Condition requested	No
KCC Flood and Water Management	Condition requested	No
KCC Public Right of Way	Future working advice only	No
Environmental Protection	Construction conditions requested	No
TWBC Parking	No comments	No
TWBC Conservation and Urban Design	Any development on the site considered to have less than substantial harm to Listed Buildings and Conservation Area identified	Yes
TWBC Landscape and Biodiversity	Local landscape harm identified and concern that mitigation strategy lies with individual property owners and an overall net loss to biodiversity	Yes





TWBC Trees	Impact to veteran trees identified	Yes
TWBC Policy	Confirmed existence of 5YLS and weight to be afforded to housing, though did not consider need for self-build any more important than need for general housing. Expressed concerns over low density of scheme	No

- 2.15 The application was determined at Tunbridge Wells Planning Committee on 5 July 2019. An officer report was produced for the committee that recommended refusal and this is attached at Appendix 1 of this report. Significantly, the officer considered the principle of development (at paragraphs 10.02-10.15 of the report) and identified that as the Council did not have a 5-year land supply, the application needed to be determined against Paragraph 11d of the NPPF i.e. whether the scheme constitutes sustainable development.
- 2.16 The officer went on to conclude that the location of the site is sustainable for new housing (Paragraph 10.18), but that the nature of the housing (9 self/custom build homes) made only a modest contribution to the Borough's housing needs, that the scheme's low density had not been sufficiently justified (Paragraph 10.30) and that the site could make a greater contribution to housing need through higher density housing which provided affordable homes.
- 2.17 Additionally, the report concluded there to be local landscape harm which 9 homes could not outweigh by way of benefit through 9 self/custom-build homes (paragraph 10.35) and less than substantial harm to the setting of the Grade II listed buildings and the Sissinghurst Conservation Area which the benefit of 9 homes could not outweigh.
- 2.18 Critically, at Paragraph 10.51 and 10.52, the report summarizes the positive and negative considerations that informed the assessment of whether the scheme constitutes sustainable development and the following negative aspects were identified/presented:
- The proposal fails to make efficient or best use of the site.
  - The proposal would be harmful to the wider rural landscape.



- The proposal would result in less than substantial harm to the setting of both Grade II listed properties and the setting of the Sissinghurst Conservation Area.
- The proposal would likely to result in a net loss to biodiversity.

2.19 In addition to the above deficiencies, the report identified impact to veteran trees. The new application proposal has therefore been formulated to address these issues.





### 3. PROPOSED DEVELOPMENT

- 3.1 An outline planning application with all matters reserved save access has been submitted for circa 18 dwellings with associated infrastructure including access, internal connecting road, open space and landscaping.
- 3.2 This area contains a new access onto Common Road, an internal access road, open space, landscaping, fencing and drainage infrastructure. Separate plans for landscaping and highway/access are submitted which collectively comprise the detailed application drawings.
- 3.3 The residential dwellings are proposed to be served via a new vehicular access point on the eastern boundary of the site onto Common Road, with an internal access road connecting each dwelling.
- 3.4 The residential dwellings are proposed to be served via existing and new pedestrian access points, including an extension of the footpath network on Common Road to align and run adjacent to the proposed access road. In addition, a residential access route will be provided along the eastern and northern boundaries of the site to extend residential connectivity beyond that provided by the Public Right of Way and avoid pedestrian/vehicular conflict on Common Road.
- 3.5 An indicative scheme has been submitted to show how an 18 dwelling scheme might be delivered in a way that achieves a sustainable form of development and high quality design. This is not the only way of developing the site in a sustainable way and future reserved matters applications could determine the most appropriate layout in light of the mix and number of dwellings proposed. In this regard, the description of development seeks “circa” 18 dwellings to enable future reserved matters applications to be tailored to the dwelling mix need and demand at the time and the overall numbers adapted to suit.
- 3.6 It is envisaged that private amenity space will be provided for each dwelling and that in addition, significant areas of landscaped amenity space will need to be provided within the site – both to mitigate site constraints and achieve high levels of biodiversity. The municipal space would be of amenity value to the occupants, but could also be of amenity value to surrounding residents, given the expansion of pedestrian footpaths through the site, which will draw pedestrians off Common Road and Frittenden Road into a safe and attractive public realm.



### **Car Parking**

- 3.7 It is envisaged that each property will benefit from a parking area and that the parking provision will be in accordance with policy requirements at the time reserved matters applications are made. The submitted Transport Assessment has set out the maximum parking standards and the requirements for visitor parking for an 18 dwelling scheme. Because the number and mix of homes is not fixed at this stage, the parking requirements for each dwelling and the total provision will be fixed through subsequent reserved matters applications.





## 4. PLANNING POLICY CONTEXT

- 4.1 This section provides a summary of the relevant planning policy context at national and local levels.

### **National Planning Policy**

- 4.2 The National Planning Policy Framework (NPPF) provides the national policy framework for plan-making and decision taking. Para 11 highlights that decisions should apply a presumption in favour of sustainable development. In situations where an authority cannot demonstrate a five year supply of housing, the Development Plan housing supply policies are deemed to be “out-of-date”. Paragraph 11 requires that where relevant policies are out-of-date, permission for sustainable development should be granted unless the application of policies in the NPPF that protect areas or assets of particular importance provides a clear reason for refusing the development proposed.

- 4.3 Paragraph 8 of the NPPF outlines that achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways:

a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and

c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.





- 4.4 Section 5 of this Statement considers the application proposal against the three overarching objectives set out above.

**Tunbridge Wells Adopted Core Strategy (2010) and Tunbridge Wells Borough Local Plan (2006)**

- 4.12 The Tunbridge Wells Core Strategy pre-dates the NPPF and given the tilted balance which is engaged by virtue of the Council's absence of a development strategy for self-build plots and the acknowledged 5 year land supply shortfall, the policies can only be afforded weight to the extent that they are consistent with the NPPF. Policies of potential significance include:

- Core Policy 1: Delivery of Development
- Core Policy 3: Transport Infrastructure
- Core Policy 4: Environment
- Core Policy 5: Sustainable Design and Construction
- Core Policy 6: Housing Provision
- Core Policy 14: Development in the Villages and Rural Areas

- 4.13 Despite its age, policies in the 2006 Borough Local Plan are still potentially of significance, provided they conform to the NPPF. Policies of potential significance include:

- Policy LBD1: Development outside the limits to Built Development
- Policy EN1: Development Control Criteria
- Policy EN8: Outdoor Lighting
- Policy EN13: Tree and Woodland Protection
- Policy EN16: Protection of Groundwater and other water courses
- Policy EN25: Development Control Criteria for all development proposals affecting the rural landscape
- Policy H2: Small and intermediate size dwellings
- Policy H8: Local Needs Housing outside the LBD
- Policy R2: Recreation open space in development of more than 15 bed spaces
- Policy CS4: Development contributions to school provision for development over 15 bed spaces
- Policy TP4: Access to the road network

- 4.14 With respect to the above policies, Core Strategy Policies 1, 6 and 14 and Local Plan policies LBD1, H2 and H8 should not be afforded weight, given the policies are out of kilter with NPPF paragraphs 14 and 49, due to the 5 year land supply position in the District and the new housing strategy and housing totals required from the new national Objectively Assessed Need requirement for Tunbridge Wells of 692 dwellings per annum.





## **Emerging Tunbridge Wells Local Plan**

- 4.15 The Council has commenced a District Local Plan review and undertook Regulation 18 consultation in August 2019.
- 4.16 Draft Policy Allocation AL/CRS 17 covers the application site and extends to land to the west. It seeks to safeguard the land for future school expansion. The allocation was objected to by both Invicta Self and Custom Build Ltd and Sissinghurst CoE School. It was also confirmed by Kent County Council, the relevant education consultee, that the land is not required for school expansion within the plan period.
- 4.17 Para 48 states that in determining planning applications, the level of given weight to relevant policies in emerging plans should be based on:
- a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);
  - b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
  - c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given)
- 4.18 In this instance, no weight should be given to Allocation AL/CRS 17 on the basis that the Local Plan is still in its infancy and has not undergone Examination, there are unresolved objections to the allocation and it has been confirmed by the education consultee and the existing school that the land is not required for school expansion, and there is no support outlined in the NPPF to safeguard land that is not required for education within the future plan period and with no known time when the land could be needed, if ever.



## 5. SUSTAINABLE DEVELOPMENT

- 5.1 A summary of the benefits and disbenefits of the scheme is outlined below. It is considered that the development does constitute sustainable development, as set out in the NPPF, and that the benefits outweigh the disbenefits of the scheme.

	BENEFITS	DISBENEFITS
Economic Role	<ul style="list-style-type: none"> <li>- Providing land for housing and assisting in meeting the shortfall in housing land supply;</li> <li>- Create direct and indirect employment during the construction phase of the scheme;</li> <li>- Development contributions to mitigate the impact of development</li> <li>- Residential development offers scope to enhance the viability of village shops and services in settlement</li> </ul>	
Social Role	<ul style="list-style-type: none"> <li>- Providing policy compliant levels of affordable housing to meet identified needs;</li> <li>- Improved walking infrastructure and potential for a safe and healthy living environment to be created;</li> <li>- Provision of extended footpaths through the site to take pedestrians off Common Road and Frittenden Road, where footpaths do not exist, and pedestrian/vehicular conflict exists</li> <li>- Scope for a high design quality to be achieved that remote healthy neighbourhoods</li> </ul>	
Environmental Role	<ul style="list-style-type: none"> <li>- Net biodiversity gain achieved</li> <li>- Sustainable location for housing development given relationship to the rest of the settlement and proximity to services</li> <li>- Significant new areas of public space created</li> </ul>	<ul style="list-style-type: none"> <li>- Loss of agricultural land</li> <li>- Minor harm to landscape</li> <li>- Negligible harm to heritage asset</li> </ul>





## 6. ADDRESSING THE PREVIOUS REASONS FOR REFUSAL

- 6.1 This section considers the reasons for refusal from the previous application 19/00205/OUT, which was refused in July 2019, and sets out how the new scheme satisfactorily addresses the reasons for refusal.

**Reason for Refusal 1 - The proposal does not represent sustainable development in the context of the NPPF (due to the impact upon the wider rural landscape, inefficient use of the land and poor design and layout that would not be outweighed by the benefits of the development).**

- 6.2 The table at Paragraph 5.1 of this report presents the benefits and disbenefits of the application proposal within the context of the three strands of sustainable development set out in the NPPF.
- 6.3 It is contended that the revised application does represent sustainable development and that key factors that led the Council to conclude that the previous application was not sustainable have been addressed in the following ways:

Issue	Response
Impacts not outweighed by benefits	The benefits of the revised scheme are likely to be deemed more considerable by the Council. These include a higher housing yield and a policy compliant level of affordable housing
Inefficient use of land	The revised scheme is considered to maximizes the number of houses that can be delivered on the site, consistent with achieving a biodiversity gain
Poor design and layout	The scheme is in outline with all matters reserved for future determination save access. However, the site is considered to offer scope to deliver a high quality design





	and layout and the indicative layout submitted shows how a high quality design and layout could be delivered
Impact upon the wider rural landscape	The application is accompanied by a landscape and visual impact assessment, which concludes that the application site is well contained from the wider countryside, and is only of medium landscape quality, value and sensitivity. The report highlights that a development that is consistent to the landscape strategy plan and the principles set out within the LVIA, can be accommodated without giving rise to material landscape, townscape or visual effects on the local area or wider landscape.

**Reason for Refusal 2 - The proposed development (by virtue of its layout, design and infilling of an open space) would result in less than substantial harm to the setting of both Grade II listed properties of Crossways and Carpenter's Cottages and would not preserve or enhance the approach, character and appearance of the nearby Sissinghurst Conservation Area**

- 6.4 The revised scheme has been reviewed in relation to the impact on the Grade II Listed Properties and the Sissinghurst Conservation Area, which is located circa 0.3 miles from the application site. It is concluded that a sensitively designed development of circa 18 dwellings would be acceptable in heritage terms and that the harm to the setting of the heritage assets in the area would be negligible.

**Reason for Refusal 3 - In the absence of sufficient mitigation and management methods the proposed development is considered to be harmful to biodiversity.**

- 6.5 Invicta has instructed Aspect Ecology to undertake a comprehensive review of the ecological background to the site and the work undertaken to date. Their brief has been to consider the potential for a development scheme to deliver a suite of environmental enhancement measures, including significant new tree shrub planting and ponds sufficient to demonstrate a net biodiversity gain. The indicative scheme produced, which is based on an outline landscape strategy that Invicta would be happy to be subject of a suitable condition, is capable of delivering a net biodiversity gain using the DEFRA 2.0 Metric and this has been calculated as a 10.85% biodiversity benefit.

**Reason for Refusal 4 - The proposed development would likely be harmful to the veteran tree buffer zones of T9, T10 and T11.**





- 6.6 The extent of the Buffer Zones for Trees T9, T10 and T11 have been accurately defined and development has been omitted from these zones, which should comprehensively address the reason for refusal.

**Reason for Refusal 5 - In the absence of a completed legal agreement, the proposal does not secure contributions towards community facilities including education and libraries.**

- 6.7 Invicta would be happy to enter into a suitable Legal Agreement with the authority concerning these matters and any other CIL Reg 123 compliant contributions and requirements necessary to make the development acceptable in planning terms.



## 7. OTHER MATERIAL PLANNING CONSIDERATIONS

### **Need for Education Development**

- 7.1 The emerging Tunbridge Wells Local Plan has proposed that the application site (and adjoining land to the west) be safeguarded for education development. Invicta enquired whether Sissinghurst School required any land for school expansion when first taking an interest in the site and has enquired again following the draft Plan allocation. The school has confirmed that there is no requirement for expansion. Furthermore, Kent County Council has confirmed that there is no need for education safeguarding within the future plan period in light of the development strategy and growth levels proposed for this area of the District.
- 7.2 It is therefore evident that the allocation is unsound and that the land should be allocated for residential development, thus avoiding the need to allocate less connected, less suitable land at Sissinghurst for isolated residential development.
- 7.3 The draft Plan can only be afforded very limited weight at this time and given the unresolved objections to the proposed education safeguarding and the absence of any need or evidence base to support the safeguarding, the draft allocation can be given no weight.

### **Density**

- 7.4 The density of the previous scheme was considered to be a key disbenefit of the proposal. The Report concluded that it had not been sufficiently demonstrated that the scheme optimized the development capacity of the site.
- 7.5 This scheme has sought to yield the maximum number of homes on the site. The “circa 18” dwellings sought in the description of development is considered to be the maximum number of homes that are likely to be able to be delivered, given the site constraints and need to achieve a net biodiversity gain. There may be scope to accommodate a couple of extra dwellings depending upon the future dwelling mix and the description enables Reserved Matters applications to optimize the site.

### **Affordable Housing**





- 7.6 Invicta is happy to enter into a Legal Agreement that secures a policy compliant level of affordable homes, in accordance with adopted planning policy. The precise number cannot be fixed at this time, given the uncertainty on the final number. However, the principle of the percentage of affordable can be agreed.



## 8. SUMMARY AND CONCLUSIONS

- 8.1 This planning application seeks planning permission for circa 18 homes with a policy compliant level of affordable housing. The application has been submitted in outline, with only access being a detailed matter at this time.
- 8.2 As confirmed in the previous Committee Report, the current adopted Local Plan is out of date and the Council is unable to demonstrate a 5 year land supply. Accordingly, if the application constitutes sustainable development, planning permission should be approved.
- 8.3 The Council identified disbenefits with the previous scheme in the form of heritage, landscape, biodiversity and harm to trees. Furthermore, it concluded that the benefit of 9 self/custom-build homes could not override the identified harm due to the scheme's low density and absence of affordable housing.
- 8.4 This scheme, which has been prepared in direct response to the Council's decision to refuse permission, has sought to address the Council's concerns in the following ways:
- The previously identified biodiversity harm has been negated. Moreover, a net biodiversity gain can now be achieved through additional ecological features that in addition to increasing biodiversity, supports a high quality design and layout through a future reserved application/s.
  - Previously identified harm to trees has been negated by removing development from identified tree buffer zones. With the retention of key trees across the site, the provision of additional trees/shrub and the creation of adjoining public realm, the significance and value of the trees can be enhanced and a high level of environmental quality should be achievable in any detailed layout.
  - The density of the scheme has increased to a level that maximises the housing yield of the site and delivers a policy compliant amount and type of affordable housing.
  - The scheme provides significant amounts of new amenity green space for incoming and existing residents' enjoyment, which provides new places within which social interaction should occur.





- The scheme maintains an existing public right of way and extends the footpath network into the site from Common Road and around the perimeter of the site to Frittenden Road. This additional infrastructure will take pedestrians off Common Road and Frittenden Road to increase safety in this location and reduce the pedestrian/vehicular conflict.

- The scheme ensures that the environmental impacts associated with the development are minimised.

8.5 It is respectfully considered that the scheme constitutes sustainable development and that planning permission should be granted for the development.

