

Application Number	21/02219/AS	
Location	Land opposite, 1-8 Elwick Road, Ashford, Kent	
Grid Reference	00867/42465	
Parish Council	Central Ashford	
Ward	Victoria	
Application Description	Reserved matters application to consider details of access, layout, scale, landscaping and appearance pursuant to Condition 1 (Approval of Reserved Matters) of Planning Permission 15/01282/AS (Outline application for residential development of up to 200 units within Class C2 (residential institution) and Class C3 (dwellinghouses) uses and associated access arrangements - Phase 2), also including information pursuant to planning conditions 5 (Materials), 9 (External Storage), 10 (External Lighting), 11 (Proposed Access), 13 (Surface Water), 15 (Bicycle Storage), 19 (HS1 Approval Process), 20 (Ecological Mitigation Strategy), 21 (Surface Water Drainage), 22 (Sustainable Drainage Scheme - in part), 23 (Foul and Surface Water Disposal), 24 (Remediation Strategy), 30 (Noise Mitigation Scheme), 33 (Archaeological Watching Brief), 35 (Sustainable Movement And Electric Charging Points), 41 (Landscape Features), 42 (Landscape Management Plan), and 45 (Schedule of the Exact Mix and Proportions of Units in the Permitted Use Classes (Class C2, C3 and C3 restricted)).	
Applicant	Stanhope plc and Sunningdale Home Developments	
Agent	Savills (UK) Ltd, Embassy House, Queen's Avenue, Bristol, BS8 1SB	
Site Area	0.8ha	
(a) 201/ 2 X	(b) CACF -	(c) Ashford Access -, EA X, Env Prot. X, Street scene X, HSE R, HS1 X, KCC LLFA X, KCC Ecol -, KCC Heritage X, KH&T X, K.Pol X, Kent Fire -, KICC R, CULT X, NE -

Introduction

1. This application is reported to the Planning Committee because the Council has an interest in the land and under the Council's scheme of delegation, it falls to be determined by the Planning Committee.

Site and Surroundings

2. The application site comprises a broadly rectangular parcel of land that is



Figure 1: Site location plan

3. The western boundary of the site is bounded by the service access to the Travelodge hotel which forms part of the recently completed Elwick Square (Phase 1) development also comprising a cinema and retail units set around new and enhanced public realm. To the east of the application site is the Borough Council's Elwick Road car park and the adjacent National Rail Car Park with the A2042/Station Road and Ashford International Station further beyond.
4. Existing vehicular access is via Elwick Road. On the north side of Elwick Road opposite the site are a number of semi-detached office buildings in a three storey Regency style that are set back from the road with parking to the front. There is a resolution to grant planning permission for the demolition of Swanton House to the north east and erection of two buildings comprising 34 apartments with associated access, parking and landscaping (reference 20/00711). Beyond Swanton House is the Ashford College site. The majority of these buildings are within the Ashford Town Centre Conservation Area.
5. The application site is located just outside, but adjacent to, the Ashford Town Centre Conservation Area and, accordingly, it forms part of the Conservation Area's setting. There are no listed buildings within proximity.
6. The previously developed nature of the site means it contains little green space or natural landscape features. The site is not affected by any landscape or environmental designations and is located in Flood Zone 1, an area of low flood risk.

Proposal

7. The application seeks the approval of reserved matters and the discharge of planning conditions imposed on the outline planning permission (reference 15/01282/AS) as below:

Reserved Matters

8. The reserved matters relate to the approval of details of access, layout, scale, landscaping and appearance pursuant to the outline planning permission (reference 15/01282). Vehicular means of access from Elwick Road was, however, expressly agreed and not for further consideration and so access in the context of this application means all other means of access. The outline permission is for the development of up to 200 units within Class C2 (residential institution) and Class C3 (dwellinghouses) uses and associated access arrangements.

Discharge of conditions

9. Condition **1** - Approval of Reserved Matters
Condition **5** – Materials
Condition **9** – External Storage
Condition **10** – External Lighting
Condition **11** – Proposed Access
Condition **13** – Surface Water
Condition **15** – Cycle Storage
Condition **19** – High Speed 1 Approval Process
Condition **20** – Ecological Mitigation Strategy
Condition **21** – Surface Water Drainage
Condition **22** – Sustainable Drainage (part)
Condition **23** - Foul and Surface Water Disposal
Condition **24** - Remediation Strategy
Condition **30** - Noise Mitigation Scheme
Condition **33** - Archaeological Watching Brief
Condition **35** - Sustainable Movement and Electric Charging Points
Condition **41** - Landscape Features
Condition **42** - Landscape Management Plan
Condition **45** - Schedule of the Exact Mix and Proportions of Units in the Permitted Use Classes (Class C2, C3 and C3 restricted).

10. I summarise the detailed elements of each of the reserved matters below.

Reserved Matter: Access

11. Access into the site from Elwick Road was previously approved under the outline planning permission 15/01282/AS; however this application includes details of the wider accessibility throughout the site for vehicles (including emergency and refuse), cycles and pedestrians (residents and visitors) as shown in **Figure 2** below:



Figure 2: Inclusive Access (Upper ground floor)

Reserved Matter: Layout

12. The site layout comprises two building blocks with a central access road between to provide vehicular and cycle access to undercrofts as shown in **Figure 2** above. The layout is consistent with the approved parameter plans. The U-form building blocks maximise the extent of street frontage and appropriately respond to the public realm on Elwick Road. The north/south alignment of the blocks either side of the landscaped courtyards also facilitate good levels of daylight and sunlight to the residential units within.

Reserved Matter: Scale

13. Both buildings would comprise seven storeys and as shown in **Figure 3** below would be within the parameters approved by the outline planning permission. The black lines depict the building outlines in the context of the maximum parameters depicted by the outer red lines.

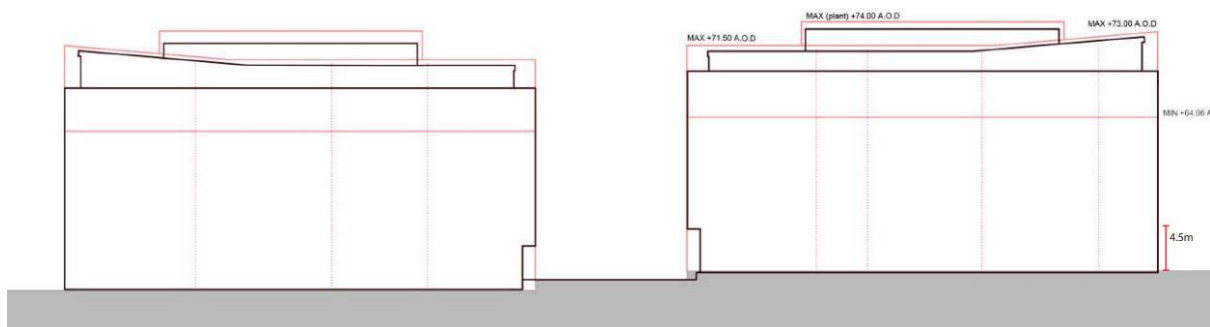


Figure 3: Proposed scale and approved parameters

Reserved Matter: Landscaping

14. The landscaping details are consistent with the parameter plans approved by the outline permission which allow for hard and soft landscaping within different character areas across the site. The character areas are depicted in **Figure 4** below and include the 'Urban Link' adjacent to Elwick Road at the front of the site (masked in blue), the 'Eco Street' on the central access road (masked in orange), the two 'Podium Gardens' (masked in dark green) and the 'Railway Terrace' (masked in light green) adjacent to the southern boundary and railway line. The Railway Terrace is located over an existing Southern Water easement which has a bearing on the site layout.

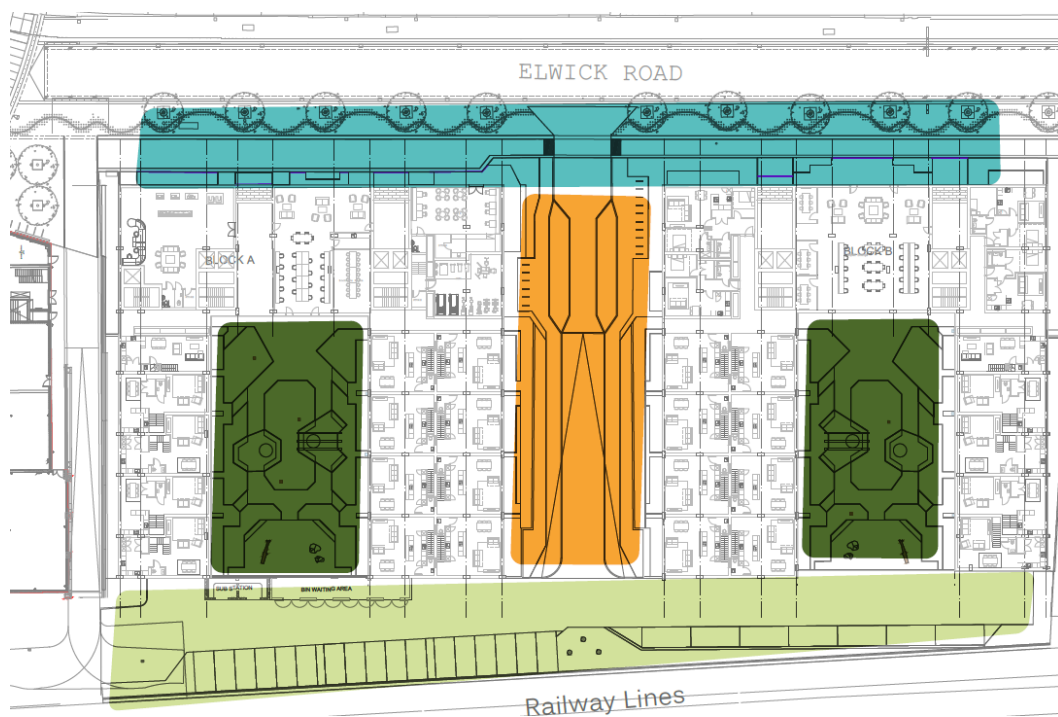


Figure 4: Landscaping character areas

Reserved Matter: Appearance

15. The appearance and architecture of the development and the unit types within it have been designed to reflect the varied conditions, opportunities and constraints on each external and internal/courtyard elevation. A full assessment of the appearance of the development and its visual impact on the surroundings is set out in the report below, however for the purposes of introducing the scheme a visualisation of the development depicting its appearance from Elwick Road and in the context of the adjacent Travelodge is included in **Figure 5** below.



Figure 5: Visualisation from Elwick Road

16. **Figure 6** below is a visualisation of the development depicting it from within the landscaped podium.



Figure 6: Visualisation from within courtyard

Planning History

17. The following is relevant relating to the application;-
- 1991: Full planning permission 91/01261/AS approved for demolition of existing retail warehouse and erection of B1 office building with complementary use such as shopping, entertainment or leisure and incorporating a pedestrian link along the Elwick Road frontage.
- 1987: Full planning permission 87/01665/AS approved for an MFI Furniture Centre on the eastern part of the site.
- 1998: Full planning permission 98/00587/AS relates to the central and western portions of Elwick Place and was for change of use of the cattle market to a commercial car park.
- 2015: Full planning permission 15/01195/AS approved for Phase 1. This included a Cinema, retail units, hotel and car park.
- 2019: Outline planning permission (15/01282) approved with all matters reserved except the means of access from Elwick Road between the two proposed buildings, for 200 units within two separate use classes – Class C2 (residential Institution) and Class C3 (dwellinghouses).
- 2021: Non material amendment (15/01282/AMND) to outline planning permission 15/01282/AS (Outline application for residential development of up to 200 units within Class C2 (residential institution) and Class C3 (dwellinghouses) uses and associated access arrangements (Phase 2) to alter approved plans under condition 3 and to amend condition 7 to change the trigger to 'prior to the commencement of above ground works'. (*Officer note: This non-material amendment had the effect of correcting errors on the original decision notice and permitted alterations to the horizontal and vertical parameters that did not materially alter the height, depth or form of the consented buildings*).

Consultations

18. The application has been subject to formal statutory and non-statutory consultation comprising the display of a site notice, a press notice and notification letters sent to 201 occupiers of buildings in the vicinity of the application site.

19. Following submission of further information a number of consultees have been re-consulted. The consultation period expired on 06.03.2022. The summary of consultation responses below reflect those received at the time of writing the report. Any further consultation responses received prior to the Planning Committee meeting will be reported in the Update report.

Ward Members: No representations received.

ABC Building Control: have reviewed the fire strategy and have no comments. Further consultations will be made with Kent Fire and Rescue Service during the building control process.

ABC Cultural Services: recommend minor amendments to planting schedules. (*Officer comment: planting schedules have been revised in accordance with recommendations*).

ABC Environmental Protection: no objections to discharge of conditions 10 (External Lighting), 24 (a) and (b) (Remediation Strategy) and 30 (Noise and Vibration Mitigation). Recommend consideration given to installing additional trunking/ground work during construction to allow the possibility of additional cabling for extra EV spaces to be introduced at a future date as part of 'passive provision' (condition 35). Further consideration required in relation to car club provision (condition 35).
(*Officer comment: the proposals have been amended to increase the number of active EVC provision and provide further information on proposed passive EVC provision*).

ABC Environmental Services: request further details on temporary refuse collection area. Refuse collection strategy acceptable subject to agreement with ABC collection arrangements.
(*Officer comment: see paragraphs 105-107 below*)

Kent County Council Highways and Transportation: require further information in relation to EV charging. Note the proposals appear to extend onto the existing adopted highway in front of Block A; proposals need to be contained wholly within site confines.
(*Officer comment: further information in relation to EV charging submitted and proposals amended to be contained wholly within site confines*).

Kent County Council Public Rights of Way: no objection but request allocation of public realm contributions to improve the PROW to provide high quality active travel routes in the vicinity of the site.
(*Officer comment: whilst there are no PROW within the application site there are PROW in the vicinity and the request is noted*).

Kent County Council Ecological Advice Service:

Condition 1 (Reserved Matters): need to ensure eco buffer planting to south of site will be established and managed as an ecology area. It is adjacent to car parking and therefore it is possible that it will be damaged by people driving on it or residents getting in and out of the car. There is a need to ensure that the design of the area has taken in to account the practicalities of managing and maintaining this area.

(Officer comment: proposals amended to provide protection to eco buffer planting).

Condition 10 (External Lighting): recommend number of lights proposed throughout site (including parking areas) are reduced and overnight levels further dimmed or switched off to benefit biodiversity.

(Officer comment: see paragraphs 120-121 below).

Condition 20 (Ecological Mitigation): recommend an updated bat scoping survey undertaken to assess the likelihood of bats roosting and assessing if updated emergence surveys are required. Details on location of bat and bird features required, including impact of artificial lighting required.

(Officer comment: see paragraph 119 below).

Advise that a full Habitats Regulations Assessment is required.

(Officer comment: see paragraphs 135-140 below).

Kent County Council Archaeology: no objection to discharge of condition 33 (archaeological watching brief).

Kent County Council Flood and Water Management: no objection to approval of reserved matters application and discharge of conditions 21 (SUDs) and 22 (SUDs management and maintenance).

High Speed 1 Safeguarding: no objection to approval of reserved matters application and discharge of condition 19 (HS1 approvals) subject to further conditions to secure (i) a risk assessment to identify risks to HS1 from wind blown debris from the development and (ii) details of building maintenance to manage the risk to the safety and operation of HS1.

(Officer comment: see paragraphs 128-130 below).

Health and Safety Executive: 'Advice to LPA' – Some Concern. The response provides detailed comment on the design and fire safety measures proposed, including relating to escape routes, fire and rescue access to maisonettes, stairs to basement, flats opening into main access corridor, firefighting lifts, firefighting shafts layout and water supply for fire and rescue service which require further consideration and may affect the design and layout of the buildings.

(Officer comment: the applicant's fire design consultant has reviewed the concerns and has identified that these are likely be able to be overcome through minor changes that would have no material change to the design fundamentals of the proposed buildings or their external appearance. I cover this further at paragraph 70-71 below and my Recommendation (A)).

Kent Police: recommend use of Secured By Design and consideration be given to defensible spaces, appropriate access controls, recessed entrances, fire doors, mail delivery, CCTV, lighting, refuse stores, parking and cycle stores and landscaping matters.

(Officer comment: the applicant intends to build to Secured by Design principles. I consider that on-going dialogue between the applicant design team and Kent Police would be sensible to further finesse fine details).

Southern Water: no objection to discharge of condition 23 (foul and surface water sewerage disposal).

Environment Agency: no objection to proposals from a groundwater quality perspective and to discharge of relevant conditions, including condition 24 (phase 2).

Natural England: no comment.

Ramblers: no objection.

Ashford Access Group: no comment.

Central Ashford Community Forum: no response.

Kent Invicta Chamber of Commerce: raise concerns relating to principle of more flats in the town centre, requirement for employment generating uses including offices and retail to join town's retail centre with the outlet, potential for a bus station.

(Officer comment: see paragraphs 25-26 below).

Neighbours – 1 objection received from Victoria Road Primary School and 1 letter of comment received from a local resident as summarised below:

Objections:

- Victoria Road Primary School is one-form entry and is full with long waiting lists.
- Appeals for places by new residents is having a financial impact on the school.

- Concerns about height and being imposing across the railway line. (*Officer comment: see paragraph 52 below*).
- Impacts on local infrastructure, existing population and their living standards. (*Officer comment: impacts on local infrastructure were fully assessed in the granting of outline planning permission and appropriate mitigation was secured as necessary*).

Comments:

- Development out of scale compared to existing buildings in Elwick Road and considered overbearing. (*Officer comment: see paragraphs 39-44 below*).

Planning Policy

20. The Development Plan for Ashford Borough comprises the Ashford Local Plan 2030 (adopted February 2019), the Chilmington Green AAP (2013), the Wye Neighbourhood Plan (2016), the Pluckley Neighbourhood Plan (2017), the Rolvenden Neighbourhood Plan (2019), the Boughton Aluph & Eastwell Parishes Neighbourhood Plan (2021), the Egerton Neighbourhood Plan (2022), the Kent Minerals and Waste Local Plan (2016) as well as the Kent Minerals and Waste Early Partial Review (2020).

21. The relevant policies from the Local Plan relating to this application are as follows:-

Vision for Ashford Borough

SP1 Strategic objectives

SP2 The strategic approach to housing development

SP6 Promoting high quality design

HOU1 Affordable Housing

HOU12 Residential space standard internal

HOU14 Accessibility standards

HOU15 Private External Open Space

HOU18 Providing a range and mix of dwelling types and sizes

EMP6 Fibre to the Premises

TRA3a Parking standards for residential development

TRA6 Provision for cycling

TRA7 The road network and development

TRA8 Travel plans, assessment and statements

ENV1 Biodiversity

ENV4 Light Pollution and Promoting Dark Skies

ENV6 Flood Risk

ENV7 Water efficiency
ENV8 Water quality, supply and treatment
ENV9 Sustainable drainage
ENV11 Sustainable Design and Construction
ENV12 Air Quality
ENV13 Conservation and enhancement of heritage assets
ENV14 Conservation areas
ENV15 Archaeology
COM1 Meeting community needs
COM2 Recreation, Sport, Play and Open Spaces
COM 3 & 4 Allotments and Cemeteries
IMP1 Infrastructure provision
IMP2 Flexibility, viability and deferred contributions
IMP4 Governance of public community space and facilities

22. The following are also material considerations to the determination of this application:-

Supplementary Planning Guidance/Documents

Affordable Housing SPD 2009
Residential Parking and Design Guidance SPD 2010
Sustainable Drainage SPD 2010
Residential Space and Layout SPD 2011 (now external space only)
Sustainable Design and Construction SPD 2012
Public Green Spaces and Water Environment SPD 2012
Ashford Town Centre Conservation Area Appraisal and Management Plan 2016
Heritage Strategy 2017

Informal Design Guidance

Informal Design Guidance Note 1 (2014): Residential layouts & wheeled bins
Informal Design Guidance Note 2 (2014): Screening containers at home
Informal Design Guidance Note 3 (2014): Moving wheeled-bins through covered parking facilities to the collection point

Government Advice

National Planning Policy Framework (NPPF) Revised 2021
Planning Practice Guidance (PPG)
Technical Housing Standards – nationally described standards

Assessment

23. The key areas for consideration are as follows:
- (a) Compliance with the outline planning permission
 - (b) Design quality and visual impact on the locality
 - (c) Heritage impacts
 - (d) Housing mix and standard of accommodation proposed
 - (e) Highway impacts, car parking, sustainable measures and EVC and cycle provision
 - (f) Landscaping, ecology and biodiversity, surface water and drainage and contamination
 - (g) Impacts on HS1
 - (h) Sustainability and climate change
 - (i) Habitats Regulations
 - (j) Planning Obligations
 - (k) Whether the relevant conditions imposed on the outline planning permission can be discharged
- (a) Compliance with the outline planning permission**
24. The outline planning permission established the principle of redevelopment of this brownfield site within the town centre. It also established the extent of the developable area and the access arrangements to serve future development as well as the number of homes to be provided. The outline permission also approved a number of parameter plans relating to height and horizontal and vertical deviations. All reserved matters applications have to fall within the parameters of those plans.
25. The outline planning permission permitted the delivery of up to 200 Class C2 or Class C3 residential units. The reserved matters subject of this application are for 200 Class C3 residential units and in this respect are in compliance with the outline planning permission.

26. Therefore, notwithstanding the representations submitted by the Kent Invicta Chamber of Commerce this Reserved Matters submission is consistent with the outline planning permission and issues relating to alternative land uses for this site are not relevant to consideration of this application.

(b) Design quality and its visual impact on the locality

27. The Government attaches great importance to the design of the built environment, with national policy placing great emphasis on the importance of good design as a key aspect of sustainable development. The requirements outlined in paragraph 130 of the NPPF include the need to add to the overall quality of the area and establish or maintain a strong sense of place. While appropriate innovation and change, such as increased density, is not to be prevented or discouraged, developments must be sympathetic to local character, including the surrounding built environment.
28. Paragraph 126 states that the creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is considered to be a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.
29. Paragraph 130 states that decisions should ensure development:
- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
 - b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
 - c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
 - d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
 - e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
 - f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.*

30. Paragraph 134 states that permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions. The NPPF calls for significant weight to be given to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit within the overall form and layout of their surroundings.
31. The National Design Guide (2019) further supports the principles of the NPPF and seeks to illustrate 'how well-designed places that are beautiful, enduring and successful can be achieved in practice'. This sets out ten characteristics of well-designed places.
32. The Council places great weight on quality place making and Policy SP6 (Promoting High Quality Design) of the ALP is relevant and aligns with this national guidance. The policy sets out a number of design criteria to which new development is expected to positively respond.
33. The proposals have been subject to pre-application advice and have been presented to the Ashford Design Review Panel. A copy is attached as **Annex 2** to this report. The following assessment considers the design quality of the scheme in relation to its layout and access, height, form, scale and massing and design and materials.
 - **Layout and access**
34. The proposed layout has been carefully considered to respond to the site's specific constraints and opportunities. The parameter plans approved by the outline planning permission allow for the development to be configured as two separate U-shaped blocks around courtyard spaces with an access road between the two. As shown in **Figure 7** below each block has a main spine fronting Elwick Road with two wings on a north east-south west orientation:

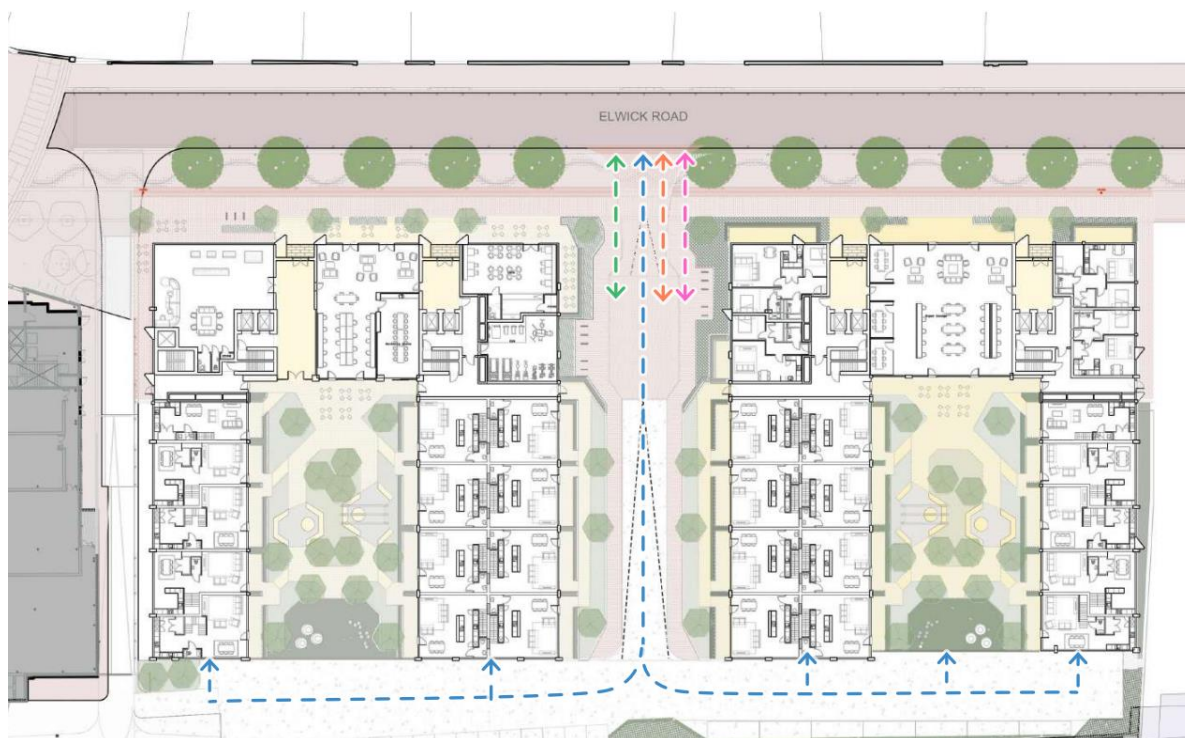


Figure 7: Layout and access arrangements

35. The main spines would introduce a good level of enclosure to Elwick Road and by locating the main building entrances on this elevation would also activate the street frontage, boost footfall and provide a good level of natural surveillance. The retention of the wide shared space surface along Elwick Road is supported and would also reflect the layout of the adjacent Phase 1 development.
36. The rear wings of both buildings have been designed around landscaped courtyard podiums: these also maximise sunlight and daylight into the site interior. The access road from Elwick Road would be ramped to reflect the natural topography of the site and provide access to on-site car parking within the undercrofts to the development that would not be visible from the public realm. Pedestrian and cyclist access would be provided from both Elwick Road and the access road, thereby facilitating ease of movement as required by Policy SP6 of the ALP.
37. Whilst I support the overall access strategy, I consider it is necessary and reasonable to require further details of the proposed physical access control measures to ensure the provision of a safe and secure environment for residents using the undercroft parking areas. In response to comments by Kent Police I note the applicant's response that the development would comply with Secure by Design best practice and utilise CCTV to monitor internal communal areas, covered car parking and external areas to

discourage antisocial behaviour and crime.

38. Whilst the simplicity of the U-block form was queried by the Design Review Panel, I am satisfied that the layout responds well to the site's different edge conditions and would be compatible with the character of the surrounding area in accordance with criterion (a) of Policy HOU3a of the ALP. I am also satisfied that the detailed vehicular, pedestrian and cyclist access arrangements would be acceptable.

- **Height, form, scale and massing**

39. The supporting text to Policy SP6 of the ALP requires all development proposals to reflect their local context, and where the built environment is of decent quality, new proposals should be sensitive in terms of scale, height, layout and massing to surrounding buildings.
40. Notwithstanding the resident objection relating to the height and overbearing nature of the proposals it is important to note that the maximum height and massing of the buildings has been established by the parameter plans granted by the outline planning permission. Whilst this is the case, the form and scale of the development has been subject to extensive pre-application advice with Officers.
41. In response to Design Review Panel and Officer feedback the proposed development has been carefully designed to break down the perceived mass of the buildings. In particular the scale has been refined through the use of architectural features that seek to reduce the visual dominance of some of the horizontal elements of the buildings by giving greater vertical emphasis to different sections of the facades. At street level, the incorporation of a generous 4.5m floor to ceiling height at ground floor level is welcomed. This has the benefit of providing continuity of visual approach with the adjacent Elwick Phase 1 development and building in future flexibility for accommodation of different ground floor uses over time.
42. As acknowledged by the Design Review Panel, the proposed development is not comparable to the height and scale of the Victorian villas opposite. Notwithstanding this, the design has evolved from an analysis of the varied proportions of the villas which have been reinterpreted and, in my view, appropriately reflected in the development.

43. The roof level and necessary enclosed plant at that level would be set back in accordance with the parameter plans and the form of the roof has been designed to add visual interest and to respond to the prominent corners. The roof level has been further amended and broken down by incorporating a central set-back feature. The uppermost parapet details have also been amended to create a lighter and more slender frame as depicted in **Figure 8** below:



Figure 8: Visualisation from Elwick Road

44. In summary, I consider that the height, form, scale and massing of the development is appropriate for this brownfield site and respects the long established vision for Elwick Road, including to provide strong enclosure to the street. In my view it is an acceptable and complementary response to the surrounding townscape.

- **Design and materials**

45. In terms of detailed design, the buildings exhibit strong architectural expression and include a welcome balance of shadow and depth through a rich combination of projecting and recessed elements such as balconies and vertical columns. The textured facades with contemporary materials and generous amounts of glazing will result in a high quality finish to the building.

As shown in **Figure 9** below the ground and first floor treatment includes a high proportion of glazing that will enable good transparency and views into and through the building to the internal residents' only planted courtyards therefore helping to improve the sense of visual interest and animation along the street.



Figure 9: Visualisation from Elwick Road

46. Details of all external architectural features and details of the typical joints between the cladding and glazing can be dealt with by condition including rooftop details, including relating to plant and materials and details relating to rainwater goods and vents etc. Condition 7 of the outline permission has recently been varied to require all of these details (including 1:20 horizontal and vertical cross sections of each façade) to be submitted prior to commencement of ground works and so I am satisfied that this will ensure the external appearance and fine detailing of the buildings will be of an appropriate quality.
47. The submitted External Lighting Strategy confirms that x 8 'Wall mounted downward fixtures' are proposed to the front and side elevations with the locations 'to be coordinated and approved with the architect'. The buildings will be very prominent in the streetscene and carefully considered external lighting has the potential to emphasise the interesting form and drama of the main elevations. In my view, it would be reasonable to secure specific details of the lighting and building signage via an appropriate condition to ensure the lighting strategy is appropriate and balances any particularly sensitive parts of the site from an ecological perspective.
48. In terms of materials, high quality brick, stone, powder coated aluminium, cladding and mesh are all proposed in a colour coordinated manner that will help emphasise the proposed architectural quality. It is however necessary to further consider the suitability of exposed and white concrete, particularly in terms of weathering over time. Whilst the details submitted are sufficient to discharge condition 5 of the outline planning permission, I note condition 6 requires submission of precise details, including samples, of external materials prior to commencement of development and so I am satisfied that the weathering properties of the white concrete and the construction of a

sample panel could also be sought at this time.

49. In summary, I consider that the buildings would be of high quality design and materials. They would be visually distinctive and contribute to a richness of architecture in this prominent location whilst also being sympathetic to the local context and character of the surroundings in accordance with Policies SP6 and HOU3a of the ALP.

- **Visual impact on the locality**

50. Further to Officer advice this Reserved Matters application is supported by a number of representative views which have been used to assist with an assessment of the impact of the development on existing townscape character and visual amenity. The number and spread of viewpoints were agreed are considered to be appropriate. A number of the views can be shared in the Planning Committee presentation.
51. In short distance views, the redevelopment of this vacant site and creation of new active roadside frontages and additional tree planting would be of benefit to visual amenity. In middle and longer distance views, including from the A2042 bridge, the railway and beyond, the introduction of high quality buildings in this town centre location would contribute to the varied roofline through adding new skyline features and qualities to the townscape that would in my opinion also represent an improvement to visual amenity.
52. The representations received relating to the development appearing overbearing are noted, however the height of the buildings has been established by the outline planning permission and the vertical scale of the buildings would not be dissimilar in terms of skyline impacts to the vertical scale of Elwick Phase 1. In addition, the 'wings' to the two buildings have the benefit of breaking up the massing of the development and as shown in **Figure 10** below, from the south the development would tend to be read from more distant views as a series of buildings.



Figure 10: Visualisation from Victoria Road

53. As in **Figure 11** below the viewpoints also demonstrate how the use of high quality materials would help to assimilate the development into its surroundings:



Figure 11: Visualisation from west on Elwick Road

54. The views demonstrate that whilst the proposals would introduce large buildings into the existing townscape, the buildings would be of high quality design and therefore add positive townscape elements that will enhance legibility and contribute to the overall visual quality of the area. The views also demonstrate that the redevelopment of this important brownfield site would play an important role in setting a good impression of Ashford to visitors to the town.

(c) Heritage impacts

- Setting of the Ashford Town Centre Conservation Area

55. The application site lies outside but directly adjacent to the Ashford Town Centre Conservation Area. The application site is therefore located within the immediate setting of this designated heritage asset and the Planning (Listed Buildings and Conservation Areas) Act 1990 is therefore relevant. There are no listed buildings within close proximity to the site.
56. Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the general duties of Local Planning Authorities in regards to the protection of conservation areas. Section 72 states “In the exercise, with respect to any buildings or other land in a conservation area, of any [functions under or by virtue of] any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.”
57. Paragraph 193 of the NPPF states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.
58. Paragraph 194 of the NPPF sets out that any harm to the significance of a designated heritage asset, including from development within its setting, should require clear and convincing justification. Paragraph 196 of the NPPF states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

59. The southern part of the conservation area opposite the site is identified as the 'Elwick Road Area' in the Ashford Town Centre Conservation Appraisal. The Appraisal notes that the public realm and existing buildings (comprising large semi-detached symmetrical Victorian villas set long a regular building line behind a ragstone wall) in this character area are generally in good condition. The redevelopment of the application site would have an impact on the setting of the conservation area, however in my view the contribution of this open brownfield site to its setting is very limited. By reason of the strong built edge to the southern boundary the application site is only visible from limited viewpoints within it.
60. I am satisfied that the significance of the adjacent heritage asset has been considered and reflected in the proposals. Although of a significantly larger height and scale than the unlisted Victorian villas opposite, the development would introduce a strong sense of enclosure to the southern side of Elwick Road and be consistent with the townscape setting to the west. The development would also sensitively respond to the character of the existing historic built form through richness of design and use of high quality materials that would complement the predominant building materials of white painted render. It would not prejudice any important views into or out of the conservation area.
61. In summary, my view is that the proposed redevelopment of this site, where regeneration and change is expected and consistent with the Council's expected area of focus through the adopted Town Centre Reset, would conserve and enhance the urban setting and the character and appearance of the Town Centre Conservation Area. The proposals are therefore consistent with Policies ENV13 and EN14 of the ALP, the NPPF and the statutory requirements set out in the Planning (Listed Buildings and Conservation Areas) Act 1990.

- **Archaeology**

62. Whilst the Phase 1 Elwick development adjacent to the application site is designated as an Area of Archaeological Potential and was assessed as having medium potential for early prehistoric archaeology, the Phase 2 application site is not designated. The site has seen limited development pre-1950s, with land use restricted to horticultural functions. Since the 1950s the site has been subject to extensive disturbance from ground resurfacing and industrial warehouse construction and demolition.

63. Notwithstanding the above, the Reserved Matters application is supported by a Written Scheme of Investigation (WSI) for an archaeological watching brief to monitor intrusive ground works within a targeted area of the application site. The WSI would ensure that any features of archaeological interest found during construction works are properly examined and recorded on site in accordance with the requirements of Policy ENV15 (Archaeology) of the ALP. The County Archaeology Advisor is satisfied with the WSI and recommends that condition 33 of the outline planning permission be discharged.

(d) Housing mix and standard of accommodation proposed

64. Policy HOU18 of the ALP 2030 requires development proposals of 10 or more dwellings to deliver a range and mix of dwelling types and sizes to meet local needs. The outline planning permission permitted the delivery of up to 200 Class C2 or Class C3 residential units. The reserved matters subject of this application are for 200 Class C3 residential units. The residential units would be provided within a range of accommodation types and sizes across the two blocks, including:

26 x 2 and 3-bed duplexes (13%)

59 x 1-bed (30%)

7 x 1.5-bed (4%)

104 x 2-bed (52%)

4 x 3-bed (2%)

65. This mix of dwelling sizes would be in compliance with the broad objectives of Policy HOU18 and appropriate for this town centre location. The details submitted also fulfil the requirements of condition 45 requiring submission of a schedule of the exact mix and proportion of units in the permitted use classes. As a town centre flatted development, adopted Policy HOU1 of the ALP does not require the provision of affordable housing and therefore none is proposed.

- Space standards

66. All dwellings would comply with the Nationally Described Space Standards set out in Policy HOU12 and the Council's Residential Space and Layout SPD. All units would also provide private external open space in the form of projecting balconies or private terrace gardens in accordance with the requirements of Policy HOU15 of the ALP.

67. In response to the objection by High Speed 1, the proposed design has been amended to incorporate fixed glazing and full-height screens to all balconies on the rear elevation of both buildings. This change would safeguard the safety and operation of the adjacent railway without prejudicing the quality of the accommodation proposed.

- **Internal layout**

68. Both blocks would be served by two centrally located cores with two lifts each. Primary access to the cores would be via the main entrances at street level. Although few cores would benefit from natural light, no core would serve more than 9 units per floor thereby limiting the size of the community sharing it. In response to Design Review Panel feedback, all ground floor duplex units would benefit from their own private terraced entrance to the street or to the landscaped podiums.

69. Both blocks would include ground level 'super-lounges' for residents to meet, work and foster community. In response to Design Review Panel feedback to consider more varied amenity provision it is also proposed to include a resident gym and resident café in Block A that would be accessible to residents across the development. In my view, the internal layout would provide good quality town centre living arrangements for future residents.

- **Fire Safety**

70. In accordance with the requirements of Planning Gateway One which was introduced in August 2021, this Reserved Matters application is supported by a comprehensive Pre-Planning Fire Strategy and Fire Statement. This has been subject to statutory consultation with the Health and Safety Executive (HSE) who have raised 'Some concern'.

71. As identified further above, this has been reviewed by the applicant team and it has been identified that the areas of stated concern should be able to be dealt with via minor adjustments which would not be likely to have a material change to the architecture and appearance of the two buildings. In my view, such further adjustments can be dealt with by officer view the delegation that is included as part of my Recommendation. Should changes of a nature that, in my judgement, would have a material impact then such changes would fall outside of such delegation and necessitate an updated proposal to be brought back to Committee. However, from the available evidence I consider that this is unlikely to be the case.

- **Daylight and Sunlight**

72. The application is supported by a Daylight and Sunlight Assessment relating to the provision of natural daylight and sunlight to habitable rooms within the ground, first and second floors of the proposed development. I am satisfied that the daylight and sunlight calculations have been correctly undertaken in accordance with the BRE document "Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice, Second Edition" (2011).
73. There are two main tests for assessing interior daylighting. These are Average Daylight Factor (ADF) and Daylight Distribution/position of the No Sky Line (NSL).
74. ADF is a measure of the overall amount of daylight in a space that takes into account the internally and externally reflected components and the direct light from the sky. It is primarily intended for use in calculating daylight provision in new rooms. The BRE guide recommends in new dwellings, the ITEM NO: 7 minimum average daylight factor (ADF) is 1% for bedrooms, 1.5% for living rooms, and 2% for kitchens, including combined living/kitchen/dining (LKD) rooms. Whilst the BRE document explains that these are minimum values of ADF which should be attained even if a predominantly daylight appearance is not required, it is relevant that recent guidance from the Mayor of London in the SPG on Housing Design Quality and Standards states it is reasonable to apply a target of 1.5% to LKD rooms where the principal use of those rooms is as a living room.
75. The Daylight Distribution test analyses the position of the No Sky Line (NSL). This method takes into account the number and size of windows to a room but does not give any quantitative assessment of the light in the room, only where sky can or cannot be seen. In new developments, the BRE guide states that no more than 20% of a room area should be beyond the NSL. Where more than 20% of a room lies beyond the NSL then the distribution of daylight in the room will look poor and supplementary electric lighting will be required.
76. The assessment identifies that the development would provide high levels of compliance with minimum recommended daylight standards across both buildings. Specifically, of 211 windows tested, 194 (92%) would pass the ADF test. The 17 rooms that would fail the test are all situated either beneath a balcony serving the floor above or are set back from the façade to accommodate an internal balcony and it is inevitable in such circumstances that such rooms will receive slightly lower daylight levels. In recognition of this, the BRE guidance permits a reassessment based on the hypothetical situation of the window moved to the external edge of the balcony or the

façade of the building. In this scenario the assessment confirms that the majority of rooms (206 windows/98%) would comply with the ADF target values. 4 of the 5 rooms failing to comply would be LKD with ADF values of 0.9%, 1.2% and 1.3% which are only marginally below the target. Some of these rooms would also be dual aspect and thereby provide higher quality living accommodation.

77. The assessment also demonstrates that the majority of rooms would comply with the Daylight Distribution test.
78. To ensure that the proposed residential accommodation achieves the interior daylighting standards anticipated in the assessment it is necessary to secure details of the internal finishes by appropriate condition. This is because the ADF calculation is based upon BRE internal reflectance values and includes assumptions relating to finishes of floors (reflectance value 30%), internal walls (painted pale cream or white paint) and internal ceilings (painted white).
79. The method for quantifying sunlight receipt to buildings is the Annual Probable Sunlight Hours (APSH) method. The BRE document states that 'a dwelling will appear reasonably sunlit provided that:
 - i) at least one main window wall faces within 90 degrees of due south; and
 - ii) on this window wall, all points on a line 2m above ground level are within 4m (measured sideways) of a point which receives at least a quarter (25%) of annual probable sunlight hours, including at least 5% of annual probable sunlight hours during the winter months, between 21 September and 21 March'.
80. The BRE guide states that where possible each dwelling should have at least one main living room window facing within 90 degrees of due south, albeit it acknowledges that this is not always possible in flats. The assessment identifies that 75% of eligible rooms would receive the minimum recommended amount of annual sunlight and/or winter sunlight. Those rooms not receiving the recommended amount of annual or winter sunlight would still receive some sunlight throughout the year.
81. On balance, and in the context of the total number of units and the generally good adherence to other qualitative design aspects, including the general layout, orientation and form of the development and the provision of high quality internal and external communal spaces, I consider that the level of daylight and sunlight availability will be sufficient to provide good quality homes for future residents.

- **Overshadowing**

82. An overshadowing assessment has been undertaken as to the effects of the proposal on the available sunlight to the two main podium gardens. The assessment has been undertaken in relation to the BRE 2-hour sun on ground test which recommends at least two hours sunlight on 21st March on more than half their area. The assessment demonstrates that Block A will receive two hours or more of direct sunlight to 90% of its area and Block B to 91% of its area in excess of the minimum recommended amount of sunlight across the day and confirms that the podiums would appear adequately sunlit throughout the year and fulfil their function of providing high quality communal amenity space for future residents.

- **Privacy and Outlook**

83. A number of residential units would be located at ground level and the submitted Landscape Strategy confirms that generous buffer planting and terraces would provide defensible areas to protect the privacy of future occupants of these units. Where adjoining the landscaped podiums the residential units are designed as duplexes.
84. Above ground floor the layout of the buildings mean that separation distances between the wings and across the access road would be approximately 20m. This distance combined with the careful angled orientation of balconies mean that the potential for direct overlooking between units would be minimised and I am satisfied that in the town centre context of the site, this would be an acceptable approach.
85. All units would benefit from good levels of outlook and in many cases middle to long distance views towards the Memorial Gardens to the north and Victoria Park to the south.

- **Aspect**

86. In response to Officer feedback the number of dual aspect units has been increased and there are now more dual units (53%) than single (47%) aspect units across the development. Whilst 19 x 1-bed units (9.5%) would be single aspect north-east facing, the majority would be located in the wings facing either east or west and thereby benefitting from either morning or afternoon sunlight. The north-east facing units would benefit from adequate daylight and in the context of the overall accommodation offer are considered acceptable.

- **Noise and vibration**

87. In accordance with the requirements of condition 30 of the outline planning permission this Reserved Matters application is supported by a noise and vibration assessment report. The report includes an assessment of the background noise levels for the area and their potential effect on future residents.
88. The Council's Environmental Health team is satisfied that the assessment has been undertaken in accordance with the appropriate methodology and guidance. In terms of noise, the main noise sources were identified as from Elwick Road and, to a lesser extent, from the railway to the south. A glazing strategy and whole property mechanical ventilation is proposed throughout all dwellings. No vibration mitigation measures are considered necessary. I am therefore satisfied that noise levels can be appropriately controlled such that future residents would not be subject to significant or unacceptable noise or disturbance.

- **Amenity impacts**

89. There are no residential or other sensitive land uses within close proximity to the application site and its redevelopment would not result in any significant adverse impacts on the amenities of the users of surrounding buildings. I am therefore satisfied that the proposals would safeguard and promote a high standard of amenity for existing and future users of development in accordance with paragraph 130 of the NPPF.

(e) Highway impacts, car parking, sustainable movement and EVC and cycle provision

90. Full consideration of the impact of the development of this site on the surrounding highway network was undertaken as part of the assessment of the outline planning application. No objections were raised by KCC as the highways authority and the impacts were found to be acceptable. The following assessment relates to the access details, car and cycle parking provision and the refuse strategy and servicing arrangements.

- **Access details**

91. The location and layout of the vehicular access to the site from Elwick Road are in accordance with those matters established by the grant of outline planning permission. In accordance with the requirements of condition 11 of the outline planning permission, this application is supported by further details

of that agreed access, including technical details which are required as part of the separate S278 Agreement process with the Highways Authority.

92. The submitted details demonstrate how the access will be constructed and finished to result in minimal disruption to the existing high quality public realm that forms part of the shared space scheme along Elwick Road. It has been established that the 'Flume' artwork embedded in the surface is not designed to take vehicle loading and so is not a suitable surface for a vehicle crossover. As shown in **Figure 12** below it is therefore proposed to create a break in the artwork across the vehicular access and to create a heavy duty vehicular crossover using clay pavers. The clay pavers would be laid to a Herringbone pattern and bound at the edges by a double stretcher bond soldier course. It is also proposed to install granite kerbs and grey tactile paving blocks as an appropriate hazard warning to pedestrians using the southern side of Elwick Road.

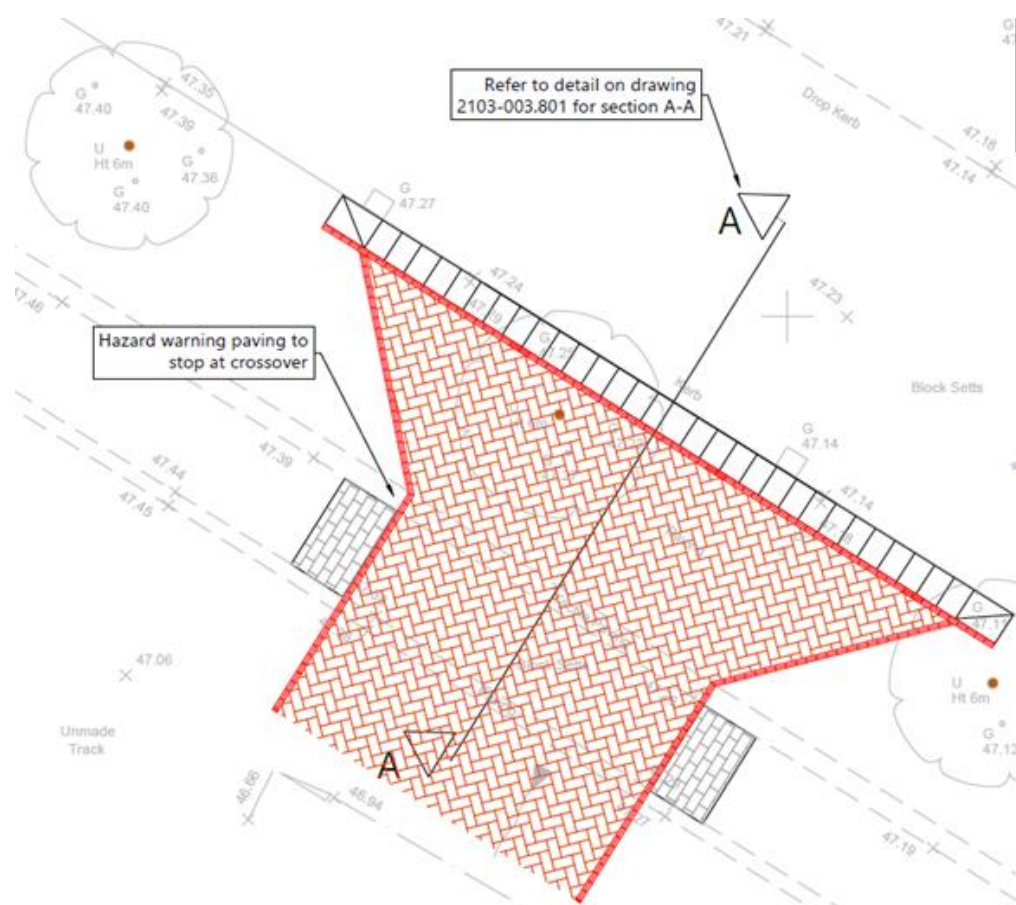


Figure 12: Proposed access detail

93. The Highways Authority has made no adverse comments on the details presented. The proposed detailing and materials would match the existing

crossover into Gasworks Lane and in my view would deliver a consistent, cohesive and high quality finish that is appropriate in this location balancing access needs with visual impact..

94. It is important to note that provision of the approved access necessitates the removal of a single street tree and that the acceptability of this was assessed and agreed as part of the outline planning permission. In addition to replacement tree planting to be secured as part of this application (discussed further below), separate discussions regarding potential financial compensation for the loss of the street tree are ongoing with the Highways Authority as part of the S278 Agreement process. This is outside of the remit of this application.

- **Car parking**

95. Policy TRA3 (a) of the ALP sets out the required parking standards for new development within town centre, suburban and rural locations but also permits flexibility, for example where there is a good level of accessibility to shops and services and a good level of non-car access.
96. The proposals would provide for 200 car parking spaces, including 9 disabled bays. All of the spaces would be located on-site within the undercrofts to both buildings and also adjacent to the southern boundary. Notwithstanding that two spaces would be allocated to proposed car club vehicles, the parking provision equates to a 0.99:1 (spaces: dwellings) parking ratio in accordance with the requirements of policy TRA3 (a) which seeks the delivery of 'a minimum parking standard of 1 space per residential unit on average'. The level of provision is one that I consider acceptable.
97. Whilst there is no designated on-site visitor parking, policy TRA3 (a) states that this should be provided primarily off-plot in short-stay car parks where available or on-plot where layout permits. The site is located in the town centre where a number of short stay car parking options exist, including within the Elwick Place Car Park, approximately 150m to the west of the site.

- **Sustainable movement and electric vehicle charging (EVC)**

98. Condition 35 of the outline planning permission requires submission of details relating to measures to help facilitate more sustainable forms of movement for non-town centre journeys, including the provision of a car club facility and EVC.
99. This application is supported by a Sustainable Travel Measures report which

sets out 19 initiatives including the provision of Travel Information Packs to all residents and the creation of a Travel Information Point at a prominent location within the development to promote sustainable movement. It is also proposed to provide an on-site car club and details of correspondence with Enterprise has been submitted in this respect. The details include the provision of 2 years free membership and £50 drive time to incentive use of the car club by residents.

100. Details of EVC infrastructure has also been submitted. Further to my feedback to the applicant, the proposals now provide 100 (50%) active EVC spaces and 100 (50%) passive EVC spaces. Both car club spaces would have active EVC. Details of the layout and specification of both active and passive provisions have been provided. The Highways Authority raise no objection to the details contained within this reserved matters application and I am satisfied that they are acceptable and would help provide sustainable alternatives to travel by private car in accordance with relevant planning policy as well as help stimulate the take-up of EV's by residents through good on-site infrastructure provision.

- **Cycle parking**

101. Policy TRA6 of the ALP requires cycle parking to be provided at a minimum of 1 space per unit. In accordance with the requirements of condition 15 of the outline permission, provision is shown for at least 200 cycles on two-tier racks, split evenly between the undercrofts of both blocks. Whilst these would be covered and easily accessible to the building cores they are not shown as having an overtly secure design/layout. In response to my feedback, the applicant has confirmed that comprehensive access control measures will be introduced across the development and it is therefore appropriate in my view that further details pertaining to the security of the cycle stores (which may include their enclosure with visually permeable cage-style walls/doors) and the wider development be secured via condition.
102. It is proposed that cyclist access from Elwick Road to the undercroft cycle parking is to be shared with vehicles. Whilst this is acceptable in principle my recommendation is that line markings showing dedicated routes for cyclists and pedestrians be provided to enhance safety and further promote active travel. The applicant has agreed this can be reserved by condition.
103. Further visitor cycle parking is proposed via Sheffield stands on the access road and near to Elwick Road. These would be appropriately integrated into the landscaping strategy and sited to benefit from passive surveillance.

104. Subject to the conditions referred to above, I am satisfied that the cycle parking provision is acceptable and in accordance with relevant planning policy.

- **Refuse strategy and servicing**

105. Sufficient communal refuse and recycling storage has been incorporated into the lower ground floors of both buildings. The storage areas are easily accessible from the building cores. The refuse collection strategy would involve the input of the on-site management team who would be responsible for manoeuvring bins between the storage areas and the designated bin collection area on collection days. Tracking plans of refuse vehicle movements have been submitted to demonstrate that the layout of the development works. Such managed approaches to refuse collection is not uncommon within major developments and the Council's Street Scene and Open Spaces Officer is satisfied with the arrangements.

106. Notwithstanding the requirements of condition 9 of the outline permission relating to external storage areas, no details of the design of the bin collection area have been submitted. I recommend that these and fine details (to ensure good practice in relation to general waste, food waste and recycling, including details of internal signage and any other related proposals to achieve such practice and help avoid cross-contamination) are secured by an appropriate condition.

107. Finally, appropriately sized and located servicing bays have been incorporated into the access road between the two buildings to facilitate deliveries to the development without impacting on highway safety on Elwick Road.

(f) Landscaping, ecology and biodiversity, surface water and drainage and contamination

- **Landscaping**

108. This Reserved Matters application is supported by a Landscape Statement, Landscape Management Strategy and comprehensive hard and soft landscape plans in accordance with the requirements of conditions 1, 41 and 42. An extract of the Landscape Illustrated General Arrangement Plan is shown in **Figure 13** below:



Figure 13: Extract from Landscape Illustrated General Arrangement Plan

109. The parameter plans approved by the outline planning permission allowed for hard and soft landscaping on the Elwick Road frontage and the landscape design has evolved to carefully integrate the development with the established public realm in this location. Specifically, it is proposed to retain the mature landscape feature provided by the avenue of street trees and to use high quality hard and soft landscaping, including 11 new trees, to signpost the main building entrances, to promote active frontage and to create spill out spaces with potential for seating adjacent to Elwick Place, the resident super-lounges and café. Notwithstanding the limitations imposed by the narrower red line boundary in front of Block A and the consequent impact on suitable tree species in this location, the layout and design of this 'Urban Link' would in my view respond well to the existing design of the shared space surface and would enhance its role as a key connection between the town centre and railway station for pedestrians and cyclists.
110. The ramped central access road (referred to as the 'Eco Street' in the Landscape Statement) would be flanked by two feature trees to emphasis the gateway role of this street. As shown in **Figure 13** above, it would incorporate different surface materials with the section closest to Elwick Road comprising clay pavers to match the existing shared space scheme. Consideration of the precise access details are reported in paragraphs 91-93 above.

111. In terms of planting, the Eco Street would incorporate 10 new trees and extensive shrub planting to create a welcoming tree-lined boulevard linking Elwick Road with the undercroft parking areas. It would also include visitor cycle parking and a servicing/set-down area. The landscape design in this location also includes retaining walls and careful demarcation of private residential entrances, semi-private residential spaces and the public realm. Further details of the finishes of the proposed retaining walls in the context of the topography of the site and the need to secure high quality public realm are ones that I consider it is reasonable to secure by condition. In response to the topography of the site it is also proposed to install a piece of kinetic art adjacent to the southern boundary to act as a landmark feature and to help terminate the available view from Elwick Road and reduce the visual impact of the concrete barrier wall to HS1. I recommend details of this feature also be secured by condition.
112. Within each of the two buildings is a large 'Podium Garden' featuring small integrated play spaces, seating and tree and shrub planting for use by residents. The play spaces are in addition to the financial contribution for off-site play equipment secured by the outline permission s.106 agreement. The podiums would provide high quality and imaginative social spaces to foster a sense of community and be visible through (and directly accessible from) the communal 'super-lounges'. I consider this would create a welcome visual interaction between the communal private realm and the public realm of Elwick Road. As with the Eco Street, the Podium Gardens would utilise careful seasonal planting to effectively demarcate and provide an element of privacy between the private residential entrances and amenity spaces and the adjacent communal amenity spaces. As recommended by the Design Review Panel the podiums would also incorporate blue roofs and be of direct benefit to the planted landscape.
113. Notwithstanding the significant constraints imposed by the Southern Water easement adjacent to the southern boundary, the landscape design of the 'Railway Terrace' would provide buffer planting and a soft green edge to the development. It is also proposed to utilise permeable block paving for the parking bays in this location. In my view, this area would be suitably landscaped.
114. In summary, the proposals would result in significant enhancements to hard and soft landscaping across the application site compared with the existing situation and, as noted by the Design Review Panel, will make a significant contribution to the character and town centre 'liveability' of the development.

The Landscape Management Strategy sets out an appropriate strategy for the long term maintenance of the whole development. Revisions to tree and soft planting schedules have been secured in response to comments from the Council's Tree and Open Spaces Officers to ensure that the soft landscaping is fully integrated into the layout and design and offers maximum visual interest and biodiversity benefits in accordance with relevant planning policy and guidance.

- **Ecology and biodiversity**

115. The site is not subject to any national or local nature conservation designations. The outline planning application was supported by a desk study and extended Phase 1 Habitat Survey which found no evidence of protected species. A detailed bat survey assessed 4 trees as having low potential to support roosting bats and recommended a precautionary approach be implemented during the removal of these trees. Notwithstanding the low ecological value of the existing site, it offers much scope for ecological and biodiversity enhancement and the permission is subject to a condition (20) requiring further details to be provided.
116. This Reserved Matters application is therefore supported by an Ecological Mitigation Strategy (EMS) that would secure the recommendations set out in the approved Preliminary Ecological Appraisal.
117. The strategy includes incorporation of a planting mix to provide a variety of habitats for floristic diversity and includes both native species and species of benefit to biodiversity. The planting mix has ecological value through providing bird nesting opportunities, shelter and overwintering for invertebrates and for nectar and pollen production for foraging birds and bats. The planting plans have been amended in accordance with the Council's Open Spaces Officer's advice and are acceptable. Details of the location and specification of 5 bat tubes and 5 bird boxes have also been provided.
118. The Council's Ecology advisor (KCC Ecological Advice Service) initially made comments in relation to the practicalities of managing and maintaining the eco-buffer planting adjacent to the southern boundary in the context of the car parking layout. They also made comments in relation to the extent of the external lighting strategy, the requirements for further bat scoping surveys and proposed bat and bird features. Natural England has no comments on the application.
119. In response to these comments, relevant plans have been amended by the

applicant to provide a kerb and strip of paving adjacent to the southern boundary planting area to protect the planting from damage in this location. The EMS has also been amended to reflect the requirements and responsibilities of contractors in relation to bats when felling trees. It is also noted that condition 38 of the outline permission requires the applicant to inform the Council if bats are discovered during felling and for such activity to cease immediately in such a scenario. In this context further bat scoping surveys are not considered necessary. The EMS and relevant plans have also been amended to include further details on the precise location and specification of bat and bird boxes.

120. The comments in relation to the extent of the external lighting strategy have been considered. In response, the applicant has confirmed that the proposed level of lighting complies with relevant British Standards and is necessary to ensure a safe environment for residents and visitors, including on the podiums where the main accesses to duplex units are located. The application is supported by a Lighting Impact Assessment which confirms that a lighting control system will be installed to control the external podium lighting (comprising mainly bollard lights), which will be switched off between 23:01-06:59. Similarly, the system will dim the external column lighting to 25% of full output between 23:01-06:59. I am satisfied that the strategy has been designed to incorporate bat sensitive lighting (with lower UV content) and to prevent night time light pollution.
121. Being mindful of the site's urban location and the existence of overspill light from street lighting and adjacent commercial premises I am satisfied that the lighting strategy is acceptable and in accordance with the requirements of Policy ENV4 (Light Pollution and Promoting Dark Skies) of the ALP. The Council's Environmental Protection team recommend that condition 10 (External Lighting Strategy) of the outline planning permission be discharged. This does not impact on the recommendation above to secure further details of the lighting on the front and side elevations of the building to ensure it is appropriate in the streetscene.
122. In summary I am satisfied that the development proposals would enhance the ecology and biodiversity value of the site in accordance with Policy ENV1 and ENV4 of the ALP.

- **Surface water and drainage**

123. Policy ENV9 of the ALP and the adopted Sustainable Drainage SPD state that all development should include appropriate SuDs for the disposal of water in order to avoid any increase in flood risk or adverse impact on water quality.

The outline planning permission is subject to a condition to restrict water consumption to no more than 110 litres per person per day in accordance with the requirements of Policy ENV7 of the ALP. Other conditions (13, 21, 22 and 23) require details of a drainage scheme and means of foul and surface water sewerage disposal to be submitted.

124. This Reserved Matters application is supported by a Drainage Management Plan which identifies that discharge rates will be limited through the use of blue roofs on the podiums, an attenuation tank and permeable paving. The site lies within flood zone 1 with a very low risk of flooding and the details confirm that the proposed development would be served by adequate drainage. Neither the Local Lead Flood Authority nor the Environment Agency has any objection to the proposals in this regard. Southern Water are also satisfied with the details relating to foul and surface water drainage which will be via the public sewer network.
125. In summary, the hierarchy of surface water disposal has been adhered to, resulting in proposed connections to the public sewers in the vicinity of the development consistent with Phase 1. Surface Water flows are to be attenuated on site. Living (blue) roofs plus lined permeable paving shall also be incorporated into the proposed drainage infrastructure, which would improve water quality and provide biodiversity benefits in accordance with the requirements of national and local planning policy and the Council's Sustainable Drainage SPD.

- **Contamination**

126. A site investigation report submitted in support of the outline planning application identified some contamination on the site following the previous uses. In accordance with the requirements of condition 24 of the outline planning permission requiring the submission of a remediation scheme to deal with the contamination found on site, this Reserved Matters application is supported by a Phase 2 Remediation Strategy and Verification Plan.
127. The remediation scheme includes the decommissioning of monitoring wells and keeping a watching brief for signs of potential contamination during works. Both the Environment Agency and Council's Environmental Health team raise no objection to the details submitted and recommend discharge of condition 24 of the outline planning permission.

(g) Impacts on HS1

128. By reason of the proximity of the application site to HS1 there is a requirement

for any development on the site to protect the integrity, safety, security, operation, maintenance and liabilities of HS1 and HS1 Property. To this end condition 19 of the outline permission required submission of evidence to demonstrate that a formal process of approvals between the applicant and HS1 has been entered into and commenced.

129. HS1 has confirmed that a Protective Provisions Agreement is now in place with the applicant which gives a large degree of control over onsite operations and they therefore confirm that condition 19 can be discharged.
130. HS1 has also reviewed the details submitted as part of this application. In response to feedback from HS1 the applicant has submitted amended plans. Whilst HS1 has confirmed that the issues they have raised are capable of being addressed, they have requested further detail relating to the design of balconies on the southern elevation be submitted following a proper risk assessment. They have also requested submission of details relating to any future maintenance of the development which could prejudice the safety, operation or maintenance of HS1. In my view, it is reasonable to secure these details by a further planning condition.

(h) Sustainability and climate change

131. This Reserved Matters application is supported by a Design Statement that states the design of the two blocks is focussed on delivering 'the most sustainable residential property in Ashford'. The proposed energy strategy comprises the installation of energy efficient air to water heat pumps located on the roof of each building which would facilitate local generation and storage of heating and hot water in each unit, thereby eliminating circulation heat losses and the potential for overheating within the building. Whilst the proposal does not commit to the use of any traditional renewable or zero carbon technologies, the ALP notes the demise of Eco-Homes and Code for Sustainable Homes with the updated Building Regulations effectively superseding these initiatives aimed at securing more sustainable methods of design and construction. The Council's adopted planning policy position is to rely on the Building Regulations to reduce energy emissions. The Design Statement states that the development will meet the anticipated requirements of the Building Regulations Part 1A applicable in 2025 and will align with the principle of the Future Homes Standards (2025).
132. To this end the design of the buildings incorporate careful façade engineering and passive architectural measures to optimise heat loss, prevent overheating due to solar gain and minimise air leakage through high standards of air-tightness within each unit. It is anticipated that these measures would achieve

a 40% reduction against the Part L 2013 Building Regulations requirements. Each unit would also feature natural and mechanical ventilation with heat recovery.

133. More widely, the development would feature high efficiency LED lighting with movement detectors in communal areas and low flow water fittings. Each unit would have independent metering of utilities. The proposal provides for 100 parking spaces to be ('actively') equipped with chargers from the outset with the remainder ('passively') future-proofed to enable further provision to be provided in time. This would be in accordance with the requirements of Policy ENV12 of the ALP which requires all major development proposals to promote a shift to the use of sustainable low emissions transport.
134. In summary, I am satisfied that the proposed development has been designed to address and mitigate the risks of climate change, including through the implementation of a low carbon energy strategy and the construction of a building designed to minimise energy consumption. In this regard the proposals are consistent with national and local planning policy and guidance.

(i) Habitats Regulations

135. Since the application was submitted, the Council has received advice from Natural England (NE) regarding the water quality at the nationally and internationally designated wildlife habitat at Stodmarsh lakes, east of Canterbury, which in particular includes a Special Area of Conservation (SAC), a Special Protection Area for Birds (SPA) and a Ramsar Site.
136. The importance of this advice is that the application site falls within the Stour catchment area and the effect is that this proposal must prima facie now be considered to have a potentially significant adverse impact on the integrity of the Stodmarsh lakes, and therefore an Appropriate Assessment (AA) under the Habitats Regulations 2017 (as amended) would need to be undertaken and suitable mitigation identified to achieve 'nutrient neutrality' as explained in NE's advice, in order for the Council to lawfully grant planning permission. This is consistent with the KCC Ecological Advice Services request.
137. Under the Council's Constitution, the Head of Planning and Development already has delegated authority to exercise all functions of the Council under the Habitats Regulations. This includes preparing or considering a draft AA, consulting NE upon it, and amending and/or adopting it after taking into account NE's views.
138. As matters stand, it is very likely that an off-site package of mitigation

measures will be required in order for the development proposal to achieve 'nutrient neutral' status and in the absence of such measures (or any others) having been identified and demonstrated to be deliverable, it is not possible to conclude, at this moment in time, that the scheme would be acceptable in respect of this issue.

139. However, work commissioned by the Council has commenced on identification of a package of strategic mitigation measures that should enable relevant developments within the Borough's River Stour catchment (where the NE advice applies) to come forward on a 'nutrient neutral' basis, subject to appropriate obligations and conditions to secure the funding and delivery of the mitigation before occupancy of the development.
140. Therefore, on the basis that this proposal is considered to be otherwise acceptable in planning terms (subject to planning conditions), I recommend that a resolution to approve the reserved matters should also be subject to the adoption by the Head of Planning and Development (having consulted NE) of a suitable Appropriate Assessment to address the Habitats Regulations, to the effect that the proposed development will not adversely affect the integrity of the SAC, SPA and Ramsar Site (by achieving nutrient neutrality), and to secure any necessary additional obligation(s) pursuant to a Deed of Variation and/or planning conditions that are necessary in order to reach that Assessment and ensure that at the time of occupancy the necessary mitigation is in place. This is included as part of my Recommendation (B) detailed further below.

(j) Planning Obligations

141. Whilst the applicant entered into a s.106 agreement as part of the grant of outline planning permission it is likely to be necessary to enter into a Deed of Variation to (i) secure the mitigation required to address the Habitats Regulations as discussed above and (ii) secure when the development might be able to be occupied according to successful delivery of the required off-site mitigation.
142. It has also been brought to my attention that minor changes to the existing s.106 agreement are now needed in order to ensure that wordings used are fully aligned with other contractual arrangements that the Council has in place as part of securing the commencement and delivery of the development. Such changes would have no implications on the planning obligations already secured and no implications in respect of the detail of this application and so I am content that the applicant can progress these separately with the Solicitor to the Council.

(k) Approval of outline conditions

143. For the reasons set out in the relevant sections of the above assessment, and as summarised below, I proposed that the following conditions be discharged. For the avoidance of doubt, I include that in my Recommendation further below.

Condition 1 - Approval of Reserved Matters
Condition 5 – Materials
Condition 9 – External Storage
Condition 10 – External Lighting
Condition 11 – Proposed Access
Condition 13 – Surface Water
Condition 15 – Cycle Storage
Condition 19 – High Speed 1 Approval Process
Condition 20 – Ecological Mitigation Strategy
Condition 21 – Surface Water Drainage
Condition 22 – Sustainable Drainage
Condition 23 - Foul and Surface Water Disposal
Condition 24 - Remediation Strategy (a)
Condition 30 - Noise Mitigation Scheme
Condition 33 - Archaeological Watching Brief
Condition 35 - Sustainable Movement and Electric Charging Points
Condition 41 - Landscape Features
Condition 42 - Landscape Management Plan
Condition 45 - Schedule of the Exact Mix and Proportions of Units in the Permitted Use Classes (Class C2, C3 and C3 restricted).

Human Rights Issues

144. I have also taken into account the human rights issues relevant to this application. In my view, the “Assessment” section above and the Recommendation below represent an appropriate balance between the interests and rights of the applicant (to enjoy their land subject only to reasonable and proportionate controls by a public authority) and the interests and rights of those potentially affected by the proposal (to respect for private life and the home and peaceful enjoyment of their properties).

Working with the applicant

145. In accordance with paragraphs 38 of the NPPF, Ashford Borough Council (ABC) takes a positive and creative approach to development proposals

focused on solutions. ABC works with applicants/agents in a positive and creative manner as explained in the note to the applicant included in the recommendation below.

Conclusion

146. The submitted Reserved Matters details relating to access, layout, scale, landscaping and appearance demonstrate that the proposals comprise a high quality well designed residential development as envisaged by the outline planning permission. In terms of access, layout, scale and design the proposals would be well integrated with its surroundings. The sensitive redevelopment of the existing vacant site would, in my opinion, represent an improvement to visual amenity and conserve and enhance the setting of the adjacent Town Centre Conservation Area. The proposals would also provide for significant enhancements to landscaping and biodiversity, including through extensive replacement tree planting.
147. The proposals would offer a range of dwelling types and sizes that would provide a choice of high standard of living accommodation and external amenity space for future occupiers. Externally, the proposals incorporate acceptable car and cycle parking in accordance with adopted Policies in the ALP. The development would incorporate highly efficient low carbon technologies and has been designed to minimise energy consumption. Importantly the development would also address climate change through measures including 50% active and 50% passive EVC infrastructure provision and would deliver a car club giving occupants of the development choice for those needing only occasional car usage given the central location close to amenities, bus stops and Ashford International railway station
148. The proposals would have no adverse impacts on the amenities of any adjoining residents or land uses. My Recommendation (A) below seeks delegation back to officers to deal with any further minor design changes that might be necessary in order to satisfactorily resolve on-going discussions with the Health & Safety Executive.
149. Currently, insufficient information has been provided to allow the Council to assess the impact of the proposal on the Stodmarsh SAC, SPA and Ramsar Site under the Habitats Regulations. Therefore, the Recommendation below to approve is subject to the adoption, under delegated powers, of an Appropriate Assessment to the effect that the development will not adversely affect the integrity of the SAC, SPA and Ramsar Site, and to secure any necessary additional obligation(s) and/or planning conditions to that end. Mitigation will be via an off-site solution.

150. Recommendation (B) further below deals with the necessity for the applicant to enter into a deed of variation s.106 agreement and includes delegation to officers to deal with any necessary deletions, amendments and additions that might be necessary to mitigate against impacts of development on the integrity of Stodmarsh SAC, SPA and Ramsar site.
151. As discussed within the main body of the report I recommend that a number of conditions will be necessary. My Recommendation (C) further below deals with delegation to add/amend/remove planning conditions as appropriate.

Recommendation

- A. Delegated authority to be given to the Development Management Manager or the Strategic Development and Delivery Manager to conclude the acceptability of any further minor changes to the design of the buildings and/or layout that may prove necessary in order to resolve, to their satisfaction, any remaining issues requiring resolution with the Health & Safety Executive,**
- B. Subject to the applicant first submitting information to enable an Appropriate Assessment under the Habitats Regulations 2017 (as amended) to be adopted by the Head of Planning and Development which identifies suitable mitigation proposals such that, in his view, having consulted the Solicitor to the Council and Natural England, the proposal would not have a significant adverse effect on the integrity of the Stodmarsh SAC, SPA and Ramsar Site alone or in combination with other plans or projects; and with delegated authority to the Development Management Manager or the Strategic Development and Delivery Manager, in consultation with the Solicitor to the Council, to enter into a section 106 deed of variation agreement/undertaking to add, amend or remove planning obligations and/or planning conditions as they see fit to secure the required mitigation and any associated issues relating thereto,**
- C. Resolve to;-**
- (i) APPROVE the relevant conditions of the outline application and,**
 - (ii) APPROVE the reserved matters details subject of the application**

subject to the further planning conditions and notes, including those dealing with the subject matters identified below (but not limited to that list) and any necessary to take forward stakeholder representations, with wordings and triggers revised as appropriate and with any ‘pre-

commencement' based planning conditions to have been the subject of the agreement process provisions effective 01/10/2018.

Further conditions:

1. Details of external lighting strategy for front and side elevations of buildings
2. Details of external building signage/advertisements for front and side elevations
3. Provision of internal surface finishes (ceilings, walls and floors) for LKD and bedrooms
4. Details of cycle store security measures
5. Details of undercroft access controls
6. Details of undercroft line-marking for pedestrians and cyclists
7. Details of refuse strategy, including bin collection area
8. Details of retaining wall finishes and materials
9. Details of kinetic art feature adjacent to southern boundary
10. Details of a risk assessment to identify risks to HS1 from deliberate or windblown debris from the development
11. Details of development maintenance which could prejudice the safety, operation or maintenance of HS1

Notes

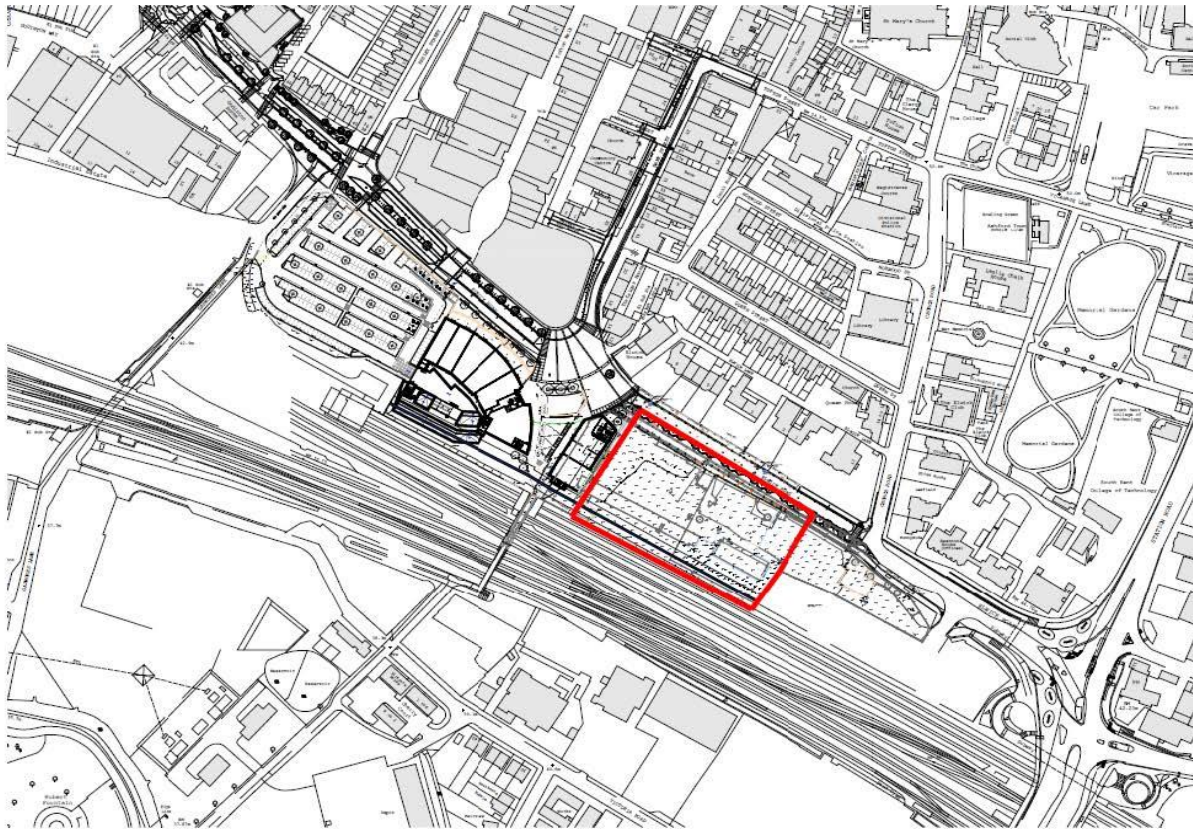
Expect applicant to liaise with Kent Police to further review how Secured By Design principles can be included in fine detail etc.

Background Papers

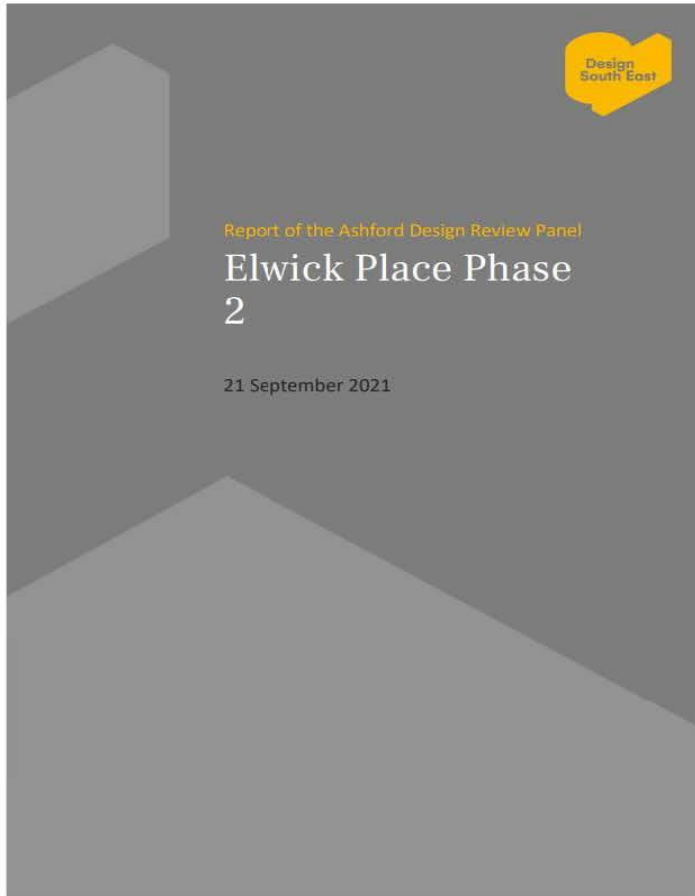
All papers referred to in this report are currently published on the Ashford Borough Council web site (www.ashford.gov.uk). Those papers relating specifically to this application may be found on the [View applications on line](#) pages under planning application reference 21/02219/AS)

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Annex 1 – Site Location Plan



Annex 2 – DRP Report



The design review meeting

Reference number	1688/070921
Date	7 th September 2021
Meeting location	Online via Zoom
Panel members attending	Liz Gibney (chair), architecture and urban design Nimi Attanayake, architecture and housing Chris Boarman, architecture and housing Peter Neal, landscape architecture Robert Sakula, architecture and urban design
Panel manager	Lizzie Atherton, Design South East
Presenting team	Guy Holloway, Holloway Mike Pearson, Holloway Clinton Olajide, Holloway
Other attendees	Carl Thomason, Sunningdale House Developments Gary Bourne, Stanhope PLC Robert Park, Exterior Architecture Chloe Clark, Savills Emily Porter, Savills Mark Chaplin, Ashford Borough Council Matthew Durling, Ashford Borough Council Roland Mills, Ashford Borough Council Rebecca Potter, Ashford Borough Council Councillor Mick Burgess, Ashford Borough Council Councillor Charles Suddards, Ashford Borough Council Graham Galpin, Central Ashford Community Forum Sarah Brown, Design South East Bridie Lebdiri, Design South East (observer)
Site visit	This review was carried out during the Covid-19 outbreak in 2020/21. Independent site study including desktop research prepared by Design South East and a digital walk-around (in a similar fashion to that which would have been conducted on-site) was carried out prior to the review.
Scope of the review	As an independent design review panel, the scope of this review was not restricted.

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Report of the Ashford design review panel

Panel interests	Allies and Morrison have been appointed to work on the Ashford Town Centre Reset. Chris Bearman is an employee of Allies and Morrison but is not directly involved in this project.
Confidentiality	This report is confidential as the scheme is not yet the subject of a detailed planning application. Full details of our confidentiality policy can be found at the end of this report.

The proposal

Name	Elwick Place Phase 2
Site location	Land opposite, 1-8 Elwick Road, Ashford TN23 1AE
Site details	A 0.835 ha brownfield site, broadly vacant with a small parcel for parking. The site is bounded by Elwick Road to the north and the HS1 railway line to the south. The eastern boundary is bounded by National Rail Car Park. Beyond this is the A2042 /Station Road) and Ashford International Station itself. Directly to the west, and coterminous with the application site, lies the Phase 1 development comprising a cinema, retail units and hotel which are currently under construction. To the north lies the Town Centre Conservation Area.
Proposal	Residential development for 182 units with self-contained office space (intended for occupation by the developer) plus co-working/super lounge spaces for residents.
Planning stage	Pre-application with intention to submit reserved matters application based on existing outline permission for residential development of up to 200 units.
Local planning authority	Ashford Borough Council
Planning context	The site is covered under policy TC3 in the Ashford Town Centre Area Action Plan which states: "East of Elwick Square, the part of the site fronting the Victorian villas on the northern side of the street is proposed for mainly residential use (with the potential for some office space integrated into a more mixed-use) and needs a design treatment that is sympathetic to the scale and pattern of building blocks these villas bring to Elwick Road".

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Report of the Ashford design review panel

Planning history	An outline application (ref. 15/01282) was submitted in 2015 and granted, with all matters reserved except access.
Planning authority perspective	Ashford Borough Council approves of the development principle at the outline stage but the discussions are still at an early stage with detail still being progressed.
Community engagement	N/A

Summary

We welcome the development of this site and the opportunity it provides to positively shape the street scene in this prominent and sustainable town centre location.

The proposal is promising, however more thought needs to be given to the identity of this particular place and its role in Ashford. Complexity and variety should be introduced to the blocks (and the homes within them) so that this scheme becomes a characterful and rich addition to Elwick Road. As a second phase development, which will be visible to many, it should not only be Ashford's landmark residential scheme but also sensitively accommodate future residents, based on an understanding of how they will live and their specific needs.

We would welcome a further review of this scheme once the following recommendations have been worked through.

Key recommendations

1. Further consider the development's role in Ashford and what it will offer to its residents and the community.
2. Introduce character, identity, and variety to the blocks, considering how they will activate the streetscape and contribute to the surrounding townscape.
3. Increase substantially the number of units that are dual aspect, and that are cross-ventilated and benefit from natural light.
4. Respond more sensitively to the site's edge conditions and define how the scheme connects with the public realm beyond the site boundary.
5. Embed sustainability principles throughout the design. Given the highly sustainable location, a reduction in parking should be prioritised by Ashford Borough Council and the applicant team.
6. Explore a more ambitious landscape strategy and ensure it is achievable, given environmental conditions and constraints.

Detailed comments and recommendations

1. **Design Strategy**
 - 1.1. The options process and previous design iterations should be presented, to better understand the evolution of the design process, and to understand why the option presented was taken forward.
 - 1.2. The site's constraints, context, and edge conditions could be further celebrated and used to drive sensitive and positive relationships with neighbouring spaces and buildings.
 - 1.3. An in depth analysis of the local context and views will enable the buildings to move beyond imitating neighbouring geometry and architectural treatment and more thoughtfully respond to Ashford in terms of materiality, scale, quality, and proportion.
 - 1.4. Access and routes across the site, and the people who will use them, need to be described further. The transitions and boundaries between public/semi-public/and private spaces during these journeys should be established to support positive interactions and foster community.
 - 1.5. We would welcome some wider thinking about how this scheme will provide homes that meet contemporary needs and demonstrate how the proposals will respond to the climate crisis, contribute to the sustainability of neighbourhoods, and foster community.
2. **Site layout**
 - 2.1. We would question the simplicity of the U-block forms and their responsiveness to the site's different edge conditions. Their symmetrical nature appears to assume a negative condition on the eastern boundary as well as the west. These conditions should be interrogated further to introduce complexity and thoughtfulness to the design.
 - 2.2. Additionally, the ramp on the west side of the site, between the proposals and the Travelodge has the potential to be an overshadowed uninviting space, and therefore prone to antisocial behaviour.
 - 2.3. The proposals could relate much more closely to external views of key green spaces, in terms of orientation, by exploring maximising the views southwest to Victoria Park and northeast out to the Memorial Gardens.

- 2.4. The public, semi-public, and private realm should be mapped with consideration given to the journeys and routes people will take.
3. Landscape
- 3.1. The landscape design will make a significant contribution to the character and liveability of the development. It should provide social spaces to foster a sense of community and should seek to deliver biodiversity net gain. Enhancements across the roofs, southern boundary, eco-street, and courtyards should be resilient to both current and future environmental conditions.
- 3.2. The easement landscape treatment on the southern boundary should be reconsidered, and the described restrictions challenged, to provide further landscape benefit where possible. As a starting point, removing or reducing the carparking provision on the southern boundary could be explored to provide a stronger green edge.
- 3.3. The eco-street depicted has the potential to be a welcoming tree-lined boulevard. As an elevated landscape, its structural integrity should be tested to ensure tree planting is maximized. The views along the corridor and landscape treatment of its terminus should also be worked through.
- 3.4. The 900mm planting depth proposed for the podium will be challenging for plant and tree growth when combined with the southerly aspect of the courtyards, the amount of light and resultant solar gain. The blue/green engineering solution for the podium slab is welcomed but should be tested and if necessary increased in depth to ensure it is sufficient for the long-term growth of plants and trees.
- 3.5. The courtyard gardens will require a strong seasonal planting strategy and management plan to make them attractive and successful gardens for residents.
- 3.6. The roofs' environmental performance should be maximized, by exploring incorporating green, brown and blue roofs - as well as solar panels where appropriate - to create passive BioSolar roofs. Incorporating blue roofs in particular will improve surface water management and provide direct benefit to the planted landscape.
- 3.7. The greening proposed on Elwick Road should take account of the north-facing aspect and reduced solar gain.

4. Movement
- 4.1. The site's location is extremely sustainable with excellent public transport links. Consequently a lower, more ambitious car parking ratio should be pursued in conjunction with Ashford Borough Council.
- 4.2. The movement sequences from the scheme, beyond the site boundary, to key public routes and green spaces, should be worked through and considered at a human scale. For example, the bridge to the southwest of the site will be part of a key pedestrian link towards Victoria Park and pedestrian routes to this should be addressed thoughtfully by the scheme.
- 4.3. The cycling provision should be more generous to ensure it is an accessible and attractive mode of transport for all residents.
5. Architecture and treatment
- 5.1. Further consideration should be given to how this scheme fits into and responds to Ashford by testing and presenting a variety of architectural approaches
- 5.2. We are not convinced by the comparison of the blocks' geometry with the villas due to their entirely different scales and heights. The drawings should not suggest that the villas and the proposed buildings are of the same height.
- 5.2.1. Exploring a mansion block typology - and taking clues from Ashford's typical materiality and architectural treatments - could be a solution to providing buildings that complement the villas. Such a typology could also introduce verticality into the facades and reduce the emphasis on the proposal's width.
- 5.3. We would question whether both the buildings must be treated the same, or whether they could express difference in character as part of a changing streetscape. Further richness and enhancements could also be introduced by considering what residents and passers-by alike may see from various perspectives and exploring how these glimpses could delight and add interest to the street scene.
- 5.4. The ground floor frontage should be activated as much as possible. This could start to be addressed by moving circulation into the public realm, avoiding the need for internal corridors, and locating the front doors of the ground floor duplexes facing the street.
- 5.5. The gold treatment is leading to the proposal's character relating closer to the cinema, rather than the villas, and confusing their identity.

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6. Internal layout

- 6.1. The limited number of dual aspect flats is concerning, and a much higher percentage of the flats should be dual aspect to limit the risk of overheating, allow for cross-ventilation, and increase the provision of natural light for residents. Several suggestions were made to resolve this and options that could be explored include adding more cores (although we appreciate there may be associated viability constraints), aligning flats east to west, or more substantial reconfiguration.
- 6.2. Consideration should be given to what makes one flat different to another, to bring richness to the internal layouts and provide a diversity of internal spaces.
- 6.3. We welcome the super-lounges; they will be a good opportunity for residents to meet, work, and foster community. However, the amenity provision could be further varied and the frontages activated by introducing additional ground floor uses, for example, a gym, workspace, nursery or community space.

7. Energy strategy

- 7.1. We welcome the client's evident commitment to sustainability. However, the embodied carbon in this building will be substantial, and the applicant team should explore an approach to construction that is less reliant on concrete and steel.
- 7.2. The longevity of this scheme should be assessed with consideration given to how different future uses could be accommodated - particularly regarding if the carpark is ever repurposed.
- 7.3. Our guidance is that at the planning application stage the proposal must produce a clear energy strategy which details how the development will optimise thermal performance, minimise the demand for energy, supply the remaining energy requirements efficiently and optimise the use of renewables in order to align with the Government's emerging zero carbon policy. This strategy should be informed by detailed modelling work informed by respected calculation methods.

reserves the right to make this report available to another design review panel should the scheme go before them. If you do not require this report to be kept confidential, please inform us.

If the scheme is the subject of a planning application the report will be made publicly available and we expect the local authority to include it in the case documents.

Role of design review

This is the report of a design review panel, forum or workshop. Design review is endorsed by the National Planning Policy Framework and the opinions and recommendations of properly conducted, independent design review panels should be given weight in planning decisions including appeals. The panel does not take planning decisions. Its role is advisory. The panel's advice is only one of a number of considerations that local planning authorities have to take into account in making their decisions.

The role of design review is to provide independent expert advice to both the applicant and the local planning authority. We will try to make sure that the panel are informed about the views of local residents and businesses to inform their understanding of the context of the proposal. However, design review is a separate process to community engagement and consultation.