

**Application Number** 19/00579/AS

**Location** Land on the North Side of Highfield Lane, Sevington, Kent

**Grid Reference** 04000 / 41000

**Parish Council** Mersham

**Ward** Highfield (Ashford)

**Application Description** Approval of the appearance, landscaping, layout and scale of the 'Phase 1A works' being the works comprising the estate roads, the sustainable drainage system embedded within open space and the landscaping and layout of that open space (including measures specifically designed for ecological/biodiversity enhancement purposes within that open space)

**Applicant** Aviva Life and Pensions UK Ltd

**Agent** Montagu Evans LLP  
 5 Bolton Street  
 London  
 W1J 8BA

**Site Area** 47.75ha

- |              |   |   |
|--------------|---|---|
| (a) 380 / 1R | (b) Sevington/Mers<br>ham Parish<br>Council - R | (c) KH&T – X; KCC PROW – X,<br>KCC ECO – X; KCC SuDS –<br>X; HE – X; CTRL - ; NR - ;<br>RAM - ; EA – X; NE – X; KWT<br>- ; UKPN - ; SGN - ; RSIDB –<br>X; PO (Drainage) - ; |
| (a) NA       | (b) NA  | (c) KH&T – X; KCC PROW – X,<br>KCC ECO – X; KCC SuDS –<br>; HE – ; EA –RSIDB – ;  |

## Introduction

1. This application for approval of various reserved matters is reported to the Planning Committee because it is a major application relating to a large scale employment development at the site and although some elements could be dealt with under delegated powers others would involve delegation only after the prior consultation with the Planning Committee process: in the circumstances of the case, and the timetable to which the applicant is working in terms of commencement, it was agreed with the applicant that it would be appropriate to report the application directly to the Planning Committee. Alongside the application reserved matters, the applicant has also submitted various applications to discharge details to planning conditions that require approvals prior to commencement: determination of these submissions falls within the powers delegated to officers.
2. The application is a reserved matters application submitted pursuant to condition 1(A) of outline planning permission reference 14/00906/AS.
3. That outline application was submitted by Montagu Evans LLP on behalf of Friends Life Limited. Friends Life is now part of the Aviva group and so Aviva is the applicant.

### The Outline Planning Permission

4. Outline planning application 14/00906/AS was considered by the Planning Committee on 18 May 2016 where it was resolved to grant planning permission subject to various matters including the completion of a s.106 agreement. Outline planning permission was subsequently granted on 13 September 2017.
5. Outline planning permission 14/00906/AS grants permission for the following development:

*Development to provide an employment led mixed use scheme, to include site clearance, the alteration of highways, engineering works and construction of new buildings and structures of up to 157,616 sq m comprising: up to 140,000 sq m Class B8 (storage and distribution) use; up to 23,500 sq m of B1a/B1c Business (of which a maximum of 20,000 sq m of B1a); up to 15,000 sq m of B2 (general industry); up to 250 sq m of A1 (retail shops) and 5,500 sq m of sui generis to accommodate Kent Wool Growers together with ancillary and associated development including utilities and transport infrastructure, car parking and landscaping.*

6. Given the major nature of the development the application was accompanied by an Environmental Statement (ES) together with a suite of supporting documents including a whole site masterplan, as required by the Council's adopted Planning Policy relating to the site at the time the application was

determined (policy U19 of the Urban Sites and Infrastructure DPD). A number of possible variations of the masterplan were contained within the outline application, however, the main illustrative master plan supporting the application is copied below as Figure 1.



**Figure 1 Illustrative Masterplan**

7. The applicants approach to the masterplanning of the site involved:
- creation of a 'landscape and ecological framework' within the site through the creation of a 'green grid' comprising landscape buffers, green edges and corridors helping filter views, preserve views of the Grade I Listed St Mary's Church in the interest of its setting and through building plots and building sizes being dictated by landscape context.
  - creation of 'character areas' comprising key landscape elements.
  - creating an 'eco park environment' involving changing levels by 'cut' towards the centre of the site and 'fill' towards the edges to create level plots for the uses identified in the allocation, creation of a series of swales and ponds as an integral component of the landscape framework

(‘blue grid’) and an early approach to planting and changes to levels in order to help establish a natural environment.

- creation of a ‘connected development’ to the strategic and local highway networks, establishing safe streets with access connection to proposed plots from new streets, provision of public access via a series of themed paths and trails and safeguarding future routes.
  - placement of smaller buildings to the site edges, the creation of inward looking buildings, the provision of the long edged large buildings to best utilise the potential for solar gain and the provision of landscape screening.
8. The outline application also considered the matter of vehicular access to and from the site via Church Road, which included proposals to realign Church Road to the east of the A2070 in order to help reduce the approach gradient for vehicles entering the Strategic Road Network (SRN). The application (as amended in 2015) contained two different options as to how the Church Road/A2070 junction might be reconfigured depending on various development scenarios and taking into consideration the progress of the Highways England proposals to create a new Junction 10A to the M20 motorway together with link road through the land to the north of the site in order to connect the new junction to the A2070. Following the issue of the Development Consent Order, the works to the M20 to create the new junction and link road are now at an advanced stage: these are expected to be completed in the summer of 2020 but open to traffic in autumn 2019.
9. The access arrangements were previously deemed to be acceptable, subject to a number of conditions and subject to road infrastructure improvements secured through a s.106 agreement. The relevant conditions, (imposed on the outline planning permission) include conditions 11-15 which restrict the amount of traffic generated from the site prior to road infrastructure improvements. The s.106 agreement includes a requirement to prevent through traffic moving between Highfield Lane and Kingsford Street, a requirement to prevent through vehicular traffic at the southern end of Church Road (using lockable bollards or similar measures to maintain an access for emergency vehicles only) and a requirement to provide a refuse freighter sized turning facility to enable a turn and return in an easterly direction along Kingsford Street.
10. In terms of the detailed design for the primary access connection onto the Junction 10A link road, this will form the subject of a future planning application.

### The Current Application

11. The principle of an employment led mixed use scheme on this site has already been established through the grant of outline planning permission 14/00906/AS. The permission remains extant.
12. The purpose of this reserved matters application is to consider the detailed design relating to matters required to be submitted in accordance with Condition 1(A) of the outline planning permission.
13. Condition 1(A) of the outline planning permission expressly requires the following detail to be submitted prior to any reserved matters relating to the layout and design of the first building at the site:
  - Details of the siting, design, appearance and landscaping of:
    - the estate roads,
    - the sustainable drainage system embedded within open space; and
    - the landscaping and layout of that open space (including measures specifically designed for ecological/biodiversity enhancement purposes within that open space)
14. In full condition 1(A) states:

*“Approval of the phase 1 works involving the siting, design, appearance and landscaping of the estate roads, the sustainable drainage system embedded within open space and the landscaping and layout of that open space (including measures specifically designed for ecological/biodiversity enhancement purposes within that open space) shall be obtained from the local planning authority prior to the approval of the first new building to be constructed within the site and thereafter the phase 1 works shall be carried out in accordance with such approval unless the Local Planning Authority has agreed to any variation in writing”.*
15. Therefore, the reserved matters application before the Council relates solely to all land situated outside of the proposed development plots that the market will come forward with in due course through applications to the Council. The intention behind this approach was to ensure that the details of estate structure / ‘green grid’ structure / ‘blue grid’ structure and buffer/edge planting detail all came forward at the earliest opportunity for approval thereby creating a clear framework into which future applicants for the various plots could prepare their designs and layouts in the clear knowledge of a series of givens. In practice, and notwithstanding any ecological matters, around the margins of individual plot development and design there will need to a degree pragmatism when

future applications are submitted as detail approved now might need to be finessed but having an approved framework was considered the best way to ensure a coherent development as the site progresses in relation to market interest.

16. Approval of the siting design and external appearance of each of the buildings, the means of access from the estate roads into each individual development plot and the landscaping of each individual development plot will therefore form the subject of future reserved matters applications in accordance with condition 1(B) of the outline planning permission.
17. For clarification and as stated at paragraph 10 above, the detailed design for the junctions into the site including connection to the A2070 and the primary access onto the Junction 10A link road do not form part of this application.
18. The reserved matters application was submitted in April 2019 and full stakeholder and community consultation has been carried out. Minor amendments to the application were subsequently made in response to comments received from Kent County Council (KCC) Highways and Transportation, KCC Flood and Water Management, KCC Public Rights Of Way & Access Service, KCC Ecology and the River Stour Internal Drainage Board. As the amendments made are not considered to be significant in the context of the overall scheme, in accordance with the Council's Statement of Community Involvement 2013 I have not considered it necessary to undertake a wider stakeholder and community consultation on those minor changes: consultation has, however, been undertaken with those consultees requiring further information and/or amendments to the scheme.

### **Site and Surroundings**

19. The site (located as per Annex 1) currently comprises an area of approximately 48 hectares and is located to the south east of the town. The site is bounded by countryside and the existing M20 and new Junction 10A and associated link road to the north, Highfield Lane and Kingsford Street to the east, the Channel Tunnel Rail Link (CTRL) line to the south and Church Road and the existing A2070 to the west. Between the application site and the A2070 to the west is a farmstead with Grade 2 listed buildings and St. Mary's church which is Grade 1 listed.
20. The site currently comprises an area of countryside approximately 48 hectares in extent. The countryside in this location is not designated as Special Landscape Area or Area of Outstanding Natural Beauty. The land forming the application site is used for agriculture.

21. The report to the Planning Committee relating to the outline planning permission describes the site as being bounded to the north by countryside and the existing M20. Immediately to the north of the M20, the land was described as comprising a mix of uses including a number of residential properties and the Wyevale Garden Centre and slightly further to the north the Tesco superstore at Crooksfoot, the Pilgrim's Hospice and the William Harvey Hospital. All shown in the image copied in the image below:



**Figure 2 Aerial Imagery**

22. As stated above, the Highways England works to the M20 to create new Junction 10A and link road to the A2070 are now underway. Figures 3 to 6



**Figure 3 Interchange bridge(s)**

below show works associated with the construction of J10A and the link Road in context with the application site.



**Figure 4 Progress at Junction 10A (November 2018) published by KentOnline Picture: Ashford Borough Council / Ady Kerry**



**Figure 5 Roundabout linking to the A2070 (October 2018) published by KentOnline – Picture Vantage Photography**



**Figure 6 New Link Road (October 2018) published by KentOnline – Picture Vantage Photography**

23. Highfield Lane and Kingsford Street are located to the east of the site. The Channel Tunnel Rail Link (CTRL) line is located to the south and Church Road and the existing A2070 are located to the west with the suburb of Willesborough located on the western side of the A2070.
24. Between the application site and the A2070 to the west is the Court Lodge Farm farmstead with Grade 2 listed buildings and St. Mary's church, the latter being a Grade 1 listed building. Both are shown in the aerial image at Figure 7 below.



**Figure 7 Court Lodge Farm farmstead with Grade 2 listed buildings and St. Mary's Church Grade I listed**

25. There is no conservation area within or close/adjacent to the application site.
26. In terms of scale of built form, homes along Church Road and Kingsford Street are generally 2-storeys with pitched roofs and differ in their visual relationship with the site. Homes located on Kingsford Street nearest to the application site and the junction with Highfield Lane are generally more screened by existing trees at plot sides and rears rather than having uninterrupted views to and through the application site as the image at Figure 8 below shows.



**Figure 8**

23. Further east along Kingsford Street, there is a mixture of homes screened by existing trees at plot sides and rears as well as some homes fronting westwards as the image at Figure 9 below shows.



**Figure 9**

24. The majority of homes on Church Road have relatively open views across the site as the image at Figure 10 below shows.



**Figure 10**

25. Topographically, land levels rise from both the south and the north to the centre of the site. At this centre, there is a sense of a low ridge running in a broadly east-west axis through to Highfield Lane and beyond. Ground levels range from 61.95m AOD to 46.50m AOD across the whole site. From Highfield Lane moving westwards towards St. Mary's, land levels fall by 6 metres. The annotated aerial image at Figure 11 below depicts this arrangement.



**Figure 11 Topography**

26. A high pressure gas main runs in a north-east/south-west axis through the western part of the site: this has practical safety implications for the achievable master planning layout of the site.
27. Hatch Park, a Grade 2 listed Registered Park and Garden is located approximately 2km to the east of the site.
28. The nearest statutory sites of nature conservation importance are the Ashford Green Corridors (80m to the east) and Hatch Park (680m to the east) with five non-statutory sites of nature conservation value located within 2km of the site. These are as follows;-
  - (i) Roadside Nature Reserve Local Wildlife Site ('LWS') – abutting the north-eastern boundary of the site
  - (ii) Willesborough Lees and Flowergarden Wood LWS – km north
  - (iii) South Willesborough Dykes LWS – 1.7km south-west
  - (iv) Woods near Brabourne LWS – 1.7km
  - (v) Great Stour River LWS – 1.9km north

## **Proposal**

29. This reserved matters application seeks approval of the appearance, landscaping, layout and scale of the Phase 1A works, as set out in condition 1A of the outline permission which is copied in full in the introduction section of this report.
30. The details relating to the reserved matters relate to all the land situated outside of the development plots identified on the master plan copied at Figure 12, and includes detailed proposals for:
  - the estate roads;
  - the sustainable urban drainage system embedded within the open space; and
  - the landscaping and layout of that open space, including measures for the enhancement of ecology and biodiversity.
31. Approval of the siting design and external appearance of each of the buildings, the means of access from the estate roads into each individual development plot and the landscaping of each individual development plot will form the subject of future reserved matters applications in accordance with condition 1(B) of outline planning permission 14/00906/AS and so do not form part of the application.



Figure 12 Proposed Masterplan

### Estate Roads

33. This reserved matters application comprises a number of drawings, which identify the location and design of the estate roads, including the General Arrangement Plans which identify the location of the roads and show the proposed carriageway, cycleway and footways.
34. In accordance with the illustrative masterplan accompanying the outline planning application, the roads are proposed to be arranged with a north-south route, accessed from the M20 J10A link road, and a new east-west road in the southern part of the site accessed from Church Road/A2070 (Figures 13-15).

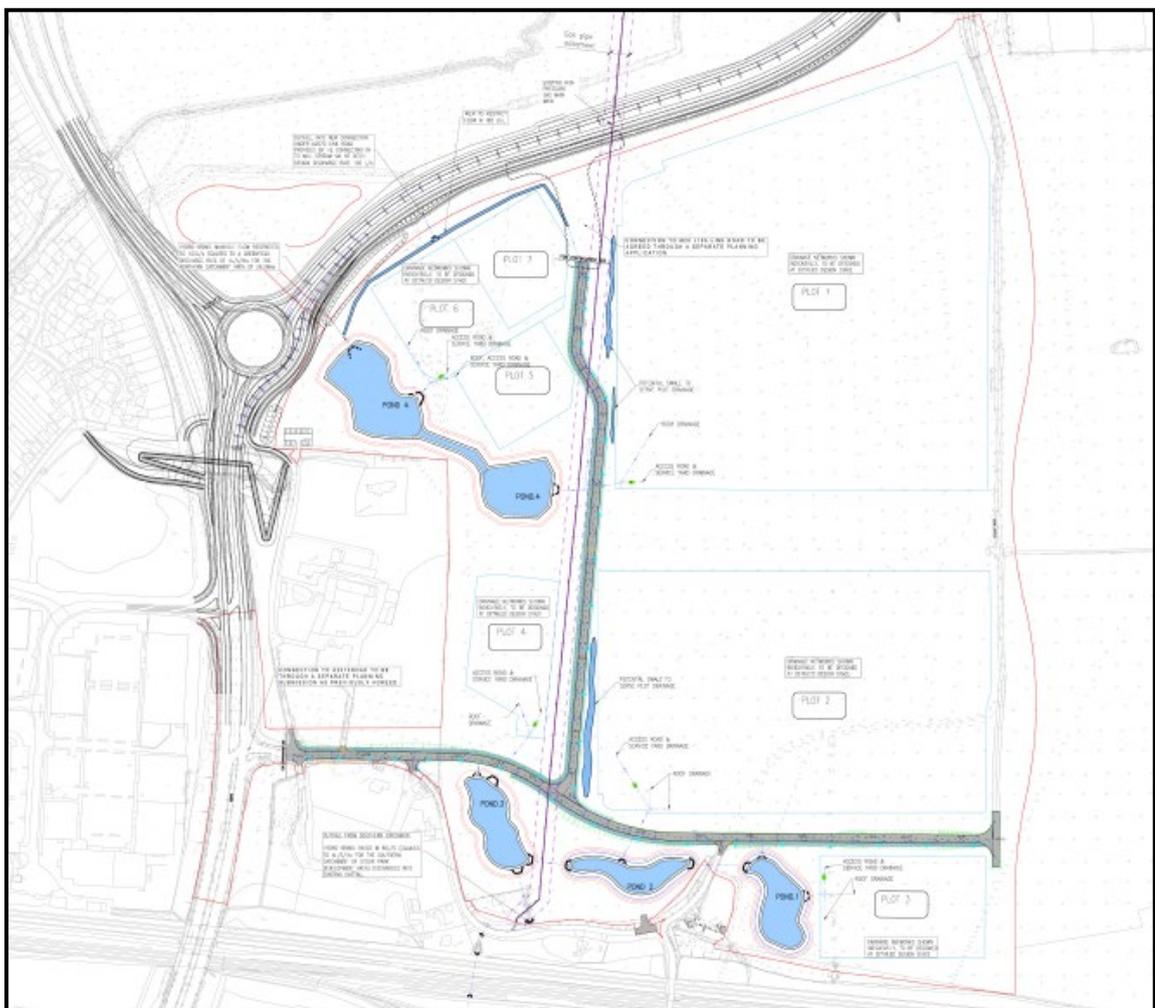
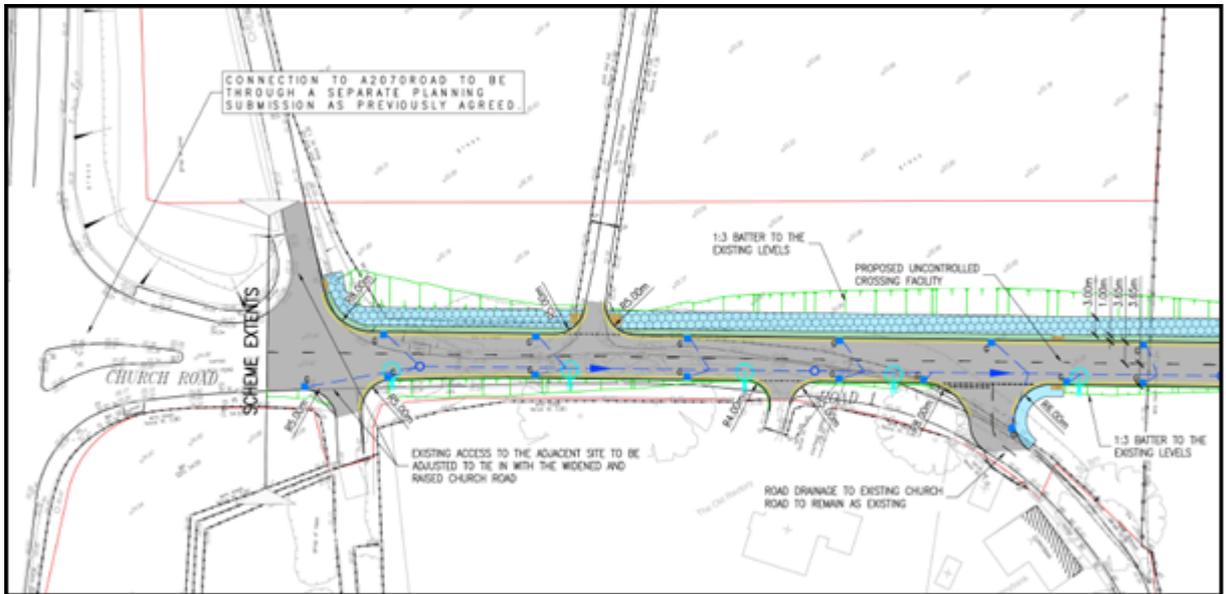
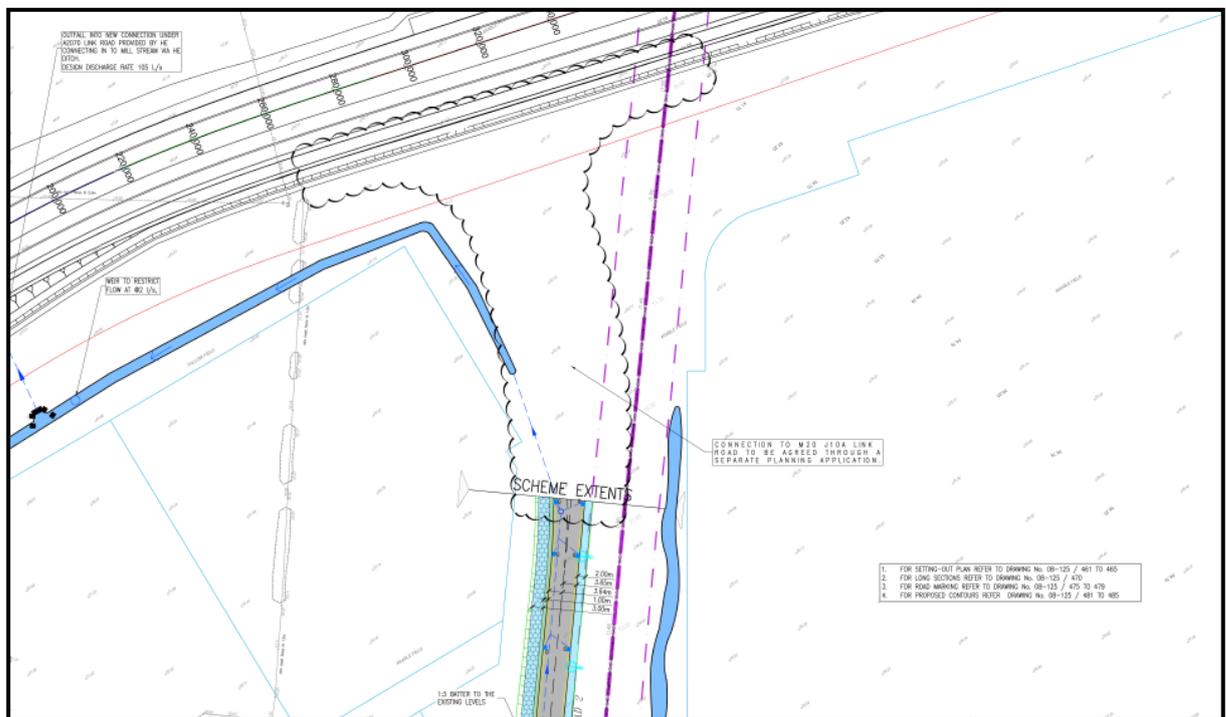


Figure 13 Road Arrangement



**Figure 14 Future point connection from Church Road to the A2070**



**Figure 15 Future point of connection to the M20 Junction 10A link road.**

35. The reserved matters proposals do not include detailed designs for the junctions as these will form separate planning applications, to be submitted in due course.

36. The estate roads have been designed to include grass verges and embankments and the plans also show the drainage feature and services. Plans submitted show the setting out of the roads, contours and the profile of the roads in long sections.
37. In terms of the materials to be used for the estate roads, main vehicular areas will comprise blacktop tarmac with concrete kerbs.

#### Sustainable Urban Drainage

38. The applicant has reviewed the suitability of a variety of Sustainable Urban Drainage Systems (SUDS). Ponds, in combination with swales offer scope for reducing storm runoff. Therefore, swales and ponds form the basis of the SuDs scheme for this site. Ponds and swales would be lined, ensuring no infiltration into the ground.
39. The 'drainage feature' shown on the masterplan in the north west corner of the development site to the north of the new link road, no longer forms part of the reserved matters proposals: this land has been utilised by Highways England for their new junction and associated roadworks and drainage in relation thereto.

#### Landscaping

40. The site has been divided into six Character Areas which are identified in the table below.

Area	Character Area	Area	Character Area
1	Highfield Lane	4	Church Parkland
2	South West Aspect & East/West Boundary	5	Green Corridor
3	Western Footpath	6	Park Gateway

41. General arrangement plans have been provided for each character area. The general arrangement plans set out the existing trees and hedgerow to be retained as well as proposed planting of trees, hedges, plants, grass and meadow. Hard landscaping information is also provided on the general arrangement plans, including details and the location of vehicular, pedestrian and cycle routes. Details of the location of street furniture including benches, bins, bollards, and signage and information boards are also provided.
42. The general arrangement plans are supported by schedules that set out (in detail) the typologies for both the hard and soft landscaping. Contained within 'Landscape Soft Typologies Schedule' is a list of the proposed ecological enhancements. Boxes for bats, birds, starling, robins and owls are proposed across trees on the site. In addition, reptile hibernacula would be established as well as invertebrate 'log pile' structures.

43. Planting Schedules provided identify the landscape objectives for each area, the key landscape elements that are proposed in response, the phasing and a full specification schedule of the proposed planting.
44. Drainage features, including permanent wet ponds and wetland planting are also identified on the general arrangement plans and form part of the soft landscaping proposals.
45. The following supporting information has been submitted with the application:

Application Covering Letter

46. This letter:

- Describes the background to the outline planning permission.
- Describes the proposed development.
- Sets out the Planning Policy context against which the application should be determined.

Road Safety Audit Stage 1

47. The road safety audit details the Section 278 highways improvements required to the A2070 Trunk Road and on the County Council maintained roads at Sevington associated with the construction of the mixed use employment scheme.
48. The report identifies the Road Safety Audit Team's recommendations for resolving any fine detail issues relating to access infrastructure.

Non-Motorised User (NMU) Context Report

49. The report confirms that the purpose of the NMU Context Report is to collate background information relevant to NMUs to aid agreement on the design stages at which an NMU Audit Report is required.
50. The report confirms that the proposed Stour Park development affects a small number of existing, public rights of way that run through agricultural land and along Church Road and Highfield Lane. The report indicates that the development includes a number of measures to mitigate these impacts and to ensure existing levels of NMU safety and accessibility are retained or enhanced.
51. The report concludes that based on the identified effects of the development on NMUs and the proposed mitigation measures, the key scheme objectives relating to NMUs are to:

- Ensure continuity and convenience of existing NMU routes in the vicinity of the development;
- Minimise where possible the level of generated motorised traffic demand to reduce the conflict with NMUs;
- Improve safety for NMUs through reduced speed limits on the A2070 and the internal roads of the development;
- Introduce an at grade Toucan connection across the A2070 to improve safety and accessibility of the development;
- Provide landscaping surrounding the diverted public footpaths to provide an enhanced environment for NMUs; and
- Provide an improved cycle and pedestrian connection between the A2070 footbridge and Highfield Lane on the Sevington to Ruckinge Loop Cycle Route through provision of a shared footway and cycleway.

#### Preliminary Design Stage Non-Motorised User (NMU) Audit

52. Based on an examination of the NMU context report prepared at feasibility stage and detailed above, the NMU audit relays the 6 key objectives (copied above) for the Stour Park scheme. The audit details the design features that have been incorporated in the preliminary design to help achieve these objectives.
53. The document also highlights issues raised in undertaking the Preliminary Design stage NMU audit and details changes to be incorporated in the design, or to be considered/incorporated in subsequent stages of the design for each issue raised.

#### Landscape and Ecological Management Plan (Rev B) ('LEMP')

54. The LEMP was originally prepared in 2016 in response to a request by Kent County Council for an outline ecological management plan to accompany the outline planning application.
55. This updated version of the LEMP focuses on Phase 1a of the proposed development.
56. The document confirms that the aim of the LEMP is to provide an overview of the management objectives and prescriptions that will be implemented to ensure that the biodiversity value of any retained, enhanced or created habitats within Phase 1a of the proposed development are maintained in the long-term. The LEMP confirms that it is anticipated that subsequent updates may be necessary as future phases of development are brought forward at the site. The plan states that it should be noted that Phase 1a includes the strategic landscaping works for the whole site, and establishes the development platforms, representing the

main phase of development which would require habitat management and monitoring.

57. The document confirms that the original outline LEMP accompanied a Framework Ecological Mitigation Strategy ('FEMS'), which was produced in 2016 and was updated in March 2019.
58. The updated FEMS provides details regarding the landscaping and habitat creation that is to be provided within as well as the additional mitigation/compensation measures that are included to address impacts on ecological receptors. The plan confirms that the FEMS provides a context for the LEMP and should be read in conjunction with the LEMP. The FEMS has been submitted in support of application 14/00906/CONB/AS which relates to the discharge of ecology planning conditions.
59. The LEMP confirms that the proposed development has also been subject to an Ecological Impact Assessment (EclA) which was integrated into the Stour Park Environmental Statement (ES).

#### Drainage Strategy

60. The strategy states that the Stour Park development site is approximately 44,292ha in extent and that the proposed development site lies approximately 100m south of the Aylesford stream which is the only watercourse of any significance in close proximity to the site.
61. The strategy confirms that the IH124 runoff method suggests the 100 year peak flow from the existing undeveloped arable Greenfield north and south catchments would produce 304.2l/s (167.3l/s north and 136.9l/s south) based on a Tc of 3 hours.
62. The strategy identifies that Ashford Borough Council Sustainable Planning Document restricts Greenfield flows to a maximum of 4 l/s/ha and that Ashford Borough Council and the Environment Agency require no increase in peak flows, and for flows to be minimised or reduced where possible to the Greenfield rate.
63. The strategy indicates that Surface water sewers shall be designed to a 1 in 30 year no flooding. There will be no flooding of buildings or off-site areas during a 1 in 100 year return period storm event including a climate change allowance.
64. The strategy confirms that an increase of 30% in rainfall intensity to account for the effects of climate change over the lifespan of the development shall be considered.

65. The strategy states that the surface water attenuation will be designed to store the critical 100 year return period storm event including an allowance for climate change.
66. The strategy details the SuDs features to be incorporated into the site and concludes that with the provision of these features the final developed site onward flows would be restricted to the Greenfield rate of 4l/s/ha in accordance with the Council's adopted policy.

### **Relevant Planning History**

12/00014/EIA/AS Development of up to 175,000 sqm of Class B1, B2, B8 uses including mixed Class B8 with ancillary retail/ trade counter use. Scoping adopted.

14/00906/AS Development to provide an employment led mixed use scheme, to include site clearance, the alteration of highways, engineering works and construction of new buildings and structures of up to 157,616 sq m comprising: up to 140,000 sq m Class B8 (storage and distribution) use; up to 23,500 sq m of B1a/B1c Business (of which a maximum of 20,000 sq m of B1a); up to 15,000 sq m of B2 (general industry); up to 250 sq m of A1 (retail shops) and 5,500 sq m of sui generis to accommodate Kent Wool Growers together with ancillary and associated development including utilities and transport infrastructure, car parking and landscaping. Granted.

#### Applications to discharge conditions

14/00906/CONA/AS Discharge of conditions: 33 & 34 (Phase 1a). Pending decision.

14/00906/CONB/AS Discharge of conditions: 47, 48 & 49. Pending decision.

14/00906/CONC/AS Discharge of condition 23. Details approved.

14/00906/COND/AS Discharge of conditions: 8, 9 & 30. Pending decision.

14/00906/CONF/AS Discharge of conditions: 40, 44 & 46. Pending decision.

14/00906/CONE/AS Discharge conditions 18, 19, 20, 22, 25. Pending decision.

### **CONSULTATIONS**

**Ward Members:** Cllr Bartlett is the Ward Member. No representation received.

Responses to the application as originally deposited in April 2019 are summarised below:

**Sevington/Mersham Parish Council:** 'The Parish Council objects in the strongest terms to this application as the path was always supposed to be the boundary. The drawings clearly shows works on the other side of the path, even if this is referred to as landscaping, it should not be allowed.'

**[HoPD comment:** For clarification, the path that the Parish Council are referring to is Highfield Lane. The works on the eastern side of 'the path' (i.e Highfield Lane) comprise proposed landscaping/tree planting and the erection of a timber post and rail fence. At outline application stage, the application was amended to include a linear belt alongside the eastern side of Highfield Lane in order to help create a strong tree planted belt to help soften the impact of proposed commercial buildings at the site].

**Kent Highways and Transportation:** Double yellow lines are proposed along the whole of the estate roads to prevent any HGV parking. This should also include the proposed turning head in the south eastern corner of the site to prevent any potential for HGV parking in the turning head.

Bell bollards are required around the turning head to prevent vehicles driving along the existing section of Highfield Lane to the north.

The visibility splay as shown on drawing number 08-125/493 Revision P1 out of Church Road onto the new estate road is drawn incorrectly. The drawings should be revised using a 2.4 metre setback as Church Road only serves residential properties. The visibility splay to the right should be drawn to the near side carriageway and not the centre of the carriageway. Likewise the visibility splay out of Highfield Lane onto the estate road should be re-drawn using a 2.4 metre setback.

The estate roads need to be designed in accordance with TD 9/93 - Highway Link Design in terms of the proposed horizontal and vertical alignment. There are sections along Road 1 and Road 2 where the road curvature does not meet the required standards. Transition kerbs will be required to show the proposed design of the road. The vertical curvature needs amending to meet the required standards.

It also appears that the long section plan (08-125/470 Revision P1) ties in with the M20 Junction 10A link road. These details of the long section should be removed as they are not being approved as part of this application.

Drainage pipes need to be a minimum of 4 courses of brick work under the gully frame in order that the drainage systems can be inspected easily.

**Kent County Council Public Rights Of Way & Access Service:** As stated in the Section 106 agreement, public footpaths AE639 and AE363 will be upgraded to public bridleway. The plans submitted with this application show the surface of AE639 to be improved using dusted gravel with timber edging to a width of 2m. As the minimum required width for a public bridleway is 3m the plans need to be corrected to show a width of 3m for AE639 and AE363.

The PROW and Access Service will need to approve all PROW surface improvement specifications prior to any works taking place.

We will require suitable crossing points over any of the access roads within the site, Pegasus for bridleway and Toucan for pedestrian / cycle routes.

Sections of footpaths AE337A and AE338 have been extinguished through the M20 Junction 10a Development Consent Order and subsequent Definitive Map Modification Order. The remaining sections of both AE337A and AE338 currently run through the swale near to Plot 5, although there is a timber bridge located over the narrow part of the swale, the paths have been diverted from their current alignment. Any PROW diversions will need to be considered at an early stage. It is sensible to initiate consultation on proposed alterations to the path network as soon as possible.

The alignment of footpath AE339 is incorrect and part of this path has been extinguished through the M20 Junction 10a Development Consent Order and subsequent Definitive Map Modification Order.

This site has the potential to provide excellent opportunities for walking, cycling and equestrian use. Such provision will greatly benefit the sites connectivity, further increasing opportunities available for recreation, active travel and exercise.

**Kent County Council Ecology:** Confirm they have reviewed the landscape plans submitted in conjunction with the information submitted as part of application 14/00906/CONB/AS to discharge conditions 47, 48 and 49.

The habitats detailed within the Landscape and Ecological Management Plan submitted as part of condition 48 reflect the habitats within the landscape plans submitted as part of this application. However a different Landscape Management and Maintenance Plan has been submitted as part of this application.

We advise that there must only be one management plan implemented within the site to ensure that the habitats get managed appropriately and will benefit biodiversity.

The Landscape and Ecological Management Plan submitted as part of condition 48 provides detailed management prescriptions about when management must be implemented and therefore we advise that this is the management plan that must be implemented on site.

The landscape plans demonstrate that habitat connectivity throughout the site has been maintained. The detailed designs for the plots have not been submitted and we are concerned that there is a risk that each plot will encroach into the landscaping area and reduce the amount of greenspace throughout the site. There is a need to ensure that the detailed designs for the plots do not encroach into the landscaping area and there is no loss of habitat within the site from what is depicted on the plans.

**Kent County Council Flood and Water Management:** We have no objection to approval of reserved matters with regards to the 'Phase 1A works' specifically concerning the sustainable drainage system, with the following advisories for consideration:

The design submitted is shown as indicative only and is purely an outline design, we have already set out our requirements for the detailed design in our response to the submission associated with condition 33 dated 20th May. Whilst these requirements may require the alteration of the shape and size of the ponds we feel that the indicative design shown will still be reflective of the final detailed design.

As part of the detailed design submission for the Phase 1a works, to assist with future reserved matters applications, we would request that a drawing is submitted which clearly shows the designed impermeable areas, discharge rates, and volumes of run off for each connected phase.

**Highways England:** We have no comments to make in relation to the siting, design, appearance and landscaping of the estate roads reserved matters. It is apparent that the connections with the A2070 and M20 J10a will be subject of separate planning applications and we look forward to being consulted upon these in due course.

These reserved matters are unrelated to the Strategic Road Network ('SRN') and are unlikely to materially affect the safety, reliability and / or operation of the SRN. Therefore we do not offer any objections or requirements relating to the proposals.

**CTRL Enquiries:** No comments received.

**Network Rail:** No comments received.

**Ramblers Kent Area:** No comments received:

**Environment Agency:** Flood Risk - Provided there is demonstrable continuity between the receiving ditch and the Aylesford Stream, we are satisfied with the proposals.

All of the proposed works lie outside of the Flood Zones and 8m margin of the main river. The rate of discharge into the ditch leading to the Aylesford Stream is restricted to 41/s/ha in accordance with the requirements of the Ashford Borough Council SuDS SPD. This approved rate of runoff has also been applied to the southern catchment.

**Groundwater and Contaminated Land -** We have reviewed the Drainage Strategy. This information indicates that surface water is to be disposed of via discharge to existing watercourses, in combination with attenuation ponds and swales which are to be lined. The report also indicates that pollution prevention measures such as oil interceptors will be utilised for draining areas such as roadways and parking areas. No infiltration to ground has been proposed therefore we have no issues with the proposed drainage strategy from a groundwater protection point of view.

**Natural England:** Natural England state they have no comments to make on this application.

**Kent Wildlife Trust:** No comments received.

**UK Power Network:** No comments received.

**Southern Gas Networks:** No comments received.

**River Stour Inland Drainage Board:** Whilst this site is just outside of the Stour IDB's district, the proposals do have the potential to affect IDB interests (downstream flood risk).

The proposals have been revised to maintain existing natural catchments (previously proposed to discharge via a single outfall to the south which was unacceptable, without further detailed justification).

There appears to be a good degree of open SuDS included (although not yet fully detailed) which is supported due to the wider benefits they provide.

Despite the runoff rates being generally in line with the Council's SuDS Policy (4l/s/ha) the proposed runoff rates are of concern. The initial proposal, on which outline planning was approved, was to limit runoff to 1.9l/s/ha. This is in line with the calculated (by the applicant) natural runoff rate for a 2 year event. The proposed overall runoff rate of 191l/s is higher than the calculated total for a 1 in 10 year event (152l/s) and close to the 1 in 25 year event (209l/s)– which would mean that runoff, and downstream flood risk, would be increased for lower level events (discharging at a far higher rate than at present). The applicant should therefore be requested to consider a staged discharge (to replicate Greenfield conditions), or to return to the 1.9l/s/ha as originally proposed.

The applicant should be requested to provide details of the downstream receiving drainage networks; the capacities and conditions of channels and on-line structures (such as bridges and culverts). It is particularly important that the capacity and condition of the railway culvert is also confirmed, and the applicant should clearly demonstrate that the southern catchment currently drains through this culvert (and not through a number of culverts).

**ABC Project Office Drainage:** No comments received.

Responses to application as amended are summarised below:

**Kent Highways and Transportation:** The visibility splay as shown on drawing number 08-125/493 Revision P2 out of Highfield Lane onto the estate road should be re-drawn using a 2.4 metre setback.

Transition kerbs will be required to show the proposed design of the road. The vertical curvature at the end of road 1 needs addressing to meet required standards.

KCC Highways and Transportation will only accept blacktop tarmac for the footways.

Following further amendments received on 13 June, KCC raise no objection subject to conditions.

**Kent County Council Public Rights Of Way & Access Service:**

**Kent County Council Ecology:** Reviewed the landscape plans submitted in conjunction with the information submitted to the Council as part of application 14/00906/CONB/AS to discharge conditions 47, 48 and 49.

We advise that we are satisfied the habitats detailed within the Landscape and Ecological Management Plan submitted as part of condition 48 do reflect the habitats within the landscape plans submitted as part of this application. However we do have concerns that a different Landscape Management and Maintenance Plan has been submitted as part of this application.

We advise that there must only be one management plan implemented within the site to ensure that the habitats get managed appropriately and will benefit biodiversity. The Landscape and Ecological Management Plan submitted as part of condition 48 provides detailed management prescriptions about when management must be implemented and therefore we advise that this is the management plan that must be implemented on site.

The landscape plans demonstrate that currently habitat connectivity throughout the site has been maintained - however we note that no information has been provided on the proposed access into the plots. The detailed designs for the plots have not been submitted and we are concerned that in addition to creating the access into the plots there is a risk that each plot will encroach into the wider landscaping area and reduce the amount of greenspace throughout the site.

There is a need to ensure that the access points into the site is minimal and (other than to create access into the site) there is a need to ensure that at the detailed designs stage that the ecological functionality of the submitted landscaping plans can still be implemented.

**Kent County Council Flood and Water Management:** No objection subject to conditions.

**Highways England:** No comments received.

**Environment Agency:** No comments received.

**River Stour Inland Drainage Board:** No comments received.

### **Public Consultation**

381 neighbours have been consulted, site notices have been posted at the application site, and the application has been advertised in the local press:

1 representation has been received raising the following objections to the scheme:

- Objection on highway grounds.
- Objection in relation to the hard landscaping and layout.
- The layout needs to be such that there is no possible entry from the development site to Cheeseman's Green Lane which could be achieved with appropriate hard landscaping measures.
- A HGV recently hit the railway bridge.
- The plans should be clarified in respect of access to Cheeseman's Green Lane.

**[Comment HoPD:** Details relating to access arrangements are discussed at paragraphs 8, 9, 10 and 16 above].

### **Planning Policy**

67. The Development Plan is the Ashford Local Plan 2030 (adopted February 2019), except where the Chilmington Green AAP (2013) applies instead, together with (where relevant) the Wye Neighbourhood Plan (2016), the Pluckley Neighbourhood Plan (2017) and the Kent Minerals and Waste Local Plan (2016).
68. For clarification, the Local Plan 2030 supersedes the saved policies in the Ashford Local Plan (2000), Ashford Core Strategy (2008), Ashford Town Centre Action Area Plan (2010), the Tenterden & Rural Sites DPD (2010) and the Urban Sites and Infrastructure DPD (2012).
69. The relevant policies from the Development Plan relating to this application are as follows:-

#### **Ashford Local Plan 2030**

SP1	Strategic objectives
SP6	Promoting high quality design
TRA5	Planning for pedestrians

TRA6	Provision for cycling
ENV1	Biodiversity
ENV2	The Ashford Green Corridor
ENV3a	Landscape Character and Design
ENV9	Sustainable drainage
ENV13	Conservation and Enhancement of Heritage Assets

70. The following are also material considerations to the determination of this application.

**Supplementary Planning Guidance/Documents**

Sustainable Drainage SPD 2010

Landscape Character SPD 2011

Dark Skies SPD 2014

**Other**

Green Corridor Area Action Plan 2017

**Government Advice**

National Planning Policy Framework (NPPF) 2018

71. Members should note that the determination must be made in accordance with the Development Plan unless material considerations indicate otherwise. A significant material consideration is the National Planning Policy Framework (NPPF). The NPPF says that less weight should be given to the policies above if they are in conflict with the NPPF. The following sections of the NPPF are relevant to this application:-
72. Paragraph 48 states in relation to the stages of preparing a Local Plan that:
- “Local planning authorities may give weight to relevant policies in emerging plans according to:
- a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);

b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and

c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given)”

50. Key points from the NPPF material to the application are as follows;- (a) the presumption in favour of sustainable development (para 11) (b) promoting healthy and safe communities (para 91-101) (c) requiring well designed places (para 124 -132), (d) meeting the challenge of climate change and flooding (para 148 - 169) (e) conserving and enhancing the natural environment (para 170 - 183) (f) conserving and enhancing the historic environment (184-202).

#### National Planning Policy Guidance (NPPG)

#### **Assessment**

51. The key issues are:

- (a) The principle of the development.
- (b) The impact on visual amenity.
- (c) The impact on heritage assets.
- (d) The impact on the green corridor and ecology.
- (e) Sustainable Drainage.
- (f) Access and the impact on highway safety.

#### **Principle**

52. The principle of developing the site with an employment led scheme for the types of uses consented by the outline planning permission has been agreed to by the Council through the formerly adopted Core Strategy 2008 and the Urban Sites and Infrastructure DPD.
53. Within the Urban Sites and Infrastructure DPD the site was formally allocated under policy U19 for proposed general industrial (Class B2) and storage and distribution (Class B8) uses, with some provision for light industrial uses (B1b and B1c) rather than high employment density Class B1a offices.

54. The policies within the Core Strategy and the Urban Sites and Infrastructure DPD have been superseded by the policies contained in the Ashford Local Plan 2030, (adopted February 2019).
55. Whilst the site is no longer formally allocated within the Local Plan, the principle of development has been established through the grant of outline planning permission which remains extant.

### **The impact on visual amenity**

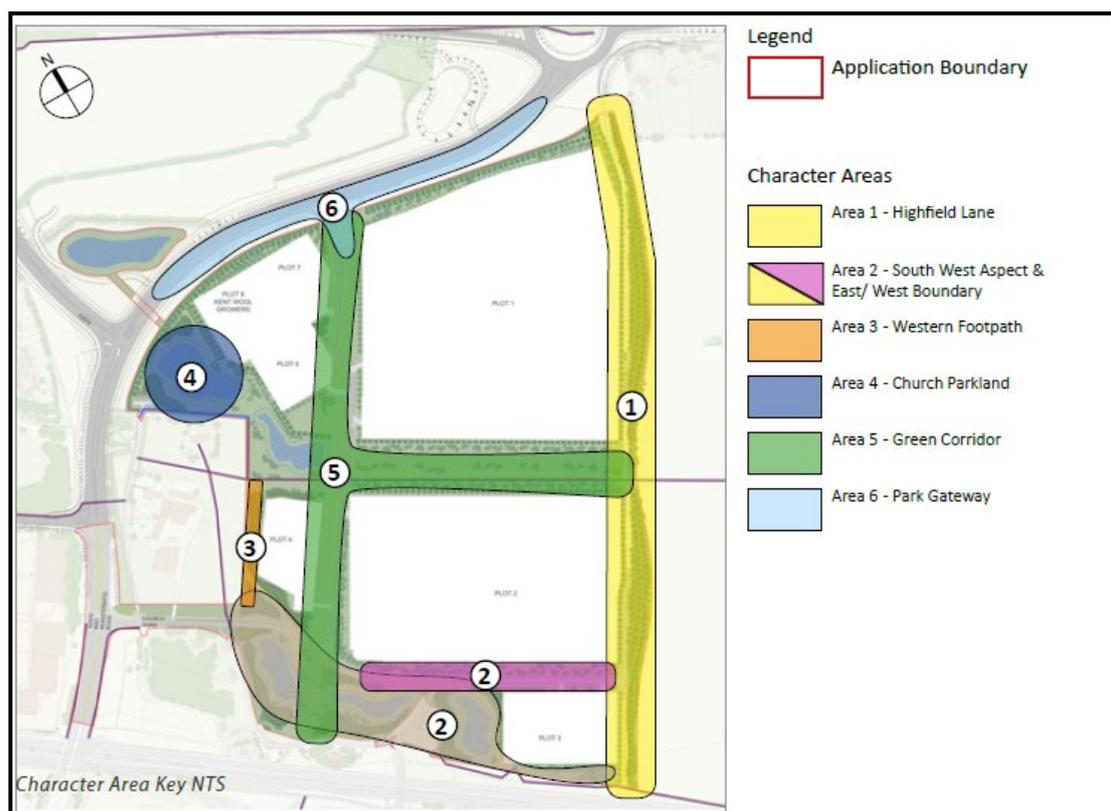
56. Policy SP1 of the adopted Ashford Local Plan 2030 sets out core principles for development within the Borough. Amongst other things, policy SP1 seeks to conserve the borough's natural environment / biodiversity; create high quality designed places; and ensure development is resilient to and mitigates climate change.
57. Policy ENV3a of the Local Plan covers landscape character and design and sets out criteria that developments should seek to conform to in order to protect the landscape setting and minimise the impact of development.
58. The site is located within the Sevington Highfields Mersham Farmlands Landscape Character Area (LCA). Characteristic Features include:
  - Open arable farmland on gentle rise crossed by Highfield Lane (bounded with hedgerows) and dominated by Sevington Church.
  - A line of Poplars delineate the brook.
  - Noise from the M20, CTRL and bypass is very apparent.

Within this LCA, the policy recommendations set out within the LCA appraisal seek to create through the introduction of tree belts and linear woodlands.

59. The proposed landscaping and layout of that open space, is broadly consistent with that shown in the illustrative masterplan approved as part of the outline planning permission copied at Figure 1 of this report.
60. The applicant's landscape strategy as detailed in the outline planning application includes the creation of level development plots through sensitive cut and fill. The principle of this approach has previously been agreed through the grant of outline planning permission. As detailed within the report to Planning Committee, it is proposed to subtly re-profile the existing landscape, which in itself is gently undulating, within and immediately adjacent to the site. Re-profiling of levels across the site is to be accompanied by planting works to include substantial

belts of tree planting which will help screen the scale and massing of future buildings on the site.

61. The site has been divided into six Character Areas. These are illustrated in the diagram below and discussed in detail in the paragraphs that follow:



**Figure 16 Character Area Key**

### Character Area 1 Highfield Lane

62. Highfield Lane will be retained as a through non-traffic route. An enhanced sense of enclosure would be provided through the retention and reinforcement of existing native hedgerow and through the provision of new native woodland and hedgerow planting to both the east and west of Highfield Lane respectively. Landscaping on both sides of the Lane would serve well in helping to screen short and medium range views to new buildings.
63. The woodland created within this character area would be set within gentle bunds to reinforce the sense of a sunken green lane. This subtle profiling to include the eastern side of Highfield Lane would help retain Highfield Lane's sunken character which is a key positive landscape characteristic of the Mersham Farmlands.

64. Timber post and rail fencing is proposed to be provided along the outer perimeter of the woodland to the east of Highfield Lane where it adjoins the open countryside. This type of fencing is typical across the Kent countryside and so is appropriate.

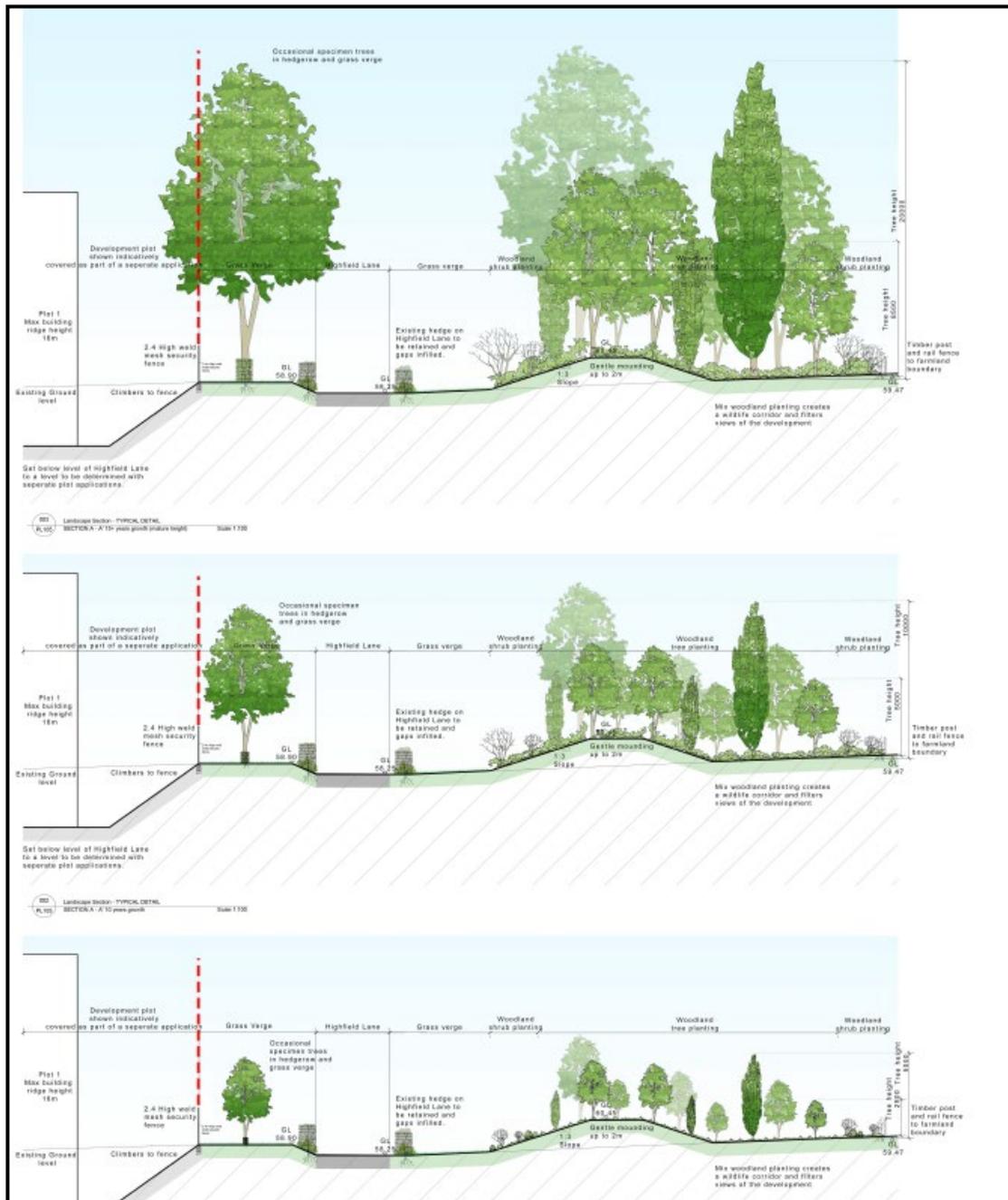
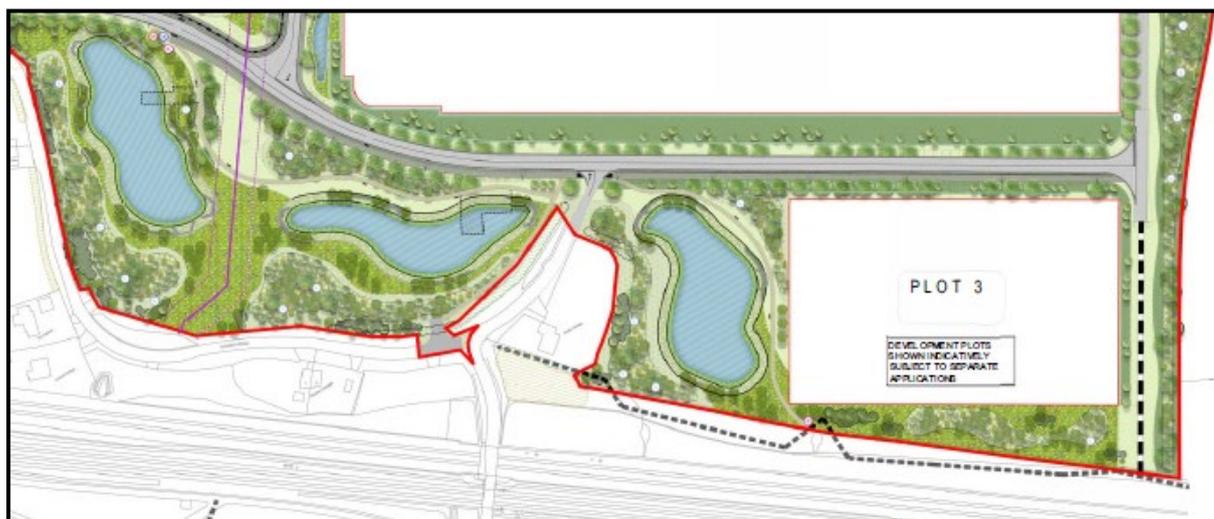


Figure 17 Section through Character Area 1 – Bottom section establishment up to 5 years. Middle section 10 years growth. Top section 15+ year’s growth (mature height).

Character Area 2 South West Aspect

65. The setting of Church Road would be enhanced through the implementation of a gently undulating landform created by varying profiled bunds and SuDS features in the form of ponds and shallow grassed swales.
66. Woodland planting would be established along the slopes of the bunds and adjacent to Church Road so as to reinforce the existing character of Church Road, whilst allowing for occasional filtered views across the undulating grassland / wildflower meadows and ponds.
67. A second layer of woodland planting and landscaped bunds would create a dense backdrop to these views and would filter and soften views towards the proposed development plots, which would help to mitigate the visual impacts of the proposed buildings.
68. The east west vehicular route forms the secondary multi-functional green landscape corridor at the southern end of the development. Avenues of trees set within planted verges would enhance the setting of the areas taking vehicle traffic as well as benefitting the built form that would ultimately be created on either side.
69. The public footpath would be set within grassed landscape with tree avenues either side framing the view of the Church.



**Figure 18 Character Area 2 as illustrated on the Masterplan.**

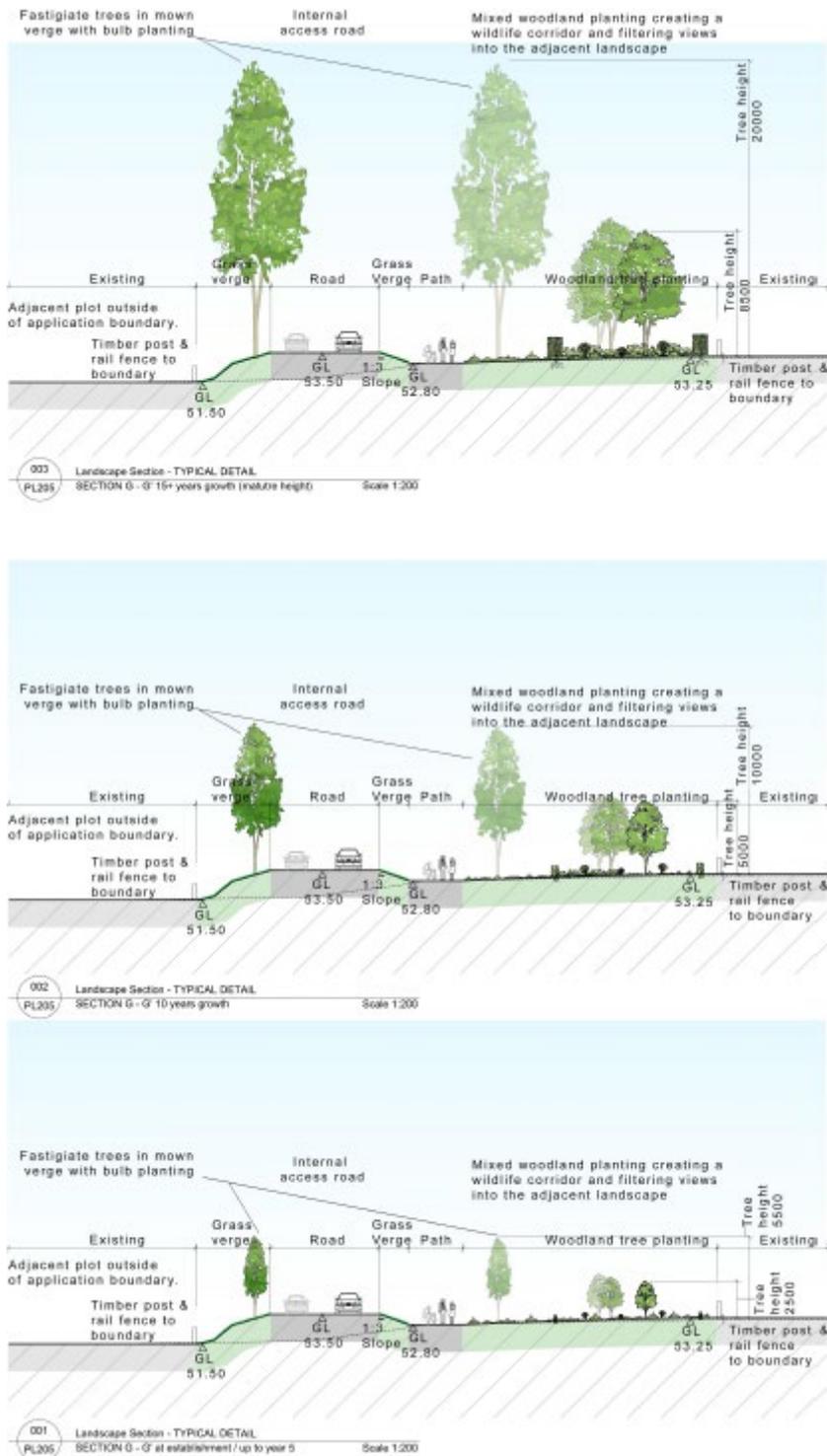


Figure 19 Section through Character Area 2 – Bottom section establishment up to 5 years. Middle section 10 years growth. Top section 15+ year’s growth (mature height).

### Character Area 3 Western Footpath

70. A linear bund with native hedgerow and tree planting would form a new boundary to the west of the site and provide a sense of containment for walkers using the existing public right of way along the site's eastern boundary. Subtle land re-profiling and linear landscape elements would create character to local pedestrian movement and would reinforce the presence of St Mary's Church and adjacent paddocks.
71. Adjacent paddocks would be reinforced by a dense hedgerow mix along its edge to help effectively soften the impacts of the new development.
72. Similarly to the tree planting within Character Area 1, this linear pattern of planting complies with the policy recommendations set out within the LCA appraisal which seeks to create landscape character through the introduction of tree belts and linear woodlands.

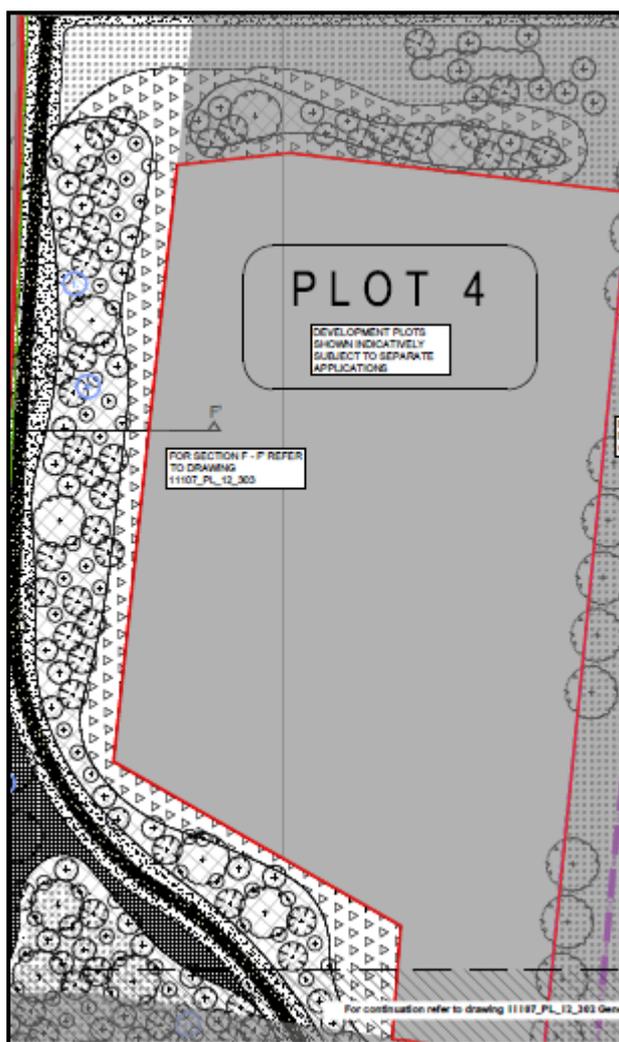


Figure 20 Character area 3 western footpath general arrangement Plan

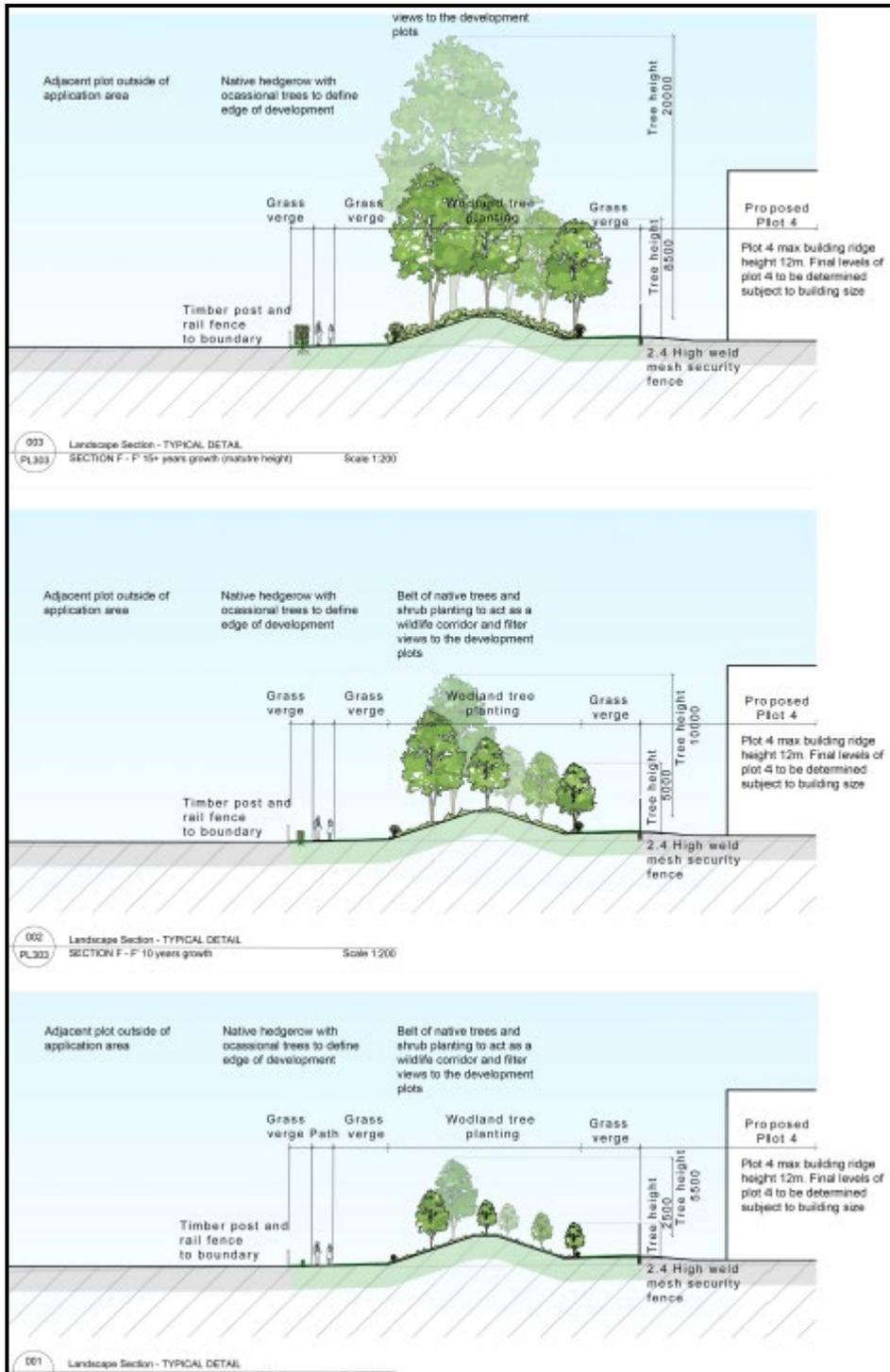


Figure 21 Section through Character Area 3 – Bottom section establishment up to 5 years. Middle section 10 years growth. Top section 15+ year’s growth (mature height).

Character Area 4 Church Parkland

73. The interface between St. Mary's Church and the adjacent undulating semi-rural landscape would be improved through the implementation of new managed landscape incorporating a mix of uses including meadow grassland, woodland planting, ponds associated with the SuDs, community orchard and public foot/cycle paths and parking facilities.

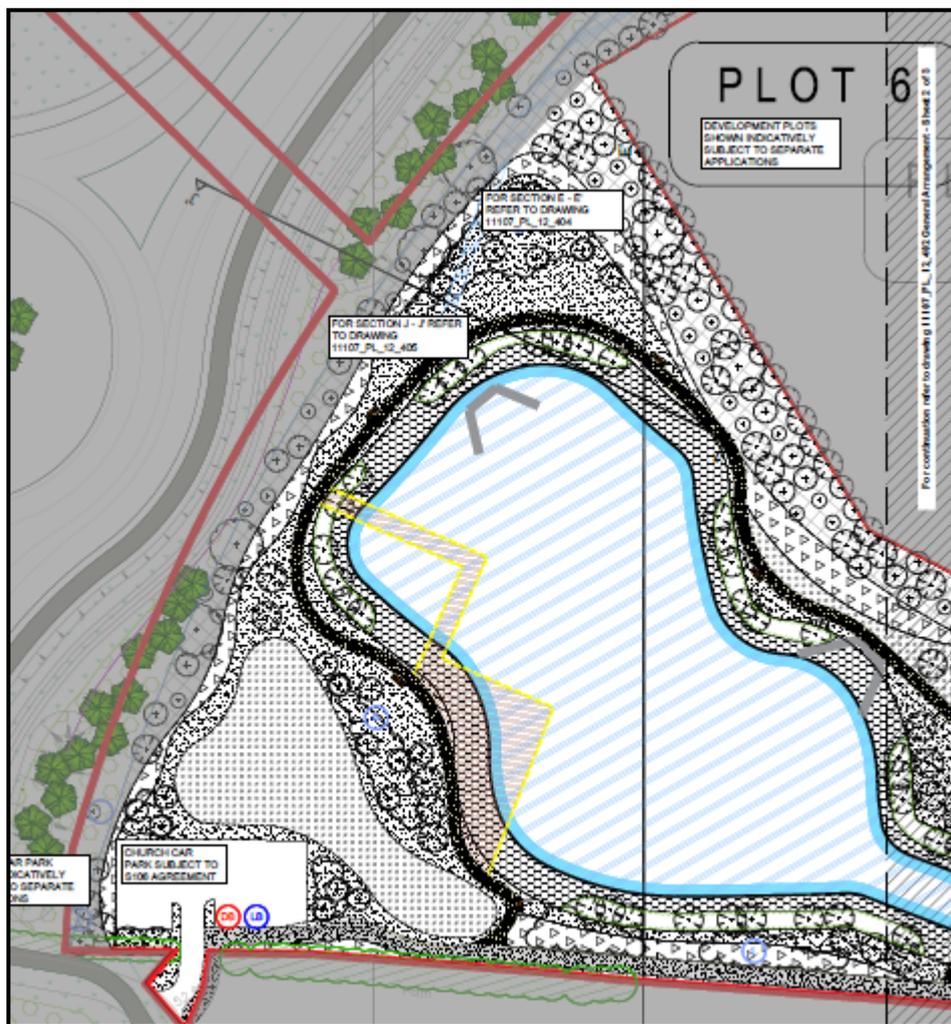
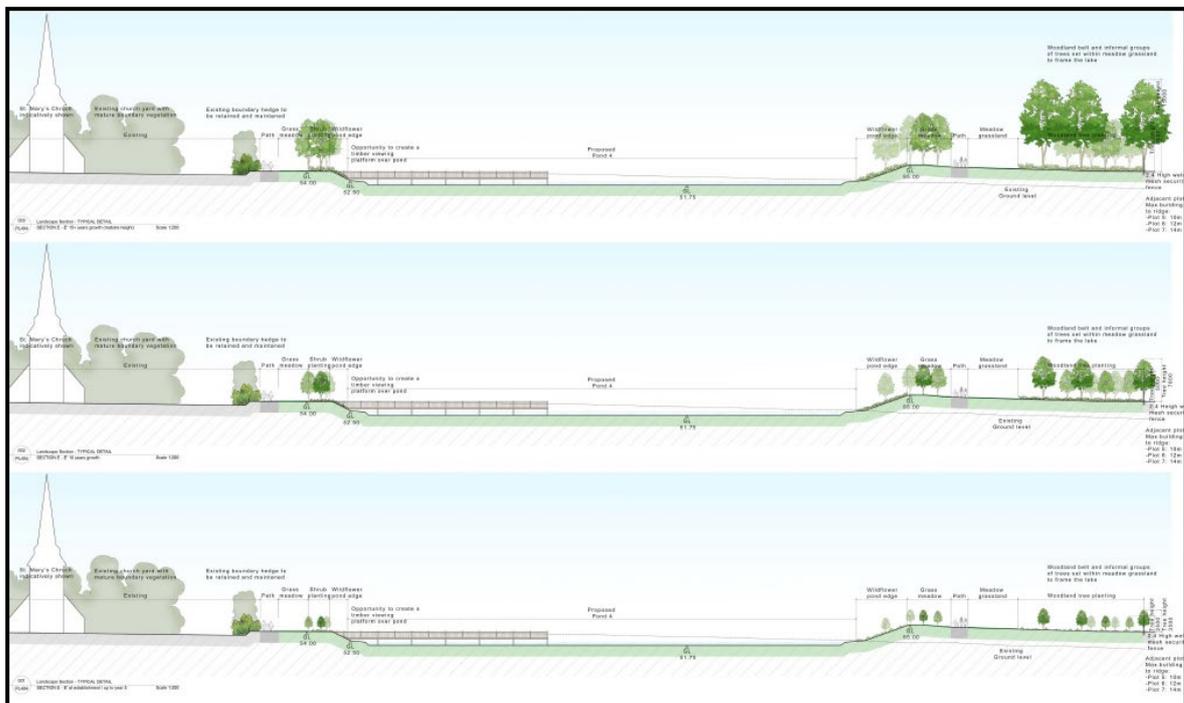


Figure 22 Character area 4 general arrangement plan

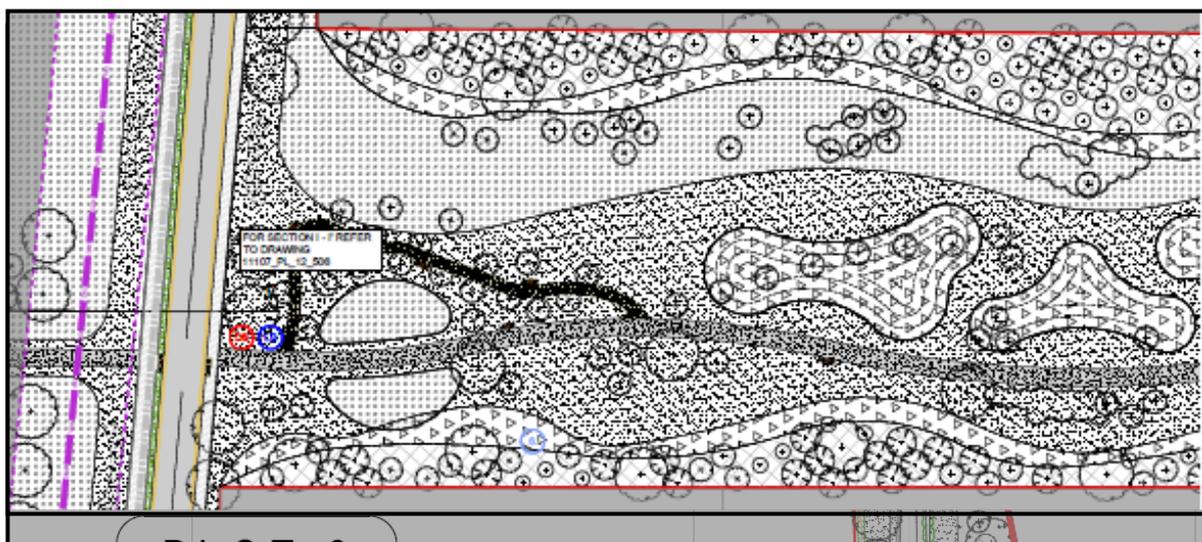


**Figure 23 Section through Character Area 4 – Bottom section establishment up to 5 years. Middle section 10 years growth. Top section 15+ year’s growth (mature height)**

Character Area 5 Green Corridor

74. The Green Corridor would form the primary multi-functional landscape corridor through the centre of the development from north to south and east to west. Landscape proposals would enhance the setting of the main trafficable areas and soften the frontage of the built form through the introduction of tree lined corridors of SuDS and linear open space. A secure, legible environment for all users would be established which would clearly distinguish vehicular and pedestrian areas. The east to west corridor would retain the views of the Church. I deal with ‘Impact on Heritage Assets’ further below in this report: this matter has a particular relationship with the landscape treatment of this character area.

**Figure 24 Character area 5 general arrangement plan**



**Figure 25 Character area 5 general arrangement plan**



**Figure 26 Character Area 5 as illustrated on the Masterplan**

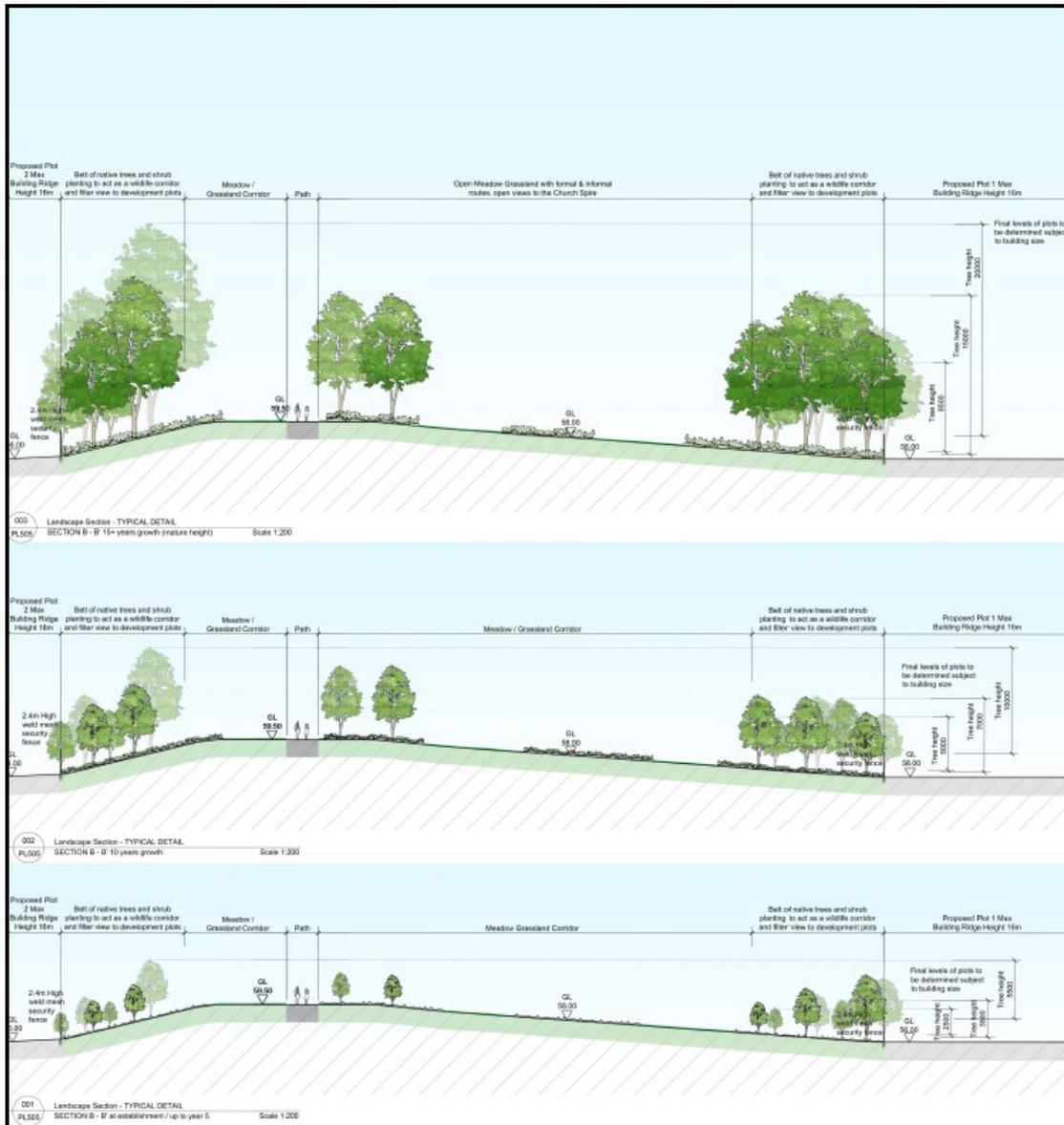
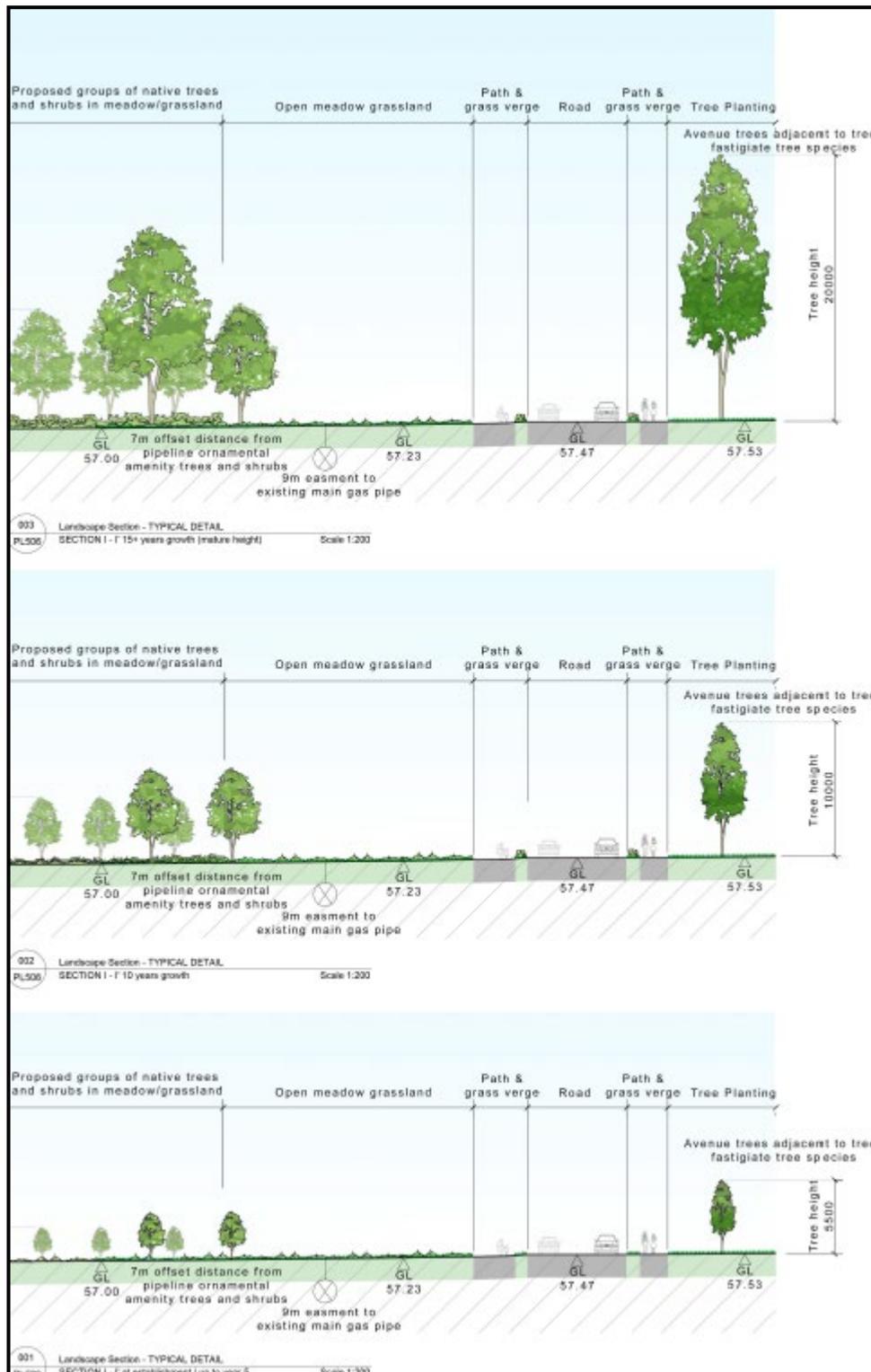


Figure 27 Section through Character Area 5 – Bottom section establishment up to 5 years. Middle section 10 years growth. Top section 15+ year’s growth (mature height).



**Figure 28 Section through Character Area 5 – Bottom section establishment up to 5 years. Middle section 10 years growth. Top section 15+ year’s growth (mature height).**

### Character Area 6 Park Gateway

75. The northern approach and site entrance would be enhanced through the provision of a formal entrance with the landscape defined by tree avenues, ornamental planting and feature signage.
76. The northern tree screen planting for the site would be supplemented by tree planting as part of Highways England's landscaping proposals for the Junction 10A scheme. This would further enhance the soft landscaping works within the northern extents of the site.

**Figure 29 Character Area 5 as illustrated on the Masterplan**



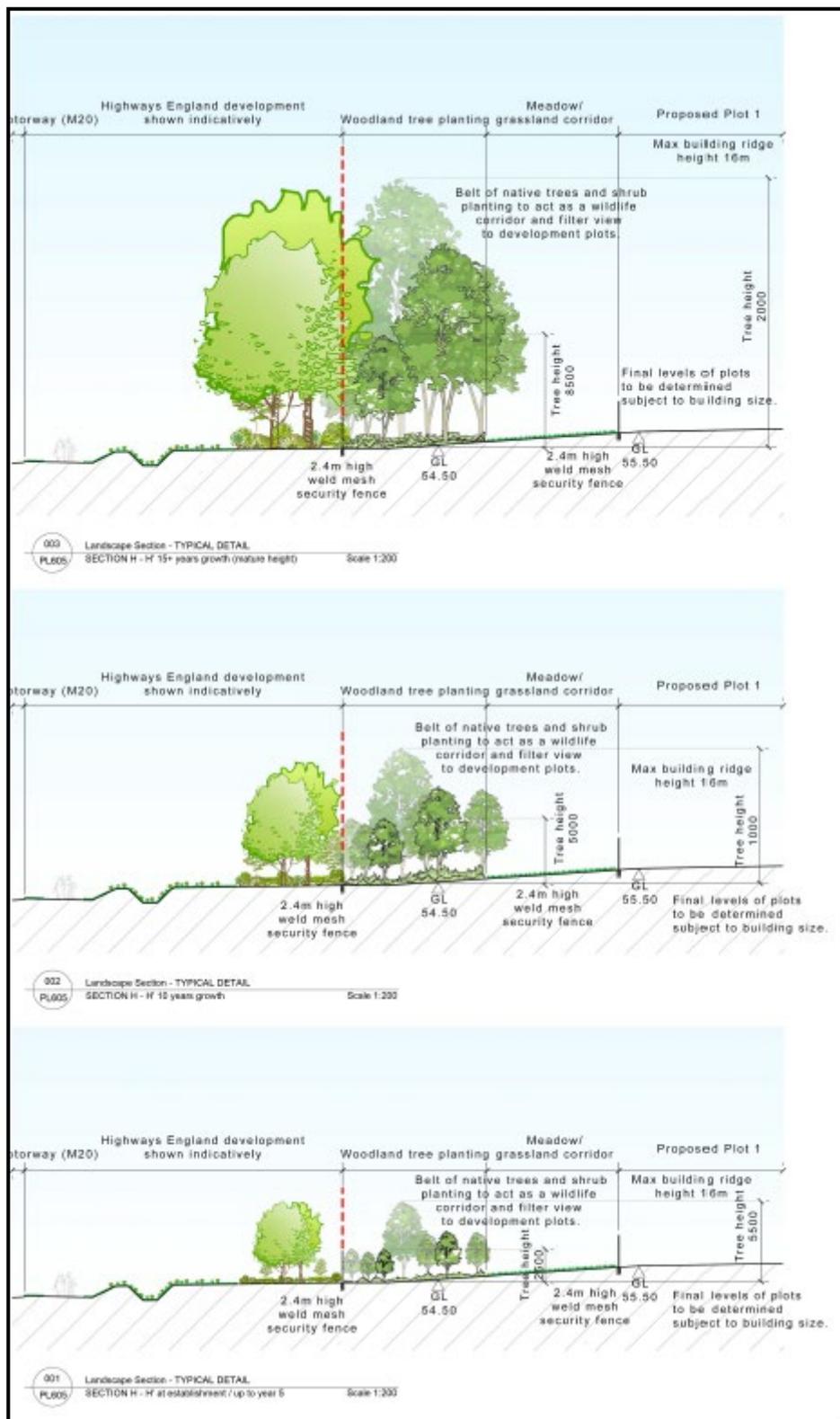


Figure 30 Section through Character Area 5 – Bottom section establishment up to 5 years. Middle section 10 years growth. Top section 15+ year’s growth (mature height).

### Conclusions

77. The proposed tree species identified in the application have been carefully considered and selected in order to ensure that they have an immediate positive landscape impact.
78. Conditions attached to the outline planning permission require the replacement of any trees that are removed, seriously damaged or become diseased, with a tree of a similar size and species within a 15 year period. In terms of establishment, tree species across the site are expected to range from 2.5 to 5/5.5 metres in height within the first 5 years, 5 to 10 metres in height within the 10 years period and 8.5 to 20 metres in height following 15+ years growth, at which point the trees will be considered to have reached maturity.
79. In the case of the woodland planting on either side of Highfield Lane, the density of this planting together with the tree species proposed would, in time, provide a robust screen that would help to soften the visual impacts of the development by providing a robust natural green buffer between the employment site and the open countryside to the east.
80. Given the importance of the structural tree belt either side of Highfield Lane, a Tree Preservation Order (TPO) can be made once the trees are no longer afforded protection by planning condition. That approach would ensure that the structural tree belt that is planted matures as predicted (with any defects addressed by planning condition during the 15 year period) and thereafter retained as an effective screen in perpetuity through the use of a TPO.
81. Overall, I consider that the applicant's landscaping schemes for the individual character areas combine to provide a rich and diverse mix of 'blue & green' infrastructure comprising various native species that are appropriate for their environment, would enhance biodiversity/ecology and which positively respond to the character of the area (in particular, the LCA within which the site is located). In addition, the layout of the open space within the site would comply with the policy objectives set within the LCA appraisal which seeks to facilitate tree belts and linear woodlands.
82. Hard landscaping includes a combination of arterial tarmac routes through the site, foot/cycle paths, timber sign posts and bollards, interpretation/information boards, timber boardwalks over SuDs features, timber benches, litter and dog bins and boundary fencing. The chosen design and use of traditional materials are appropriate to the character of the area. Strategically located seating with favourable aspect and prospect would allow people to appreciate the setting of the site and would help facilitate community engagement.

83. For the reasons identified, I am satisfied that the landscaping proposals for the site and the layout of open spaces would comply with development plan policies to which I have referred and represent a sensitive and responsive approach to the context of the site as well as creating high quality design.

### **The impact on heritage assets**

84. Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 sets out general duties of the LPA in respect of listed buildings in exercising their planning functions. In the case of Section 66, it seeks to ensure that where development affects a listed building or its setting, the local planning authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. This is reflected in adopted policy ENV13 of the Local Plan copied below:

**Policy ENV13 - Conservation and Enhancement of Heritage Assets**

**Proposals which preserve or enhance the heritage assets of the Borough, sustaining and enhancing their significance and the contribution they make to local character and distinctiveness, will be supported. Proposals that make sensitive use of heritage assets through regeneration, particularly where these bring redundant or under-used buildings and areas into appropriate and viable use consistent with their conservation, will be encouraged.**

**Development will not be permitted where it will cause loss or substantial harm to the significance of heritage assets or their settings unless it can be demonstrated that substantial public benefits will be delivered that outweigh the harm or loss.**

**Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, or where a non-designated heritage asset is likely to be impacted, harm will be weighed against the public benefits of the proposal, including securing the optimum viable use of the heritage asset.**

**All applications with potential to affect a heritage asset or its setting should be supported by a description of the asset's historic, architectural or archaeological significance with an appropriate level of detail relating to the asset and the likely impact of the proposals on its significance.**

85. It was concluded at outline permission stage that the public benefits arising from the proposed development would outweigh the harm to the setting of nearby heritage assets, in particular St Mary's Church. In reaching this conclusion the proposed development was considered to have satisfied the relevant test set out at paragraph 196 of the NPPF (formerly para 134 of the 2012 version) which is consistent with the criteria contained within adopted policy ENV13 of the Local Plan. Benefits arising from the proposed development and secured through the outline planning permission include:

- Financial mitigation to facilitate the upgrade and adaptation of the church to enable the church to better serve the existing residential community and also becomes a positive component of the emerging employment community at Stour Park.
  - The provision of an all-weather, 30 space off-street car park (to an agreed specification) to serve St. Mary's Church together with access alterations and footpath connections.
86. In addition to the above, the illustrative masterplan submitted with the outline planning application was amended in 2015 to soften the edges of the development and provide for substantial landscape penetration through the interior of the site along the east-west ridge in order to facilitate a view corridor to the spire of St. Mary's when travelling in a westerly direction along the PROW.
87. The reserved matters application has adopted this same approach, and continues to facilitate said viewing corridor along the east-west ridge. This corridor aligns with the long established pedestrian movement corridor between churches in the rural landscape.
88. This substantial corridor through the centre of the site (aligning with the PROW) has been thoughtfully landscaped so as to provide sufficient tree screening/planting to help soften the impacts of the development whilst ensuring that this does not unduly obscure views of the Church. The result is, in my opinion, an attractive viewing corridor from which the spire of St. Mary's Church would be able to be seen and appreciated when travelling in a westerly direction along the PROW.
89. The surroundings in which this heritage asset is experienced is further enhanced through the proposed provision of seating areas at either end of the viewing corridor which can be used by members of the public and employees to sit and enjoy the setting. The plans submitted also propose open space immediately to the north of the Church to enable penetration of views through the site and in order to ensure that soft landscaping dominates in the area immediately surrounding the Church.
90. Also located within the site at the eastern end of the viewing corridor (to the east of Highfield lane) is a Cold War Royal Observer Corps underground monitoring post. Documentation submitted pursuant to archaeological conditions imposed on outline planning permission 14/00906/AS confirms that the underground post would be retained in situ. The understanding and appreciation of the heritage significance of this asset would be enhanced through a heritage information board, which forms part of the reserved matters proposals.
91. Overall, I am satisfied that the impact of the reserved matters proposals upon the setting of St Mary's Church remains an acceptable one. The harm to the setting of this heritage asset remains 'less than substantial' and the public benefits

arising and secured through the outline planning permission continue to outweigh this harm.

92. In terms of relationship with other nearby listed buildings, those on Church Road and the southern end of Highfield Lane are Grade 2 listed. Inherently, these have an existing setting that is very different to St. Mary's Church and one which is considerably more localised. The reserved matters proposals show the development plots located away from the immediate site boundaries near to these homes, with open space (including screen tree planting, subtle ground re-profiling and sustainable drainage system features) forming an attractive landscape buffer between existing and new development consistent with the illustrative master plan accompanying the outline planning application. Accordingly, I remain satisfied that the impact of the proposals on the more localised setting of those buildings is an acceptable one.
93. In reaching my conclusions on heritage asset impacts conclusion I have had special regard to the desirability of preserving listed buildings and their settings as is required by the Section 66 Act.

## **Impact on the Green Corridor and Ecology**

### Green Corridor

94. The relevant policy relating to the Green Corridor (policy ENV2 of the Local Plan) is copied below:

**Policy ENV2 - The Ashford Green Corridor**

**The protection and enhancement of Ashford's Green Corridor is a key objective.**

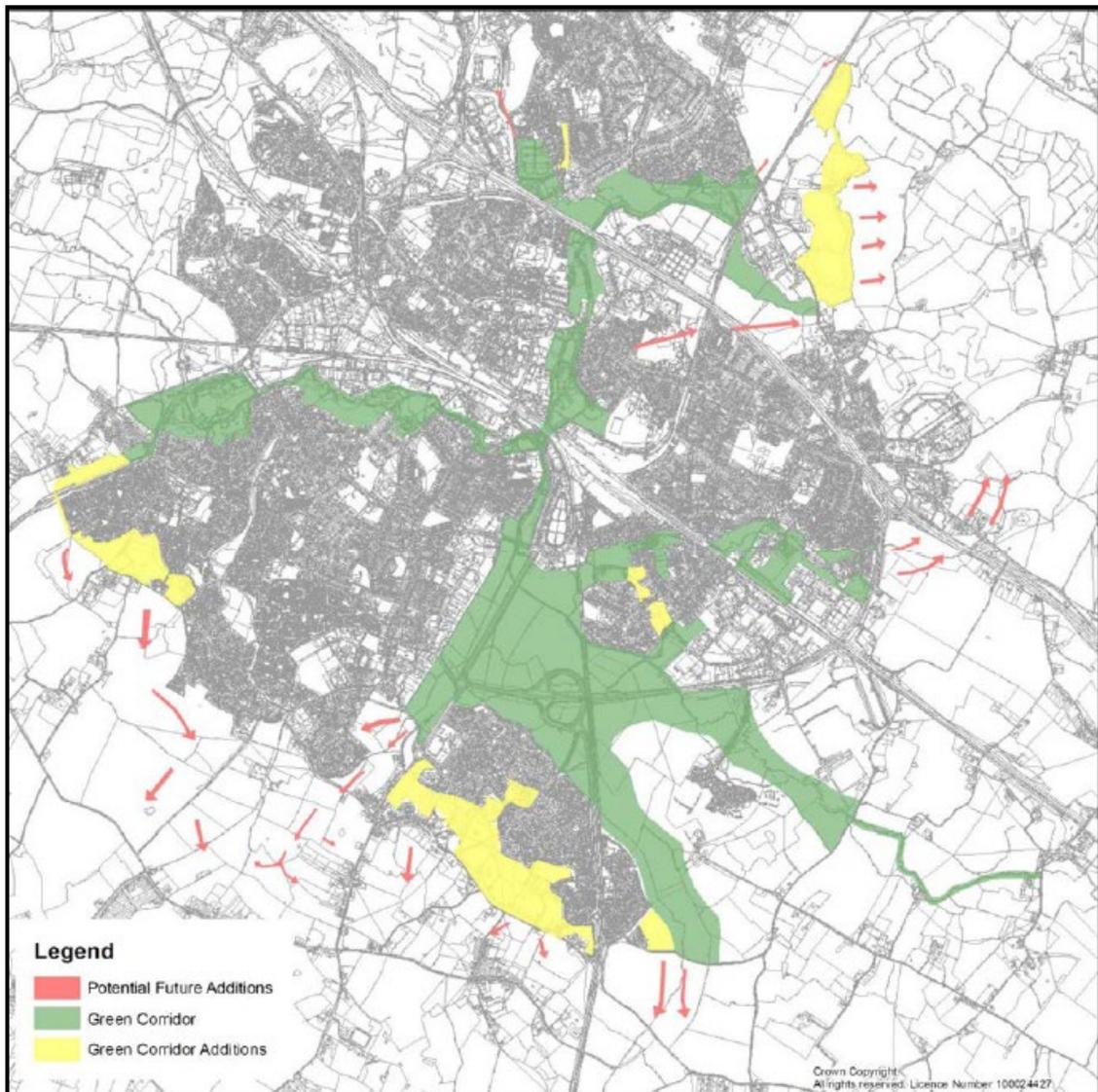
**Development proposals within the identified Corridor designation (and proposed extensions) will be permitted, providing that it is compatible with, or ancillary to, their principal open space use or other existing uses, and it can be demonstrated that the proposal would not cause significant harm to the overall environment, biodiversity, visual amenity, movement networks or functioning of the Green Corridor.**

**Other forms of development proposals within the Green Corridor will not be permitted, unless it would be in accordance with a site specific policy in this Local Plan; or where it relates to a) the redevelopment of a suitable brownfield site or b) delivers overriding benefits, and in either scenario, that it can be demonstrated that there would be no significant harm to the overall environment, biodiversity, visual amenity, movement networks or functioning of the Green Corridor.**

**Development proposals on land adjoining the Green Corridor shall provide suitable access and links to the existing movement networks of the adjoining Green Corridor wherever possible. They must not cause significant harm to any of the key features and functions, and should make a positive contribution to the Green Corridor in respect of its environment, biodiversity, visual amenity, movement networks or functioning and its setting.**

**Development proposals must take into consideration the appraisals, projects and management recommendations set out for the specific areas in the Ashford Green Corridor Action Plan, including the identified proposed extension areas to the designation.**

95. Protection and enhancement of the Green Corridor is a key objective of the Ashford Local Plan 2030. The Green Corridor Action Plan 2017 supports the Local Plan and amongst other things identifies opportunity areas to be considered in the future for extensions.
96. A copy of the map identifying areas to be considered in the future for extensions is copied below. The map identifies an area immediately to the north of the site (outside of the application site boundary) as being an opportunity area.



97. In December 2017 (following the publication of the Action Plan) the Development Consent Order was granted for the construction of the new junction 10A to the M20 Motorway. The roundabout linking the Junction 10A link Road to the A2070 (as well as the 'drainage feature' shown on the masterplan in the north west corner of the development site (both visible in figure 5) are located within the opportunity area to the north of the site is.
98. The proposed development provides for blue and green landscaping along the northern boundary of the site that includes swales and substantial dry and wetland planting. These would provide valuable wildlife habitat and attractive soft edges that would make a positive contribution to the landscape in the areas adjacent to the opportunity area identified within the Action Plan. I am therefore satisfied that when considered in conjunction with the works being undertaken in association with the consented development for Junction 10A, the detail set out

in this reserved matters application would not compromise the Local Plan objectives or objectives set within the Green Corridor Action Plan.

### Ecology

99. Policy ENV1 states that proposals for new development should identify and seek opportunities to incorporate and enhance biodiversity. Proposals should safeguard features of nature conservation interest and should include measures to retain, conserve and enhance habitats... and networks of ecological interest... including... water features, ditches, dykes and hedgerows, as corridors and stepping stones for wildlife. Where harm to biodiversity assets cannot be avoided, appropriate mitigation will be required in line with a timetable to be agreed with the Local Authority. Normally any mitigation measures will be required to be delivered on-site, unless special circumstances dictate that an off-site model is more appropriate. Policy ENV1 of the Local Plan is consistent with the guidance contained within the NPPF.
100. The outline planning application was accompanied by a comprehensive ecological assessment of the site and included details of how appropriate ecological mitigation could be provided through the proposed masterplan layout. Proposed mitigation included suitably designed lighting, provision of a green buffer and strategic green spaces within the site. In addition to the proposed mitigation, the report to the Planning Committee in 2016 recommended that Ecological Management Plans and Monitoring Strategies be secured by planning condition. These conditions were subsequently attached as conditions 47 and 48. In order to satisfy the requirements of these conditions, details, including a Landscape and Ecological Management Plan (LEMP) and a Framework Ecological Mitigation Strategy (FEMS) have been submitted to the Council under application reference 14/00906/CONB/AS. Following consultation with KCC Ecology, these details have been concluded as being acceptable in relation to the requirements of conditions 47 and 48.
101. Information available in support of this reserved matters application confirms that in March 2019 an updated ecological walk over survey relating to the site was completed. In comments received in response to 14/00906/CONB/AS KCC Ecology confirm that based on this updated survey, they are satisfied that there is no requirement for updated surveys to be carried out and the results of the 2015 surveys accompanying the outline planning permission are still considered to be valid.
102. As detailed within the introduction and under the subheading proposals, condition 1(A) of outline planning permission 14/00906/AS requires details of the landscaping and layout of that open space (including measures specifically designed for ecological/biodiversity enhancement purposes within that open space) to be submitted.

103. The reserved matters application has been subject to consultation with KCC Ecology. KCC have advised that they are satisfied that the habitats detailed within the Landscape And Ecological Management Plan reflect the habitats within the landscape plans submitted as part of the reserved matters application. However, KCC have advised that there should only be one management plan implemented within the site. In response to this, the applicant has submitted a revised Landscape and Ecological Management Plan so that the Landscape and Ecological Management accompanying this application is the same as the one accompanying 14/00906/CONB/AS which KCC have found to be acceptable. The approach across the applications is therefore now aligned.
104. In terms of ecological/biodiversity enhancements, although loss of the majority of habitats within the site is unavoidable to accommodate the proposed development, the proposed development plots have primarily been placed within the arable habitat, which is of low ecological value. Although some grassland, hedgerow and scattered scrub would be lost, the proposed landscaping and layout of the open space comprising said landscaping would facilitate the creation of new habitats in their place, which in time would provide habitats of equal or improved value for biodiversity than that lost as indicated in the submitted FEMS accompanying 14/00906/CONB/AS (para 3.3).
105. In total, the landscape proposals would result in the creation of the following habitats within the Site:
- 5.04 ha of woodland/tree and native shrub planting;
  - 1733 m of native and edible hedgerow;
  - 5.08 ha of wildflower and tussock grassland;
  - 4.45 ha of amenity grassland;
  - 1.6 ha of open water and 0.27 ha of wetland planting; and,
  - 715 m of ornamental hedgerow and 0.48 ha of amenity/ornamental shrub planting.
106. An off-site Ecological Mitigation Area situated to the north of the site, would also be subject to management. This area has been designed specifically as a reptile receptor site. Since 2015, habitat establishment works within the off-site Ecological Mitigation Area have been completed, and the arable land has been converted to wildflower grassland.
107. Within the 6 character areas identified within the site, a range of appropriate species mixes would be provided. The specifications, creation and establishment

measures relating to these are detailed within the Planting Schedules prepared by PRC (2019) which accompany the application.

108. Existing hedgerows along Highfield Lane would be retained and enhanced.
109. In addition to the habitats within the 6 character areas, a number of species-specific ecological features would be provided within the site. These features are summarised in the table copied below:

Feature	Description	Number
Bird and Bat Boxes	A mixture of Schwegler wood-crete bat boxes and bird boxes to be installed in suitable locations across the site.	<ul style="list-style-type: none"> <li>• Four Schwegler 3SV Nest boxes</li> <li>• Four Schwegler Starling Nest Boxes</li> <li>• Four Schwegler 2H Robin Boxes</li> <li>• Four Schwegler Owl Box No.4</li> <li>• 15 Bat boxes, comprising a mixture of Schwegler 2F, 2FDFP and 1FF boxes.</li> </ul>
Reptile refugia / hibernacula	Loosley stacked inert, clean bricks and hardcore capped with topsoil and turfs.	<ul style="list-style-type: none"> <li>• Three within the off-site Ecological Mitigation Area</li> <li>• Five within landscaped areas of the Site</li> </ul>
Log Piles	Log piles constructed from dead wood resource arising from site activities.	<ul style="list-style-type: none"> <li>• Four within landscaped areas of the Site</li> </ul>

110. As well as ecological/biodiversity enhancements, the LEMP also comprises a management plan which provides details of the management to be carried out within the development site and within the offsite ecological mitigation area. In addition the FEMS accompanying 14/00906/CONB/AS provides details of the proposed monitoring of the site. Said monitoring will inform reviews and updates of the management plan (where required). The management prescriptions within the LEMP and the monitoring/reviews detailed within the FEMS are secured through the approval of details relating to conditions 47 and 48 of 14/00906/AS.
111. KCC Ecology acknowledge that this application does not include the design and access arrangements for each individual plot. KCC have stated that there is a need to ensure that the detailed designs for the plots do not encroach into the landscaping area and there is no loss of habitat within the site from what is depicted on the plans. I would expect any reserved matters application submitted in accordance with condition 1(b) of 14/00906/AS to demonstrate that the ecological/biodiversity enhancements designed and secured through this application will not be compromised. I consider it prudent to draw this to the applicant's attention by way of an informative attached to the decision notice – this will ensure that applicant's taking forward development plots do so with clear understanding of the ecological context underpinning the approach to the structuring of the site.
112. Based on the information submitted and the responses received from KCC, I am satisfied that the proposed development would include suitable ecological/biodiversity enhancements and that these would be appropriately

managed and monitored. Consequently, the development is not considered to result in any adverse impacts to matters of ecological importance in accordance with the relevant policies set out in the adopted development plan and the NPPF.

### **Sustainable Drainage**

113. Amongst other things policy ENV9 of the Local Plan 2030 states the following:

*“All development should include appropriate sustainable drainage systems (SuDS) for the disposal of surface water, in order to avoid any increase in flood risk or adverse impact on water quality, and to mimic the drainage from the pre-developed site.*

*On greenfield sites, development should discharge at a maximum of 4l/s/ha, or 10% below current greenfield rates for the existing 1:100 storm event, whichever is lower. There must be no increase in discharge rate from less severe rainfall events, with evidence submitted to demonstrate this principle”.*

114. The application is supported by a Drainage Strategy which has been revised to address comments received from KCC Flood and Water Management and the River Stour Inland Drainage Board.

115. The strategy states that the post development site layout, will consist of 268,600m<sup>2</sup> of the site being impermeable with the remaining 208,981m<sup>2</sup> being used for landscaping and ponds. The strategy concludes that the impermeable area for the proposed development amounts to 57% of the total site area.

116. The strategy confirms that the applicant proposes to manage surface water on site through a comprehensive sustainable drainage system involving the creation detention ponds and swales that transport water to the storage ponds. It is also proposed to use permeable surfacing.

117. Ponds would be sized and constructed to ensure they work as wet ponds with a constant level of water in the base of the ponds. Not only does this type of SuDs solution comply with the ABC Sustainable Drainage SPD, it would also function as an ecological enhancement and an attractive ‘blue grid’ embedded within open landscaped spaces forming a ‘green grid’ across the site.

118. Topographical surveys show that the existing ground levels vary between 61.95m to 46.50m OD across the site. The site falls from a central high point on the eastern boundary of the site to two low points situated on the site boundary both to the south-west and north-west.

119. The lowest points of the site are located at the north-western point which falls towards the Aylesford stream and the south-western point of the site which drains to an existing ditch watercourse which discharges to the south of the site across the network rail land.

120. The strategy submitted with this application states that the point of discharge for the developed site will be via two outfall points as follows:

- A new connection constructed by Highways England under the A2070 Junction 10A Link Road to the north which will be via a new headwall to the Aylesford Stream.
- Outfall to the south will be via an existing ditch which has an historic outfall to the south across network rail land.

The applicant has confirmed that approval in principal for continuing to use the southern outfall has been agreed with the CTRL.

121. The strategy concludes that the final developed site flows discharging to both the northern and southern outfalls would be restricted to the Greenfield rate of 4l/s/ha.

122. The strategy has been subject to consultation with KCC Flood and Water Management. KCC raise no objection to the information submitted in support of the reserved matters application. However, KCC have commented that the drainage scheme for this phase has implications for all future phases because the works provide strategic drainage provision for the entire development.

123. With respect to the level of detail provided in support of this application, subject to discharge rates being agreed between KCC and the Inland Drainage Board, KCC recommend approval of the details subject to a condition to be applied to the reserved matters approval to ensure that each stage delivers drainage compliant to the principles being agreed. The condition would require a verification report pertaining to the surface water drainage system to be submitted to and approved by the Local Planning Authority. The condition would require the report to demonstrate the suitable modelled operation of the drainage system such that flood risk is appropriately managed. The condition would require the report to contain information and evidence (including photographs) of earthworks; details and locations of inlets, outlets and control structures; extent of planting; details of materials utilised in construction including subsoil, topsoil, aggregate and membrane liners; full as built drawings; topographical survey of 'as constructed' features; and an operation and maintenance manual for the sustainable drainage scheme as constructed.

124. Based upon the strategy and subject to the condition that is recommended by KCC, I am satisfied that the proposed development would not worsen flooding on the site or on adjacent land and would accord with the criteria set out in policy ENV9 of the Local Plan and the Council's Sustainable Drainage SPD.

### **Access and Impact on Highway Safety**

125. Policy TRA5 of the Local Plan states that development proposals shall demonstrate how safe and accessible pedestrian access and movement routes will be delivered and how they will connect to the wider movement network.

Opportunities should be proactively taken to connect with and enhance Public Rights of Way whenever possible, encouraging journeys on foot.

126. Policy TRA6 seeks to improve conditions for cyclists stating amongst other things that Developments should, where opportunities arise, include safe, convenient and attractively designed cycle routes, including, where possible, connection to the Borough-wide cycle network.
127. The roads are proposed to be arranged with a north-south route, accessed from the M20 J10A link road, and an east-west road accessed from Church Road/A2070. The reserved matters proposals do not include detailed designs for the junctions as these will form separate planning applications, to be submitted in due course.
128. The proposals have been amended to address comments received from KCC Highways and Transportation and from KCC PROW which are detailed above. The amendments submitted have been subject to discussion with the relevant consultees. KCC Highways and Transportation have confirmed that they have no objection to the proposals subject to conditions securing the provision and maintenance of visibility splays and double yellow lines. Comments from KCC PROW in response to amended plans are still awaited: any comments received will be included in my Update Report.
129. In terms of the suitability of the internal road layout, given that KCC Highways have confirmed that the amended proposals are satisfactory and meet the required standards, I am satisfied that the movement of vehicular traffic can be accommodated within the site without detriment to highway safety.
130. In terms of movement for pedestrians and cyclists, the proposals seek to ensure continuity and convenience of existing user routes in the vicinity of the developments. The development also seeks to secure improved cycle and pedestrian links including between the A2070 footbridge (currently under construction) and Highfield Lane on the Sevington to Ruckinge Loop Cycle Route.
131. A number of public rights of way are affected by the proposals and the delivery of this scheme would result in a number of diversions and stopping up of existing routes. However, the design proposals include the creation of new routes through and around the site including shared cycle/footways within character area 1 along Highfield Lane, character area 4 within the vicinity of St Marys Church and proposed new water bodies and also through character area 5, which acts as an arterial green route and view corridor providing a direct route from urban Ashford onward in a easterly direction out towards the open countryside.

132. Overall, I consider that the design has been carefully considered to accord with the aims and objectives of policies TRA5 and TRA6. In addition, I am satisfied that the movement of traffic can be accommodated within the site without detriment to highway safety.

### **Human Rights Issues**

133. 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).

### **Conclusion**

134. This application is submitted pursuant to the details required by condition 1(a) of outline planning permission 14/00906/AS. Condition 1(a) requires details to be submitted of:

- the estate roads;
- the sustainable urban drainage system embedded within the open space; and
- the landscaping and layout of that open space, including measures for the enhancement of ecology and biodiversity.

135. Since outline planning permission was granted the Development Consent Order for works to create a new junction to the M20 motorway (Junction 10A) including a link road to the A2070 has been granted. Highways England has commenced these works.

136. In terms of the layout of open space, the landscaping scheme reflects the illustrative masterplan approved at outline stage and would provide a rich and diverse mix of blue & green infrastructure comprising various native species that are appropriate for their environment, would enhance biodiversity/ecology and would positively respond to the character of the area within which the site is located. In addition, the layout of the open space within the site would comply with the policy objectives set within ABC's LCA appraisal which seeks to facilitate tree belts and linear woodlands.

137. The impact of the reserved matters proposals upon the setting of St Mary's Church is an acceptable one. As per the assessment of the outline application proposal, the harm to the setting of this heritage asset in terms of the detail with this application remains 'less than substantial' and the public benefits arising and secured through the outline planning permission continue to outweigh harm. In

terms of relationship with other nearby listed buildings, the impact of the proposals on the more localised setting of those buildings is also an acceptable one.

138. The Local Plan identifies an area immediately to the north of the site (outside of the application site boundary) as being an opportunity area for an extension to the Ashford Green Corridor. The proposed development provides for blue and green landscaping along the northern boundary of the site that includes swales and substantial dry and wetland planting. These areas would provide valuable wildlife habitat and attractive soft edges that would make a positive contribution to the landscape. I am satisfied that when considered in conjunction with the works being undertaken in association with Junction 10A, the detail proposed in this reserved matters application would not compromise the Local Plan objectives in relation to the Green Corridor or objectives set within the Green Corridor Action Plan.
139. The proposed development would comprise suitable ecological/biodiversity enhancements and these would be appropriately managed and monitored. Consequently, the detail that is proposed is not considered to result in any adverse impacts to matters of ecological importance.
140. The drainage strategy accompanying the application confirms that the applicant proposes to manage surface water on site through a comprehensive sustainable drainage system involving the creation detention ponds and swales that transport water to the storage ponds. It is also proposed to use permeable surfacing. The proposed strategy is considered to represent a feasible solution for dealing with surface water on site and subject to the imposition of a condition recommended by KCC Flood and Water Management, I am satisfied that the development would not worsen flooding on the site or on adjacent land. The surface water/SuD proposals would accord with the criteria set out in policy ENV9 of the Local Plan and the Council's Sustainable Drainage SPD.
141. The design has been carefully considered to accord with the aims and objectives of policies relating to cycling and pedestrians. In addition, the movement of traffic can be accommodated within the site without detriment to highway safety.
142. In conclusion the detail contained within the application complies with the adopted development plan, guidance contained within ABC's supplementary planning documents and within the National Planning Policy Framework. It takes forward the approved masterplan concepts and would provide a strong framework into which the development of individual plots can be fitted and come forward to the Council for similar detailed approval.

## **Recommendation**

### **Approve detail**

#### **Subject to the following Conditions and Notes:**

**(with delegated authority to either the Head of Planning and Development or the Joint Development Control Managers to make or approve changes to the planning conditions (for the avoidance of doubt including additions, amendments and deletions) as she/he sees fit)**

1. No building on any phase (or within an agreed implementation schedule) of the development hereby permitted shall be occupied until a Verification Report pertaining to the surface water drainage system, carried out by suitably competent person, has been submitted to the Local Planning Authority which demonstrates the suitable modelled operation of the drainage system such that flood risk is appropriately managed, as approved by the Lead Local Flood Authority. The Report shall contain information and evidence (including photographs) of earthworks; details and locations of inlets, outlets and control structures; extent of planting; details of materials utilised in construction including subsoil, topsoil, aggregate and membrane liners; full as built drawings; topographical survey of 'as constructed' features; and an operation and maintenance manual for the sustainable drainage scheme as constructed.

**Reason:** To ensure that flood risks from development to the future users of the land and neighbouring land are minimised, together with those risks to controlled waters, property and ecological systems, and to ensure that the development as constructed is compliant with and subsequently maintained pursuant to the requirements of paragraph 165 of the National Planning Policy Framework.

2. The visibility splays identified on drawing numbers 08-125 / 492 Revision P1 and 08-125 / 493 Revision P3 shall be provided prior to the estate roads hereby permitted being brought into use. The access and visibility splays shall be retained and maintained thereafter and the area within the visibility splay shall be permanently maintained with no obstructions over 0.9 metres above carriageway level within these splays.

**Reason:** In the interest of highway safety.

3. The double yellow lines shown on drawing numbers 08-125/475 Revision P2, 08-125/476 Revision P2, 08-125/477 Revision P2, 08-125/478 Revision P2 and 08-125/479 Revision P2 shall be provided prior to the estate roads hereby

permitted being brought into use. The double yellow lines shall be retained and maintained thereafter.

**Reason:** In the interest of highway safety.

## **Note to Applicant**

### **1. Working with the Applicant**

#### **Working with the Applicant**

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 proactive manner by;

- offering a pre-application advice service,
- as appropriate updating applicants/agents of any issues that may arise in the processing of their application
- where possible suggesting solutions to secure a successful outcome,
- informing applicants/agents of any likely recommendation of refusal prior to a decision and,
- by adhering to the requirements of the Development Management Customer Charter.

In this instance

- was provided with pre-application advice,
- The applicant was provided the opportunity to submit amendments to the scheme/ address issues.
- The application was considered by the Planning Committee where the applicant/agent had the opportunity to speak to the committee and promote the application.

### **2. The applicants attention is drawn to the following comments received from KCC Ecology:**

*Landscape plans demonstrate that currently habitat connectivity throughout the site has been maintained - however no information has been provided on the proposed access into the plots. The detailed designs for the plots have not been submitted and we are concerned that in addition to creating the access into the plots there is a risk that each plot will encroach into the wider landscaping area and reduce the amount of greenspace throughout the site*

*There is a need to ensure that the access points into the site is minimal and (other than to create access into the site) there is a need to ensure that at the detailed*

*design stage ecological functionality of the submitted landscaping plans can still be implemented.*

The applicant and/or the developer for each individual plot is advised to carefully consider this matter and application(s) submitted pursuant to condition 1(b) of outline planning permission 14/00906/AS need to demonstrate that the proposed development will not unduly compromise/adversely impact upon the ecological/biodiversity enhancements secured through this reserved matters application.

3. KCC Highways and Transportation advise that the existing carriageway of Highfield Lane will need to be stopped up in due course. The applicant will need to apply to Department for Transport for a stopping up order through the Town and Country Planning Act 1990. The applicant is reminded of the provisions of the s.106 agreement relating to these matters.
4. Planning permission does not convey any approval for construction of the required vehicular crossing, or any other works within the highway for which a statutory licence must be obtained. Applicants should contact Kent County Council - Highways and Transportation (web: [www.kent.gov.uk/roads\\_and\\_transport.aspx](http://www.kent.gov.uk/roads_and_transport.aspx) or telephone: 03000 418181) in order to obtain the necessary Application Pack.

It is the responsibility of the applicant to ensure, before the development hereby approved is commenced, that all necessary highway approvals and consents where required are obtained and that the limits of highway boundary are clearly established in order to avoid any enforcement action being taken by the Highway Authority.

Across the county there are pieces of land next to private homes and gardens that do not look like roads or pavements but are actually part of the road. This is called 'highway land'. Some of this land is owned by The Kent County Council (KCC) whilst some are owned by third party owners. Irrespective of the ownership, this land may have 'highway rights' over the topsoil. Information about how to clarify the highway boundary can be found at <https://www.kent.gov.uk/roads-and-travel/what-we-look-after/highway/land/highway-boundary-enquiries>

The applicant must also ensure that the details shown on the approved plans agree in every aspect with those approved under such legislation and common law. It is therefore important for the applicant to contact KCC Highways and Transportation to progress this aspect of the works prior to commencement on site.

## **Background Papers**

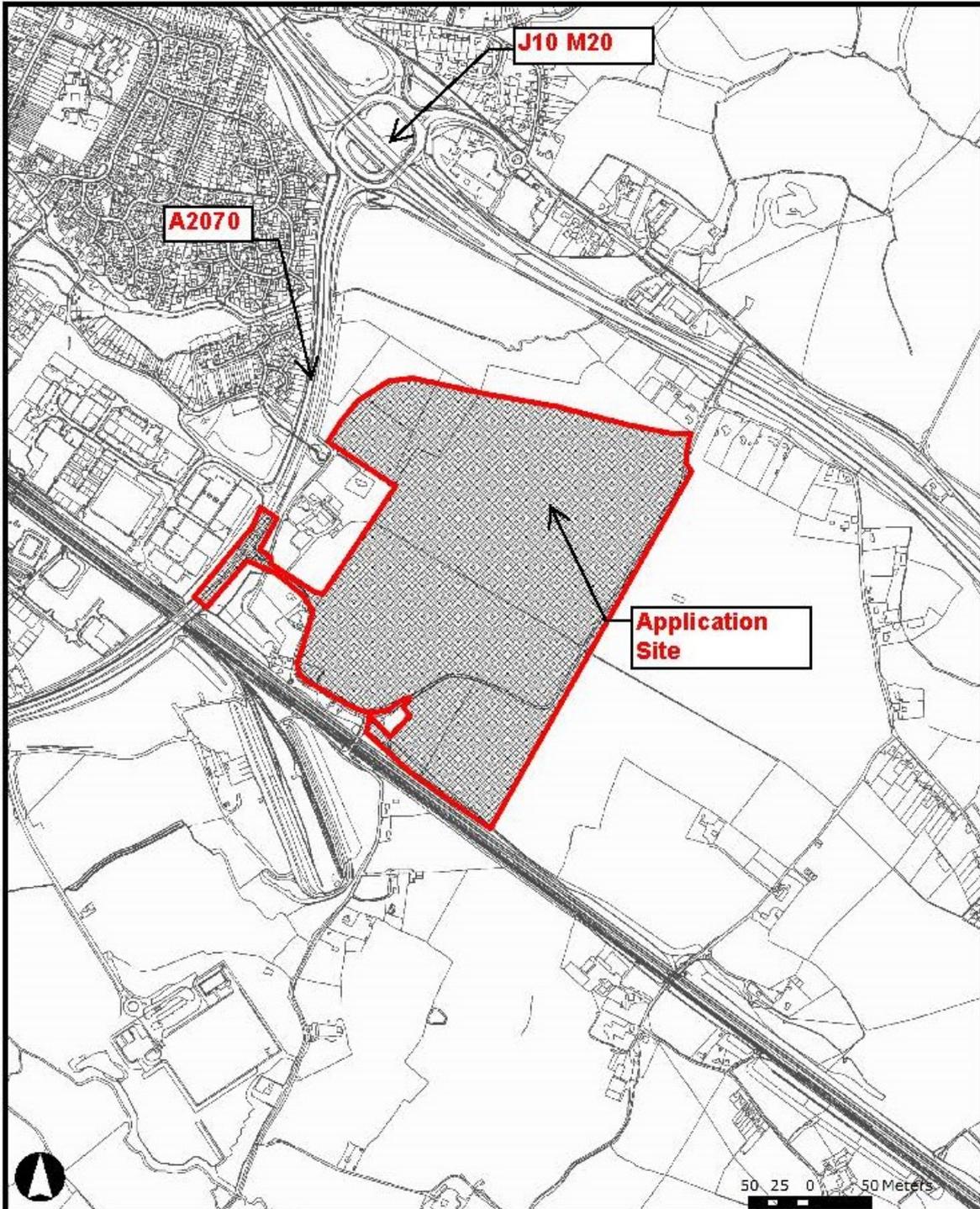
All papers referred to in this report are currently published on the Ashford Borough Council web site ([www.ashford.gov.uk](http://www.ashford.gov.uk)). Those papers relating specifically to this application may be found on the [View applications on line](#) pages under planning application reference 19/00579/AS)

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Annex 1



# Ashford Borough Council



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