

PLANNING STATEMENT

Incorporating Affordable Housing Statement

Redevelopment comprising the conversion of the existing Flour Mill, demolition of existing structures, and the erection of four ancillary blocks to provide a total of no. 53 apartments (Use Class C3), ancillary residential facilities (including residents' gym and 'superlounge'), 1 x office (Use Class E(g)(i)), retained access from East Hill, parking, and associated landscaping and infrastructure.

 **Flour Mill, East Hill, Ashford, Kent**

Prepared by Hume Planning Consultancy Ltd.

On behalf of Oliver Davis Homes

December 2021

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1. INTRODUCTION

- 1.1 This Statement has been prepared in support of the submission of a full planning application to Ashford Borough Council for redevelopment comprising the conversion of the existing Flour Mill, the demolition of existing structures, and the erection of four ancillary blocks to provide a total of no. 53 apartments (Use Class C3), ancillary residential facilities (including residents' gym and 'super lounge'), 1 x office (Use Class E(g)), retained access from East Hill, parking, and associated landscaping and infrastructure.
- 1.2 This Planning Statement provides an assessment of the proposed development against the development plan for Ashford Borough Council, the National Planning Policy Framework, and other relevant material considerations. This Statement focuses on the principle of development in this location but also identifies more site-specific and technical planning parameters that are relevant to the consideration of this proposal.
- 1.3 It is relevant that – in line with paragraph 39 of the NPPF – the Applicant has undertaken extensive pre-application engagement with the Local Planning Authority (LPA). It is emphasised that the proposed development has been the subject of two rounds of Design Review Panel undertaken by Design South East (DSE) throughout 2021 and has also been the subject of community consultation and a Members' Briefing prior to submission. Pre-application engagement has therefore informed the design evolution of this high quality proposal, duly informed by relevant technical and specialist advice from the Local Planning Authority, its members, and representatives of the local community. Please refer to **Section 3** of this Statement and the supporting Statement of Community Involvement for details.
- 1.4 The following plans and documents are submitted in support of this application:
- 20.068_Flour Mill_001 Site Location Plan_REV A
 - 20.068_Flour Mill_002 Existing & Proposed Block Plan_REV A
 - 20.068_Flour Mill_003 Existing Site Layout Plan_REV A
 - 20.068_Flour Mill_004 Existing Ground Floor Plan_REV A
 - 20.068_Flour Mill_005 Existing First Floor Plan_REV A
 - 20.068_Flour Mill_006 Existing Floor Plans_REV A
 - 20.068_Flour Mill_007 Existing Elevation AA_REV A
 - 20.068_Flour Mill_008 Existing Elevation BB&DD_REV A
 - 20.068_Flour Mill_009 Existing Elevation CC_REV A
 - 20.068_Flour Mill_010 Existing Section EE_REV A
 - 20.068_Flour Mill_101 Proposed Site Layout Plan_REV A
 - 20.068_Flour Mill_102 Proposed Floor Plans A&B_REV A
 - 20.068_Flour Mill_103 Proposed Floor Plans A&B_REV B
 - 20.068_Flour Mill_104 Proposed Floor Plans CD&E_REV A
 - 20.068_Flour Mill_105 Proposed Floor Plans CD&E_REV A
 - 20.068_Flour Mill_120 Proposed Sections_REV A
 - 20.068_Flour Mill_121 Proposed Sections_REV A
 - 20.068_Flour Mill_122 Proposed Sections_REV A
 - 20.068_Flour Mill_123 Proposed Sections_REV A
 - 20.068_Flour Mill_130 Proposed Elevations Block A_REV A
 - 20.068_Flour Mill_131 Proposed Elevations Block B_REV A
 - 20.068_Flour Mill_132 Proposed Elevations Block CD&E_REV A

- 20.068_Flour Mill_133 Proposed Elevations Block C&E_REV A
- Design and Access Statement, prepared by Hollaway
- Heritage Statement, prepared by Icení
- Transport Statement, prepared by Odyssey
- Travel Plan, prepared by Odyssey
- Pre-Development Tree Survey Report, Tree Survey Plan and Tree Survey Schedule, prepared by Invicta Arboriculture
- Preliminary Ecological Appraisal, prepared by Green Space Ecology
- Bat Survey Report, prepared by EcoAssistance
- Flood Risk Assessment, prepared by Create Consulting
- Sequential Test Assessment, prepared by Hume Planning Consultancy
- Exceptions Test Assessment, prepared by Hume Planning Consultancy
- Landscape Masterplan, prepared by ETLA
- Illustrative Landscape Masterplan, prepared by ETLA

- 1.5 The above documents should be read alongside the Planning Statement and the planning application forms in order that a comprehensive understanding of the proposal is obtained.
- 1.6 Oliver Davis Homes is a housebuilder with a noted track record of delivery since its formation, and therefore align closely with the Government's encouragement of measures to drive forward housing delivery on sites such as this. The benefits of the proposal are numerous and include the delivery of quality accommodation in a highly sustainable Town Centre location, the creation of new open space for public use, the revitalisation and enhancement of non-designated heritage asset, and marked improvements to this site within Ashford's designated Green Corridor.
- 1.7 Overall, it is asserted that the proposal represents a highly sustainable form of development which is consistent with the provisions of the development plan and the NPPF. It would deliver a high-quality form of residential development, bringing back into use a vacant brownfield site within the defined boundary for Ashford Town Centre. In this context, planning permission should be granted.

2. SITE DESCRIPTION

- 2.1 The subject site comprises the existing Flour Mill located on East Hill, Ashford. Currently vacant, the site constitutes previously developed land (**Figure 1**).
- 2.2 The site represents a prominent location at a gateway position close to the centre of Ashford with the urban area and within easy reach of central services and facilities highly accessible to excellent national and international public transport provision.
- 2.3 The River Stour runs through the site, effectively dividing it in two distinct areas comprising of one larger parcel adjacent to East Hill and another currently undeveloped parcel fronting Mace Lane which is largely inaccessible and overgrown. The River Stour runs directly past the front elevation of the existing building on East Hill which is itself accessed via bridge crossings. To the north of the site sits Mace Lane, a primary road with vehicular routes through the town and into and out of Ashford.
- 2.4 To the south east is the Mill Court residential development with amenities such as a medical centre, pharmacy, and small supermarket. To the immediate West sits the Star Inn, and the short public route to the high street. To the north west of the site sits part of the Ashford School complex.

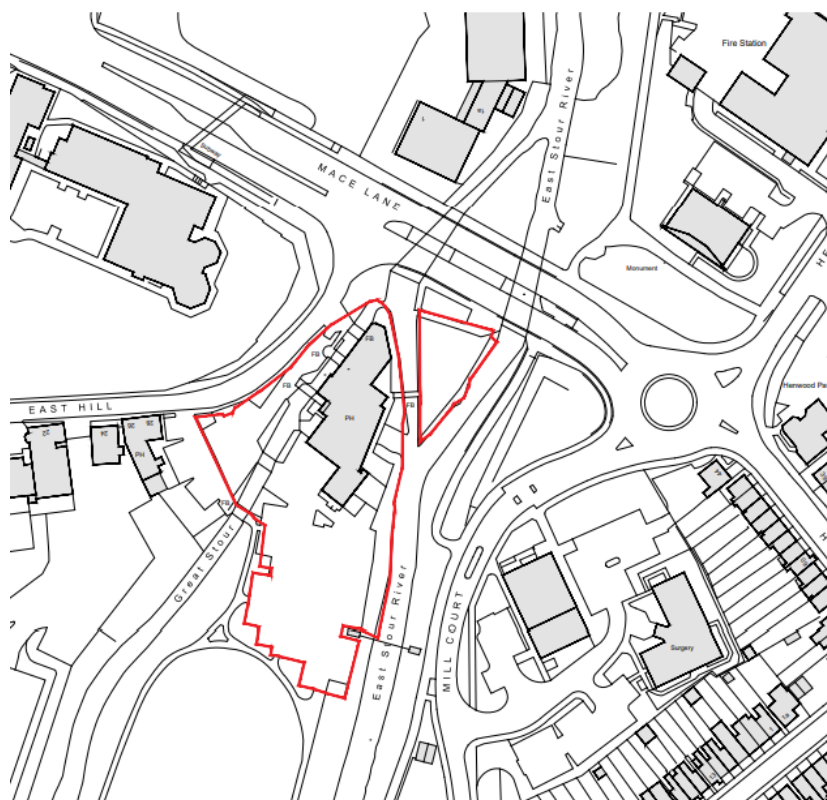


Figure 1. Site Location, edged red.

- 2.5 Constructed in 1901 as a flour mill and warehouse on site, the existing building stands between 6 and 7.5 storeys tall at its highest points, though is for the most part 5 storeys in height. The site falls within the designated Ashford Town Centre boundary.
- 2.6 Parts of the site fall within the Ashford Town Centre Conservation Area; specifically the existing building rather than the current areas of surface car parking or the 'island' site. Two Grade II listed buildings fall within the vicinity of the site – the 'Star Inn' and 'Northside' – with the Grade II* listed 'Bridge House' to the south west of the site.
- 2.7 In addition, the site is washed over by the Ashford Green Corridor (**Figure 2**) and is in part subject to designations as a wildlife site (here; specifically the River Stour rather than the surfaced or built elements of the site). The site's north-eastern extent is currently designated as open space, although it is overgrown and is not publicly accessible. This part of the site does not perform any recreational function in its current configuration.
- 2.8 The site is, in near totality, included within designated Flood Zone 3 (**Figure 2**). Part of the site fronting East Hill is included within Environment Agency Flood Zone 2.
- 2.9 Whilst the site benefits from existing a vehicular access directly to East Hill with a frontage to the undeveloped parcel of the site fronting Mace Lane (i.e. relating to the 'island' part of the site), it is also located in proximity to Ashford International rail station. In its current configuration the site retains pedestrian access from various points and is well related to existing pedestrian and cycle routes. In this regard the site benefits from close access to existing services and facilities, as well as wider connectivity via public transport links.
- 2.10 In the context of the site's central location and the level of recognised housing need, the opportunity to maximise efficient use of the land warrants a critical review of the site and its current designations.

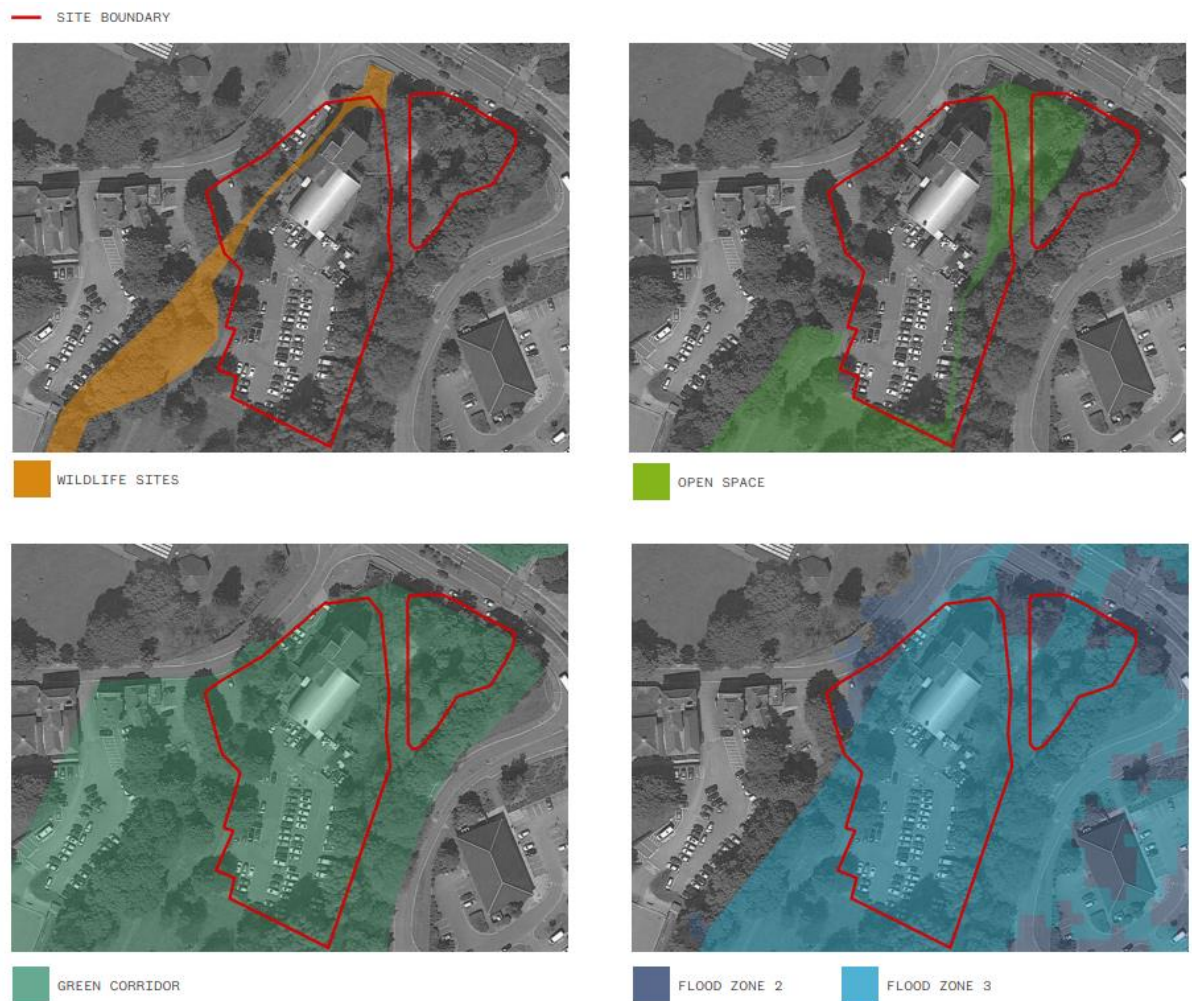


Figure 2. Planning Policy Designations; site edged red.

PLANNING HISTORY

- 2.11 There have been a number of historic planning permissions for various types of development at the subject site. Largely these refer to alterations and minor development and include for:
- 02/01002/AS Proposed external alterations to building shell to form bar and nightclub Including new roof to first floor nightclub area and new footbridge. Approved 15 August 2002.
 - 05/00135/AS Creation of one three-bedroom apartment and one four-bedroom apartment (on the upper floors). Approved 18 March 2005.
- 2.12 It is understood that previous plans for the building included its redevelopment by the nearby Ashford School. Whilst previously considered in the context of the Ashford School's masterplan, no formal planning applications pursuant to the above is known to have been submit.
- 2.13 There have been no applications of direct or material relevance to the proposed redevelopment of the Site.

3. PRE-APPLICATION ENGAGEMENT

- 3.1 In preparing this application the Applicant has undertaken pre-application engagement as outlined below. In line with paragraph 39 of the NPPF, the Applicant has sought to front-load discussions with the Local Planning Authority (LPA) in recognition that *“early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties”*.
- 3.2 The following methods of pre-application community engagement have been undertaken:
- Review of past planning history and relevant consultation responses;
 - Pre-Application Engagement with Ashford Borough Council;
 - Presentation of the Proposal at 2 x South East Design Review Panel sessions;
 - Presentation to Members of Ashford Borough Council in November 2021
 - Presentation of proposals to Central Ashford Community Forum; and
 - Publication of an online public consultation event, advertised by local letter distribution

PRE-APPLICATION DISCUSSIONS – OCTOBER 2020 & JANUARY 2021

- 3.3 Pre-application advice was sought from Ashford Borough Council in October 2020. Discussions with the LPA addressed the principle of development in this location, alongside technical matters of design, heritage, and landscape, and the impact(s) of the proposal on the surrounding site context. Detailed comments were provided in respect of ecology and flood risk, each of which have informed the proposal which is the subject of this application for full planning permission.
- 3.4 After further discussion with the LPA in respect of the proposal’s contributions to the Ashford Green Corridor, a written response from the LPA was received on 11 March 2021. The LPA’s written response established support in support of the overarching principle of development in support of the redevelopment of the Site, subject to technical consideration of site-specific opportunities and constraints. It noted in conclusion that:
- “It is clear that there are benefits to the scheme that could form a part of a balancing exercise, including bringing a listed building back into use, and providing housing within a sustainable location of the Town Centre”*
- 3.5 This level of overarching support, informed and justified by the technical assessment documents since prepared and submitted, has duly informed the material prepared to support the proposed development. Detailed assessment is set out at **Section 5** of this Statement.

PRESENTATION OF THE PROPOSAL AT 2 X DESIGN SOUTH EAST REVIEW PANEL SESSIONS

- 3.6 The proposed development has also benefitted from assessment during 2 x Design South East Review panels (DRP) at which an emerging layout proposal was presented to a panel with specialisms in planning; architecture; landscaping / landscape architecture; heritage; ecology; flooding and transport planning. The first DRP panel was held on 21 April 2021. The second DRP panel – refined following earlier advice and supporting by extensive historic analysis of the site – was held on 9 September 2021.
- 3.7 It is relevant that the Local Planning Authority and select Members of the Council and local community groups, also attended and participated in these sessions particularly the second session held in September 2021.
- 3.8 The discussions held during this DRP, and the report of the panel issued thereafter have subsequently informed the final proposal submitted under this application and are referenced in the accompanying Design and Access Statement.
- 3.9 The following key recommendations were made by the DRP in its written feedback:
- Make sure the riverside walk is usable for pedestrians, cyclists as well as being a space to linger in.
 - Improve the approach to the site from the car park in the west, giving it an attractive feeling of arrival.
 - Make the frontages as active as possible, particularly along the key pedestrian and cycle routes through the site .
 - Define the courtyard spaces, ensuring they work for their intended uses.
 - Ensure the material choices fit in with both the retained and new buildings.
 - Scheme needs to maintain the dominance of the existing Flour Mill building, and ensure it remains the flagship building in this development.
- 3.10 The proposed development subject to the current application has due regard to this earlier design guidance and specialist advice.

PRESENTATIONS TO MEMBERS OF THE COUNCIL

- 3.11 On the 10 November 2021, a presentation was made to Members of the Council, outlining the proposed development at the Site. At this presentation, members were provided with an opportunity to comment on the proposals and raise any queries. The feedback of members has been taken into account in the preparation of this submission.
- 3.12 The main focus of discussion points focused on the design and historic fabric of the site, namely the opportunities it yields to bring forward a quality scheme in a sustainable location.

PRESENTATIONS TO CENTRAL ASHFORD COMMUNITY FORUM

- 3.13 An approach was made to the Forum by letter, inviting the opportunity to meet and present the proposals to members representing the community. A presentation was made to Central Ashford Community Forum on 8 November 2021. Feedback provided was useful in guiding further consideration of the proposals, including matters of ecological mitigation, flood risk, parking, and heritage. In particular, feedback provided an additional framework to consider the landscaping of the proposal. Further commentary highlighted a potential role for the site owner in managing the site once operational.

PRESENTATION OF PROPOSALS AT ONLINE PUBLIC CONSULTATION PORTAL

- 3.14 The public were also invited to view outline proposals for the submission via an online public consultation portal hosted on Hume Planning Consultancy's website, by way of a dedicated site page and documents. The same documents as presented to Members of the Council were made available for this consultation. The online consultation was advertised by way of a letter distributed to dwellings within a close radius of the Site. A copy of the letter distributed to residents is shown in the Statement of Community Involvement. The public consultation was open for responses for a two-week period until 10 November 2021. It has, however, remained open in the interim.
- 3.15 A response form to the documents was listed on the online consultation pages at: https://www.humeplanning.co.uk/consultations/flour_mill_ashford/ . The feedback form provided was digitised to allow comments to be made. At the time of writing, no responses have been recorded. Copies of the consultation material and forms are shown in the supporting **Statement of Community Involvement**.

4. PROPOSED DEVELOPMENT

- 4.1 The proposed development consists of redevelopment comprising the conversion of the existing Flour Mill, the demolition of existing structures, and the erection of four ancillary blocks to provide a total of no. 53 apartments (Use Class C3), ancillary residential facilities (including residents' gym and 'super lounge'), 1 x office (Use Class E(g)), retained access from East Hill, parking, and associated landscaping and infrastructure.

DESIGN AND APPEARANCE

- 4.2 It is highly relevant that the proposed development has been informed through iterative and collaborative engagement with the LPA and related stakeholders, including two separate Design Review Panels. It has also been the subject of community consultation and member briefing.
- 4.3 The proposed development centres principally on the conversion and reuse of the existing Flour Mill building alongside erection of four ancillary blocks as a residential-led scheme, incorporating 'all inclusive living' comprising of a range of ancillary uses at ground floor level, considered under a 'superlounge facility' in Block A and a residents' gym in Block C. An office for Oliver Davis Homes would be provided to the ground floor of Block B.
- 4.4 Specifically, the proposed development would yield a total of 53 residential apartments across the site with a housing mix of:
- 17 x 1 bedroom apartments (32.1% of total mix)
 - 15 x 2 bedroom apartments (28.3% of total mix)
 - 4 x 1 bedroom duplex apartments (7.5% of total mix)
 - 14 x 2 bedroom duplex apartments (26.4% of total mix)
 - 3 x studio apartments (5.7% of total mix)
- 4.5 The supporting Design and Access Statement outlines the internal typologies and detailed layouts of the above apartment types and housing mix, which in turn is reflected on the submitted plans and drawings.
- 4.6 The proposed development would further include for the following built development:
- 1 x office (Use Class E(g)) (circa 123 sqm floorspace) serving Oliver Davis Homes, who will manage the site
 - 1 x residents gym and 'superlounge' (serving residents only) (318sqm floorspace)
- 4.7 Both of the above elements would be ancillary to the primary use of the site, which comprises residential-led development.
- 4.8 The development would incorporate the erection of four ancillary blocks (Blocks A – D), each reducing in height from north to south. The heights of Blocks A (5.5 storeys; plus the Tower), Block B (5.5 storeys), Block C (4.5 storeys), Block D (4.5 storeys), and Block E (4.5 storeys) reflect

a graduated hierarchy of built form directly informed by the heritage assessment of the Site, and design review and related assessment of constraints and opportunities. The Flour Mill tower would remain the tallest and most prominent structure within the site, expressing a clear hierarchy of old and new. Courtyards would be provided between blocks, allowing a permeability through the site and pedestrian links between areas of the Site. CGI visuals are provided within the supporting Design and Access Statement, and a selection are shown in summary (**Figure 3**).

- 4.9 A significant volume of landscaping is proposed. In particular the development seeks to reinstate and re-landscape the 'island site', opening it up to the public and improving the Site's contributions to the Ashford Green Corridor. Details of which are outlined in both the Design and Access Statement, the Landscape Masterplan and Masterplan Strategy, and supporting plans.
- 4.10 The proposed external materiality reflects and compliments the existing Flour Mill building. This is achieved by retaining the existing mill building as well as 2 walls in Block B of the existing building. Materials such as red stock brick, dark metal cladding, recessed brick details and soldier course banding are used to emphasise the industrial heritage of the site.
- 4.11 The materiality of Block B seeks to express the transition between the existing historical structures on site and the new proposed structures which have been designed to compliment them. The existing red multi-stock brickwork of the retained walls contrast with the dark metal cladding above. The choice of materiality helps to delineate between the new and the old making the history of the site clearly visible. Projecting balconies and cantilevers create visual interest and depth to the façade. Perforated metal panels provide additional detail to the metal cladding.
- 4.12 Block C has a brick facade which is seen as a contemporary reinterpretation of the Mill building materiality. A contemporary exploration of brick is also explored through recessed brick detailing paired next to windows. Metal details to the dormers and bespoke metal panels are seen as a consistent material palette running through the scheme. Projecting balconies and cantilevers create interesting depth to the facade.



Figure 3. Proposed Development as shown in CGI Visuals. Reference should be made to the Design and Access Statement.

ACCESS & PARKING

- 4.13 The existing access from East Hill would continue to serve the Site. The existing access arrangement in the form of an all-movements simple priority junction with East Hill is to remain the same following the redevelopment to residential use.
- 4.14 With respect of parking provision, a total of 54 car parking spaces, of which two would be disabled bays. Three would be allocated for visitors. Seven spaces located adjacent to the site's frontage with East Hill would be retained for the use of staff at Ashford School. A further four bays would be utilised by the proposed office use for Oliver Davis Homes. A total of 43 bays would be provided for the proposed residential use.
- 4.15 The cycle parking standards show that for a development of this size, a total of 55 cycle parking spaces should be provided. However, the proposed development would overprovide to the extent of providing 90 cycle parking spaces on the site. The residential use cycle spaces would be provided internally at ground floor level, in a secure bicycle store. The two office use cycle spaces (one Sheffield stand) would be provided adjacent to the front entrance of the office. Cycle parking provision is shown on the ground floor plan.
- 4.16 It is anticipated that delivery and servicing trips would be undertaken using the proposed site access on East Hill and the dedicated delivery and servicing bay is shown on supporting plans. It is also relevant that waste and refuse would be stored on site, again shown on supporting plans. It is noted that the residential bin store would be within a 10m drag distance for waste operatives of a 11.3m Council operated refuse vehicle.

SUSTAINABILITY STRATEGY

- 4.17 The proposed development seeks to amplify the site's sustainability credentials and energy efficiencies. A **Sustainability Strategy** is included within the Design and Access Statement at page 43. It outlines an indicative site section, demonstrating the site's active incorporation of the following methods and interventions:
- Passive Solar Shading – via projecting & recessed balconies and solar control glazing to elevations
 - Water package heat pump – generating heating and hot water from ambient circuit to serve apartments
 - Roof, walls, and glazing to achieve high thermal performance
 - PV panels – PV arrays to be built into pitched roofs on East, South and West orientations
 - PIR Controlled LED lighting – to serve car park and external area elevations
 - Local metering of apartment electrical and heat consumption
- 4.18 In addition to the above specific interventions, the overall design of the scheme is aligned and informed by efforts to secure principles of sustainable development to include:
- Redevelopment providing residential-led development in a Town Centre location, promoting sustainable living in line with the adopted spatial strategy and settlement hierarchy

- Restoration of the Flour Mill as an existing non-designated built resource
- Dual aspect apartments
- Natural ventilation of undercroft areas
- Permeable surfaces
- The introduction of a more permeable site, with cycle and footpaths throughout
- Provision of a car share scheme
- Provision of secure cycle storage
- Provision of electric vehicle charging points
- Provision of new public realm / publicly accessible open space
- Provision of flood compensation
- Enhanced landscaping and planting, as well as ecological enhancement and protection

5. PLANNING POLICY CONTEXT

- 5.1 Decisions on planning applications must be made in accordance with the policies of the development plan unless material considerations indicate otherwise. In this instance the Development Plan for the purposes of S38 (6) of the Planning and Compulsory Purchase Act (2004) comprises the Ashford Local Plan (2030).
- 5.2 In addition to the policies of the Development Plan, there is other guidance which is material to the determination of planning applications including the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG).
- 5.3 The relevant development plan policies are identified below and, these together with relevant NPPF references are addressed where appropriate within the planning assessment section below.

ASHORD LOCAL PLAN 2030

- 5.4 The Ashford Borough Local Plan 2030 was adopted in 2019 and sets out the strategic and development management policies for the Borough over the plan period. The following policies are considered of most relevance to the proposed development:
- 5.5 Policies of relevance in the adopted Ashford Local Plan include:
- Policy SP1 – Strategic Objectives
 - Policy SP2 – Strategic Approach to Housing Delivery
 - Policy SP5 – Ashford Town Centre
 - Policy HOU1 – Affordable Housing
 - Policy HOU3a – Residential Windfall Development Within Settlements
 - Policy ENV2 – The Ashford Green Corridor
 - Policy COM2 – Recreation, Sport, Play and Open spaces
 - Policy TRA3 – Parking Standards for Residential Development
 - Policy ENV6 – Flood Risk
 - Policy EN14 – Conservation Areas
- 5.6 These central policies are referenced throughout this Statement.

NATIONAL PLANNING POLICY FRAMEWORK (NPPF)

- 5.7 The National Planning Policy Framework ('the Framework') and National Planning Practice Guidance ('the Guidance') are material considerations of significant weight when determining applications.
- 5.8 The NPPF was updated in 2021, and guides development. Paragraph 8 identifies the three interrelated and overarching objectives that underpin sustainable development, and which need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

- a) an economic objective
- b) a social objective
- c) an environmental objective

5.9 Paragraph 11 recognises that plans and decisions should apply a presumption in favour of sustainable development. It is further outlined that:

- The purpose of the planning system is to contribute to the achievement of sustainable development [7];
- So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development [10];
- To support the government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed [60] especially for SMEs who can deliver choice and can help to accelerate delivery;
- Planning policies should recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites [86f]; and
- Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses [117]

5.10 The Framework places clear emphasis on the reuse of brownfield resources and their efficient use and prioritises the delivery of sustainable development which is well-located relative to transport infrastructure and services. In the case of the Borough, there is clear recognition that Ashford is by far the most sustainable location for development and the redevelopment of this site is therefore wholly consistent with the objectives of national and local planning policies seeking to increase delivery to meet housing need.

5.11 Relevant sections of the NPPF are referenced throughout the planning policy assessment below.

6 PLANNING EVALUATION & OPPORTUNITY

PRINCIPLE OF DEVELOPMENT

- 6.1 It is recognised that policies SP1, SP2, SP5, and HOU3a provide the initial basis for assessment of the principle of development in this case.
- 6.2 Policy SP1 focuses development at accessible and sustainable locations which utilise existing infrastructure, facilities, and services and “makes best use of suitable brownfield opportunities”.
- 6.3 Policy SP2 of the Local Plan 2030 is itself clear that the majority of new housing will be at Ashford and its periphery as the most sustainable location within the Borough. The site’s location within Ashford is evident, and its location within the designated boundary for Ashford Town Centre further establishes its sustainability credentials within the town. The Site’s location within the designated Ashford Town Centre is identified in **Figure 4** for clarity.

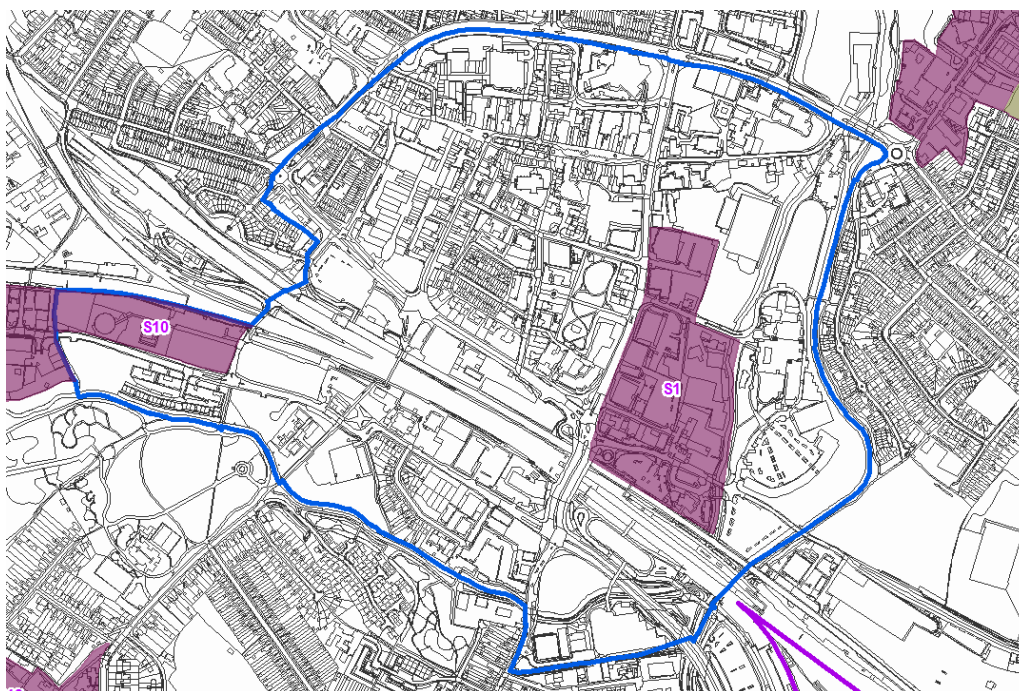


Figure 4. Extract of Local Plan Interactive Policies Map identifying the designated Ashford Town Centre edged blue.

- 6.4 Policy SP3 goes on to state that windfall housing development will be permitted where it is consistent with the spatial strategy outlined above and with other policies of the plan. In this regard, Policy SP5 addresses development proposals within Ashford Town Centre, noting that proposals for development within the town centre boundary will be supported in principle where they promote high quality design that is appropriate to their location, including those for residential development.
- 6.5 Specific criteria pursuant to this policy include that:

- a) All schemes will need to demonstrate a quality of design that makes a significant contribution to the character of the town centre, including any proposed buildings and public realm. New development proposals on major and/or prominent sites will be expected to have been subject to public exhibition/ consultation and be subject to review by the independent Ashford Design Panel;
 - b) Residential development in the town centre is supported, for example, making use of space above shops but the opportunity also exists to provide a range of types of home, including the potential for serviced private rented apartment schemes.
- 6.6 The application site in principle represents a clear opportunity to meet housing need in a highly sustainable location and through the provision of a quality design would form an attractive gateway to the Town Centre. The proposed development, by virtue of high-quality design in this location, clearly accords with the objectives of this policy and warrants support in principle. In line with Criterion (a) above, the development proposed has been the subject of two rounds of Ashford Design Review Panel. It has also been the subject of public consultation, members' briefing, and consultation with the Central Ashford Community Forum (**refer to Statement of Community Involvement**). With reference to Criterion (b), this policy clearly encourages residential development in the Town Centre. Again, this proposed development aligns with this objective.
- 6.7 Policy HOU3a of the adopted Local Plan further reinforces the acceptability in principle of the proposed development, confirming that residential development and infilling of a scale that can be satisfactorily integrated into the existing settlement will be acceptable within the built-up confines of Ashford. As per the accompanying design package, the proposal offers an opportunity to deliver an appropriate scale of residential development in a highly sustainable location within walking distance of all major services and facilities, including national and international transport links. The proposal focuses on the reuse of an existing building and the delivery of a complementary scale of additional residential provision, alongside a myriad of other benefits in heritage, landscape, ecology, and overall sustainability terms. There is no dispute in received pre-application discussions – in broad terms of overarching planning principles – that the redevelopment of this brownfield site would be anything other than consistent with the LPA's adopted planning policies seeking to delivery sustainable development and boost the supply of housing, particularly in Ashford given its location atop the settlement hierarchy.
- 6.8 Although the development plan is the starting point for decision-making, the National Planning Policy Framework (NPPF) remains a material consideration in the assessment of planning applications. As a material consideration, the National Planning Policy Framework sets out that all Local Planning Authorities across England are required to pursue 'sustainable development' in a positive way, wherein a presumption in favour of sustainable development is at the heart of national planning policy.
- 6.9 Of relevance to the proposed scheme, paragraph 69 of the NPPF is clear that small and medium sized sites can make an important contribution to meeting housing needs, noting at criterion (c) that local planning authorities should support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes.

- 6.10 As elsewhere in this Statement, the site accords with the objectives of prevailing government guidance on the delivery of housing in sustainable locations, particularly where comprising brownfield land. Paragraph 86 (f) further reinforces the role of residential development in ensuring the continued viability of town centres and encourages residential development on appropriate sites. For the reasons outlined variously in this Statement, the site constitutes an appropriate site for residential development in this highly sustainable location and will assist the local planning authority in the delivery of new housing in a manner which is well-positioned to support the ongoing vitality of existing town centre uses in Ashford.
- 6.11 Underpinning the wider strategic objectives of the Framework, paragraph 119 makes it clear that planning decisions should promote the effective use of land in meeting the need for homes whilst safeguarding and improving the environment and ensuring safe and healthy living conditions. In particular Paragraph 120 (c) notes that local planning authorities should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, whilst 120 (d) promotes and supports the development of underutilised land and buildings especially if this would help to meet identified needs for housing where land supply is constrained, and available sites could be used more effectively. In each case, the proposed development roundly accords with these overarching principles and is wholly compliant with the objective of effectively re-using existing land and buildings to deliver new quality housing in sustainable locations. Given its highly sustainable location, the site offers a unique opportunity to bring back into use an existing resource whilst providing additional residential units to meet local housing needs.
- 6.12 In summary, in light of the site's highly sustainable location in close proximity to existing services, facilities, and public transport links the proposed development comprising of the reuse of the existing Flour Mill and the erection of four complementary residential blocks would accord with prevailing national and local objectives through the provision of a high-quality development.

DESIGN, CHARACTER AND APPEARANCE

- 6.13 Section 12 of the Framework relates to design and states the Government attaches great importance to the design of the built environment stating that good design is a key aspect of sustainable development. This proposed development has been closely underpinned by such principles, as reflected both in this statement and the application drawings as submitted by award-winning practice, Hollaway.
- 6.14 The site layout has been refined following identification of the site's opportunities and constraints; and through extensive pre-application engagement as outlined previously in **Section 3** of this Statement and the Statement of Community Involvement.
- 6.15 Owing to its location within Ashford Town Centre, the site is well-related to the existing built form. The conversion of the existing Flour Mill is at the heart of the proposal and would restore its past grandeur and aesthetic appearance - a marked enhancement to its current visual condition which has, in part, fallen into disrepair as a result of its long-term vacancy over a period of years.

- 6.16 The additional massing to the site would be concentrated to its southern extent in the area of the current surfaced car park where four ancillary blocks of graduating height would be provided to make most efficient use of land. Individually and cumulatively, these blocks would provide a complementary form of development subservient to the existing Flour Mill, duly informed by heritage assessment of the contributions of the mill – and specifically its tower – to the site and wider conservation area. Visually, Block B would complement the prominence of the Flour Mill itself and would read as a sympathetic addition, appropriately referencing earlier development at the site which was physically connected and related to the tower and Block A. In all cases the heights of Blocks A (5.5 storeys; plus the Tower), Block B (5.5 storeys), Block C (4.5 storeys), Block D (4.5 storeys), and Block E (4.5 storeys) reflect a graduated hierarchy of built form directly informed by the heritage assessment of the Site, and design review and related assessment of constraints and opportunities. The Flour Mill tower would remain the tallest and most prominent structure within the site, expressing a clear hierarchy of old and new. Courtyards would be provided between blocks, allowing a permeability through the site and pedestrian links between areas of the Site.
- 6.17 In terms of the overall site layout, with respect to the proposed Blocks B, C, D, E would be read as a continuation of the built form of the existing mill, appropriately set back within the site itself in the location of the current parking area. The build line would broadly follow that of the existing mill and reflect a scale and type traditionally associated with the nature of the earlier mill building. The proposal reflects an efficient use of land, wherein the relationship of the site to surrounding built and natural environments has directly informed the proposed site layout, creating a sympathetic yet bold residential scheme.
- 6.18 The specific design form and appearance has been directly informed by local cues, specifically the Flour Mill itself. In line with the detailed provisions of Policy HOU3a, the proposed development would be of a layout, design and appearance that is appropriate to and is compatible with the character and density of the surrounding area. As such both the converted mill building, and ancillary residential blocks would complement the surroundings and heritage significance of the site.
- 6.19 In considering the design, character and appearance of the proposal in its heritage context it is then important to note that the subject site is not listed. Two Grade II listed buildings fall within proximity to the site – the ‘Star Inn’ and ‘Northside’ – with the Grade II* listed ‘Bridge House’ to the south west of the site. The site falls within the outermost limits of the Ashford Town Centre Conservation Area where development or redevelopment will typically be permitted provided that proposals preserve or enhance the character and appearance of the area and its setting (as per Policy EN14). Whilst the boundary of the conservation area was revised in 2016, the subject site remains within its boundaries at the outermost extent of the designation. The Ashford Town Centre Conservation Area Appraisal (2016) underlines the role of the existing Flour Mill building in the context of the overall character and quality of the conservation area, citing that:

“The Flour Mill dominates the character of the eastern edge of the Conservation Area. Despite the unfortunate brick side extension, the towering scale, historic value and prominent siting within the Stour valley make the flour mill a notable local building. The river is a key feature of the mill’s setting (visually and audibly). The heritage engineering features of the mill’s sluice gates add interesting richness and character”

- 6.20 The proposed development would restore and bring this building back into use and the complementary built form proposed would have a positive effect on the surroundings. It is contended that the development would form a logical and sympathetic addition to the pattern of existing development and in these terms would not compromise the heritage value of either the nearby listed buildings nor the overall quality of the Ashford Town Centre Conservation Area. The addition of supporting ancillary blocks would be sited within the site appropriately set back from the existing building. The design quality and materials palette will also allow the built form to have a positive effect on the character of the conservation area.
- 6.21 It is relevant that the design of the Site has evolved extensively in the circa 18 months of preparation leading to this submission, with direct and sustained input and advice obtained during Design Review Panel sessions and received pre-application advice from the LPA.
- 6.22 The Design and Access Statement identifies at Section 2 '*Concepts and Design Development*' the key heritage features and design principles underpinning the development, which range from:
- Key views over North Park
 - Enhanced river walk through the Green Corridor
 - Enhanced pedestrian access through the Site
 - Enhancement to bridge links
 - Enhancement of public open space
 - Retention of existing vegetation and trees
 - Retention of historic walls identified
 - Retention of historical signage
 - Retention of existing mill building
 - Reintroduction of elevated bridge links
 - Introduction of courtyards
- 6.23 One of the core drivers of the Site's redevelopment is its reference back to site-specific history, specifically through design which would include retention of historic signage, vertical piers also reflected in vertical framing detail, and infilled windows reflected in recessed brick panels. The industrial heritage of the Site is also reflected in the wider materiality outlined in the Design and Access Statement, and supporting plans.
- 6.24 The independently prepared heritage assessment by Icení of the site and proposed development corroborates this position, and concludes that the proposals bring a contemporary architectural approach to the Site and derive their character from the Site's history and mill buildings. It concludes that the proposals are a highly thoughtful response to the Site, and will enhance the Site's significance, the character and appearance of Ashford Town Centre Conservation Area and the settings of the designated heritage assets near the Site, and enable the long term conservation of the former mill. Furthermore, the creation of a new public open space on the island east of the former flour mill would allow for the appreciation of the Site by the public.
- 6.25 In this the proposed development positively responds to the characteristics of the site and its surroundings and follows the principles of good design, closely informed by detailed heritage assessment.

- 6.26 This is reflected clearly in the most recent Design Review Panel response, which notes unreservedly that:

“The response is much improved and there has been a positive response to the panel’s previous comments. High-quality historical analysis has informed the approach in a positive way. Developing a clear landscape masterplan and better defining the approach to the site’s open spaces is the next key step for this proposal, along with exploration of the options for the building materials.”

- 6.27 In accordance with the provisions of the NPPF, particularly the requirements of paragraphs 189-196, a heritage statement would accompany any subsequent planning application to justify the heritage impact(s) of the proposed development. Heritage assessment of the Site also confirms that the proposals’ positive engagement with both the non-designated heritage assets on the Site, as well as the Conservation Area, is also considered to be wholly in line with guidance set out in the NPPF, specifically paragraph 206, which encourages new, sympathetic development within conservation areas. As a whole, by bringing redundant buildings and areas into appropriate use, consistent with their conservation, and ensuring that important views of the flour mill’s tower are not impacted, the proposals also comply fully with Ashford Local Plan policies pertaining to heritage assets and conservation areas at ENV13 and ENV14 respectively, alongside wider design based policies as outlined in HOU3(a).
- 6.28 Against the backdrop of this detailed design evolution and heritage assessment, the proposed development would have a positive effect on the character of the locality and the wider conservation area within which it is sited with the Flour Mill being brought back to life, comprising a visual centrepiece to the wider redevelopment of an under-utilised site. It is noted that the proposed development follows the principles of good design that are recognized both within the development plan and within national planning policy and guidance.

RESIDENTIAL AMENITY

- 6.29 The NPPF states that planning decisions should aim to secure a good standard of amenity for all existing and future occupants of land and buildings. By virtue of its siting and existing site boundary treatments, the site is overall visually well-contained. As per earlier sections of this Statement there are few direct or closely surrounding neighbours. In this regard, the potential for adverse neighbour amenity impacts is low. In addition, and in line with the overarching principle of residential development in this Town Centre location - which is acceptable in terms of Policies SP2 and SP5 - it is clear that the nature of development proposed is an appropriate ‘town centre’ use.
- 6.30 The introduction of the four ancillary additional residential blocks would be achieved through a sympathetic design approach mirroring the existing scale of the Flour Mill at a gateway position to the town centre where the quality of the architecture of the new built form alongside the restoration of a centre piece of the Flour Mill will have a highly positive visual impact on the character of the area.

- 6.31 The proposed development would benefit from a good degree of separation from neighbouring properties. In respect of the existing mill building the siting of fenestration and openings would largely be retained as existing and will therefore continue to ensure that the amenities of occupants of neighbouring properties are appropriately safeguarded. In respect of the new-build Blocks B-D, each would occupy a part of the site well distanced from existing residential dwellings. Blocks would be appropriately screened from sensitive views by virtue of their positioning within the site and its landscape setting, and the limited proximity of neighbouring properties. In particular there are only limited residential dwellings in the immediate proximity of the site. As such the proposed development will safeguard the residential amenities of neighbouring occupants in terms of outlook and privacy.
- 6.32 As such it is submitted that the proposed development can be accommodated within the site without compromising the residential amenity standards of existing residents; and would provide future residents of the development with a good standard of amenity in accordance with the provisions of the NPPF, and in full compliance with the relevant provisions of Policy HOU3a of the Local Plan 2030.

ACCESS AND HIGHWAYS

- 6.33 The NPPF continues to recognise that transport policies have an important role to play in facilitating sustainable development and states that development should be focused in locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. Paragraph 111 of the Framework states that developments should not be refused on transport grounds unless there would be an “unacceptable impact on highway safety”, or the residual cumulative impacts of the development are ‘severe’. Owing to the site’s highly sustainable location within the designated boundary for Ashford Town Centre, the development would readily maximise pedestrian access to local services and facilities. The existing access from East Hill would continue to serve the Site. The existing access arrangement in the form of an all-movements simple priority junction with East Hill is to remain the same following the redevelopment to residential use. The site already benefits from easy access to existing pedestrian and cycle networks and would continue to benefit from this level of connectivity as part of the development in accordance with the thrust of Policy TRA5. It is also relevant that following Pre-application Advice from ABC, a traffic calming measure has been proposed adjacent to the site to slow down oncoming vehicles approaching the site from East Hill.
- 6.34 The submitted Transport Statement has provided an analysis of multi-modal trips expected to be generated by the proposed development. It has been estimated that the development would result in an increase in daily multi-modal trips, however, a significant proportion of trips would be made by sustainable modes including walking, cycling and public transport. It is considered that the proposals would result in a minimal impact on the local highway network. Any additional trips from the proposed development would not be anticipated to result in a detrimental transport impact and would be suitably accommodated within the existing highway and transport networks
- 6.35 Proposals for development make satisfactory provision for the parking of vehicles, with reference to Kent Design Review: Interim Guidance Notice 3, as well as the specific provisions of Policy

TRA3(a). With respect of parking provision, a total of 54 car parking spaces, of which two would be disabled bays. Three would be allocated for visitors. Seven spaces located adjacent to the site's frontage with East Hill would be retained for the use of staff at Ashford School. A further four bays would be utilised by the proposed office use for Oliver Davis Homes. A total of 43 bays would be provided for the proposed residential use.

- 6.36 It is pertinent that TRA(3) makes provision for proposals to depart from the standard of 'one for one' otherwise applied in the Town Centre, in exceptional circumstances. These exceptional circumstances include:

TRA(3) (a) - In order to take account of specific local circumstances that may require a lower level of parking provision, including as a result of the development site's accessibility to public transport, shops and services, highway safety concerns and local on-street parking problems; and

TRA(3) (d) - To ensure the successful restoration, refurbishment and re-use of listed buildings or buildings affecting the character of a conservation area

- 6.37 As outlined and accepted in pre-application engagement, the Site is within the Town Centre of Ashford. It represents a highly sustainable location which accords directly with the criteria at (a) above. Further to this, the development comprises a restoration and refurbishment of a building affecting the character of the Ashford Town Centre Conservation Area. As is clear throughout Design Review, pre-application engagement, and other engagement with stakeholders, the successful redevelopment of the Site is itself linked to its design appearance in the heritage context. In both cases, it is considered that there is a clear justification – on two of the exceptions criteria - for departing from the otherwise one-for-one provision sought by TRA(3). For the avoidance of doubt, the under provision would in any event be by a small number – only 10 bays less than the proposed total residential dwellings.
- 6.38 The cycle parking standards show that for a development of this size, a total of 55 cycle parking spaces should be provided. However, the proposed development would overprovide to the extent of providing 90 cycle parking spaces on the site. The residential use cycle spaces would be provided internally at ground floor level, in a secure bicycle store. The two office use cycle spaces (one Sheffield stand) would be provided adjacent to the front entrance of the office. Cycle parking provision is shown on the ground floor plan.
- 6.39 Based on the above, the Transport Statement is considered that the proposals could be accommodated without detriment to the operation of the local highway and transport infrastructure networks. The proposed development would provide for an appropriate quantum of parking (both vehicular and cycle) and would maximise access to other sustainable modes of transport in line with prevailing guidance per the adopted Local Plan and the NPPF. It is further relevant that a Travel Plan is submitted in support of the application.
- 6.40 As such, the development proposal would not result in a 'severe' impact and is considered acceptable in accordance with national and local policy.

BIODIVERSITY

- 6.41 Policy ENV1 of the Local Plan 2030 supports proposals that conserve or enhance biodiversity, particularly where new development incorporates and enhances biodiversity, and where it connects to and improves wider ecological networks.
- 6.42 The submitted Preliminary Ecological Assessment is clear that habitats within the Site are common and widespread and therefore no further botanical surveys are required to enable a robust assessment of their intrinsic ecological importance.
- 6.43 A single building was considered to be affected by the proposed development which has been assessed as having 'High' suitability to support roosting bats and, in accordance with the current Bat Conservation Trust (BCT) guidelines bat surveys were undertaken, and have since informed the detailed design of the proposal. The report further concluded further that:
- Great crested newts and reptiles are considered likely absent from the Site;
 - Suitable bird nesting habitat exists within the Site and recommendations in regard to timings and methods of best practice for breeding birds have therefore been provided within this report;
 - Records of water voles within 2km of the Site were returned in the desk study but no evidence of wate vole or otter was found during the further surveys; and
 - The likelihood of other protected and notable species to occur within the Site is considered negligible and no further surveys for other protected species are required
- 6.44 In line with these detailed site specific findings, a range of enhancements are proposed and thus incorporated, and these include:
- The installation of bird boxes within the newly created and refurbished buildings and/or on trees within the Site would benefit a diversity of bird species;
 - The incorporation of a wildlife-friendly planting scheme, using native plant species, would be of benefit to invertebrates and subsequently species such as birds and bats;
 - The creation of dense, native scrub vegetation along the riverbanks across the Site would enhance opportunities within the Site for several species by providing cover, refuge and foraging opportunities and discouraging human disturbance along the riverbank; and
 - The creation of wildflower grassland on the verge of the river corridor (where suitable riparian vegetation not already present) would also enhance the Site for wildlife
- 6.45 In all, in accordance with the requirement of the National Planning Policy Framework (NPPF) 2021, recommendations to enhance the Site's suitability for wildlife have been provided.

LANDSCAPE & OPEN SPACE

- 6.46 As outlined elsewhere, the site is, in part, subject to an 'open space' designation to its eastern extent. The majority of the site falls outside of this designated area of open space. It is emphasised that the subject site falls within the northernmost point of this land-based designation. This element of the site is physically separated from the rest of this open space designation by the course of the River Stour. Whilst a shared footpath and cycle path runs to the eastern boundary

of the designation, it does not itself provide connectivity through to the remainder of the open space designation. In this regard, the part of the site washed over by this designation is physically discrete from the rest of the designation. Its role and function as part of the open space designation is limited and whilst a balancing act it is asserted that the economic, social, and environmental benefits of the scheme in this location outweigh the weighting towards the protection of this part of the site as open space.

6.47 Given the physical separation of the site, alongside its inaccessibility by the public, it does not perform a meaningful role and its contribution as open space is not consistent with the purposes of the designation of this space, and the proposed development would not result in the loss of quality open space and given that it is not publicly accessible it nor would it result in the loss of any functional quantity of available open space.

6.48 It is recognised also that the subject site is located within the Ashford Green Corridor, an area which the Local Plan seeks to protect from incompatible development, and broadly resists some forms of development. Supporting text at paragraph 9.23 of the Local Plan 2030 states that:

“Development proposals that do not directly relate to the existing principal use but that would enhance the Green Corridor in other ways will be considered favourably, particularly if they are on brownfield land...Proposals within the Green Corridor that create overriding planning benefits will be considered on their own merits”.

6.49 As per the specific policy wording of ENV2, development proposed within the Corridor designation will be permitted, providing that it is compatible with, or ancillary to, their principal open space use or other existing uses (i.e. it represents contextually ‘appropriate’ development).

6.50 Importantly the specific policy wording in respect of ENV2 makes clear that exceptions to such restrictions include for:

- a) the redevelopment of a suitable brownfield site or
- b) delivers overriding benefits, and

6.51 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.

6.52 The proposed development relates clearly to the redevelopment of a vacant brownfield site, meeting criterion (a).

6.53 The proposal further seeks to deliver overriding benefits (principally in terms of sustainable development), per criterion (b). The proposal would deliver circa new accessible landscape, ostensibly enhancing the quality of the Green Corridor in this location, opening up an area currently of poor quality and no public access. This compares favourably to the current situation, wherein there is an approximate area of 1235.00sqm of inaccessible landscape, in many ways running counter to the aims of the Green Corridor in this location (refer to ‘Existing Ground Floor Plan’). As informed in due course by relevant technical inputs the proposed development would

secure further such benefits, including biodiversity benefits to the Green Corridor alongside improvements in drainage and public access to open space and river accessibility. In design terms, the reuse of this vacant brownfield site and the potential for visual enhancement of the site's contributions to the character and appearance of the Conservation Area are further overriding benefits of the scheme.

- 6.54 When considered in the context of the above it is clear that the proposal accords with the thrust of criteria (a) and (b) of Policy ENV2.
- 6.55 In respect of criterion (c), further technical inputs at the planning application stage will demonstrate no significant harm to the matters cited above.
- 6.56 In considering the above, it is relevant to consider the Green Corridor Action Plan 2017 which underpinned the inclusion of Policy ENV2 during the Examination of the now adopted Local Plan. The proposed development aligns directly with the overarching 'benefits' of the Corridor established on page 8 of the Action Plan, namely that it would:
- through enhancement of the existing green infrastructure and linkages on site, provide valuable wildlife habitats and corridors;
 - through detailed flood risk and drainage assessment and mitigation, offer opportunities to improve natural drainage systems;
 - through quality design, add to the visual attractions of the town and complement other initiatives to regenerate urban areas and the economy, giving the area a positive image and identity;
 - provide improved and more attractive pedestrian routes through the town; and
 - provide a tranquil atmosphere (primarily through new public landscaped open space), improving the quality of life for local residents.
- 6.57 The Action Plan further identifies the site within area 'A1 - North Park'. It proposes a number of 'Key Projects and Habitat Enhancements' such as the introduction of wild flower species and increased diversity in vegetation beside the river, rotational river bank cuts to increase species diversity, and water course invasive species removal. Through the proposed development, the proposed scheme aligns closely with these overarching 'Key Projects and Enhancements' identified within the area, particularly in relation to improved biodiversity value on the island.
- 6.58 From the above, it is asserted that the proposed development would not erode the strategy of the Green Corridor insofar as it seeks to protect against incompatible development.
- 6.59 Rather, the proposed development is well positioned to legitimately improve the quality and character of this part of the Green Corridor, enhancing the contributions of the site to the overall Corridor. The proposed development is consistent with the aspirations and objectives of the Green Corridor Action Plan and in turn with the objectives of Policy ENV2. The proposed development can deliver a number of aligned enhancements – principally the opening up of a currently inaccessible area of overgrown land on the island, and related landscape improvements creating and improving green links with the rest of the Corridor.

- 6.60 Overall the planning application is supported by a Preliminary Ecological Assessment which shows how the proposed development would deliver a net gain in biodiversity, through an appropriate combination of on-site mitigation and enhancement measures (for example the provision of bat/bird boxes where appropriate). In summary the proposed development – supported by technical survey work and recommended mitigation – is in principle capable of supporting biodiversity enhancements. The provisions of Policies ENV1 and ENV2 could be roundly satisfied, alongside those of the National Planning Policy Framework.

ARBORICULTURE

- 6.61 The Site benefits from an existing tree buffer along its perimeter, particularly in relation to the River Stour and its banks. Whilst these trees would be largely retained as a part of the proposed development, the proposal offers the opportunity to evaluate the quality and condition of these tree-lined boundaries and examining opportunities for enhancement – both in arboricultural terms, but also in respect of the overall setting of the site.
- 6.62 As per the other technical matters highlighted in this Statement, a detailed site-specific arboricultural survey and report was commissioned in advancing the present planning application for the redevelopment of the site, in line with pre-application engagement advice which sought to overcome concern regarding the need to deal with trees sensitivity and in ways that do not necessarily necessitate the removal of trees which were felt to be an integral feature of the green corridor. They are visible in views north and south along Mace lane and east and west along the green corridor and are an important visual feature within the Conservation Area.
- 6.63 This pre-development tree report confirms that the Site was surveyed in full in August 2021 in line with relevant guidance; and is not subject to any tree preservation orders. The application site lies partially within the Ashford Town Centre Conservation Area.
- 6.64 It goes on to conclude clearly that the arboricultural impact of the proposed scheme is considered to be low. The proposal results in the removal of four poor quality individual trees and four poor quality tree groups due to proposed level changes, layout proposals and general poor health. Extensive landscaping will be provided that significantly enhances the site, however further comment on landscaping is outside the scope of this report. All structures are located outside of the Root Protection Areas (RPA's) of the retained trees. BS5837 compliant fencing will be erected as required to protect some, but not all retained trees.
- 6.65 On this basis, the proposed development is considered to accord with relevant local plan policies, including ENV1 and ENV2 where they pertain to the protection of trees and the contribution of trees to the Site's character and setting.

FLOOD RISK AND DRAINAGE

- 6.66 The site falls partly within Flood Zones 2 and 3, as per available online Environment Agency mapping.

- 6.67 Policy ENV6 – Flood Risk establishes a requirement for an appropriate level of site-specific assessment and, where necessary, sequential and exceptions testing. By reason of its location within an identified area of flood risk, a site-specific flood risk assessment and drainage strategy has been commissioned to support any subsequent planning application for residential development in compliance with the provisions of Policy ENV6.
- 6.68 The submitted FRA finds that the risk of flooding from all sources is generally low, and the development can be operated safely and without significantly increasing flood risk elsewhere. However, a risk of fluvial flooding, as well as a number of residual risks have been identified, associated with public sewers, site drainage and water supply pipes and intense rainfall. It therefore goes on to outline a range of appropriate mitigation measures at Table 7.1 of the FRA, addressing and managing the risks and residual risks from flooding within acceptable parameters as outlined in relevant development plan and national policies and guidance.
- 6.69 In terms of impacts to surround areas, given the drainage strategy proposed and significant reduction in surface water runoff rates, it is considered that the development of the Site will not increase the risk of flooding in other areas, surrounding the Site, assuming the measures proposed in Table 7.1 of the FRA are implemented.
- 6.70 The Site's location within Flood Zones 2 and 3 is recognised. Ashford Borough Council does not have a published methodology in conducting sequential testing relating to flood risk. In preparing this Sequential Test, due regard has been had to the relevant guidance set out in the PPG and the National Planning Policy Framework. A methodology in undertaking this Sequential Test was agreed with Ashford Borough Council prior to submission. A Sequential Test Assessment accompanies this submission. This Sequential Test concludes there are no comparable sites available at a lower risk of flooding within the geographical search area, with due regard to the agreed methodology utilised in this assessment. On this basis the Sequential Test is passed.
- 6.71 As the Sequential Test demonstrates that it is not possible to use an alternative site, the exceptions test is required. This Exceptions Test therefore outlines how flood risk will be managed. In line with published guidance it shows that the sustainability benefits of the development to the community outweigh the flood risk, and that the development would be safe for its lifetime. Reference is made to the supporting Flood Risk Assessment, which provides detailed commentary and assessment of the Site's drainage strategy including flood risk management. The FRA therefore concludes that the development would remain safe for the duration of its lifetime, as summarised above. It is demonstrated – when read alongside the submitted FRA – that the development would not increase flood risk elsewhere. This strand of the Exceptions Test is considered to have been passed.

7 AFFORDABLE HOUSING STATEMENT

- 7.1 For the avoidance of doubt, it is noted that the proposal would not provide any on- or off-site affordable housing contributions.
- 7.2 Policy HOU1 of the Local Plan 2030 confirms that although affordable housing provision will be sought on schemes of 10+ dwellings, this does not apply to flatted development within Zone A – Ashford Town. The proposal comprises of a flatted development within Zone A – Ashford Town Centre, as identified on the adopted Proposals Map.
- 7.3 The provision of no on- or off-site affordable housing is wholly compliant with Policy HOU1.

8 CONCLUSION

- 8.1 In summary, the location of the site and the proposed residential-led redevelopment of the Site satisfy the main spatial objectives of both local and national planning policy which seek to focus new residential development to areas that enjoy a good degree of connectivity to local shops, services, and amenities, including public transport connections.
- 8.2 In this case the existing Flour Mill building (which has been vacant for some time) would be the centrepiece of the proposed development. The site's location in a prominent location at a key approach to the centre of Ashford which is underutilised provides the opportunity through the quality of the architecture to create a built form that will have a positive visual effect on the character of the area, with new development complementary to the main Flour Mill building.
- 8.3 Located within a context of an existing Town Centre site with cycle and pedestrian connections to nearby facilities and international rail, it is accepted that the site enjoys a sustainable location. The spatial pattern of development is such that the proposed conversion of the existing mill building – alongside the erection of four additional ancillary residential blocks - constitutes an appropriate type and scale of development in this location, which makes efficient use of an existing brownfield resource to assist in the delivery of much needed residential development in the Borough. It would furthermore deliver a quality landscaped provision of open space, including the opening up of the site for public uses – including a revitalised open space on the 'island' site. It is clear that the proposed development represents a sustainable form of development in full accordance with the development plan and relevant national planning policies.
- 8.4 In this regard the wider sustainability benefits to the community which result from the proposed development are numerous and include:
- the provision of new housing that would be delivered, here comprising of 53 residential dwellings in a managed flatted scheme within a highly sustainable location within Ashford Town Centre, atop the settlement hierarchy for the Borough;
 - the development of a highly sustainable site with very good access to facilities and services, given the site's location within the designated Town Centre for Ashford;
 - the high quality redevelopment of an existing non-designated heritage asset within a designated conservation area;
 - the creation of new open space for public use within a designated Green Corridor, improving and enhancing a currently inaccessible and overgrown area of this corridor;
 - contributions to the protection and enhancement of the natural environment:
 - o through enhancement of the existing green infrastructure and linkages on site, provide valuable wildlife habitats and corridors;

- through detailed flood risk and drainage assessment and mitigation, offer opportunities to improve natural drainage system
- a range of economic benefits through local construction jobs that would be created during the construction phase of the development;
- job creation through the provision of an on-site office to be occupied by Oliver Davis Homes as its headquarters;
- that future residents would contribute to the economic prosperity of the area through additional expenditure in local shops and services; and

any contributions to be secured by legal agreement for wider community infrastructure which may be forthcoming should be planning permission be approved.

8.5 Overall there would be no 'significant and demonstrable' adverse impacts which would outweigh the benefits of the development. The proposal is shown to accord with the requirements of both the Sequential and Exceptions Test, and to accord with the objectives of relevant planning policies of the Development Plan for the Borough.

8.6 The proposal represents a deliverable, sustainable and suitable development in accordance with Paragraph 11 of the NPPF, and in this regard planning permission should be granted.