

Agenda Item No: 6

Report To: CABINET



Date: 14th July 2016

Report Title: Adoption of Chilmington Green Design Code as a Supplementary Planning Document

Report Author: Mark Chaplin, Principal Urban Designer

Portfolio Holders: Cllr Bennett, Portfolio Holder for Planning and Development

Summary:

From the inception of the Chilmington Green project the ambition has been to create a place of special character with a strong community. The Design Code is an integral part of the process of delivering quality development – it moves down a level from the overall masterplan to deal with many detailed aspects of delivery and will help to guide planning applications as they come forward. The Quality Monitoring Initiative will help to check that the Design Code is delivered on site. Following consultation on the draft some amendments are suggested and the SPD is recommended for adoption.

Key Decision: Yes.

Affected Wards: Great Chart with Singleton North; Singleton South; Washford; Weald South.

Recommendations: Cabinet is asked to:-

- i. Note the representations received on the content of the draft Design Code document resulting from the public consultation process, and;**
- ii. Consider the Officer's analysis of these representations and agree the recommended changes to the Design Code set out in Annex 2 to this report;**
- iii. Approve and agree to recommend to Full Council the adoption of the draft Design Code as a Supplementary Planning Document to the 2013 Chilmington Green Area Action Plan, subject to the identified amendments resulting from the representations received.**

Policy Overview: The Chilmington Green development was agreed by Councillors in the Ashford Borough Local Development Framework Core Strategy and Chilmington Green Area Action Plan.

Links to the Five Year Corporate Plan include supporting the delivery of high quality housing to meet 'Priority 2 Living Ashford: Quality Housing & Homes for All'. Chilmington Green will be in accordance with the Council's aspiration to secure quality homes across the borough, catering for a range of ages, tenures and need, in well-planned and attractive new places.

Financial Implications: There are no direct financial implications for the Council. Under the legal agreement attached to the planning permission the developers will fund the Quality Monitoring Initiative to check on the quality of delivery.

Risk Assessment: Not applicable.

Equalities Impact Assessment: Yes.

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Agenda Item No. 6

Adoption of Chilmington Green Design Code as a Supplementary Planning Document

Purpose of the Report

1. The purpose of the report is to seek Cabinet approval and to recommend to Full Council to adopt the Design Code to guide the implementation of the Chilmington Green development, as a Supplementary Planning Document to the 2013 Chilmington Green Area Action Plan. The report is seeking this approval subject to the identified amendments to the content resulting from the comments received as part of the formal Public Consultation.
2. The report will therefore;
 - Briefly describe the role and background to the Chilmington Green Design Code in relation to the Local Development Framework (LDF) and Development Plan;
 - Set out the consultation process that has been undertaken so far and how it has broadly influenced the evolving content of the Code;
 - Set out the next steps in the formal adoption process required for the Design Code to become a Supplementary Planning Document to the Chilmington Green Area Action Plan;
 - Analyse all the comments and suggested amendments from stakeholders received as part of the formal public consultation exercise;
 - Invite the Cabinet to endorse the content of the document;
 - Explain why the Cabinet should approve and recommend to Full Council the adoption of the Design Code as a Supplementary Planning Document to the Chilmington Green Area Action Plan, subject to recommended amendments resulting from Public Consultation of the document.

A copy of the Design Code document is attached.

Background

3. Since 2005, the aspiration for a large scale new settlement south west of Ashford has featured in the Council's strategy for the strategic growth of the town.
4. As Ashford's Local Development Framework (LDF) subsequently took shape the scale and vision for a new settlement Chilmington Green emerged through a comprehensive programme of public consultation. The LDF documents and subsequent planning application led to wide acceptance that the role of design codes was crucial to the success of Chilmington Green. These documents included;
 - The Greater Ashford Development Framework (GADF) (2005)
 - Ashford Core Strategy (2008)

- Chilmington Green Masterplan (2007-2012)

Chilmington Green Area Action Plan 2013 (CGAAP)

5. The Chilmington Green Area Action Plan was adopted by the Council in July 2013. The Plan recognised the key role of a Design Code to make sure that the high standards set for Chilmington Green are delivered and a place of real quality created. It states;
 - *The AAP must be supplemented where needed by development briefs and design codes (para 2.1)*
 - *Site-wide design code are an important link between AAP/illustrative masterplan and the Main Phase Masterplans/Character Statements (para 11.41)*
 - *A site-wide design code (for the whole of Chilmington Green development area) will be needed first and this will deal with common standards and approaches to issues.....The public realm work will identify the key public spaces, streets and landscaped areas where codes will apply.....The relationship of the code to existing regulatory and policy guidance will also be set out with a clear distinction between mandatory and discretionary guidance. (para 11.42)*
 - *The codes will be clear and succinct and avoid being too prescriptive or detailed – but will need to convey the distinctiveness of each area. (para 11.45)*
 - *Codes will deal with issues such as housing types and typical designs responding to the character areas (para 11.45).*
 - *Local people, service providers and other stakeholders will be involved in the creation of the site-wide design code (para 11.46)*
 - *The Quality Agreement will underpin the detailed planning for Chilmington Green and support the site-wide design code. (para 11.52)*
 - *POLICY CG22 - Phasing, Delivery And Implementation (a) Prior to the approval of any reserved matters or grant of detailed planning permission for development within the AAP area, a detailed site-wide design code will be required to be agreed by the council (p.124)*
6. The **Chilmington Green Outline Planning Application** (ref 12/00400/AS) was submitted in 2012. Members resolved to grant permission in October 2014, but the planning permission has not yet been issued as it is still subject to the signing of a s106 legal agreement expected in the near future. The importance of the Design Code was emphasised further in this outline application and firmly engrained in the original reasons recommended for approval as;

'...(E) with delegated authority to either the Strategic Sites and Design Manager or the Development Control Manager to approve after taking into account the results of public consultation thereon any Development Briefs or Design Codes Strategies, Business Plans, or other documentation required pursuant to conditions or planning obligations;'
7. The report to Planning Committee also highlights the importance of the Design Code in several sections including:

- *The emphasis in...design codes...is on the importance of delivering a high quality designed garden city themed homes and places, takes into account how people might want to live in the future and supports different lifestyles fit for the challenges of the 21st century. (para 370)*
 - *The site-wide Design Code is a comprehensive document that looks at all aspects of the development. The application of the design code will be particularly important for the first phase of development, as a means of setting a benchmark for design quality against which future phases can be judged. (para 372)*
 - *Much of the fine detail relating to this outline application and masterplan will be developed further in the emerging Design Code (para 374).*
 - *The Code will need to be in place before reserved matters applications are considered (para 375)*
 - *The Code will remain a 'living document' as it will need to be regularly updated in the light of experience. Conditions attached to the outline permission will refer back to the masterplan and approved Design Code to ensure that their principles are implemented. (para 375)*
 - *In my view, this proposal has clear potential to become a successful, sustainable community if the detail continues to be carefully thought through within the Design Code (para 380)*
 - *The Quality Monitoring Team will focus on the build phase in particular but will also have a role in the design stage and in the post- completion reviews stage. The following list indicates some examples of the tasks involved.... Checking planning and Design Code compliance.(para 391)*
8. The concept, format and role of the Design Code emerged through all these Local Development Framework and other documents. The need for a Chilmington Green Design Code was recognised as having a critical role to play by setting out clear requirements and guidance on the design of homes, neighbourhoods, streets and open spaces. A code was seen as being able to introduce an increased level of design control in an attempt to exert greater assurance over the quality of the product.
9. Codes are not a new idea. They have been used in one form or another since the Renaissance, and possibly earlier. Some of our most cherished developments, from the Georgian period through to the Garden Villages and New Towns, were based on adopted codes. Over the last 15 years there have been several high profile examples in the UK of the use of urban design codes including The Prince of Wales' development at Poundbury and Upton on the edge of Northampton. Here in Ashford the Council have had success with the implementation of the Repton Park Design Code to help achieve high quality new neighbourhoods and a thriving new community there. Similarly a Design Code for Chilmington is aimed at securing the quality objectives for this large scale development that the Council, the consortium and local stakeholders aspire to.

Handling

10. Two workshops were held in 2013 that specifically informed the content of the Design Code along with meetings with the Chilmington Green Community Group.

Equalities Impact Assessment

11. A key principle of the Code is based on inclusive design principles and set out to deliver a diverse vibrant community based on the Garden City concept. It promotes ease of access and movement in all designs to try and deliver a place that is accessible for all able bodied and disabled bodied people.

Other Options Considered

12. The following options have been considered:-
 - (i) Do not produce a Code – Officers do not recommend this option as the Code will offer more certainty to developers and stakeholders on their expectations and will aim to help applications be determined in a timely and efficient manner. This will have substantial economic benefits for the town and wider area and create a lasting place of high quality.
 - (ii) Produce a basic Design Code focussing on building design only. This would miss the opportunity to influence the other key components of good quality place making; namely the qualities of the public realm through the design of streets and open spaces, which this Design Code also focusses on. This option would not achieve the exemplar qualities of a large scale Garden Village settlement that the Council and stakeholders are seeking to deliver here at Chilmington Green.

Assessment

Who Produced the Code?

13. The Chilmington Green Design Code has been produced by consultants John Thompson & Partners working in close collaboration with Ashford Borough Council and the developer consortium. A full copy is included as an *appendix* to this report. The Consultants have been collectively funded by the developers, but with close scrutiny and regular assessment of the content provided primarily from Ashford Borough Council's Strategic Sites & Design Team working closely with other Ashford Borough Council officers and a range of other stakeholders from other organisations and bodies.

The Purpose of the Design Code.

14. The Code provides rules and principles that apply to the process of making this new place and captures this in written and plan form. The Chilmington Green Design Code will therefore give the place a good start by making sure the fundamental basics are right and by setting some clear parameters as to what can be done and what can't be done in changing and evolving the physical fabric of the neighbourhood. The key objectives of the Chilmington Green Design Code are therefore:

- to set clear guidelines and establish design controls within a well-structured masterplan framework;
- to provide technical advice on the vision to deliver 5750 high quality new homes in a unique new Garden Village settlement with neighbourhoods, streets and open spaces of distinctive character and clear identity;
- Ensure the aims and objectives of the original masterplan, The Chilmington Green Area Action Plan policies and requirements of the Outline Planning Application are delivered;
- to meet the principles set out in the Quality Charter;
- Seek to inform the forthcoming work to create the first phase detailed masterplan layout through dialogue with a range of stakeholders;
- To assist in the preparation and approval of reserved matters applications for the different phases and land parcels;
- Inform applications to discharge conditions;
- Help inform and enforce Quality Monitoring of all building, streets and open space elements that make up the place.

15. The Design Code is primarily aimed at architects, landscape architects planners and urban designers working for landowners, housebuilders and developers. It also sets out the design starting point for the expectations of Ashford Borough Council, Kent County Council and the proposed Community Management Organisation which will evolve over the next 20-25 years.

16. However the Design Code will also be a useful tool to aid discussions with stakeholders and communities so that they are engaged in the shaping of the new communities and neighbourhoods, and can hold developers, ABC and KCC accountable to these standards.

17. Accordingly, the Design Code acts as a framework containing important design principles and standards. It cannot and does not deal with all points of detail. Points of detail will flow as part of the masterplanning and reserved matters applications. Furthermore, the Design Code does not deal with requirements to be covered by other, specific strategies eg Discovery Park masterplanning and Public Art.

18. The Cabinet is being asked to adopt the Code as a Supplementary Planning Document to ensure it becomes part of the current Local Development Framework and a material consideration when determining individual planning applications. This gives the document sufficient weight so that the Council and emerging communities have a much stronger negotiating position to help it deliver a clear reference point on the quality of the place.

19. **Annex 1** called '*A Brief Introduction to the Design Code*' contains some further background as to how the Code is structured, and summarises the main design principles that lie at the heart of the Code. This annex also includes some illustrations of one neighbourhood to give a sense of the sort of distinctive garden village residential character that is envisaged for one part of the settlement.

The Formal Supplementary Planning Document (SPD) Adoption Process

20. The following formal steps have been undertaken to date in order to ensure the SPD complies with the Town and Country Planning (Local Planning) (England) Regulations 2012 and Ashford's adopted Statement of Community Involvement (SCI) 2013.

- March 2016 - Production of an on-line Consultation Statement notifying how Ashford Borough Council has undertaken previous consultation in preparing draft versions of the Chilmington Green Design Code SPD and the process it went through.
- Holding a Statutory Public Consultation Period for minimum of four weeks that ran from 4th March 2016 until 18th April 2016, with Design Code document available to download online with hard copies available for inspection at Council offices. This forms the main basis for this report. A number of key stakeholders, including residents, were directly contacted as part of the SPD process.

21. If members are minded to approve the Design Code SPD on 14th July subject to amendments the next steps are:

- Final document changes to be completed by Consultants.
- Full Council to ratify Cabinet's decision on 21st July which would potentially be the official date of its adoption as SPD.
- Production of an Adoption Statement setting out the following;
 - i. The date the SPD was adopted, any changes between the consultation version and the adopted version;
 - ii. That any person with sufficient interest in the decision may apply to the High Court for permission to apply for judicial review of that decision; and
 - iii. That any application must be made promptly and in any event no later than 3 months after the adoption date.
- This adoption statement and the adopted SPD has to be put on the website, made available for viewing at the Civic Centre, and at such other places as we consider appropriate. It has to remain there as long as the SPD is in force.
- Notification of the adoption of the SPD to anyone who requested so.

Analysis of the Public Consultation Responses

22. In total 23 representations were received from a range of respondents including local residents. In total 235 individual comments were received covering a

range of themes within the code. The table in **Annex 2** contains a full list of all the comments received (with corresponding reference number for each comment). Alongside each comment is an assessment of each comment and where appropriate, suggested changes to the Code that are recommended to Cabinet.

23. A considerable number of the points made focussed on very specific issues that are well beyond the scope of a Design Code; others deal with issues to be resolved at the planning application stage. Many important points were raised that need to be considered as part of the masterplanning of each phase of the development and a record of each of these has been made to feed into that process so that the points are not missed.
24. After the Design Code is adopted, in subsequent years further refinement will continue to be needed as the development moves forward. The Code will therefore remain a 'living document' as it will need to be regularly updated in the light of experience and to assess how effectively it is working against the finished products on the ground. Further public consultation is expected to be key to any such reviews.

Conclusion

25. It is recommended that members adopt the code subject to the amendments set out in the comments table in **Annex 2** of this report.

Portfolio Holder's Comments

26. **Cllr Bennett – Portfolio for Planning** commented as follows;
'Quality is key to all development in the borough and after extensive consultation with all interested parties this Design Code document shows our determination to make Chilmington Green a shining example of how through Masterplanning a new community can, and will, be created and be a credit to our council in future generations. I commend the report to members'

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A Brief Introduction to the Code.

1. The code provides a strong direction on the Council's expectations of architecture, landscape and public realm. Where possible the requirements set by the Design Code are mandatory. For instance it is deliberately more exacting in terms of the urban design principles of good placemaking which include;
 - The character and distinctiveness of the place;
 - A street network and hierarchy of routes to make place easy to move around
 - An interesting holistic street design with structural tree planting, junction design, lighting and parking that is also attractive;
 - High quality open spaces and green landscape
 - Built Form and key groupings of buildings responding to the rich local context
 - Relationship between homes and streets/open spaces in terms of boundary treatment, scale, architecture, materials, access and day to day functioning (refuse collection, cycle storage, visitors, deliveries etc).

The Code is flexible in respect of many elements of the more detailed design of individual buildings, streets and open spaces in order to encourage creativity and not to stifle innovation.

2. It is prudent to point out that to a large extent the high quality design principles need to be executed with a good degree of pragmatism, to ensure any long term maintenance costs are realistic for owners and any relevant adopting authorities.
3. The Design Code consists of the following three main elements;
 - The Written Code – The Code offers a range of introductory guidance in Part A (Background to understanding the context and vision) but the crucial design led sections are Part B (Understanding the character of areas) and C (Detailing The Place). Parts B and C are essentially a detailed design manual based on a 13 step process through which the residential parcels should start to be designed in order to create the distinctiveness set out in the masterplan vision. **Annex 1 'A Brief Introduction To The Code'** contains further useful guidance and advice.
 - A Regulatory Plan – Read in conjunction with the Code and its manual section, the Regulatory Plan sets out all the mandatory requirements on a single scalable drawing that must be adhered to, to achieve the vision for Chilmington Green
 - A Design Code Compliance Checklist form which is intended to be completed by all applicants submitting reserved matters planning applications to try and ensure the relevant parts and steps in the process to be followed closely.
4. The content of the code is structured into three main parts (A) Background Information, (B) Establishing Character and (C) Place and the layers that make up the spatial qualities of the place. These sections are colour coded to enable the reader to navigate the Code effectively. Given the complexity of the Design

Code and Regulatory Plan there are clear instructions provided on how to use the code on pages 17-18.

5. The Code sets very strong expectations for Chilmington that build on the wider vision that has taken shape in former years, which essentially means that Chilmington Green will be a great place to live – a place that:
 - is lively and fun, with an attractive High Street
 - provides community, education and health facilities for people of all ages;
 - sets challenging standards of innovative design, becomes a place of special and varied character;
 - has sustainability integrated into all aspects of design;
 - offers a range of local jobs,
 - has its own, strong, identity in a landscape setting,
 - respects the local environment as part of a well-planned layout;
 - fosters local pride and a strong community with the capacity to help manage Chilmington Green on a day to day basis, and
 - is flexible in design and resilient to change, and able to respond positively to advances in technology and changing lifestyles.

6. A critical part of the Code that is instrumental to achieving this vision is the aim to create a place with distinctive neighbourhoods and identities, which includes 5 key areas of different uses and qualities;

- The District Centre (High Street & Market Square);
- Chilmington Brook;
- Orchard Village and
- The Hamlet
- Main open space of Discovery Park.



7. Initially the visions for the different character areas are along the following lines;



8. Taking Chilmington Brook neighbourhoods as an example, the Code envisages that the place will have distinctive qualities and the images below reflect these. The Code sets standards for the design of buildings and their materials, the varied hierarchy of differently designed streets and also the design qualities that the open spaces may have which includes parks, play areas and SUDs. The following images taken from the code give an indication of the sort of design qualities expected at Chilmington Brook, what it might look and feel like and the sort of qualities it will offer the community.





PALETTE I
(Chilmington Brook Neighbourhood)

Roofs

Orange/red plain clay tile	Dark red plain clay tile	Profiled tile red/orange/dark red	Grey slate natural or good quality reproduction	Standing seam metal

Walls

Predominant

White stained or painted weatherboarding	Stained or painted weatherboarding various colours	Natural stained weatherboarding

Limited

Stone	Red stock brick	Red multi mix brick	Brown multi mix brick	Self coloured render

Windows

Timber natural stain	Timber white	Metal	Grey UPVC

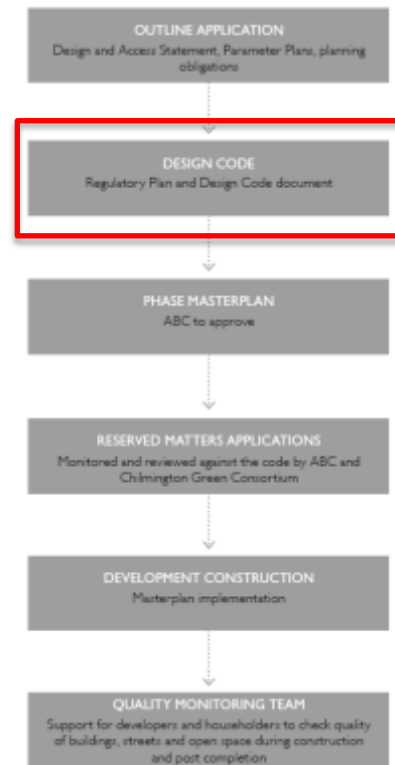
Balconies

Timber painted white	Timber stained	Grey or black metal



Intended Status of the Code

9. The diagram to the right broadly illustrates how the Design Code (highlighted) sits in relation to the Outline Application and how it will be a tool to guide the next design and planning stages of the development. The Code will directly inform the emerging layout detail of the Phase Masterplans and Reserved Matters Applications. Its role will continue to be vital throughout the construction period and monitoring of build quality to ensure the expectations of the Code are being met.
10. At the end of each of the first three of the four phases the success of the Code will be tested and any necessary changes to its content will be implemented.



Consultation Process on the Evolution of The Code

11. The draft content of the Design Code has been shaped through a robust consultation over a number of years. This involved dialogue with the developer consortium, task groups, local people, professional bodies and organisations and a range of key stakeholders primarily including ABC and KCC officers. It also involved advice from an Independent Highway Design Consultant working collaboratively with ABC, KHS, the Consultants and the Consortium.
12. A series of events were held to discuss Design Codes at Chilmington Green including;
- Workshop on Role of Design Codes Sep 2005 (35 attendees)
 - A ½ Day Design Code Workshop including the housing consortium, local people and other stakeholders - June 2013 (51 attendees)
 - A ½ day follow up Chilmington Design Codes Workshop - October 2013 (42 attendees)
 - Update on Design Codes to Chilmington Green Community Group (Feb 2014)
 - Update on Design Codes Chilmington Green Community Group (March 2016)
13. Regular Design Code meetings have been held with the Consultants JTP who wrote the Code. Regular feedback on drafts were provided by the Strategic Sites & Design Team Officers. In late 2015 the first working draft version was circulated to key stakeholders for comment. In excess of 340 comments were received and the main themes of representations received were;
- Clearer differentiation between Character Areas

- Integrate with the 32 objectives of The Quality Charter
- Seek to encourage Garden City Principles in the design
- Architectural Styles that achieve a high quality modern Kentish vernacular.
- Ensure a gradation of density across the site.
- Street Designs that are attractive and robust.

These comments were discussed with the consultants and the draft Code was consequently adapted.

Issue	Ref	Consultee	Comments	ABC Response
LAYOUT/STREET ISSUES				
Highways Infrastructure	1.	Kevin Bown (Highways England)	Road Network: Highways England will be concerned with proposal that have the potential to impact on the safe and efficient operation of the Strategic Road Network(SRN) in this case the M20 and A2070. Having examined the above document , we do not offer any comment on its content.	Noted. No action necessary.
	2.	Ian Wolverson	Connections (p. 13): There is no proper plan for an eastward exit from the development with its long list of destinations: Two Tesco stores, Asda, B & Q and associated retailing, Ashford Business & Retail Park, The Designer Outlet, Orbital Park, Junction 10 (and eventually J 10 A), the William Harvey, Ashford International – used by many commuters. There is clearly a recognition of “increased traffic”, east to west and it can only go down Magpie Hall Road, where KCC currently only have plans for traffic calming. Can the results from the recent traffic monitoring be considered when correcting this problem? The honest reason this problems is being ignored is all due to lack of finance.	This traffic issue was analysed under the Outline Planning Application and has been dealt with through relevant planning conditions and obligations approved by members accordingly. This includes the need to monitoring traffic levels in Magpie Hall Road and elsewhere. Further discussions will be held at first phase Masterplan and Reserved Matters stages.
	3.	Ian Wolverson	Bus (pg. 140): The proposed bus route falls in line with the whole traffic plan problem of the Chilmington Development-which is currently a giant cul-de-sac off the A28. No exit via an easterly route to cope with the mass of commuters who will be living here. For example, commuters will NOT use a bus if it takes longer than the car to reach the station. The currently proposed traffic loading on the A28 will lengthen the bus journey time to the station.	The efficient movement of buses was considered under the Outline Planning Application and has been dealt with through relevant planning conditions and obligations approved by members including upgrades to the proposed route. The first phase masterplan and reserved matters applications will also need to make sure buses access the site easily and efficiently and serve the community.

Table - ABC Response to Consultation Comments

Issue	Ref	Consultee	Comments	ABC Response
Highways Infrastructure (cont)	4.	John Durrant (resident), Chilmington Cottage, Chilmington Green.	Burden on existing roads: The Code implies that the Hamlet will remain much the same and possibly enhanced. When completed, the Chilmington Development is planned to incorporate 5,750 units which equates to some eight to ten thousand cars or more operating in the area. No mention had been made on the effect that this number of cars will have on the lanes around the Hamlet. For example: Code states that Bartlets Lane and Chilmington Lane will be retained in their current form as much as possible. Both Bartlets Lane and Chilmington Lane are little more than one car width. How can they cope with the potential number of cars accessing the Cricket Green and Super Play Area?	Traffic calming in Bartletts Lane and Chilmington Lane was secured through the Outline Planning Application, planning conditions and obligations approved by members. There will be a hierarchy of roads serving the development and traffic monitoring will take place at several agreed points around the development. The design and layout, including restrictions to traffic, will be discussed in more detail at first phase Masterplan and Reserved Matters Application stage.
	5.	Karen Hopkins, (resident), Chilmington Green.	Electric charging stations (p. XI): Where is the street level electric charging infrastructure? By the time this 'design' goes live most cars will run on electricity. So where are the plans for charging points and high current electrical infrastructure? Every residential street will require this (p.225 omission) as will the public areas mentioned in Vision on pg. 49).	Best dealt with through evolution of first phases of masterplan and Reserved Matters Applications. The aim will be to provide these stations in public car parks and in larger flatted developments where justified.
	6.	Katie Stewart (KCC, Director of Environment, Planning and Enforcement)	Further conversation: In light of the KCC's Highways comments, KCC would welcome further co-operation with the Borough Council and relevant stakeholders in addressing the Highways & Transportation matters.	Regular dialogue has been had with Kent Highways into Design Code. Further discussions will also be essential soon to discuss the phase 1 masterplans and Reserved Matters applications.
	7.	Will Train (ABC, Health, Parking and Community safety)	Speed restrictions: With regard to a blanket 20mph speed restriction across the development (design code part C, p.102, 10.0.1), this will either require regular repeater signs (if applied as a 20mph limit) or extensive traffic calming	Kent Highways have confirmed that 20mph repeater signs are not required. Signs are only required where speed limits

Issue	Ref	Consultee	Comments	ABC Response
<p>Highways Infrastructure (cont)</p>			<p>measures for the restriction to become 'self-enforcing' (if applied as a 20mph zone). These elements should be worked into the design from an early stage and it should be recognised that parking controls may be required to reinforce and protect formalised road safety features, and these should also be worked into the design from an early stage.</p>	<p>alter. The principle of 20mph street has been discussed and agreed with Kent Highways. KHS have accepted that CG streets will have subtle sensitive self enforcing traffic calming solutions designed into them</p>
	8.	Shadoxhurst Parish Council	<p>Access roads mph: Apart from short lengths of the access roads from the A28 which will be 30mph, all the rest will be permanently 20mph. There will eventually be a strategic road connecting Magpie Hall Road and some of Chimington Green Road to go to Access C at Sandy Lane on the A28. Although this would be a through route, due to the road network spreading from it, it will mostly be 20mph. We envisage that many drivers will opt to come down Tally Ho road and join the A28 through Bethersden Road rather than take the slower speed road. We therefore need protection and some form of calming to prevent/restrict through traffic using the village. We understand that this will come as a S106 agreement at the end of Phase 4, but this is too little too late.</p>	<p>Any issues with vehicle speed in Shadoxhurst is not an issue for the Design Code to tackle. The impact of traffic on Tally Ho Road and Shadoxhurst generally was analysed under the processing of the Outline Planning Application and has been dealt with through relevant planning conditions and obligations approved by members.</p> <p>Traffic monitoring/mitigation at several agreed positions around the development, including Tally Ho Road and Criol Lane, was agreed and will be secured in the Planning Obligation.</p> <p>Further conversations will be held at first phase Masterplan and Reserved Matters Applications. The code will attempt to ensure all streets are designed to restrict vehicles to sensible speeds and mostly no more than 20mph and to direct traffic to the main access points</p>

Table - ABC Response to Consultation Comments

Issue	Ref	Consultee	Comments	ABC Response
	9.	Shadoxhurst Parish Council	Criol Lane is shown as a chosen route onto the development, even with its own "Welcome to Chilmington Green' sign, we are very concerned that this road will need to be improved/protected in the western half of this road which is single track and in poor condition outside the scope of the Design Code which will need to be considered.	Not an issue for the Design Code. Traffic monitoring at several agreed positions around the development, including Criol Lane, was agreed during the processing of the planning application, and will be secured in the Planning Obligation.
Street Layout	10.	Ian Wolverson	Cul-de-sacs (pg. 108): How far is the outline street layout now a 'given'? There seem to be many cul-de-sacs, yet on page 1-2 it states these should be avoided.	The precise layout of minor street configuration is not an issue to be resolved in Design Codes and will be dealt with at first phase masterplan and reserved matters applications. The preference is to generally avoid cul-de-sacs.
	11.		The typical plan would obstruct commercial/services access. Good concept- needs some adjustments. (10.3)	Access for commercial and service vehicles will be considered at a reserved matters stage.
	12.	Karen Hopkins, (resident), Chilmington Green.	Existing poor layout design: Typical examples of poor/impassible local streets are Violet Way/Bluebell Road (Park Farm/ Bridgefields). And the newest section of Repton Park (Cars parked both sides reducing width to less than one medium size vehicle in places). Is this the expectation for CG?	Important to avoid these sort of problems but this is an issue that should be discussed at Phase 1 Masterplan stage and reserved matters applications.
	13.		Mock Lane should be blocked off in a similar way to how Chart Road has been blocked on the Brisley Farm estate. Since being developed, access is available to properties only at Brisley Court, but traffic is no longer able to use Chart Road as a cut through- access only. Mock Lane cannot be considered as part of the new plans. It is a single track at best and wholly unsuitable for new traffic. Mock Lane should be retired and used as access only	The planning application showed the southern section of Mock Lane being up-graded in order to serve the District Centre, and this was made clear in the report to Planning Committee. Careful attention to detailed design will be needed.

Table - ABC Response to Consultation Comments

Issue	Ref	Consultee	Comments	ABC Response
<p>Street Layout (cont)</p>		<p>Karen Hopkins, (resident), Chilmington Green.</p>	<p>when these new plans are being considered. It is especially important that this lane is not used when the proposed secondary school is built as a dumping ground for parents bringing their kids to school. Paper provision must be made at the school and the A28 for parking and dropping off. The map on p140 is at odds with the design statement on p107. It shows a bus route using Mock Lane instead of the new strategic road. Having a bus route use Mock Lane is totally inappropriate and at odds with the design statement. It needs to be routed on the new road. The key strategic highway is via Chilmington Gardens and any bus service should obviously be routed where there are sufficient properties and people to use it. The service is shown passing through the District Centre and onward to the bottom of Mock Lane (Which is totally unsuitable for this purpose) before turning left into Chilmington Green Road. There is no requirement for any service to run past two existing properties at the bottom of Mock Lane. The obvious route should be from the District Centre through the strategic route into Chilmington Gardens (great many more users) and then onward along the new Orchard Way.</p>	
	14.	<p>William Train (ABC, Health, Parking and Community Safety)</p>	<p>Vehicular domination: Regarding point 18 of the 'Quality Charter' (a place designed with the needs of all users in mind) the imposition of parking control or physical impediments to vehicle movement such as street furniture may be required to ensure that cycle routes, pedestrian spaces and footpaths do not become dominated by vehicle parking.</p>	<p>Understood and agreed. Code encourages well designed on street parking. Fine detail will be discussed as part of phase 1 layout masterplan and reserved matters applications.</p>
	15.		<p>Parking: With regard to point 10.0.2 (p. 102, para 2) an orthogonal [gridded] street layout will likely require parking controls to function effectively.</p>	<p>Parking issues will be discussed as part of phase 1 layout masterplan and reserved matters applications.</p>

Issue	Ref	Consultee	Comments	ABC Response
Street Layout (cont)	16.	William Train (ABC, Health, Parking and Community Safety)	Radii: Regarding point 10.0.3 (p. 103), small junction radii will require the imposition of parking controls in order to preserve a sufficient visibility splay for motorists at junctions and so preserve safety for all road users. Such controls should be incorporated into the design at an early stage. Several local housing developments in recent years have shown that a preference for raised carriageway surfaces at small radii junctions have led to significant instances of vehicle overrunning to the detriment of pedestrian safety and footway integrity. In such designed junctions footways should be constructed to highway standard with regard to depth of services and strength of materials.	<p>Precise detail of junctions and on street parking solutions will be discussed as part of phase 1 masterplan and reserved matters applications.</p> <p>The strength of hardstandings and footways is a key issue for the Design Code as vehicles often encroach onto hard landscaped areas that are not designed to cope with the weight of refuse trucks, maintenance vehicles, delivery vehicles or parked cars. On page 26 after 4th paragraph or p104 after section 10.0.7 the following text should be added;</p> <p><i>“Construction Detail -At the corners of all junctions or other vulnerable areas, footways or other hard-standings will be constructed to the same quality as the carriageway to avoid being damaged by vehicles overrunning the footways or parking. All details of trees, tree pits, utilities will need to be factored in to ensure a holistic design of the sub base and surfaces to ensure longevity.”</i></p>
	17.		Local Access Streets: The provision of inset on-street parking should not be placed in locations which would present an obstruction to vehicle movement between the street and any on-plot parking facilities; or in locations where the presence of vehicles would present a visual	<p>Understood and agreed. Code encourages well designed on street parking. Fine detail and solutions will be discussed as part of phase 1 layout</p>

Issue	Ref	Consultee	Comments	ABC Response
Street Layout (cont)			obstruction to driveway visibility splays. Such incident may discourage the use of on-plot parking in favour of on-street parking to the detriment of traffic flow on the access streets.	masterplan and reserved matters applications.
	18.		Shared Space: A high prevalence of on-street parking in shared spaces will be to the detriment of pedestrian and cyclist priority within the streets. The absence of kerbs alone does not imply pedestrian priority, and strong consideration should be given to a differentia in carriageway level between shared spaces and connecting distributor streets (as in the precedent image) to reinforce the change in status.	Fine detail and solutions will be discussed and tested as part of phase 1 layout masterplan and reserved matters applications.
	19.	Matt Whitby Guy Holloway Architects & Ian Bull (Consultancy ltd, on behalf of client Pentland Homes LTD.)	Pedestrian Route Road Code: There are two instances on Land Parcels A & E and F & G that would benefit from a more pedestrian orientated road. The implementation of gates, shared surfaces and changes in materials would all help to reduce the presence of cars on the street, while emphasising pedestrian priority and safety. Although this option is not specifically prohibited by the code it should be incorporated as an additional option/ variation for the above land parcels.	A narrow lane typology is considered appropriate in some areas with an intimate character which can be designed with pedestrians primarily in mind but which might accommodate the occasional vehicle. The following text is recommended to be added to end of section 10.0.10 p109 - <i>“ Occasionally a pedestrian orientated surface could be appropriate which might have the look and feel of a traditional narrow rural lane or tight homezone. Here the introduction of low automatic rural-style gates or rural gateway features, shared surface materials listed above and contrasting materials would all help to reduce the dominance of motor vehicles on</i>

Issue	Ref	Consultee	Comments	ABC Response
Street Layout (cont)				<i>these tight surfaces while emphasising pedestrian and cycle priority and safety. A locked gated community would not be acceptable so any discrete gates would need to remain unlocked and would only seek to restrict vehicle access but would be open to sides to allow pedestrian and cyclist to pass.'</i>
	20.		Rights of Way: The Design Code should also make clear that in order to facilitate easier access and design continuity Rights of Way should be extinguished and/or redirected if they converge to the same point or would benefit from taking a route that integrates into the proposed design.	Fine detail and solutions will be discussed and tested as part of phase 1 layout masterplan.
	21.	Bill Barrett (Singleton South Ward Councillor)	Minor Access streets p. 129: Pinch points will create blockages as at Singleton Hill. As with the main use streets there should at ALL POINTS on these roads be the ability for cars to pass each other on either side if no cars are parked. To do otherwise would be to create undue parking issue for residents. As these roads will be quieter than the main roads, crossing them isn't going to be unduly dangerous for residents, thus pinch points are not needed.	A varied street width is important to creating high quality minor streets by helping to naturally slow streets and make it more pleasant for pedestrians and cyclists. Tight pinch points in the carriageway will be minimised and carefully considered.
	22.	Mark Cobley, (resident), Great Chart.	'Marker' building locations: There are 'marker' buildings indicated for either side of the access roads into the new development. However, Access B is not classed as a main access, therefore I see no reason for 'marker' buildings for this access. Or, at least no requirement for additional storey 'Marker' buildings at access Junction B.	The form and design of these units will be in keeping with the scale of the related junctions. The detail will start to be discussed during the relevant phase masterplan and reserved matters applications.

Issue	Ref	Consultee	Comments	ABC Response
Street Character	23.	Ian Wolverson	Transitions: No mention at all has been made on dealing with the transitions between the four neighbourhoods, nor indeed the transition between one developer style and the adjacent style. ABC site visits have clearly shown us how well <u>or badly</u> this can be carried out. There were excellent transitions in Bolnore Village, but a very varied mix of standards at Ingress Park. This is a major omission in the Design Code Draft.	Code highlights need for sensitive transitions between adjoining areas in several sections. Ultimately the primary aim of a successful Code should be to achieve a visually coordinated place and its objective is to prevent an inappropriate transition from happening. This will be closely assessed in early phase masterplans and reserved matters applications
	24.		Street Furniture (p. 204): As Seen on ABC visits, boundary typologies seem to be the most quickly changed (by residents) out of regulation. How will this be policed.	ABC will have some control over boundary treatment through reserved matters applications, and can be partially covered by planning conditions. The CMO will be expected to have a key role to play in educating and informing residents.
	25.	Karen Hopkins, (resident), Chilmington Green.	Existing area: As part of the character section of the document, the proposal is entirely out of context with current surroundings and will totally change the character of our property (which has been in place for decades) and does not adhere to the design code's principles. What plans are in place to compensate existing residents for the unwelcome blight we are expected to suffer?	The character of the place will be refined in phased masterplan. The detailed layout will be discussed as part of reserved matters applications and will seek to minimise impact on existing residential properties.
	26.	Wendy Roger (KCC, Senior Archaeological Officer)	Section 5 Character Areas: I note the guidance to explain how the form of development in each character area should respond to built /cultural heritage assets; This is welcome positive consideration of and active encouragement to use the historic environment but this it not really highlighted in the opening core principle sections.	Understood and agreed. In order to ensure built and cultural assets and distinctiveness is considered carefully at Chilmington the Design Code should highlight

Issue	Ref	Consultee	Comments	ABC Response
Street Character (cont)			To ensure guidance is clear, could the aspiration to use the historic environment as a design tool be mentioned in the core principles section.	this as a core principle. The following text should be added to page 23 under Built Form heading; <i>“The form of development in each character area should respond creatively to the built and cultural heritage assets within the locality to emphasise the distinctiveness and identity of the new place”</i>
	27.		Ancient influence: Chilmington Rise (p.27) and Orchard Village p.31 both contain sections on Built/Cultural/Heritage Assets and encourage design character and public art to draw inspiration from the important Iron Age, Roman and 20 th century military archaeology nearby and on the site itself.	Understood and will be discussed through phased masterplan and reserved matters stages.
	28.	SallyAnne Logan (on behalf of CMO Project Team & Culture and the Environment)	p. 47 Market Square and Highstreet: There is significant opportunity at this destination to create a sense of place and distinctiveness through public art, landscaping and the provision of facilities which sets the space apart from the surrounding development. It is heartening to see this explored in greater detail in this section.	Agreed and an issue to be developed further through each phase masterplan and reserved matters stage.
Street Design	29.	Ian Wolverson	Sign design: Street sign (names) design, will this incorporate a logo for each district, or the complete development be incorporated by logo style. Not much wrong with using the current logo as per the cover on this document?	Agreed and an issue to be developed further in character areas within early phase masterplans
	30.		Street lights: -The need for spare stocks to match for replacement purposes, if bespoke designs are used. Replacements elsewhere do not match. p. 213 all this lighting is new design. Continuity of same design supplies for replacements may be a problem in the longer term. As stock of spares perhaps?	This point will be explored further with CMO and KHS.

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Issue	Ref	Consultee	Comments	ABC Response
Street Design (cont)	31.		Cycle racks (pp. 211/12): No references/examples of cycle racking. Steel finish perhaps?	Cycle racks are included on page 212 of Design Code.
	32.		Occlusion of meter/utility units: No mention of hiding green junction boxes and meter cupboards and other services as seen on ABC visits. (whereas external piping is illustrated).	Advice on utility boxes set out on page 227 of code. A condition asking for these details will be applied to reserved matters.
	33.	John Durrant (resident), Chilmington Green.	Definition of Verges: Code states that the lanes themselves have characteristic wide grass verges which underline the rural character of the Hamlet, retaining these is particularly important. Unless these verges are protected, it is inevitable that cars will park on the grass verges particularly when using the public footpaths. Most of these verges are soft during the winter months and car wheels sink in.	Agreed and a detailed issue to be developed further through first phase masterplan.
	34.	Katie Stewart (KCC, Director of Environment, Planning and Enforcement)	Lighting clutter: KCC. Recognises that paragraph 10.0.7 (pg. 104) proposes lighting to be situated on buildings to reduce street clutter. This is a practice that the County Council no longer undertakes due to issues regarding maintenance and access. During initial discussions regarding lighting at Chilmington Green KCC specified that wall mounted units would not be adopted.	This is a worthy aspiration and could help with creating a strong identity and character of the place. KCC policy could evolve in future and in some rare circumstances could adopt lighting on a building in their ownership in a key public space. Will retain in Code to ensure there is some flexibility in key places in future years, but detail will be resolved with these parties through reserved matters application process.
	35.		Column Height: With regard to column heights, the County Council considered that the height of columns will be dictated by the required lighting class and spacing. Whilst KCC previously considered 5m columns as a standard height for residential roads, 6 metre columns are currently	Lengthy discussion held with KHS on this. KCC Policy is evolving on this and it is important it doesn't undermine quality. Agreed position was Design Code responds to

Issue	Ref	Consultee	Comments	ABC Response
Street Design (cont)			used as the lighting spread and uniformity are regarded to better compliment LED luminaries. Therefore, it is advised that the proposed use of 5m columns should not be to the detriment of the lighting for the benefit of aesthetic vision.	flexible position on height of columns relating to context but to try and keep height to a minimum. Detail to be discussed with KHS in at reserved matters applications stage.
	36.		Woodhouse manufacturers: p. 213. Refers to Woodhouse manufactures columns and lanterns and the County Council does not consider these as acceptable.	Understood and other standard KCC lighting units have recently changed. Not all streetlights to be adopted by KCC so other options suggested to ensure flexibility and promote quality. On page 214 - Reference to specific units and suppliers to be amended to refer to 'options' rather than stating 'KCC approved'. An image of a CU Phosco unit needs to be added to page 213 as this is now the preferred Ashford model. Also the following reference to be added on page 213. <i>'There is likely to be a need to install a CMS – Central Management System, allowing all new LED's street lights to be controlled remotely. Early dialogue with KCC is crucial.'</i>
	37.		Trees: The County Council also has concerns regarding tree planting at the development site. The proposed road and footpaths appear to be heavily tree lined, which conforms to the Borough Council's preferences, but this is counterproductive as it limits space for locating columns and would have an immeasurable negative effect on	The need for the early coordination of the siting of lighting columns and street trees when designing streets is crucial so the following text is recommended at the end of the 1st paragraph under Public

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Issue	Ref	Consultee	Comments	ABC Response
Street Design (cont)			lighting levels and uniformity.	Realm section on page 26 to read as follows; <i>'The need to carefully consider the location of tree planting in relation to the location and height of lighting columns (and windows to homes) is vital to create an attractive place with comfortable lighting levels suitable for the street.'</i>
	38.	Will Train, (ABC, Health, Parking and Community Safety)	Entrance/Exits: The street design would also have to account for entry and exit signs being placed at the terminal point of each zone and repeater signs detailing the restriction in force at 30 metre intervals along the carriageway throughout the zone. Given the desire within the SPD to reduce street clutter from signage I have erred in comments towards a 'traditional' lining solution.	Implications of parking restrictions on signage issues needs to be discussed in detail with KHS at reserved matters application stage.
	39.	Will Train, (ABC, Health, Parking and Community Safety)	Regarding hard landscaping: Shared surfaces should be discouraged unless these are designed to facilitate pedestrian movement on clear desire lines. At all other points there should be an overriding preference for a clear delineation in height between carriageway and footpath to discourage footway parking by vehicles and reinforce pedestrian priority at raised table crossings around the district centres and key crossing points.	Code indicatively suggests some solutions to this and a detail that needs to be carefully considered at each phase of masterplan design
	40.		Market Square accessibility: The design of the Market Square street layout (design code Part B, p. 50) raises a concern with bus accessibility across the development. Bus stops should not be sited on stretches of carriageway where the surface of the road has been raised to meet the level of the pavement as step-free access to bus services cannot be provided. A raised kerb boarder should be provided at all stops to ensure stops are DDA compliant.	The design of bus shelters is important on inclusive design and accessibility grounds. A well designed area and surface around shelters needs to ensure a level pavement to provide step-free access to bus services as a key objective. On page 139 the following text should be

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Issue	Ref	Consultee	Comments	ABC Response
Street Design (cont)		Will Train, (ABC, Health, Parking and Community Safety)		added to read as follows; <i>'The provision of good quality bus kerbs and bus boarders that are well integrated with bus shelters and the street, is important to ensure a level step free access onto buses for people with impaired mobility, wheelchairs and pushchairs.'</i>
	41.		The Avenue (Gateway): Marked parking controls will be required if the 'occasional permitted' nature of on-street parking is to be enforced adequately and two way traffic enforced. The nature of the Avenue as the principal access form the A28 may remove the need for controls as the wider development is built out and vehicle flows increase, however in early stages it is likely that parking will occur on-street outside of the in-set parking bays. Marked bus stop clearways will also be required to prevent obstruction of bus stops by parked vehicles.	Understood. Code urges restraint on signs and lines within highway and a carefully integrated design approach which accepts that sometimes they are inevitable.
	42.		The Avenue (typical): Marked parking controls will likely be required to prevent on-street parking beyond the confines of the in-set bays. Marked bus stop clearways will also be required to prevent obstruction of bus stops by parked vehicles.	
	43.		The High Street: Street furniture and raised kerbs should be employed to reinforce a distinction between the pedestrian and vehicle areas of the adopted highway. Marked parking controls and waiting limits on the parking bays will be required to ensure an adequate turnover of on-street parking stock. Marked bus stop clearways will also be required to prevent obstruction of bus stops by parked vehicles.	Code suggests ways of designing the High Street in this integrated manner. Detail needs to be carefully considered through reserved matters applications.
44.	Orchard Way: Marked parking controls and waiting limits	Understood. Code urges		

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Issue	Ref	Consultee	Comments	ABC Response
Street Design (cont)		Will Train, (ABC, Health, Parking and Community Safety)	on the parking bays may be required on the approach to the mixed use centre to ensure an adequate turnover of on-street parking stock. Marked bus stops clearways will also be required to prevent obstruction of bus stops by parked vehicles.	restraint on signs and lines within highway and a carefully integrated design approach.
	45.		Chilmington Brook: On-Street parking may likely occur on the shared space street beyond the confines of the indicative laybys if an insufficient on-plot parking standard is applied. Marked bus stop clearways will be required to prevent obstruction of bus stops by parked vehicles.	Detail needs to be carefully considered at each phase of masterplan design.
	46.		The Green Spine: Marked bus stops clearways will be required to prevent obstruction of bus stops by parked vehicles.	Code urges restraint on signs and lines within highway.
	47.		In order to ensure longevity timber elements should not be utilised in the design of lighting columns.	Lighting design to be in accordance with what the adopting authority agrees. Code seeking to be flexible so planning to retain reference to timber.
	48.		Discovery Park link road: Future provision of a bus route will require the implementation of hard standing bus stops with raised kerb borders directly linked to the adjacent shared footway/cycleway.	Code deals with bus stop design and need for bus boarders in section 10.6
	49.		Local Access Streets: Parking controls may be required in areas of high property density and lower per-dwelling parking provision to prevent obstructive parking practices at junctions and pinch points to facilitate vehicle movement.	Detail needs to be carefully considered at each reserved matters application stage.
	50.		Minor Access Streets: On-street parking should only be provided in areas where the carriageway is widened to preserve a suitable access for vehicles.	

Issue	Ref	Consultee	Comments	ABC Response
Street Design (cont)	51.		Street furniture: The enforcement of non-permitted vehicle access to plot frontage will require the imposition of parking controls or suitable street furniture to prevent vehicle access via footways, cycleways and verge spaces. Where occasional access (as noted in 11.2, page 144) is required, the limits of highway adoption should extend to the property boundary in order that parking controls may be implemented to prevent tandem parking in obstruction of the combination footway/cycleway.	
	52.	Luke Mockeridge (KCC) Luke Mockeridge (KCC)	Lighting p. 26: There is reference to the Kent Design Guide section 2.4 of the document. As far as I am aware, this is currently under revision as it is fairly out of date in terms of street lighting. As such, it may be best for the lighting consultant to contact me directly with any questions or queries.	Lighting will need to meet the requirements of the adopting authority. Kent Highway Services policy is evolving so full discussion with KHS and others regarding street and amenity lighting will be required. There does not appear any obvious need to change design code as lighting will be adequately dealt with at reserved matters stage. Future option may be to produce a technical lighting addendum to the code if KHS and CMO see fit.
	53.		Lighting mounts p. 104: 10.0.7 mentions lighting is to be situated on buildings to reduce street clutter. Whilst KCC do historically have lanterns mounted on buildings, this is a practice we no longer undertake, and have been trying to move away from where possible. For example, The High Street in Ramsgate, where many of the wall mounted luminaries have been changed for column mounted due to the associated issues of ongoing maintenance and access. Some time ago, during initial discussion about the lighting	Noted. The CMO will not be adopting lighting normally adopted by KCC Highways. CMO will only adopt amenity lighting where it is within open space. Lighting to meet the requirements of the adopting authority. Detailed designs will be dealt with at reserved matters

Issue	Ref	Consultee	Comments	ABC Response
Street Design (cont)		Luke Mockeridge (KCC)	at Chilmington, KCC Street Lighting did specify that wall mounted units would not be adopted, and there was mention that the management company could potentially retain these as private fitting, and maintain them.	stage.
	54.		Column Heights: Referring again to p.104 the column heights are made note of with 5 metre columns being stated as the norm. The heights of columns will very much be dictated by the required lighting class and spacing. KCC used to use 5 metre columns as standard or residential roads. There has been a move to 6 metre columns as the lighting spread and uniformity are generally better with LED luminaries. Whilst we do not have an aversion to the proposed 5 metre columns, this should not be to the detriment of the lighting for the sake of aesthetic vision.	This has been agreed through discussions with KHS as a good starting point. At reserved matters stage further discussions on precise technical detail of lighting with KHS will be essential at detailed design stage to ensure it responds to locality.
	55.		Control nodes: p213 makes reference to the Urbis Axia lantern as our standard unit. This was the case until recently, but under the county wide LED replacement project this will be replaced with the CU Phosco P852 (to Kent spec) in the residential roads in Ashford. We are also using Central Monitoring System from Telematics Wireless to have full control over the lighting levels and switching of the lanterns. As such, the lighting within the development will need to be fitted with the appropriate control nodes and associated collectors to be able to link to this system.	Identifying specific lighting unit types as only option is not flexible enough. KHS position on lighting units inevitably needs to be flexible to reflect evolving policy position and commercial supplier issues. Lighting will meet the requirements of the adopting authority and detailed designs will be dealt with at reserved matters stage. Page 213 will be amended as follows; <i>“Ashford is also using Central Monitoring System from Telematics Wireless to have full control over the lighting levels and switching of the lanterns. As such, the lighting within the development will need to be fitted with the appropriate control</i>

Issue	Ref	Consultee	Comments	ABC Response
Street Design (cont)	56.		Woodhouse manufacturers p. 213: There is reference to woodhouse manufacturer columns and lanterns. Unfortunately, KCC street lighting will not consider or accept these even with commuted sums.	<p><i>nodes and associated collectors to be able to link to this system.”</i></p> <p>To ensure flexibility the reference to these units will be retained as these lights simply represent higher quality aspirations. CMO will not be adopting lighting normally adopted by KCC Highways. It will only adopt amenity lighting where it is within open space. All lighting to meet the requirements of the adopting authority and types and detailed designs/suppliers will be discussed at reserved matters stage.</p>
	57.	Shadoxhurst Parish Council	Street Lighting: It would appear that every road will be lit. There will be 8 metre poles on the main roads and 6 metre poles on lesser roads. We asks that the lighting design will be state of the art for minimising light spillage and skyward light pollution as we already have the Ashford glow which will come very near and affect residents. This is important to the village who have so far resisted having street lighting on our village roads. Will there be provision for some/alternate light columns to be switched off to a) reduce cost and b) reduce the light impact in the night?	Agreed. It is not confirmed all streets will be lit as KHS policy is subject to review. KCC/ABC/CMO are keen to reduce light pollution and use more energy efficient units. All lighting issues must meet the requirements of the adopting authority. Lighting should comply with Dark Skies, so reference will be added to section 10.0.7. Lighting issues will be discussed at reserved matters stage.
	58.		Edge Design: Much is made of the edges of the development for different sections. The western side however appears to just let the edges melt into the farmland. This I suspect will make the house facing out village very stark and very visible. We therefore ask for	A common theme of the code along the south-west edges is to secure very low density development with detached homes in large plots.

Issue	Ref	Consultee	Comments	ABC Response
Street Design (cont)			some distinct hedging to soften the appearance and reduce the visual impact. The planting of trees would also help break the starkness and retain the rural aspect that is present. Whilst we appreciate that future residents facing west would love direct visual views onto farmland, there are likely to be 2 metre high fencing and so we would like this softened with early hedgerow planting to establish successfully growth once building commences. We appreciate the decision that a maximum of two storey dwellings will be at the edges.	A detailed landscaping scheme for edges will be crucial to achieve a sensitive transition to the countryside. Advance planting and landscaping will be discussed at each masterplan phase and reserved matters application.
	69.	Ian Wolverson	Utilities: Statutory Utility Provision needs more descriptive depth. We cannot predict if we may have another replaying- to match Fibre optic cable laying for example, - other utilities yet to be invented.	Agreed. The design of streets will have an integrated approach to underground utilities
	60.	Karen Hopkins, (resident), Chilmington Green.	Subterranean plans: Modern designs should include detailed plans of the underground provisions, including but not limited to subterranean walkways, roads, water, electricity, gas, tele-communications. A modern design should include detailed plans that ensure the co-ordination of service deployment. It should include the requirement that a master plan is held and enforced to ensure that the roads are not constantly being dug and re-laid by different third parties and proper mapping of all the pipes and services is maintained. This should be done upfront alongside the over-ground mapping and thoroughly planned in advance, manhole planning should be performed and mapped in advance of the roads and pavements being laid. We can't see any mention of this in the document.	Agree this is important matter that needs to be addressed in all reserved matters applications. Utilities have been dealt with principles on page 89 and need for a strategy on page 227 of Design Code. The need for a co-ordinated approach to underground utilities is also illustrated on pages 110-160. This will seek to ensure the streets are designed as best we can to future proof requirements. For instance service ducts will help coordinate and combine works with specialist providers.
Community &	61.	Karen Hopkins,	Emergency Services: In the design, I would expect a	Agreed. All streets will be designed to allow vehicles to

Issue	Ref	Consultee	Comments	ABC Response
Public services		(resident), Chilmington Green	mention of emergency services. What are the benchmark timings for each emergency service to reach any of the new locations given all the other planned growth in the area? How long to get a heart attack to the hospital at 8:45 in the morning? Or the Fire brigade to the district centre on Friday evening? What plans, are there plans for any local site based services? Fire, Police, Hospital, Flooding? Any special access considerations for these special vehicles ie.Fire Engine size?	navigate them at sensible speeds including emergency vehicles.
	62.	Katie Stewart (KCC, Director of Environment, Planning and Enforcement)	<p>Education Funding Agency (EFA): KCC's school development programme is operated through the Education Funding Agency (EFA), with objective to build new school buildings where there is an identified need. As part of this funding programme, the EFA imposes strict requirements on any development including the size and range of facilities, cost per square metre and programme. In order to meet these targets, the EFA has implemented a range of standardised Baseline Designs for schools, with the assumption that these will be utilised In the vast majority of cases. The uses proposed on the school sites and within the stand-alone building itself have been dictated by the spatial area requirements set out in the Baseline Design model and BB103.</p> <p>(Further statement from KCC Property- KCC's school development programme is operated through the (EFA), with objective to build new school buildings where there is an identified need. As part of this funding programme, the EFA imposes strict requirements on any development including the size and range of facilities, cost per square metre and programme. In order to meet these targets, the EFA has implemented a range of standardised Baseline Designs for schools, with the assumption that these will be utilised in the vast majority of cases. The uses proposed on the school sites and within the stand-alone building itself have been dictated by the spatial area requirements set out in the Baseline Design</p>	Understood. This is one of the reasons why Code does not stipulate specific design standards for schools or community buildings. Flexibility is critical as KCC school development programme and education policy may change in future and also the EFA impose strict requirements on the design and delivery of new schools. Some broad parameters on school design are contained in p49 of Code. Also the Code states on page IV that there is an ambition for public buildings to be of excellent quality, designed to an agreed brief, subject to architectural competition where possible, and with strong involvement of KCC, EFA, the community and the Regional Design Panel in Ashford. It is critical that the Code maintains flexibility on

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Issue	Ref	Consultee	Comments	ABC Response
Community & Public services			model and BB103. The County Council recognises that reference is made to the materials palette associated with housing and community facilities within the development. In designing new schools, and within the resource available, KCC's design team will review the design code of the particular development to compliment the surrounding development and enhance its setting. In addition, KCC will strive to provide an economic design solution to meet financial requirements, reflect the County Council's and school's aspirations and encourage distinctive and striking modern design.	school design and that these issues are discussed at each phase masterplan stages and detailed applications.
	63.	SallyAnne Logan (on behalf of CMO Project Team & Culture and the Environment)	Lack of community building discussion: We feel the mention of community buildings and their design and statement within the streetscape is limited. This should be an important principle and that more mention of this should be made to ensure the buildings themselves are seen as destinations, fostering a sense of community pride from the outset? Given so much emphasis is placed on community aspects of the development, little mention of the role the community buildings will play is creating a sense of place is at odds with the overall aspirations.	Code focuses on tackling house building primarily. However some broad principles for community buildings are set out in page XIII pt9 which states that high quality architecture will be sought on all community and public buildings. Detail and solutions for public/community buildings will be discussed and tested as part of design briefs, the phase 1 layout masterplan and reserved matters application.
	64.	Karen Hopkins, (resident), Chilmington Green.	Postal Service: No mention of post boxes or collections/deliveries for the development.	This is a service delivery issue that needs to be followed up with discussions with service providers at phase masterplan and reserved matters stages.
	65.		Facilities for Internet postal drops similar to those being created in the old Tube station ticket officers in London	
Public Realm	66.	SallyAnne Logan (on behalf of CMO Project	Public Realm : Page Xiii is excellent to see a page insertion for Management and Maintenance. This is very welcome and makes the clear connection between form	As SUDs will need to be integral part of the design of streets and open spaces it's appropriate to emphasise their importance by

Issue	Ref	Consultee	Comments	ABC Response
		Team & Culture and the Environment)	following function, the application of best practice guidance and the strong link between good quality design and the connection to long term maintenance resource and financial implications for the CMO. It also makes the strong need for stakeholder and community engagement throughout the development of assets and facilities which is heartening to see in this document. We feel there should be an inclusion here for SuDS to in the title, given they are so much part of the public realm and can be featured themselves without opens pace. Is this possible?	adding SUDs to main heading on page XIII.
Street Trees	67.	Sally Anne Logan (on behalf of CMO Project Team & Culture and the Environment)	Image use of street trees: p. 28 we welcome the diagram which illustrates the point above, whereby trees have been sculpted to create interest and a sense of character. However, the picture above is of a high street with no trees! It is not a good match. Again there are better examples from elsewhere that could be inserted here to express both the creative opportunity and expressing functional vitality.	A better image of a street café with trees needs to be included on page 28.
	68.		Trees to distinguish areas: p.30 Use trees to create character and distinction between public parks, open space and squares as well as distinction between villages within the development. Trees can be public art in themselves.	Agreed and Code reflects this. This is a key detail to be resolved through early phase masterplans.
	69.	Luke Mockeridge (KCC)	Tree planting concerns p.77: Though not finalised, I have concerns over the tree planting at the site. From looking at the proposal on p.77 the proposed roads and footpaths appear to be very heavily tree lined. Whilst this is nice aesthetically, and falls in line with Ashford Borough Councils proclivities, from a lighting perspective it is completely counter productive and leaves little room for locating columns. It will also have an immeasurable effect on the lighting level and uniformity. The problems associated with tree planting seem to be a constant issue	Understood. This is an early diagram to illustrate density and is not a design solution for the trees or lighting. Clearer concepts for this area are developed under character sections and lighting and trees will be resolved through further discussions with KCC and CMO. A technical note to support the Code will be drawn up with

Table - ABC Response to Consultation Comments

Issue	Ref	Consultee	Comments	ABC Response
			at the majority of the S38 sites I receive from review. The planting seems to be agreed at the planning stage before lighting has been properly consider. This is in contravention to the guidance within the BSEN 5489, which states 'In new streets where trees are to be planted, the lighting should be designed first and the planting sites fixed afterwards'.	KCC,KHS,CMO and ABC. These issues will then be analysed at reserved matters stages.
Highways Maintenance	70.	Will Train (ABC, Health Parking and Community Safety)	As an overriding point, where parking controls are identified as necessary within the development these should be included within the development design from an early stage and their provision co-ordinated with the Highway Authority (and their agents) in order that enforceable controls can be brought into force at the point at which roads become open to the public.	Understood and agreed and early dialogue on street design is key part of the Code.
Parking	71.	Dr & Mrs Frohnsdorff (residents) Chilmington Green	Proposed Cricket Green/Soft play area: No Parking has been allocated for these facilities. A minimum of 25/30 car parking spaces would be required for a cricket match.	P71 of Code states car parking facilities for cricket green will be behind the building. Will be addressed in early phase masterplan and in reserved matters applications.
	72.	Ian Wolverson	Market Square & High Street & Chilmington Square: Apart from chevroned area, what other parking will be provided to attract crowds to this 'vibrant' centre? Parking should be free as in other out of town retail areas.	Has been provisionally considered in original masterplan and outline application. More detailed assessment needed as detailed plans emerge for district centre and at first stage masterplan.
	73.		Recreational parking: The Cricket Green has similar problems- where there is no parking provision indicated.	P71 of Code states car parking facilities for cricket green will be behind the building. Will be addressed in early phase masterplan and reserved matters applications.

Issue	Ref	Consultee	Comments	ABC Response
Parking	74.		Parking allocation (p. 228): 3+ bed house with 2 spaces is the absolute minimum.	<p>The standards listed here will need to reflect ABC’s Residential Parking Standards and Policies set out in draft Local Plan. The Design Code will need to include the following in the table on page 228;</p> <p><i>Residential parking requirements for Chilmington this will be ;</i></p> <p><u>Central Areas</u> <i>Minimum of 1 space per residential unit on average, and to be provided on-site.</i></p> <p><u>Residential Areas</u> <i>Minimum of;</i></p> <ul style="list-style-type: none"> • <i>1 BED FLAT OR HOUSE - 1 SPACE PER UNIT</i> • <i>2 BED FLAT OR HOUSE - 2 SPACES PER UNIT</i> • <i>3 BED DWELLING - 2 SPACES PER UNIT</i> • <i>4 BED HOUSE – 3 SPACES PER UNIT</i> <p>Visitor parking requirements will not change. NB below table on page 228 needs to remain in Code.</p>
	75.	John Durrant, (resident),	Recreational parking facilities: No mention is made of how many car parking spaces will be made available for the Cricket Ground or the Super Play Area ow how it is to be accessed?	Will be addressed in early phase masterplan. P71 of Code states car parking facilities for cricket green will be behind the building.
	76.	Karen Hopkins,	Insufficient parking provision for school : Chilmington is	Not a role for Design Code to

Table - ABC Response to Consultation Comments

Issue	Ref	Consultee	Comments	ABC Response
<p>Parking</p>		<p>(resident), Chilmington Green.</p>	<p>promoted as an ‘exemplar development’, but with an entire lack of parking provision for schools will mean result in more similar chaos and gridlock as evident daily at John Wesley/Great Chart Primary Schools. These two schools were planned at the inception of their housing scheme, but poor planning at the outset now traps residents twice a day due to severe congestion. Many objections were raised over further expansion including plans for 60 more homes because of this major flaw, yet both appear approved. Reckless planning creates misery for residents Get it RIGHT at CG. Once the first school is ready sufficient parking MUST be available for drop off/collection. Once again will ABC/Developers fail to provide adequate parking at key points in CG- District Centre/Schools?</p>	<p>resolve. Original masterplan and outline application have looked at car parking levels for schools in broad terms. Detail to be refined at next stage masterplans and reserved matters stages in liaison with Local Education Authority.</p>
	77.		<p>Recreational parking facilities: Also other community facilities ie. Cricket Green does not show ANY parking for visitors or users.</p>	<p>Parking for cricket green will be behind the building.</p>
	78.	<p>Will Train, (ABC, Health, Parking and Community Safety)</p>	<p>Formalised parking scheme: Need for marked parking controls to formalise parking behaviour at many points through the development. Whilst the possibility exists that yellow lines can be dispensed with in certain areas of the development through the implementation of restricted parking zones (As seen in the Ashford Shared Space), such zones require that all areas of the street are subject to a formalised parking scheme- even if no conditions of use are applied to parking areas. As such, parking spaces would have to be marked out in all areas where enforcement as an alternative to yellow lines marking prohibited waiting areas.</p>	<p>Understood. Will be addressed through a technical protocol to follow on from the Design Code to handle parking controls systematically. Will be discussed with Kent Highways, ABC and CMO. Fine detail will be refined through reserved matters applications.</p>

Issue	Ref	Consultee	Comments	ABC Response
Parking	79.	Will Train, (ABC, Health, Parking and Community Safety)	District centre parking demand: Regarding point 17 of the 'Quality Charter' (a varied, memorable place that residents are proud of), the district centre must be adequately provided for in respect of parking in order to cater for the varied functions it is envisaged to fulfil. It will be necessary for the public facilities and residential elements in these areas to have a sufficient on-plot parking to accommodate demand; however the imposition of parking controls may be required to facilitate vehicle movement and prevent the likelihood of danger to road users from arising within high-traffic areas.	Detail to be refined at next stage masterplans and reserved matters stages.
	80.		Retain land long-term for parking: Regarding point 22 of the 'Quality Charter' (a flexible layout with space to accommodate changing future needs), parking demand within the development will only increase as development progresses. Consideration should be given to the long-term or permanent retention of 'spare land' put into temporary use for parking if it is not developed within a set timeframe. This will allow for the development to adapt to increase parking demand as phases are built out and retain a baseline of parking provision. Consideration should also be given to stipulating that undeveloped land within built out phases be committed in the first instance as an off-street parking resource to alleviate parking pressures which may arise within a development phase.	Noted. Not a detailed issue for Design Code to resolve. Detail to be refined at next stage masterplans and reserved matters stages.
	81.		Employee/staff parking: Ensure that an appropriate level of staff and customer parking provision is included in the development.	Noted. Not a detailed issue for Design Code to resolve. Detail to be refined at next stage masterplans and reserved matters stages.
	82.		Under provision: Regarding point 32 of the 'Quality Charter' (Taking stock and learning from completed phases before	Not a detailed issue for Design Code to resolve. Detail to be refined at the relevant phased

Issue	Ref	Consultee	Comments	ABC Response
Parking		Will Train, (ABC, Health, Parking and Community Safety)	moving on), phases of the development should not be viewed in isolation from each other with regard to the generation of parking demand. An under provision of parking within one phase of the development must be both avoided within a subsequent phase both through imposing a higher parking standard and compensated for by providing an additional off-street parking resource or additional on-street parking on roads which maintain at least 6 metre width of carriageway for vehicle movement.	masterplans and reserved matters stages. On street parking is crucial to all streets however wide.
	83.		District centre (Design code part B, p. 28): the streets surrounding the District Centre and Market Square will require the imposition of parking controls in order to ensure a suitable turnover of any on-street parking spaces within the street design and prohibit instances of obstructive and dangerous parking.	A detailed issue beyond the scope of Design Codes. Discussion with KHS, ABC and CMO seeking to agree on the need for a technical protocol for all parking control points after. Issues then to be refined in phased masterplans and reserved matters stages.
	84.		Chilmington Rise parking controls: The urban structure of Chilmington Rise (design code Part B, p. 29) described in paragraphs 3 and 4 will likely require the imposition of parking controls at junctions and bends in order to prevent obstructive parking and facilitate the free movement of vehicles (particularly large vehicles) within a high density, orthogonal street layout. The use of orthogonal street layouts within some local housing developments in recent years have shown that uncontrolled on-street parking in such a street layout can give rise to congestion and obstruction of traffic flows. A suitable parking provision which reflects the suburban location of the development should be stipulated for all dwellings.	
	85.		Orchard Village, parking controls: The centre of Orchard Village (design code Part B, p.31, para. 3) may require the imposition of parking controls in order to ensure a suitable turnover of any on-street parking spaces within the street	A detailed issue beyond the scope of Design Codes. Discussion with KHS, ABC and CMO seeking to agree on the

Table - ABC Response to Consultation Comments

Issue	Ref	Consultee	Comments	ABC Response
<p>Parking</p>		<p>Will Train, (ABC, Health, Parking and Community Safety)</p>	<p>design and prohibit instances of obstructive and dangerous parking. These controls should be included in the street design and their consultation/ introduction co-ordinated with the Highway Authority (and their agents) in order that enforceable controls can be brought into force at the point at which roads become open to the public.</p>	<p>need for a technical protocol for all parking control points after. Issues then to be refined in phased masterplans and reserved matters stages.</p>
	86.		<p>Orchard Village: The defined higher density housing area, within Orchard Village (design code Part B, p. 32, para 4) will likely give rise to a significant on-street parking demand. This will necessitate the imposition of parking controls in area where road user safety will be compromised, and such controls should be included in the street design and their consultation/introduction co-ordinated with the Highway Authority (and their agents) in order that enforceable controls can be brought into force at the point at which roads become open to the public. Where possible, front gardens should be set to a minimum depth of 4.8 metres throughout in order to allow for the potential future conversion to driveway space.</p>	
	87.		<p>Chilmington Brook Centre: The urban form of the Chilmington Brook local centre (design code part B, page 36, paragraph 2) may require the imposition of parking controls to prohibit instances of obstructive and dangerous parking. These controls should be included in the street design and their consultation/introduction co-ordinated with the Highway Authority (and their agents) in order that enforceable controls can be brought into force at the point at which roads become open to the public.</p>	<p>Not a detailed issue for Design Code to resolve. Detail to be refined at the relevant phased masterplans and reserved matters stages.</p>
	88.		<p>The sports hub at Discovery Park (design code Part B, p. 36, para. 4): Will need to provide sufficient off-street parking to accommodate a potentially high number of users, and surrounding streets may require the imposition</p>	<p>A detailed issue beyond the scope of Design Codes. Discussion with KHS, ABC and CMO seeking to agree on the</p>

Table - ABC Response to Consultation Comments

Issue	Ref	Consultee	Comments	ABC Response
<p>Parking</p>		<p>Will Train, (ABC, Health, Parking and Community Safety)</p>	<p>of parking controls to prohibit instances of obstructive and dangerous parking. These controls should be included in the street design and their consultation/introduction co-ordinated with the Highway Authority (And their agents) in order that enforceable controls can be brought into force at the point at which roads become open to the public.</p>	<p>need for a technical protocol for all parking control points after. Issues then to be refined in phased masterplans and reserved matters stages.</p>
	89.		<p>The Cricket Green (design code Part B, p. 38, para 3): Will likely generate a number of additional vehicle trips and a higher parking demand which should either be accommodated within a suitable off-street parking facility or on-street within a suitably wide street frontage to facilitate vehicle movement. The imposition of parking controls to prohibit instances of obstructive and dangerous parking in surrounding streets may be required. These controls should be included in the street design and their consultation/introduction co-ordinated within the Highway Authority (and their agents) in order that enforceable controls can be brought into force at the point at which roads become open to the public.</p>	
	90.		<p>The Hamlet parking: The urban form for The Hamlet (Design code part B, p. 38, para 5-6) should avoid the use of parking to the rear of plots within higher density areas such as rows of cottages. The use of parking facilities situated to the rear of properties have been widely underused within some local housing developments in recent years in preference to parking on-street to the front of properties. If such parking occurs the imposition of parking controls may be required.</p>	
	91.		<p>Mixed use with residential: The use of parking facilities situated to the rear of properties have been widely underused within some local housing developments in recent years in preference to parking on-street to the front</p>	

Table - ABC Response to Consultation Comments

Issue	Ref	Consultee	Comments	ABC Response
Parking		Will Train, (ABC, Health, Parking and Community Safety)	of properties. Within this area on-street parking is likely to occur and the imposition of parking controls will be required to provide a suitable turnover of spaces to support trade and prohibit obstructive and dangerous parking practices.	Residential Parking standards and policies set out in draft Local Plan, and guidance in Residential Parking SPD or its replacement.
	92.		Formal Urban: Allocated parking for residents will only be feasible within off-highway parking area. The imposition of parking controls will likely be required within adjoining streets to prohibit obstructive and dangerous parking practices and facilitate vehicle movement.	
	93.		Medium Density Urban: Allocated parking for residents will only be feasible within off-highway parking area. The imposition of parking controls will likely be required on approach and distributor streets to prohibit obstructive and dangerous parking practices and facilitate vehicle movement.	
	94.		Medium Density Suburban: The imposition of parking controls may be required on arterial streets to prohibit obstructive and dangerous parking practices and to facilitate vehicle movement.	
	95.		Low Density Suburban, The Hamlet, Rural Edge: It is unlikely that parking controls will be required in these areas provided that a suitable level of parking provision is adhered to.	
	96.		Definition of parking areas: Several local housing developments in recent years have shown that point 10.0.5 (p.104) is incorrect with regard to design cues providing an obvious indicator of acceptable areas for parking and pedestrian movement, and clear delineation through lining or highly contrasted surfacing to replicate lining should be used to define suitable and unsuitable parking areas.	Designs to resolve this parking issue will be explored as part of early phase masterplans and reserved matters applications.
	97.		Parking typology P5 (p. 202): Rear of plot parking will	The Code will reflect ABC's

Table - ABC Response to Consultation Comments

Issue	Ref	Consultee	Comments	ABC Response
Parking		Will Train, (ABC, Health, Parking and Community Safety)	likely give rise to a preference toward on- street parking as described at paragraph 24 (7.1) above. The imposition of parking controls on property frontage access roads may be required to prohibit obstructive and dangerous parking practices and encourage use of any rear of plot parking facilities.	Residential Parking standards and policies set out in draft Local Plan, and guidance in Residential Parking SPD or its replacement.
	98.		Parking typology P7 (rear parking courts, p. 203): Will likely give rise to a preference toward on-street parking as described at paragraph 24 (7.1) above. The imposition of parking controls on property frontage access roads may be required to prohibit obstructive and dangerous parking practices and encourage use of a rear of plot parking facilities.	
	99.		Parking typology P9 (Detached car barns, p. 203): Use of detached barns will likely fall as the distance from the main property increases, giving rise to a preference for on-street parking. The imposition of parking controls on property frontage access roads may be required to prohibit obstructive and dangerous parking practices and encourage use of allocated car barns/garages.	
	100.		Parking typology P10 (on-street visitor parking, p. 204): On-street parking will be used by residents in preference to rear of plot or remote parking facilities (as described above at paragraphs 34-36). In such circumstances parking controls will be necessary to enable a turnover of spaces to accommodate a visitor parking demand. Such controls should be imposed from the earliest build stages.	
	101.		Suburban location parking standards: Regarding car parking standard, the only public transport service development will be a singular bus route. Due to the distance between the development and the closest transport interchange/principal long distance transport	The Code includes reference to ABC's Residential Parking Standards and Policies set out in draft Local Plan. The Design Code will include an updated

Issue	Ref	Consultee	Comments	ABC Response
			mode, the development as a whole should be subject to a 'suburban location' parking standard in accordance with the Ashford Borough Council residential parking SPD.	table on page 228 to reflect the new ' <u>minimum</u> ' standards for Central Area and Suburban Area parking requirements. (see <i>earlier parking points discussion above comment ref - 74</i>)
	102.		Regarding the plot layout rules on car parking (p. 220), the imposition of parking control will be required to ensure that streets are not used for resident parking in preference to rear of plot and set back parking. The removal of cars from the street scene and property frontage will only be achievable through the imposition of parking controls.	The Code like the original masterplan and outline application, reflect ABC's Residential Parking SPD.
BUILDING & PLOT ISSUES				
Building Uses	103.	Karen Hopkins, (resident), Chilmington Green.	District Centre: assumptions that commercial space will be utilised are unproven- no supporting evidence in other recent Ashford Developments.	Comment noted but not an issue that Design Code can address.
	104.		Consumer Demand: "Includes both shops and office space" – there are several issues associated with this idea: Firstly, any provision of retail outlets will be commercially driven and outside control of ABC or the Developers. There is a decline in Ashford Town Centre, with many retail units unoccupied, including in the flagship County Square, and Park Mall remains desolate. It is hard to envisage an estate on the outskirts of Ashford attracting business of any size to fulfil the promised employment opportunities and thus meet the 'key element' requirement for a 'sustainable community'. Secondly, even if the promised 1000 job opportunities materialise this seems woefully inadequate when 5750 houses are planned, and any jobs may not necessarily be offered to local residents. The development will become a 'commuter estate', adding more vehicles to the road with its practical and environmental implications	Understood. These issues are wider points on the development proposed and not a detailed issue for Design Code to resolve. Original masterplan is flexible and will not in itself prevent commercial units or land reserved for this use, converting to residential use. This issue will be discussed in response to market demand and as development evolves through evolution of relevant phase masterplans.

Table - ABC Response to Consultation Comments

Issue	Ref	Consultee	Comments	ABC Response
			<p>and destroying all sense of ‘community’. Thirdly, if there is no interest by the commercial sector in these units, how likely is it they will revert to more housing? This could also be true for other planned amenities that lie outside the Council or the Developers control, such as schools, surgeries, cricket pitches, badminton courts etc.</p>	
<p>Affordable Homes</p>	<p>105.</p>	<p>Jennifer Shaw (ABC housing strategy manager)</p>	<p>Proximity to services: It would be expected that the affordable housing provided in any phase meets the same high standard design criteria as those set out in the design code, to be visually indistinguishable from the open market homes and is integrated with residential area which will contribute to the sense of community that is strived for. The affordable housing should be located within easy access of services and facilities including transport hubs. Any affordable homes should meet the standards expected (or higher) across the development for energy efficiency.</p>	<p>The Code does not stipulate any difference between market or affordable housing design as design expectations are the same.</p>
<p>Heritage/ Archaeology Issues</p>	<p>106.</p>	<p>Dr & Mrs Frohnsdorff (residents) Chilmington Green</p>	<p>Old Chilmington Moat: Our home, Old Chilmington is a medieval property which is 2-star listed. It is mentioned by Hasted in his ‘History of Kent’ and is described in the Royal Commission on medieval houses in Kent, the subject of a report by English Heritage. It was formerly the home of Sir Roger Twysden MP. There is a moat in the grounds containing many species of wildlife. Your plans show that you intend to build up to the boundary hedges of our property which we feel is inappropriate and insensitive to a building of such historic importance. You state on page 11 “the relationship of the new development to the hamlet will be carefully considered to provide an appropriate setting for the listed buildings”. Yet your diagrams show the intention of building close to Old Chilmington. When this proposed development was first mooted an archaeological buffer zone was shown around</p>	<p>Understood. As more detailed design work is carried out at 1st stage masterplan and reserved matters the development will need to respect the setting of this important building, in consultation with local stakeholders.</p>

Issue	Ref	Consultee	Comments	ABC Response
Heritage/ Archaeology Issues			the hamlet. Now there is none why? Boy's Hall in Willesborough and Singleton Manor have both been given space around them- will not Old Chilmington?	
	107.		Farm buildings: No mention is made in the design code of the existing farm buildings in the hamlet. Presumably they will be demolished (except the listed one)?	Detail to be refined at first phase masterplan and reserved matters applications.
	108.	John Durrant (resident), , Chilmington Green	Protection of Hamlet: We believe that the Design Code, as far as the Hamlet is concerned, is unrealistic and unachievable in its present form by ignoring the fact that there will be a vast number of extra cars. The Hamlet is of historic nature, contains many listed buildings and needs better protection.	Any pressures will need to be managed and issues of car parking to be refined in detail in first phase masterplan and reserved matters applications.
	109.	Wendy Rogers (KCC, Senior Archaeology Officer)	Initial lack of historical inclusion: It is disappointing that in the initial setting out of the principles of the Design Code there is virtually no mention of the historic environment. The heritage of this area could contribute in a positive and significant way to the quality and sustainability of Chilmington Green and this need to be recognised in the principles. Where the principles highlight the need for creating a sense of place and achieving a high quality environment, especially for the public realm, heritage is a fundamental tool for achieving this and could be highlighted more clearly in these opening sections.	This is an important point but there are significant references made to the historic and archaeological features of this area, including buildings, landscape, routes and social history in opening pages 7, The Vision on p15, and in each character area principle from page 23-42. However a reference will be added to page Xiii at end of bullet point 5 to read ‘... and local heritage assets will also play an important role in achieving quality and creating local distinctiveness’. Clearly this important context will need to inform the next
110.	Wendy Rogers (KCC, Senior Archaeology Officer)	Local heritage + community: Para 20 mentions the careful use of trees. Should there not be a corresponding mention of the use of local heritage to contribute to the distinctive character of the key area; to contribute to the quality of each place; to provide key tools for community facilities and activities. Interest in heritage binds communities and		

Issue	Ref	Consultee	Comments	ABC Response
Heritage/ Archaeology Issues		Wendy Rogers (KCC, Senior Archaeology Officer)	gives depth to a home and village centre especially.	stages of phase masterplans and reserved matter applications through heritage statements and contextual analysis.
	111.		Extend consideration of the historic environment: The Design Code needs to provide more clarity on the care and consideration of the historic environment as a guiding principle as well as the positive use of the historic environment in each phase of the new development. Page Xi. Highlights “Development which enhances the natural environment” and so there should be a paragraph on how “Development conserved important heritage assets in a manner appropriate to their significance and carefully integrated the old with the new”.	
	112.		Integrate history in environment: Although the historic environment may not necessarily be a stated principle with the Quality Charter and principles of Garden Cities (p. xii) it should be for Chilmington Green. This particular Garden City could be specially distinctive by clearly stating the aspiration to positively integrate the new development with the historic environment as a broad standard.	The Code is simply summarising what is in these background documents. The Design Code for Chilmington Green helpfully emphasises the importance of the natural features of the site and its heritage assets in pages 7, 15, and 23-42. Further reference will also be added as highlighted.
	113.		Although the opening sections of the Design Code do not clearly and strongly encourage consideration of the historic environment, the details of the Design Code, especially the Character Areas, does clearly encourage use of the local heritage. This is a very welcome approach and should ensure the heritage can contribute positively to the quality	Understood

Issue	Ref	Consultee	Comments	ABC Response
Heritage/ Archaeology Issues			and sustainability of the Chilmington Green development.	
	114.		Highlight heritage: I welcome the section on Heritage and Archaeology on page 7. I particularly welcome the mention of the Roman roads and the consideration of the Ashford Airfield and the alignment of the airstrip in the proposed layout of streets. However, I would encourage mention of the nationally important Iron Age funerary site at Brisley Farm, including the warrior burials. Furthermore, can this section also mention that the Roman road alignments are also reflected in the layout of footpaths towards Stubbs Cross Wood. Such positive heritage measures need to be highlighted.	The important heritage assets need greater emphasis. The following text should be added to Heritage & Archaeology section after paragraph 1 on page 7; <i>‘The alignment of this Roman road is also reflected in the layout of footpaths towards Stubbs Cross Wood. The Iron Age funerary site at Brisley Farm including the warrior burials are also important heritage assets.’</i>
	115.		Heritage Protection: I welcome the reference to <i>heritage protection</i> in CS5 policy context (c) setting out core aims (2 Context 2.3 policy context p. 9)	Understood.
	116.		In note the reference in section 3.2 Vision for Chilmington Green (p. 15; 3 Masterplan) that it will be a place which – <i>respects and integrates heritage buildings, landscape features and wildlife habitats as part of a well planned layout;</i>	Understood.

Issue	Ref	Consultee	Comments	ABC Response
Heritage/ Archaeology Issues	117.		Heritage guidance: Although the historic environment is not highlighted sufficiently in my view as a key issue in the opening principle section, the rest of the Design Code clearly encourages consideration of the local heritage assets: historic buildings, historic landscapes and archaeological sites. I would like to encourage robust consideration of this heritage guidance throughout the decision making process of each planning application to ensure this positive heritage approach is implemented throughout the scheme, even through to legacy community activity .	The Heritage & Archaeological context will inform the next stages of phase masterplans and reserved matter applications.
	118.	Bill Barrett (Singleton South Ward Councillor)	p. 31 Street Names: Orchard Village should have at least one road named Roman road to reflect the historical heritage straight Roman road towards London has around the local village of Stubbs Cross.	Understood and agreed that the street naming process can play a key role in creating a sense of place to a new development and an opportunity to share and celebrate the heritage of the site. The street naming process is yet to be decided but the CMO could potentially play a role here. The CMO will also be a consultee.
	119.	Wendy Rogers (KCC, Senior Archaeological Officer)	Public Realm no mention of heritage Page Xiii: The historic environment and local heritage assets can be major contributors to the distinctiveness and quality of the public realm and community facilities. Point 5 mentions the ambition to create a strong sense of place and community but this can only be achieved sustainably if use of the local historic environment is embedded as a core principle.	Although this is the Maintenance & Management section, a reference will be added to page Xiii at end of end of bullet point 5 to read <i>'... and local heritage assets will also play an important role in achieving quality and creating local distinctiveness'</i>.

Issue	Ref	Consultee	Comments	ABC Response
	120.	Susan Good (resident) Chilmington Green,	My immediate and most serious concern about the Chilmington Green development is the preservation of the hamlet itself. The hamlet is mentioned in documents in 792 and contains several listed buildings and a medieval moat. My property is "Twysden", a Grade 2 listed house attached to "Old Chilmington", a rare Grade 2* listed property. Only 5.5% of listed buildings are Grade 2*. Both Twysden & Old Chilmington date back at least 500 years.	Agreed and understood. A reference will be added to page Xiii at end of end of bullet point 5 to read ‘... and local heritage assets will also play an important role in achieving quality and creating local distinctiveness’. The setting of these buildings and wider Heritage & Archaeological context will also sensitively inform the next stages of phase masterplans and reserved matter applications.
	121.		We know that the medieval moat runs down the side of 'Little Netters', continues under the unnamed lane, beneath the footpath next to the Great Chilmington farm buildings and into Old Chilmington. This water course could be a feature of the green cordon.	The local context needs to be analysed as part of the next stages of phase masterplans and reserved matter applications, to help inform the detailed design.
Scale of Buildings	122.	Ian Wolverson	District Centre floors (p.28 &45): Flexible ground floors. Will the centre be built as a result of demand for such spaces? If not, how will the quantity of Market Square 4m floor to floor height be calculated/justified.	The evolution of the district centre is important and a separate workstream will progress this with ABC and CMO leading rather than the Code. The CMO would clearly welcome a place at the table when discussing the evolution of the district centre as it is a key destination and focal point within the development. The CMO will be a consultee at master planning and Reserved Matters stage alongside others.

Issue	Ref	Consultee	Comments	ABC Response
<p>Scale of Buildings (cont)</p>	123.	Ian Wolverson	<p>Building height on ridge: Worried that the building in this drawing is shown as three stories. Surely as buildings rise towards the ridge the height should be restricted- to maintain as much of the visual wooded ridge-line as possible. An essential edge condition here. This also needs to be re-considered in 12.9.(Discovery Park) and 12.15(Green Corridor)as well. They do not comply with Policy 2.3 (c).</p>	<p>Masterplan and Code stipulate that Great Chart Ridge edge is defined by 3 storey properties with a well-designed roofscape and landscaping. It will be set well back from ridge. Important to have this subtle extra scale onto most prominent green spaces to enclose edge and in keeping with Policy 2.3(c) p9, and is thus considered to be an acceptable scale.</p>
	124.	Karen Hopkins, (residents), Chilmington Green	<p>Surrounding building heights: There is no mention of <u>any</u> other properties in Chilmington Green, many are single storey and spread around the area. What measures are being made to compensate for loss of seclusion, or disturbance of lifestyle for duration of the build and beyond? The diagram on p. 28 shows our property, The Gables, in relation to the proposed district centre and Chilmington gardens. Chilmington Gardens will be immediately behind our single storey house. We consider the fact buildings of this height immediately adjacent to our property will have a detrimental effect on our environment and seriously blight our life. Our garden and home will be overlooked 24/7 and the associated noise and disruption will be immense. Also, maintenance of our boundary will be limited by implementing these plans.</p>	<p>Original masterplan and outline application have looked at indicative layout. The Design Code emphasises the importance of the local context informing the next stages of phase masterplans and reserved matter applications. Detailed relationships to existing homes and buildings will be considered then.</p>
<p>Materials</p>	125.	Ian Wolverson	<p>Paving: Check private paths and driveways for types of paving stones. Should they not- as far as possible- also be permeable?</p>	<p>Permeable surfaces are important in streets lane and private drives and paths. The following text should be added to page 109 (section 10.0.10) after final 6th paragraph ‘Private driveways and private pathways</p>

Issue	Ref	Consultee	Comments	ABC Response
Materials				<i>should ideally be constructed of permeable surfaces.'</i>
	126.		Painting: Painting timber. Evidence from ABC visits suggest painters do not know how to do this. We should specify all painted items to have primer, undercoat and a specified number of top coats etc. The same applies to standards on metal coatings. A subject for deeper discussion with developers.	Agreed and understood but beyond planning control. We will need to work closely with developers to address this..
	127.	Katie Stewart (Director of Environment, Planning and Enforcement)	Slab paving: Should not be used where vehicular overrun can occur	Text highlighting the importance of strengthened sub-base structure to be added to page 26 or 104.
	128.		Granite Setts: Should not be used in vast areas (due to maintenance issues regarding re-bedding which can create lengthy road closures due to the time taken for the concrete bed to set).	The public realm materials section includes high quality and standard KHS materials to enable flexibility for developers should they want very high spec and are willing to pay commuted sums. Previous discussions with Kent Highway Services have been held to address a standard materials palette. We all accept there are practical issues but we agreed to aspire to quality solutions which may at times require more flexible responses from highway authority. A further technical note or protocol is needed to support Design Code which will be drawn up with Kent Highways and CMO. Also further discussions with
	129.		Block paving: Weinerberger Foru and Vandemoortel is not a stock item for KCC and will be difficult to source and maintain and should therefore not be located in an adoptable highway.	
	130.		Fine surfaced asphalt: Clear specification should be provided and the word 'fine' should be removed.	
	131.		Breedon gravel: This is an unbound material and is therefore not acceptable for us within the highway.	
	132.		York Stone: This is not a stocked item for KCC and will therefore be difficult to match when maintenance is required. This should not be used within adoptable areas.	
	133.		Pre-Case concrete kerb: Should be used unless in a Conservation Area as these items will create a commuted sum and is used only for aesthetics.	
	134.		Conservation Edge: Conservation edges will be replaced with Pre-cast Concrete (PCC) and therefore it is	

Table - ABC Response to Consultation Comments

Issue	Ref	Consultee	Comments	ABC Response
Materials	135.	Katie Stewart (Director of Environment, Planning and Enforcement)	recommended that standard PCC should be used.	KHS/ABC/CMO will be arranged at detailed design stage through phased masterplan and reserved matters applications.
	136.		Footway Construction: Remove fine surface asphalt and replace with asphalt concrete and remove conservation trims as this should be standard PCC.	
	137.		Kerb at Pedestrian Crossings: Remove conservation trims.	
	138.		KCC design input: With regard to paragraph 15.1, the County Council recognises that reference is made to the materials palette associated with housing and community facilities within the development. In designing new schools, and within the resource available, KCC's design team will review the design code of the particular development to compliment the surrounding development and enhance its setting. In addition, KCC will strive to provide an economic design solution to meet financial requirements, reflect the County Council's and school's aspirations and encourage distinctive and striking modern design.	This can be covered by agreeing a brief at an early stage with all stakeholders for school designs at Chilmington including KCC, EFA, ABC, CMO and community. The Code through the wording of the Quality Charter stipulates this on page VI.
	139.	Will Train, (ABC, Health, Parking and Community Safety)	Internal fences: The County Council welcomes the proposed inclusion of school boundaries as discussed in page 209 and 2010, in particular internal fences, as this reflects what is used throughout KCC's school designs.	Agreed and understood.
	139.	Will Train, (ABC, Health, Parking and Community Safety)	Surfaces and Parking control: Line 2 of point 10.0.6 should be removed based on likely driver behaviour and the lessons learned from a number of local housing developments in recent years. The 2016 Traffic Signs Regulations and General Directions allows for contrast surfacing to be used to indicate certain parking controls and this can be included as a design option for the development where valid environmental concerns exist over the use of Thermoplastic and Mixed Methyl Acrylate lining. The use of contrast surfacing will support the imposition of parking controls at a design and initial construction phase; however contrasting materials must	Agreed. Remove the second line from para 10.0.6 (page 104)... <i>'With the exception of some parts of the Avenue it should not be necessary to introduce lines.'</i>

Issue	Ref	Consultee	Comments	ABC Response
Materials			provide a clear indicator to road users if enforcement is to be effectively carried out. Line 2 should still be removed in order that traditional line marking can be carried out in the event that any contrast surfacing employed is later deemed unenforceable.	
	140.		Chilmington Gardens: Contrasting surface materials should be employed by developers to ensure that designated cycle routes are visibly separate from vehicle parking areas to discourage ‘echelon’ parking by motorists to accommodate increased numbers of parked vehicles on street. Marked parking controls will likely be required to prevent off-street parking beyond the confines of the in-set bays. Marked bus stop clearways will also be required to prevent obstruction of bus stops by parked vehicles.	No need to change text. This is a detail to work up with KHS at detailed design stages.
	141.	Bill Barrett (Singleton South Ward Councillor)	Play Space material p. 97: Attention should be given to the materials used for “longevity” and ease of maintenance, as often these large project have large ambitions, with expensive play objects which the CMO may find hard or expensive to replace maintain at a later date.	Add to page 95..... ‘All equipment and associated materials in Super Play Areas, Local Play Areas and Naturalistic Play Areas, will need to ensure they are constructed to the best possible specification to ensure their longevity and ease of maintenance.
	142.		Windows palette p.182: In my opinion no wooden windows, cladding or soffitts and cladding should be used anywhere in Chilmington Green. Various colours of UPVC should be used instead. This has a life of 25 years, compared to barely 8 years before the need for redecoration of wood.	Understood. A good variety of window styles listed to offer flexibility. Timber option included as can be preferred by some developers and has sustainability benefits.
	143.		Balconies p.182: No balconies should be made of wood. All in metal. Again, 25 to 40 years useful life, with painting every ten years, as opposed to every 5 years for wood. If	A variety of balcony styles are shown to offer flexibility to developer and to achieve a varied character. The benefits of

Issue	Ref	Consultee	Comments	ABC Response
			wood isn't treated or painted every 5 years it will become materially useless outside in normal UK climate within 15 years or less. (I'm a decorator!)	low maintenance are crucial, but the correct use of timber can be as effective as alternatives and timber can be preferred by some developers. The materials of balconies issues will be discussed at reserved matters stage.
	144.		Weatherboarding p.182: No weatherboarding in wood, UPVC lifespan estimates, 25 to 35 years. Compared to wood. Various areas of CG will degrade in visual quality (thus affecting the visual amenity) if too much wood is used. It has happened at every single housing estate in the past, which is why developers now use UPVC. We don't want to turn the lock backwards by trying to be too artistic. Quality rather than art. Also it puts a heavy maintenance burden on owners of properties going forward.	A variety of weatherboarding and cladding options listed to offer developers flexibility. Timber option included as can be preferred by some developers and house buyers and can have sustainability benefits if well looked after.
	145.		Painting p. 182: As a decorator I would advocate the used of knot black undercoat to be put into the planning proviso for all woodwork to be painted within all residences. This will future proof the interior look of the properties as so many estates I visit this has not been done and I find knots showing through. Whilst this may seem a detail too far, it is actually the "foundation" of all the interior decoration. And if it is done, then the subsequent undercoat and top coat will stay good for many years.	Understood. ABC does not have planning control over timber painting specifications, but this can be discussed with developers as part of quality monitoring regime.
Renewable Energy & sustainability	146.	Ian Wolverson	Photovoltaic equipment (p. 227): New, better panels are available. A subject needing constant updating as models improve.	Understood. Extra image on page 227 to be added to include images of current best practice in photo voltaics.
	147.	Katie Stewart (KCC, Director of Environment,	Sustainable building: In relation to pages 223 to 228, designing for sustainability is integral across the County Council's school development programme. Orientation,	This can be covered by agreeing a brief with all stakeholders for school designs

Issue	Ref	Consultee	Comments	ABC Response
		Planning and Enforcement)	construction materials and detail design are included within the coordinated strategy contributing to the performance, financial sustainability and environmental impact of the building. KCC considers that the designs submitted comply with the Approved Document Part L2A (2013) emissions criteria.	at Chilmington which The Code requires on page IV.
	148.	Jennifer Wilson (Environment Agency)	Water resources: Although the government has now officially withdrawn the Code for Sustainable Homes, we welcome the intention to build homes to its level 4, and to provide water butts to each property. The measures proposed will allow the development to meet the tighter Building Regulations optional requirement of 110 litres/person/day including external use, for which there is a clear local need, arising from the region's being characterised by us as one of serious water stress.	Water resource issues addressed on page 224 Technical Guidance.
Garages	149.	Karen Hopkins, (resident), Chilmington Green.	Garage size: The large majority of vehicles today at 4x4 or MPV- garage space MUST be sufficient length and width to accommodate them. The result of small size garages is they end up being used as a junk room, or are converted into an extension, leading to all cars parked on the street or blocking pavements.	Addressed by ABC's Residential Parking Standards SPD and this supported by Design Code.
	150.	Matt Whitby Guy Holloway Architects & Ian Bull Consultancy LTD, on behalf of client Pentland Homes LTD.	Garages to rear of properties: Setting the garages to the rear boundary line of the property reduces the visual impact of cars on the road by setting back the parking spaces. The additional room created can then be used for the expansion of the garages to include purpose built cycle & refuse storage which further improves both the street scene and reduces the necessity for garden sheds, ensuring continuity in architectural language. The rear of the garage can also become part of the boundary wall improving security and design quality. Although this option is not specifically prohibited by the code it should be	To provide flexibility extra images will be added to page 201 diagram ref P3 and also page 204, diagram ref p11. This will need to mention that this should not impact on garden sizes.

Table - ABC Response to Consultation Comments

Issue	Ref	Consultee	Comments	ABC Response
			incorporated as an additional option/variation.	
Wheelie Bins	151.	Ian Wolverson	Hiding of Wheely-bins (pg. 226):needs to be more strictly define. The illustration on page 226 is fine for bicycles, but non-ventilated units for wheely bins will inevitably cause odours. A brick built unit by the door will probably be converted to hold a washing machine. No instructions on this for the central area where restaurants and shops (commercial premises) can cause problems- this need much firm defining. ABC visits show bins stored in ventilated units parking areas.	Agreed - extra images of best practise high quality residential and retail/commercial bin storage solutions to be added to page 226.
Crime/ Safety	152.	Karen Hopkins, (resident), , Chilmington Green.	Effect on Crime Rate: Will the plans increase or decrease the average crime rate in the area? And how will that be catered for? CCTV, dedicated PCs/PCSO? Any planned traffic measures? Apart from the 20mph limit and staggered roads? Speed cameras, traffic lights?	P228 deals with crime and security issues. Nearly all streets are to be designed well with 20mph speed limits specifically to help ensure environment is safe without need for cameras and traffic lights.
Public Transport	153.	Karen Hopkins, (resident), , Chilmington Green.	Train provision: When planning a town like CG why are there no provisions for a train station? This should be a key element to any proposal, and the development should be created around this feature. Commuters either drive, or take the train- or both. The High Speed rail link to London is already at capacity during peak times. What measures have been taken by developers/ABC 7 rail companies to guarantee delivery of additional rolling stock/increased capacity sufficient to cope with demands cause by thousands of newcomers to the borough? Where are the additional parking facilities for these commuters? (They will <u>not</u> catch the bus!) If you are designing a dormitory garden city, wouldn't the focal point be a railway stations with good links to Ashford town so that the executive and their family can commute. Even the Victorians knew about this, so why	The extension of the railway into Chilmington Green would be prohibitively expensive, but the transport needs of residents have been considered. The plans provide for a fast bus route directly to the train station in the town centre, together with bus tokens upon occupation of dwellings to encourage residents to use the bus. Also provided for are improvements to the A28 to increase capacity and accommodate background growth and the additional traffic generated by Chilmington Green

Issue	Ref	Consultee	Comments	ABC Response
Public Transport			<p>in 2016 is there no mention of train infrastructure in these plans? Please don't try to mitigate and pass the buck by saying this is networks rails' business, it's not- serious talks should be taking place, and these meetings should be documented and minuted as to that the obstacles are. We've seem the buck passing with regard to Park Farm's rail infrastructure, so lets put this on the table and show that a concerted effort has been made not to let Chilmington go the same way as Park Farm.</p>	<p>travelling north towards J9 of the M20.</p>
	154.		<p>Unrealistic usage : Lets be honest here, no executive worth their titles will be bussing it to work! Every executive who buys an executive house will expect to have at least two cars, and they will expect their partner to be able to drive their children to the multitude of schools while they drive to the railway station in their executive electrically powered green company car to get on the executive high speed train and perform their executive job in London. Frankly, they don't care if the bus costs 50p or £5, its not part of their world.</p>	<p>Understood.</p>
	155.	William Train, (ABC, Health, Parking and Community Safety)	<p>Reliability of bus service: Regarding point 28 of the 'Quality Charter' (Quality public transport that can compete with private cars), the appeal of the public transport offer within the development will be heavily affected by the reliability and punctuality of the services provided. The street design for bus routes should account for the need to protect these routes and bus stops from obstruction by parked cars through the imposition of parking controls.</p>	<p>Design Code has fully considered flexible high quality street design to support and balance needs of all users including public transport. Future management of parking and roadspace will be addressed in a technical protocol to support principles of Design Code</p>
	156.	William Train,	<p>Park and Ride: In Part A of the design code (p.10), a park and ride site is shown on the northern periphery of the development, however this is not covered In the phased masterplans shown in pages 11-14. This will likely provide</p>	<p>Page 11-14 include simple diagrams to explain evolution of concepts rather than forming part of masterplan. The Park and</p>

Issue	Ref	Consultee	Comments	ABC Response
<p>Public Transport</p>		<p>(ABC, Health, Parking and Community Safety)</p>	<p>a useful facility for parking in connection with the planned secondary school, and a pedestrian footbridge crossing the A28 should be stipulated in the design for this area to enable this.</p>	<p>Ride land is simply safeguarded in AAP and no implications for Design Code. Options and design issues could be discussed in phased masterplans and reserved matter applications if P&R was to come forward.</p>
	157.		<p>Bus siting: In Part A of the design code (p.13,bullet 8) it is noted that ‘A bus will follow a circular route so that all homes are within a 5-8 minute walk of a bus stop’. Walking times will be heavily subjective based on user, and so should not be used as a measure for siting bus stops. Bus stops siting should be set in line with the guidance contained in section 6 of the Department for Transport circular ‘Inclusive Mobility’; which suggest that ‘in residential areas bus stops should be located ideally so that nobody in the neighbourhood is required to walk more than 400 metres from their home’. Consideration should also be given, at later phases of the development and subject to sufficient patronage, to the provision of bus services on a ‘hail and ride’ basis on the circular route.</p>	<p>The route of the bus was agreed following discussions with Stagecoach and Kent Highways. The siting of the bus stops will have to have regard to the need to provide a fast route to the town centre but this will be finalised with the providers of the service once it is procured.</p>
	158.		<p>Bus route and stops (10.6, p. 139): Marked bus stop clearways will likely be required in area of high on-street parking demand to prevent obstruction of bus stops by parked vehicles. Bus stop siting should be undertaken in line with the comments at paragraph 12 above. There may also be a need for the imposition of parking controls along the bus route to facilitate vehicle movements and the reliability of the bus service as described in paragraph 7 above.</p>	<p>Discuss with stakeholders as early phase masterplans emerge and at reserved matter application stages.</p>

LANDSCAPE ISSUES

Issue	Ref	Consultee	Comments	ABC Response
<p>Landscaping</p>	159.	<p>Susan Good (resident) Chilmington Green,</p>	<p>I consider a green cordon protecting the hamlet is vital. There should be a protective green band surrounding the hamlet both to protect it and retain its heritage and integrity as the building proposals state as their purpose</p>	<p>As more detailed design work is carried out at first stage Masterplan and Reserved Matters applications the setting of this important building will need to be respected.</p>
	160.		<p>I think it possible that the owners of the land at Great Chilmington and the other spaces in the hamlet not yet included in the building plans will apply for permission to build at a later stage. If such an application took place and was approved this would reduce the green space yet further. Could not these green spaces be part of the creation of a wider and more complete green cordon around the hamlet? We know that the medieval moat runs down the side of ‘Little Netters’, continues under the unnamed lane, beneath the footpath next to the Great Chilmington farm buildings and into Old Chilmington. This water course could be a feature of the green cordon. On such as basis;</p> <ol style="list-style-type: none"> 1.The integrity and heritage of the hamlet are better protected. 2. The interests of the residents of the hamlet are better protected – that is those comparatively few residents whose properties are not owned by either the biggest landowner involved in the development or by one of the developers. 3. Grade 2 and Grade 2* listed buildings are protected. 4. The potential traffic flow is improved. 5. Fewer cars, more bicycles and pedestrians are encouraged. <p>We would like to think that ABC is trying to preserve the hamlet and its spirit. We believe that ABC has a duty towards its aforementioned residents. We consider that</p>	<p>These Hamlet related issues will need to be discussed with stakeholders at first phase masterplan stage and at reserved matter application stages to ensure layout and detailed design responds carefully to the local context and character of the place.</p>

Issue	Ref	Consultee	Comments	ABC Response
			our proposed green cordon will help to protect the hamlet and reduce the impact of the massive building development at Chilmington Green.	
Green Space Maintenance	161.	Ian Wolverson	Maintenance authority (p. 60 & 93): A28 Interchange shows mown pathways and wildflower beds. If this is to be controlled by KCC Highways it will mean the grass is mown at best once a year and the wildflower beds will contain weeds rather than wild flowers- as can quite clearly be seen at Drover’s Roundabout right now. Either a simpler design is required- or far better- the responsibility is removed from KCC. Wild Flower meadows/beds are highly labour intensive and need constant renewal planting/seeding and are therefore very costly. A positive case for the CMO taking over design and maintenance- as had happened with other roundabouts in Ashford eg. Two at the Designer Outlet- to positive effect. Another area taken from KCC highways and landscaping into Ebbsfleet Station- is neat and positive. Same applies to Northern Gateway (p. 93).	KCC/KHS will maintain the A28 highway. The design and materials are expected to be based on KHS’s standard materials palette and maintenance regime. We all accept there are practical issues but we agreed to aspire to quality solutions which may at times require more flexible responses from highway authority. A further technical note or protocol is needed to support Design Code which will be drawn up with Kent Highways and CMO. Also further discussions will be arranged at detailed design stage through phased masterplan and reserved matters applications.
Green Space Maintenance	162.		P89 “ inclusive” and “high quality” environment: What does this actually mean and how will this quality be achieved?	The high quality environment means designing cohesively to address all the issues on page 89 including creating a unique cohesive identity, retain existing landscape features, trees, space, effective drainage to high standards. Inclusive design is explained on page 103 and 228. It refers to the need to design for all able and disabled bodied people. It is a key aim of Design

Issue	Ref	Consultee	Comments	ABC Response
Green Space Maintenance	163.		Care & skill required: Green clutter is even worse than street furniture clutter, as it keeps growing back. Green maintenance is a complex skill, not only horticulturally and ecologically but it also needs to consider many plants' invasive tendencies. We have seen disastrous consequences on ABC site visits.	Code. A robust Management & Maintenance Strategy is a key issue for the Community Management Organisation (CMO) and which will be discussed at master planning and Reserved Matters stages.
	164.	Karen Hopkins, (resident), Chilmington Green.	Maintenance of Trees, shrubs and flowers: While planting trees is a great idea, fallen leaves occur, causing slip hazards. Problems with branches and tree roots ripping up the pavement are all common problems in Ashford. Given the amount of trees in CG, we think that a dedicated professional tree surgeon needs to be allocated from the outset to ensure good tree maintenance as well as a Chilmington Gardener. A good example of how <u>not</u> to maintain street planting can be seen at Park Farm and Britannia Lane which have become a homage to overgrowth, rubbish and weeds.	A robust Management & Maintenance Strategy for trees and landscaping is important to the Community Management Organisation (CMO) and which will be discussed at master planning and Reserved Matters stages.
	165.	Katie Stewart (KCC Director of Environment, Planning and Enforcement)	KCC Maintenance : KCC advised that it would not accept the provision of grass, shrubs, hedges, planting and trees in the adopted highway due to maintenance costs.	This is specifically why a Community Management Organisation will be set up to reduce any burden on KCC/KHS. ABC and KCC agreed in September 2014 that KCC would accept planting on verges where the CMO agrees to take on verge maintenance under licence from KCC. A further technical note or protocol is needed to support Design Code which will be drawn up with Kent Highways and CMO. Also further discussions will be held at

Table - ABC Response to Consultation Comments

Issue	Ref	Consultee	Comments	ABC Response
Green Space Maintenance				detailed design stage through phased masterplan and reserved matters applications.
	166.		Visibility Splays: KCC recommends that all vegetation should be clear of visibility splays, including either side of private driveways.	Streets will be designed to create a high quality environment which carefully balances sight lines and landscaping to create safe vehicle speeds mainly of 20mph.
	167.		Easily maintainable: All vegetation should also be maintainable without the need for having vehicles on the highway.	Understood but this might be difficult to achieve. This should be addressed by a Maintenance Strategy
	168.	SallyAnne Logan (on behalf of CMO Project Team & Culture and Environment)	Over-elaborate design: p.59+60 the success of such proposals at the gateway to the site (or indeed other similar areas of landscaping) will lie in the detail. Careful consideration to the edging of the scheme, density of planting, use of materials and species planted will in turn create an aesthetically pleasing ‘welcome’ and a low maintenance arrangement or the opposite! This is a key principle for both now and to carry through at the detailed masterplanning stage. We feel the A28 gateway is an example of potentially over-elaborate design, when simplicity and clean lines may achieve better impacts.	This is a conceptual design. The detail will be refined as part of early phase masterplans and reserved matters applications with stakeholders and future CMO. Management & Maintenance will be a key consideration alongwith creating a distinctive entrance to the new settlement.
	169.		Quality not quantity: Strong emphasis is placed on the presence of high quality landscaping and tree planting, alongside the architectural form of the buildings. However, we feel as a principle that quality does not always mean quantity, particularly with reference to trees (see p.77+79 [bottom] images as an example of where this does not work). The team are keen to drive home this point and those below in order that there is no illusion at the master planning stage that high density planting will be acceptable	These images illustrate a conceptual design. The detail will be refined as part of early phase masterplans and reserved matters applications with stakeholders and CMO. Its accepted that a best practise balance will be struck between the importance of tree planting and these other practical issues.

Issue	Ref	Consultee	Comments	ABC Response
		SallyAnne Logan (on behalf of CMO Project Team & Culture and Environment)	<p>to either the council or CMO. This is for the following reasons;</p> <ul style="list-style-type: none"> a) Maintenance liabilities and long term cost implications b) The potential detriment to the long term character of the development including practical concerns about the loss of light to those residing in both housing and using community/commercial buildings and may act to make it difficult to appreciate the local architecture (think Letchworth Garden City where very mature and dense tree and shrub planting in several areas acts to cut out much natural light from properties, and where in time decisions have been taken to remove areas of tree planting. c) Then the impacts of high density planting beneath the trees; weed/little grass growth as canopies mature, and difficulties in accessing such areas for maintenance- visually this can be uninviting, as well requiring more intense management. 	<p>Species selection is critical as great trees and landscaping adds considerable value socially and economically to a place as well as the significant environmental benefits they bring.</p> <p>Planting on Highway verges may also be addressed through a technical note to support Design Code</p>
	170.		<p>Use of specific plant species with regards to maintenance: It is accepted that the Consortium and Council will be looking for high impact from the outset and part of delivering on this will be the green infrastructure .What is required at the beginning of the development to set the tone could turn into a long term maintenance headache from the CMO. It is therefore possible to consider two approaches;</p> <ul style="list-style-type: none"> a) Plant species which mix in long term value with those that have a shorter lifespan but that which create a more instant impact. Those with a shorter lifespan will die away within a 20-30 year lifespan, leaving a more mature and acceptable landscape design into the longer term. There is clearly a capital investment impact here in 	<p>This is not something a design code can tackle.</p> <p>A robust Management & Maintenance and Landscape Strategy will address these issues and this should be developed alongside the early phase masterplans and reserved matters applications.</p> <p>Planting on Highway verges may also be addressed through a technical note to support Design Code that seeks to ensure best</p>

Issue	Ref	Consultee	Comments	ABC Response
			<p>the short term and a maintenance implication to take away the trees with a shorter lifespan.</p> <p>b) Plant at a higher density from the outset, knowing that in time some species will die off but in the knowledge that the CMO will remove some planting as the schemes mature. Thus, create a maintenance plan which accepts this principle and account for it in the plan in terms of physical maintenance and the cost associated with this.</p>	<p>practise. This will be produced with input from KHS and CMO.</p>
<p>SUDs</p>	171.	Ian Wolverson	<p>Key SuDS design principles: No indication, other than via the main green routes, that SUDs and the currently shown road layouts work in concert within the contours? The clay oils on the site tend to hold heavy rainfall on the surface. Has this been taken into consideration? Will the SUDs truly 'go with the flow'?</p>	<p>The SUDs on original masterplan and outline application are to some extent indicative and will need to be worked up as part of early phase masterplans and reserved masterplans.</p>
	172.	Ann Davies (ABC. Assistant Street Scene & Open Space Manager)	<p>Integration: Code could have said more about the design of SuDS and their integration with public open space.</p>	<p>SUDs are dealt with sufficiently. A range of flexible and high quality options have been identified but the detail needs to be worked up based on site context with creative landscape solutions, when precisely this sort of detailed, practical consideration will need to be taken into account.</p>
	173.	Karen Hopkins, (resident), Chilmington Green.	<p>Monitoring: SuDS - needs to be regularly kept in check. Many vigorous non-native species are prone to invasive habit. As seen on Park Farm estate- the SuDs are weed chocked with a liberal sprinkling of shopping trolley and household rubbish bags.</p>	<p>Agreed. This is a key issue for Management & Maintenance Strategy rather than Design Code</p>
	174.	Bronwyn Buntine (KCC)	Reference to SuDs Manual should be C753 (p.223)	<p>A change to the text on page 223, is required to replace '(C697)' with '(C753)'.</p>
175.	SuDS design code amendment: Revise the statement		<p>Ref 188 – The SUDs advice on</p>	

Issue	Ref	Consultee	Comments	ABC Response
SUDs		Bronwyn Buntine (KCC)	<p><i>“initial design should assume that infiltration is not feasible from the outset and sufficient space provisions made throughout the development of facilitate the integration of open and green SUDs” p. 223. To perhaps “Feasibility of infiltration should be appropriately assessed to inform design and sufficient space provisions made through the development...”</i></p>	<p>page 223 needs to be revised. The statement; <i>‘initial design should assume that infiltration is not feasible from the outset and sufficient space provisions made throughout the development to facilitate the integration of open and green SUDs’</i> should be replaced with <i>‘Feasibility of infiltration should be appropriately assessed to inform design and sufficient space provisions made through the development...’</i></p>
	176.		<p>p.223.“strategic SUDs”: It is recommended that consideration is given to how individual land parcels are accounted for within the strategic provision. As development occurs this should be accounted against the strategic provision to ensure that when the final phases are delivered that attenuation volumes are still available. This is important as designs go through detailed design changes in impermeable area will impact the attenuated volumes required to be accommodated on-site. A process should be clearly stated within the Design Guide as to how a developer may approach this requirement.</p>	<p>The siting of the SUDS will be determined during each main Area Action Plan Phased Masterplan in consultation with the relevant statutory bodies. It is not a matter for the Design Code.</p>
	177.		<p>KCC has other guidance documents for surface water management in additional to local guidance which will also inform review of surface water drainage proposals. Reference should also be made to the Kent Design Guide.</p>	<p>This section on SUDs and surface water management on page 223 needs to include the following reference under the local guidance list bullet points; <i>‘Kent County Council’s Kent Design Guide section 2.2.7 (p95) and Making It Happen Technical Appendices (section C-</i></p>

Issue	Ref	Consultee	Comments	ABC Response
SUDs				<i>Sustainability).</i> '
	178.	Jennifer Wilson (Environment Agency)	Planting and SuDS: KCC has commissioned a project to investigate planting options for SUDs with research being carried out in the Spring of 2016. The Design Code was prepared before the project commenced but it is suggests that it should now include the guidance that will be produced in the project.	This needs to be addressed in a SUDs Strategy which should be developed alongside the early phase masterplans and reserved matters applications.
	179.		Invasive Species: Great care should be taken to ensure that invasive species are not planted in the SUDs or introduced during planting. The reason being that the spreading of many invasive species in to the wild is an offence under the Wildlife and Countryside Act 1981, as amended.	This needs to be addressed in a future SUDs detailed Strategy
	180.	Katie Stewart (KCC, Director of Environment, Planning and Enforcement)	KCC recommendations: In its response dated 12 April 2016, KCC sustainable drainage set out its recommendations regarding Key Sustainable Urban Drainage Principles (p. 223).	Design Code deals with this on page 223-224.
	181.	SallyAnne Logan (on behalf of CMO Project Team & Culture and Environment)	Open space SuDS: Reference to use of SuDS in the design and function of public open space is welcome in Part B p.67 onwards. It is considered further opportunities could be made to strengthen this principle throughout the development (and the design code) using an approach which defines the SuDS as open space features from the outset, limiting the need for any underground SuDS equipment.	SUDs details needs to be worked up alongside the early phase masterplans and reserved matters applications. The site context, character and function of open spaces needs to be considered with SUDs provision and a creative landscape solution will be required to integrate the two..
182.		Maintenance: Consideration to planting within SuDS features such as Swales, should be carefully considered with regard to maintenance, balancing the requirement for aesthetically pleasing spaces versus challenging maintenance routines and costs. P. 105 draws attention to	This detail will need to be addressed in a future SUDs detailed Strategy and/or Management & Maintenance Strategy	

Issue	Ref	Consultee	Comments	ABC Response
SUDs	183.	SallyAnne Logan	<p>such opportunities and is welcome.</p> <p>Planning of SuDS: The success of the SuDS scheme will be at masterplanning stage where it will be possible to see how the SuDS fit within the wider site ployout. Best practice guidance must be used on this scheme and be in keeping with the latest CIRIA SuDS guidance as well as our own SPD guidance. With the intention of the scheme being clear from the outset we would expect to see very little pipework to deal with the surface water across the site. There is no reason that we should be seeking tanked storage on this site if master planning is undertaken comprehensively and SuDS infrastructure is integrated with green spaces from the outset. Thought should be given to whether our own SPD is robust enough and aligned closely enough with the current best practice guidance to ensure the two documents are not in conflict, but that together they set a premise here innovation, high quality and (wherever possible) over ground features are encouraged.</p>	<p>Agreed. The design of SUDSs need to be addressed in discussions with stakeholders to evolve early stages of each phase masterplan and reserved matter applications.</p>
	184.	Simon Good (resident) Chilmington Green.	<p>Drainage will be a significant concern, given the low lying nature of the site, especially the hamlet. As it is, drainage ditches in the hamlet are overflowing (or close to it) following heavy rain. The massive reduction of agricultural land will reduce the soak anyway.</p>	<p>Agreed. Drainage must be addressed in early stages of each phase masterplan and reserved matter applications.</p>
	185.		<p>Hamlet SuDS ribbon: Wrapping a green and watery SuDS ribbon around the main historic buildings of the hamlet would, I suggest, add to the visual appeal of the setting and allow for a natural pedestrian/ cyclist flow around and through the hamlet. I feel it is important that the hamlet is protected but not totally isolated from the development. This is, I realise, a difficult balance to strike.</p>	<p>Options will be explored in early stages of each phase masterplan layout and reserved matter applications.</p>
	186.		<p>Inserting a watery cordon: Developer's profitability may need to be accommodated but the interests of the existing</p>	

Issue	Ref	Consultee	Comments	ABC Response
SUDs			residents should and must be respected to. A green and watery cordon around the western part of the existing hamlet would significantly alleviate the inevitable objections from residents. I also suggest that it will enhance the development and add value to the developed land.	
	187.	Mark Cobley (resident) Great Chart	Ditch and SuDS Diagram 12.3 and 12.4: There is to be a new balance pond to the south side of the A28, next to the Pig Whistle cottage. However, I believe there is currently a ditch that runs parallel with the A28 to the south side verge, approximately running the length from Singleton Hill to the Pig and Whistle, possibly further. Due to the current groundwater saturation issues around this area, would it not be worthwhile retaining this ditch and incorporating into the new SuDS scheme. It is not currently included in the section diagram for 12.3 but is at point of 12.4. It should also be incorporated in 12.3.	Diagrams are indicative to give an impression of starting point for designs. Solutions will need to be discussed and tested in early stages of each phase masterplan layout and reserved matter applications
Community Sports/ Recreation/ Play areas	188.	Ian Wolverson	Discovery Park funding: "Facilities for all in South Ashford", but will costs be solely borne by CG residents? An oft-repeated question- not yet positively answered. Not a 'design' question as such but how can the design be executed out without prior knowledge of the funding source?	The part of Discovery Park that will meet the needs of the development will be CMO adopted and maintained on behalf of the residents of Chilmington. The developer consortium is only responsible for the delivery of that part of Discovery Park. The remaining areas of Discovery Park will need to be delivered by a third party, most likely the Council and brought forward as timing and funding permits. Funding for the acquisition of this remaining land is expected to come forward through a variety of sources, such as developer

Issue	Ref	Consultee	Comments	ABC Response
Community				contributions, New Homes Bonus or Council Tax.
	189.	John Durrant (resident), Chilmington Green.	Super Play definition: Extent of the term Super Play Area is not defined?	Page 35 and 95 explains how Super Play Areas will be at least 1.5hectares in size; all residents will be within 10 minutes walking distance; they are to be located in a landscape setting along green open space corridors; they will have good pedestrian and cycle links; they should contain equipment for all age groups; and could provide for informal play and recreation. It should also include reference to Roman themes. The Code could provide some further images on this key space.
	190.	Karen Hopkins, (resident), Chilmington Green.	Dog bins: We note that there are plenty of parks and recreation area planned for CG, but no mention of dog bins and how these will be maintained and payed for.	Design Code does mention ideas for dog litter bins in street furniture section p 211. Maintenance and costs an issue to consider in a Maintenance Strategy. The CMO will be responsible for their maintenance where these are part of public open space.
	191.	Katie Stewart (KCC, Director of Environment, Planning & Enforcement)	Allotments: The County Council welcomes the intention to locate allotments adjacent to schools as set out in paragraph 9.10	Understood.
192.	Ian Bull Consultancy LTD,	Lack of non-residential info: Whilst supportive of the draft Design Code in principle, Pentland are concerned that the	I agree this is an important issue. The Design Code predominantly focusses on	

Issue	Ref	Consultee	Comments	ABC Response
Community		on behalf of client Pentland Homes LTD.	code does not include reference to the non-residential elements of the development. The District Centre, neighbourhood centres, schools and the recreational facilities are essential elements in the overall concept of Chilmington Green. Without design guidance there is no confidence that these facilities will accord with the design and layout sought for the residential element of the scheme.	residential schemes. The Code would have become too long and unwieldy with even more coding for relatively few other buildings. The decision was taken to deal with all these community and commercial buildings through specific briefs agreed with stakeholders and potentially new residents and the community. Some broad principles features in p49 and the Code states on page IV that public buildings will be expected to be of excellent quality, designed to an agreed brief, subject to architectural competition where possible, and with strong involvement of the community and the Regional Design Panel in Ashford.
	193.	Wendy Rogers (KCC, Senior Archaeological Officer)	Heritage links at Chilmington Brook: 5.3 Chilmington Brook refers to heritage assets and particularly the Roman character, even for the super play area, which is extremely welcome and should raise awareness, understanding and enjoyment of the rich Roman heritage of this particular area of Ashford.	Understood.
	194.	SallyAnne Logan (on behalf of CMO Project Team & Culture and the Environment)	Allotments: No. 26, same comment as before applies, use of open space for allotment have not been agreed as part of the outline application or subsequent section 106 negotiations, or is necessarily appropriate given the different land uses here.	It is not intended that any allotment land allocation will form part of the open space allocation. Allotments and open space provisions are different uses and therefore will be brought forward independently

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				of each other under different formula. Will be discussed at early stages of each phase masterplan and reserved matter applications.
	195.		Trees and Art: p. 41 Great to see mention of opportunities for public art at Discovery Park.	Understood.
	196.		Discovery Park: No inclusion had been made for the Discovery Park (We made this point before). It is a key destination in the development and equally as significant as others mentioned. Is there a reason it is not included?	In due course further work is required on Discovery Park as a dedicated project alongwith involvement of CMO, ABC and local people. The Discovery Park master planning process will need to carry a key principle to explore and set the principles for the quality of provision, giving clear reference back to how it will deliver on the Design Code principles.
	197.	Simon Good (resident) Chilmington Green	Green Corridor confusion: There seems to be a contradiction in where the Green corridor is to run. Page 12 shows a green cordon curving around Old Chilmington/Twysden Chilmington Oast towards the Cricket Pitch. Whereas the map on pages 12, 24, 37, 75 & 76, 92 imply that houses will be built up on the boundary hedge that surrounds Old Chilmington and Twysden.	Agreed. However these diagrams are indicative to convey broad themes not a precise layout. The detail of any layout will be refined with stakeholders at first phase masterplan discussions and also as the detail for reserved matters applications begins to take shape. The setting of heritage assets will be an important issue.
Ecology/ Wildlife	198.	Ian Wolverson	Wildlife Advice: Much wildlife advice needed generally- also no maintenance at the right times of year. This has to	A critical part of a Maintenance & Management Strategy

Issue	Ref	Consultee	Comments	ABC Response
			be organised at an early stage.	
Landscape Species	199.	Ian Wolverson	Suitability: Species listed do not seem to have taken the poor soil structure or maintenance costs into account, nor in the case of trees, their root patterns. This needs a review.	A flexible provisional starting points for a range of species for a range of soils and conditions has been drawn up. Details to be refined as layouts begin to emerge.
	200.	Jennifer Wilson (Environment Agency)	Native Species: Planting in the Chilmington Green area should only be of native species of local provenance. Contrary to the statement on page 1-5 (“include non-native wetland species” and “non-native species can be used in good measures etc”), aliens such as some of the species suggested, irrespective of the length of time that others have been planting them elsewhere, should not be included in the Design Code or in the development. Section 109 National Planning Policy Framework states that the planning system should contribute to and enhance the natural and local environment by minimising impacts on biodiversity and providing net gains in biodiversity. Planting alien species is contrary to this objective.	Agree with the principle but specimen trees etc may be acceptable as an exception to general rule to create variety. Details on species to be refined as discussions with stakeholders on the detailed layouts begin to take place so that clear Landscape Character Strategies are formulated.
Landscape Species	201.	Katie Stewart (KCC Director of Environment, Planning and Enforcement)	Fruit Trees(p34): The planting of fruit trees in the adopted highway would not be suitable due to slip and trip hazards associated with falling fruit.	Details of suitable species to be refined as layouts and reserved matters applications begin to emerge.
	202.		Herbaceous Borders (p. 53): These would not fit with the current maintenance contract and would self-seed and in turn create weeding problems.	
	203.		Wildflower Meadows (p. 93): These would not fit with the current maintenance contract and would self-seed and in turn create weeding problems.	A comprehensive Landscape Character Strategy needs to be formulated as layouts start to emerge.
	204.		Visibility Splays: In addition, the County Council recommends that all vegetation should be clear of visibility splays, including either side of private driveways.	Landscaping needs to respond to a range of constraints as detailed layout stages come

Issue	Ref	Consultee	Comments	ABC Response
Public Art	205.	Ian Wolverson	Public Realm Public Art: Links to RAF Ashford, agriculture and early pre-history? We have a good deal of material.	<p>forward.</p> <p>Agree that the heritage of the site should be celebrated on the development given the key role it plays in creating a sense of place and ownership for its residents. We will be exploring how heritage can play a role in the delivery of Public Art as part of the work to produce a Public Art Strategy.</p> <p>The Planning Obligation has specific triggers for the provision of public art throughout the development and each Phase Masterplan will be required to show the indicative locations of public art within that phase.</p>
	206.	Wendy Rogers, (KCC, Senior Archaeological Officer)	Advisors needed on historic character of art: I thoroughly applaud the encouragement of using the historic environment to inspire public art, the design of the public realm and community spaces and general character in key areas but reflecting the historic character needs to be appropriately informed and guided by specialist advisors. Guidance on historic character needs to be appropriately informed and guided by specialist advisors. Guidance on historic character for Chilmington Green Garden City should stem from the investigations on Chilmington Green area itself or the neighbouring archaeological discoveries within Ashford, such as Brisley Farm or Westhawk Farm. Inspiration should not be sought from general heritage reference material.	<p>A public art strategy and brief will be required as the first detailed layouts begin to emerge.</p>

Issue	Ref	Consultee	Comments	ABC Response
Public Art	207.	SallyAnne Logan (on behalf of CMO Project Team & Culture and the Environment)	Turning landscape into Public Art: It is great to see reference to Public Art on p.27 (and throughout the document) and the connection between the importance of celebrating the heritage of the site and how this can be achieved through Public Art. Could greater connection be made (throughout the whole document) to the opportunity to landscape key destinations within the site (Market Square for eg) in a way which allows the landscaping to be a Public Art feature in itself? There is a prime opportunity here to make good use of budgets and create design features that change through the seasons and which works with the proposed landscape features. We would like to promote this principle from the outset. There many examples the Design Code could draw on to illustrate this point. An explanation of 'who and how' public art is delivered should also be added to emphasise the requirement for a professional artist or artists in this context.	Public art is mentioned regularly in character area vision sections. Fully agree Chilmington needs to deliver such interesting, fresh and innovative approaches to Public Art . However rather than be spatially specific within the Design Code a Chilmington Art Strategy promoting the production of specific art briefs for early phase masterplans should then help inform the first discussions with stakeholders about the detailed reserved matters layouts that emerge.
Flooding	208.	John Durrant, (resident), Chilmington Green	Existing buildings: The code makes no mention for protection of flooding of existing dwellings. As owners of Chilmington Cottage that is of particular concern. During times of high rainfall, our grounds flood due to a high water table and the existence of springs all of which drain into a large pond. The only thing that stops our dwelling from flooding is a large overflow pipe which passes under Bartlets Lane, which drains into existing ditches and land drains in the surrounding fields. It is unlikely that this pipe, is shown on any map. It is likely that developers will put in their own drainage system to serve their needs, destroying the existing system which would be regarded as redundant. We consider that we have in legal term an easement over adjoining land which should be recognised	Details on surface water and drainage will be refined as discussions with stakeholders on the masterplan and reserved matters detailed layouts begin to take place so that a clear strategy is formulated.

Issue	Ref	Consultee	Comments	ABC Response
	209.	Jennifer Wilson (Environment Agency)	in the Code Groundwater: The submitted document provides no additional information regarding ground conditions or risks to groundwater to what has already been reviewed and commented on through planning application 12/00400/AS. Therefore, we have no comments.	Details on drainage will be discussed as detailed layouts begin to come forward.
	210.	Mr Robert Thompson (resident), Great Chart	Threat to existing residents: Whilst it is pleasing to see that emphasis is being placed on the provision of high quality SUDS, the possibility of flooding is of considerable concern to existing residents. As is noted, there is low filtration. The water table is frequently at or very close to ground level. It would be good to see more meaningful and tangible expectations regarding this development. For example, where any ground levels within a certain distance of the development (50 metres?) are lower than the development site, we would welcome a requirement within the planning application for those area to be identified, together with consideration of the risk of increased chance of flooding in those areas and how this will be prevented.	Prior to any development commencing within any of the Main AAP Phases, the developers will be required to have had approved a SUDS Strategy for that Phase. Each application for the approval of Reserved Matters shall require detailed SUDs plans and no development within that site shall be commenced until the SUDs scheme has been approved.
Miscellaneous Issues	211.	Ian Wolverson	Design Code: The suggested period for review of The Design Code is too infrequent. Every 2 years is a good minimum and even then a regular review of any timing agreed will be needed to see if that timing is correct.	We will monitor the situation to see how the code is working and keep that under review on the basis of experience. Its crucially important that we stay on top of design issues.
	212.	Karen Hopkins, (resident), Chilmington Green	Employment: Major construction companies retain employees and contractors and move them around the UK as needed for large scale developments. A handful of local's are hired for labouring etc. Local companies may get to tender for work, but cannot compete with work rates offered by the multi-nationals. As a matter of interest – exactly how many local people are employed on Repton Park, Finberry/Bridgefields/Conningbrook Lakes? Your	Understood. The Council and CMO's role will be to explore way to promote building jobs for local people. However this is not an issue for Design Code.

Issue	Ref	Consultee	Comments	ABC Response
<p>Miscellaneous Issues</p>			<p>claims of employment are unquantifiable without figures? Exactly which local businesses have been/are involved in the above projects? How much were their contracts worth to the local economy? Where are these figures published? We need to measure your success to believe your assertions! Why not actually list the contractors used by the proposed developers for CG-are they local? For example what is the breakdown of contractors used by Ward Homes at Brisley Farm?</p>	
	213.		<p>Personal Attack: We believe our home is deliberately targeted purely because we have been the most outspoken against the plans. The proposed placement is clearly an act of vindictiveness by the council and the developers and is a deliberate attempt to blight our property given the unnecessary proximity of high rise density building directly next door to us when there are 100s of empty acres to choose from.</p>	<p>This assertion is not correct. The masterplanning process has balanced a wide variety of issues and has been an inclusive process not one dictated by the Council. The particular concerns of individual householders can be tackled best at the first phase masterplanning and then as Reserved Matters applications come forward with a view to mitigating impacts as far as is reasonable.</p>
	214.	<p>Ian Bull (Consultancy LTD, on behalf of client Pentland Homes) & Matt Whitby Guy Holloway Architects</p>	<p>Derogation of the Code: Where a design solution is proposed that is not strictly in direct accordance with the Code, but is felt to be more applicable, a possible derogation from the code should be permitted with a justification provided.</p>	<p>If a good case can be made then this may help inform subsequent review of Design Code.</p>
	215.	<p>SallyAnne Logan (on behalf of CMO Project</p>	<p>Amendments for Document: a) Wording relating to the CMO is not slightly outdated in Exec Summary, 4th para. Can we amend?</p>	<p>The wording relating to the Community Management Organisation is out of date so the entire 4th para on page IV in</p>

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Issue	Ref	Consultee	Comments	ABC Response
Miscellaneous Issues		Team & Culture and the Environment)	<p>b) Additional previous comments still apply where we suggested that a reference to this as a major condition of the AAP and Planning Approval should be made. We also suggested the phrase ‘self sustaining’ need to go in as this is part of the condition.</p> <p>c) Finally whether Letchworth should be sited as ‘the’ model is debateable.</p>	<p>‘Executive Summary’ section needs to be replaced with the following text; <i>‘The ambition is to make Chilmington Green an exemplar Garden Suburb emerged from a collaborative design process involving many stakeholders. The concept of a Community Management Organisation (CMO), evolved from the Letchworth model, is agreed with the Developer Consortium and Ashford Borough Council and whom have refined the Trusts’ form and remit. The CMO will take responsibility for safeguarding endowed assets and managing facilities and unadopted open space for the benefits of the community, using funding from residents contributions, income from CMO assets and a developer cash endowment. The CMO will be self sustaining. This approach to community management and development is a major condition within the AAP and Planning Approval.’</i></p>
	216.	SallyAnne Logan (on behalf of CMO Project Team & Culture and the	Design code document comments: Page. VIII, point 20; can we add in the word ‘affordability’ to the maintenance plan given that a Plan is great and appreciated, but the CMO needs to be able to deliver its contents within its available resources. Same with point 21- affordable maintenance plan is also important here.	<p>This section is simply repeating the content of the Quality Charter and cannot be changed.</p>

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Issue	Ref	Consultee	Comments	ABC Response
Miscellaneous Issues	217.	Environment)	Design code document comment : page.Xii The bottom paragraph is good and captures the role of CMO against the design principles well.	Understood.
	218.		Design Code: p. 31-36 ; no mention of public art or trees.	Trees & public art are mentioned
	219.		Language of Design Doc.: p. 105. My feeling is this is a bit of a sweeping statement and actually depends on each location and the statement & function the landscaping is trying to provide. What does 'double rows' mean? Either side of the street I presume?	Evidence about value of soft landscaping backs up content of paragraph 1 (10.0.8) Double rows mean trees aligned together on both sides of street
	220.	Shadoxhurst Parish Council	Construction Traffic: We are very concerned that there is an important and urgent need to get preferred construction routes in place that avoid the village of Shadoxhurst. This includes the placement of clear signs prohibiting construction traffic on key roads to afford proper protection. This does not appear to be in the Code, but must be addressed before work commences.	The planning permission will require, prior to the commencement of development in each Main AAP Phase, that a Construction Environmental Management Plan for that Phase to be submitted and approved.
	221.	Bronwyn Buntine (KCC)	Climate change impact: The need to accommodate climate change is referenced. Given that the EA has recently revised guidance on climate change it would be beneficial to reference that "climate change allowance should reference the latest guidance on climate change as published by the EA "as some point within the document.	The Code needs to highlight link between green infrastructure & climate change. On page 89 an extra point should be added to include " <i>The design of landscaping has a key role to play in tackling climate change problems.</i> Also Climate change needs to feature on page 223 with the following text added;. "<i>climate change allowance should reference the latest guidance on climate change as published by the EA</i> ".
Editing	222.	General	The important street geometry diagrams and related text on page 103 need to be larger and clearer to emphasise	Changes to be implemented

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ANNEX 2

Issue	Ref	Consultee	Comments	ABC Response
			the importance these junction designs will have on the quality of the place.	

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