

planning
transport
design
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Planning Statement

November 2021 MB/LJ/15361



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1 Introduction

1.1 Purpose of this Statement

- 1.1.1 This statement has been prepared by DHA Planning on behalf of Woodchurch Property Developments Ltd. in relation to an application seeking full planning permission for the erection of 7 dwellings within the curtilage of Rosary House in Bekesbourne, together with access, parking and landscaping.
- 1.1.2 This statement provides an overview of the site, its context, and the relevant planning history, as well as a review of all applicable development plans, the National Planning Policy Framework and other relevant guidance.
- 1.1.3 The merits of the proposed development are discussed having regards to this context and policy framework. Following consideration, it is subsequently concluded that this proposal is appropriate in planning terms. Accordingly, we request that planning permission be granted.

1.2 Application Documents

- 1.2.1 This Planning Statement forms part of a suite of documents that support the planning application, and it is designed to be read in conjunction with the following documents and plans:

| Document | Author | Reference |
|--|---------------------------------|---------------------|
| SUPPORTING DOCUMENTS | | |
| Application Form | DHA Planning | - |
| Covering Letter | DHA Planning | MB/LJ/15361 |
| Design and Access Statement | OSG Architecture | 20-0933 |
| Planning Statement | DHA Planning | MB/LJ/15361 |
| Archaeological Desk-based Assessment | Canterbury Archaeological Trust | 2021/91 |
| Preliminary Ecological Appraisal | KB Ecology | 2021/05/17 |
| Reptile Survey and Mitigation Strategy | KB Ecology | 2021/05/17 |
| Reptile Receptor Site Management | KB Ecology | 2021/05/17 |
| Bat Survey | KB Ecology | 2021/05/17 |
| Noise Impact Assessment | MRL Acoustics | MRL/100/1764 |
| Nutrient Neutrality Assessment | Water Environment | 21078-NUT-RP-01-C01 |
| Outline SUDS Strategy | Water Environment | 21078-DNG-TN-01-C01 |
| Canterbury City Council Surface Water Drainage Pro-Forma | Completed by Water Environment | N/A |
| Transport Statement | DHA Transport | SM/15733 |
| DRAWINGS | | |
| Existing Site and Site Location Plans | OSG Architecture | 20-0933-01 |
| Proposed Site Plan | OSG Architecture | 20-0933-10H |
| Proposed Site Perspectives | OSG Architecture | 20-0933-11A |
| Plot 01, 02 – Proposed Ground and First Flood Plans | OSG Architecture | 20-0933-15A |

| | | |
|--|------------------|-------------|
| Plot 01, 02 – Proposed Second Floor and Roof Plans | OSG Architecture | 20-0933-16A |
| Plot 01, 02 – Proposed Elevations | OSG Architecture | 20-0933-17A |
| Plot 01, 02 – Proposed Elevations | OSG Architecture | 20-0933-18A |
| Plot 03 – Proposed Ground and First Floor Plans | OSG Architecture | 20-0933-20B |
| Plot 03 – Proposed Roof Plan and 3D Perspective | OSG Architecture | 20-0933-21B |
| Plot 03 – Proposed Elevations | OSG Architecture | 20-0933-22B |
| Plot 03 – Proposed Elevations | OSG Architecture | 20-0933-23B |
| Plot 04 – Proposed Ground and First Floor Plans | OSG Architecture | 20-0933-25A |
| Plot 04 – Proposed Roof Plan and 3D Perspective | OSG Architecture | 20-0933-26A |
| Plot 04 – Proposed Elevations | OSG Architecture | 20-0933-27A |
| Plot 04 – Proposed Elevations | OSG Architecture | 20-0933-28A |
| Plot 05 – Proposed Ground and First Floor Plans | OSG Architecture | 20-0933-30 |
| Plot 05 – Proposed Roof Plan and 3D Perspective | OSG Architecture | 20-0933-31 |
| Plot 05 – Proposed Elevations | OSG Architecture | 20-0933-32A |
| Plot 05 – Proposed Elevations | OSG Architecture | 20-0933-33A |
| Plots 06, 07 – Proposed Ground and First Floor Plans | OSG Architecture | 20-0933-35B |
| Plots 06, 07 – Proposed Ground and First Floor Plans | OSG Architecture | 20-0933-36B |
| Plots 06, 07 – Proposed Elevations | OSG Architecture | 20-0933-37B |
| Rosary House – Existing Plans and Elevations | OSG Architecture | 20-0933-40 |
| Rosary House – Proposed Plans and Elevations | OSG Architecture | 20-0933-41 |

Table 1-1: Application Documents

2 Site Context

2.1 Application Site

- 2.1.1 The application site comprises Rosary House, a two-storey dwelling with garaging and storage shed, and its expansive rear garden.



Above: Google Earth extract of Application Site

- 2.1.2 The site is located off Aerodrome Road in Bokesbourne. This area forms part of the wider settlement of Bokesbourne and is the only cohesive part of the village, as the rest is in linear form. The street scene consists of a mixture of property types and styles, which to the north-east side of the road are relatively scattered with no uniformity to their layout.
- 2.1.3 The site is bordered to the northeast by a railway line, and to the south, west and east by residential dwellings and private gardens.
- 2.1.4 The site does not fall within a Conservation Area or Area of Outstanding Natural Beauty. However, it does lie within a designated Area of High Landscape Value (AHLV).

2.2 Planning History

- 2.2.1 An online review of the Council's Public Access database has revealed the following planning applications relevant to Rosary House.
- (1) Application Reference CA//87/01069: First floor extension and replacement of flat garage roof with pitched, Approved; and
 - (2) Application Reference CA//19/00846: Outline application for 3 no. dwellings including access and layout. Approved.

2.3 Pre-application

- 2.3.1 A pre-application virtual meeting with Officers from the Council took place in April 2021 (Reference PRE/21/00028) to determine whether the principle of development on site is considered acceptable.
- 2.3.2 Following the meeting, the Officer confirmed that she could give Officer level support to the proposal in principle as it would represent effective use of land in a sustainable location.
- 2.3.3 It was advised at that stage that consideration should be given to window positions, noise and disturbance impact and separation distance to the neighbouring property occupiers, landscaping, ecological surveys, Stodmarsh Nature Reserve and highways impact should a full application be forthcoming.

3 Development Proposals

3.1 Overview

3.1.1 This application seeks permission for:

'Erection of 7 new dwellings together with access, parking, landscaping and ancillary works'

3.1.2 Full details of the proposed development can be found in the accompanying Design and Access Statement. A summary has been set out below for ease of reference.

- (1) Erection of comprises three detached properties and four semi-detached properties, each with two parking spaces and private rear gardens;
- (2) Rosary House will be retained;
- (3) As with the extant permission, the houses to the front of the existing dwelling will be single storey in form, providing accommodation in the roofspace.
- (4) The heights of the proposed dwellings have been minimised as far as possible;
- (5) Retention of trees within and around the perimeter of the site;
- (6) New tree and hedgerow planting would be mainly of native species to help to encourage wildlife;
- (7) The internal boundary treatments have been kept to a minimum; and
- (8) A new access will be created off Aerodrome Road to serve Rosary House and the proposed dwellings.

4 Planning Policy Context

4.1 Introduction

- 4.1.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning applications must be determined in accordance with the development plan unless material considerations indicate otherwise.
- 4.1.2 The Statutory Development Plan in this case comprises the Canterbury District Local Plan 2017.
- 4.1.3 In addition to the development plan, there are other material considerations including the National Planning Policy Framework (NPPF), the Planning Practice Guidance and other supplementary planning guidance and standards.

4.2 Development Plan

Canterbury District Local Plan 2017

- 4.2.1 The following policies of the adopted Local Plan are considered relevant to the determination of this application:

| Policy | Summary |
|--------|---|
| SP1 | Presumption in favour of sustainable development: States that planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in Neighbourhood Plans) will be approved, unless material considerations indicate otherwise. |
| SP4 | Strategic approach to location of development: States that in the villages, including Bekesbourne, priority will be given to protecting the rural character of the district and infill development of an amount appropriate to the size of the settlement (or development to meet an identified local need for affordable housing), in a location appropriate to the form of the settlement and of a design and scale that respects and enhances the character of the village. |
| T1 | Transport Strategy: Seeks to control the level and environmental impact of vehicular traffic including air quality. |
| T9 | Parking Standards: States that the Council will have regard to the local parking standards as set out in Appendix 4 of the Local Plan. It also states that where provided, cycle parking should be convenient, secure and covered. |
| CC2 | Reducing Carbon Emissions from New Development: States that development should show how they have taken account of landform, layout, building orientation, massing and landscaping to minimise energy consumption. |
| CC11 | Sustainable Drainage Systems: States that all development applications should include drainage provision. |
| DBE1 | Sustainable Design and Construction: States that All development should respond to the objectives of sustainable development and reflect the need to safeguard and improve the quality of life for residents, conserve resources such as energy, reduce/minimise waste and protect and enhance the environment. |

| | |
|-------------|---|
| DBE3 | Principles of Design: Sets out a number of design considerations that development proposals should have regard to. |
| DBE4 | Residential Space Standards: States that all new housing proposals should have an acceptable standard of accommodation in terms of internal layout, room sizes and amenity space. |
| HE11 | Archaeology: Requires planning applications, on sites where there is or is the potential for an archaeological heritage asset, to include an appropriate desk-based assessment of the asset. |
| LB2 | Areas of High Landscape Value: States that within the Areas of High Landscape Value, development will be considered in relation to the extent to which its location, scale, design and materials would impact on or protect the local landscape character and enhance the future appearance of the designated landscape and its heritage and nature conservation interest. |
| LB8 | Landscape Scale Biodiversity Networks: Seeks to ensure that notable ecological features of conservation value are retained, protected and enhanced as part of new development. |
| LB9 | Protection, Mitigation, Enhancement and Increased Connectivity for Species and Habitats of Principal Importance: States that all development should avoid a net loss of biodiversity/nature conservation value and actively pursue opportunities to achieve a net gain. |
| LB10 | Trees, Hedgerows and Woodland: States that new development should incorporate trees in areas of appropriate landscape character, to help restore and enhance degraded landscapes, screen noise and pollution, provide recreational opportunities, help mitigate climate change and contribute to floodplain management. |

4.3 Other Material Considerations

4.3.1 Other material considerations include:

- (1) The National Planning Policy Framework (NPPF): Paragraphs 8, 10, 11, 38, 39, 47, 60, 79, 111, 119, 120, 124, 126, 130, 174 and 180;
- (2) National Planning Practice Guidance (NPPG);
- (3) Natural England's '*Advice on Nutrient Neutrality for New Development in the Stour Catchment in Relation to Stodmarsh Designated Sites - For Local Planning Authorities (July 2020)*'; and
- (4) Canterbury Area of High Landscape Vale Supplementary Planning Guidance.

5 Planning Considerations

5.1 Introduction

- 5.1.1 The NPPF highlights that local planning authorities should plan to support strong, vibrant, and healthy communities with accessible local services that reflect the communities needs and support its health, social and cultural well-being that therefore contributes to sustainable development.
- 5.1.2 In this case it is considered that the following issues are important to assess as part of the proposal:
- (a) Principle of Development;
 - (b) Landscape and Visual Impact;
 - (c) Character and Appearance;
 - (d) Impact on Residential Amenity;
 - (e) Noise Impact;
 - (f) Highway and Access;
 - (g) Ecology;
 - (h) Archaeology;
 - (i) Flood Risk and Drainage; and
 - (j) Sustainable Development.

5.2 Principle of Development

- 5.2.1 The National Planning Policy Framework (NPPF) at Paragraph 11, states that there is a presumption in favour of sustainable development and that proposals should be approved without delay so long as they accord with the development plan.
- 5.2.2 NPPF Chapter 11 outlines that planning decisions should make effective use of land by promoting and supporting under-utilised land and buildings, particularly where they would contribute to housing need and where sites could be used more effectively.
- 5.2.3 At the local level, the broad objectives of Canterbury City Council's Local Plan are to provide sufficient housing to meet local need and support economic growth, broaden the local economy, protect the built and natural environment, develop sustainable communities and ensure adequate community facilities are provided.
- 5.2.4 The Local Plan sets out a strategic approach to the location of housing development in order to deliver the Local Plan's sustainable development strategy. It generally seeks to direct development to the urban areas of Canterbury, Whitstable and Herne Bay, with new residential development permitted in identified settlements in specific circumstances.

- 5.2.5 With regard to existing settlements, Policy SP4 sets out a hierarchical approach to new residential development. Bekesbourne is identified as a 'Village' under SP4, in which priority is given to protecting the rural character of the district and infill development of an amount appropriate to the size of the settlement (or development to meet an identified local need for affordable housing), in a location appropriate to the form of the settlement and of a design and scale that respects and enhances the character of the village.
- 5.2.6 In this case, the principle of further residential development on the application site has already been deemed acceptable under application CA//19/00846, where outline permission was granted for 3 no. dwellings on part of site. Whilst this proposal seeks permission for 7 no. dwellings, the principle of development is still the same and the extended site is still considered to represent a minor form of infilling at a scale commensurate with the size of the village and immediate surroundings, being seen on the backdrop of the adjacent residential development and physically contained by the railway line to the north.
- 5.2.7 Furthermore, given the size of the application site and its location within the only cohesive part of Bekesbourne, the proposed number of dwellings is considered appropriate and in accordance with LP Policy SP4.
- 5.2.8 It is also important to note that at the pre-application stage, the Officer confirmed the following:
- (1) The location of the two semi-detached dwellings at the front of the site is acceptable in principle;
 - (2) The remaining five two-storey dwellings represent a backland form of development that would infill the gap between the existing built form and railway;
 - (3) Backland development is a characteristic of this locality and therefore the proposed development is considered to reflect the rural character of the area; and
 - (4) The development would represent an effective use of land in a sustainable location.
- 5.2.9 Taking into account the above, the principle of this residential development is therefore deemed to be acceptable.

5.3 Landscape and Visual Impact

- 5.3.1 The NPPF requires planning decisions to ensure that developments '*are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change*' (paragraph 127).
- 5.3.2 The application site is located within an Area of High Landscape Value (AHLV), where LP Policy LB2 requires development to be considered in relation to the extent to which its location, scale, design and materials would impact on the local landscape character and enhance the future appearance of the designated landscape and its heritage and nature conservation.

- 5.3.3 In this case the nature and scale of the proposed development is such that there would inevitably be a slight change to the landscape character. However, given the location of the site between the dwellings fronting Aerodrome Road to the south and the railway line to the north, the impact of the proposal on the local landscape character is likely to be minimal. Furthermore, this area of the AHLV is characterised by residential uses, and as such the proposal is considered appropriate to the character of the settlement.
- 5.3.4 The proposed dwellings would be situated such that views into the site from the AHLV, as well as views out to the AHLV, would not be unduly impacted upon.
- 5.3.5 By virtue of the number of dwellings proposed, together with the overall size of the application site, the development is considered to be of an appropriate scale and design that would not appear over dominant or visually harmful within the context of its surroundings. It will have no adverse impacts upon the character and setting of the wider countryside, which in the immediate area is already characterised by other similar backland cul-de-sac developments.
- 5.3.6 Accordingly, it is considered that the proposed development would integrate effectively into the surroundings and would not significantly detract from the character and appearance of the area. It is therefore considered that the proposals are acceptable in visual terms.

5.4 Character and Appearance

- 5.4.1 The NPPF states that planning decisions should aim to ensure that development will function well and add to the overall quality of the area; establish a strong sense of place; respond to local character and history; reflect the identity of local surroundings and materials; are visually attractive as a result of good architecture and appropriate landscaping (paragraph 58).
- 5.4.2 In terms of architectural style, the NPPF encourages development that is sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (paragraph 127).
- 5.4.3 The Kent Design Guide adds that in order to achieve a well-integrated design, the character of an area must be understood and respected.
- 5.4.4 Local Plan Policy DBE3 seeks to ensure that the distinctive character, diversity and quality of the Canterbury District is promoted, protected and enhanced through high quality, sustainable inclusive design, which reinforces and positively contributes to its local context creating attractive, inspiring and safe places.
- 5.4.5 Whilst the development would result in backland development, the residential intensification is deemed to be in keeping with the character and appearance of this area of Bekesbourne, which is predominantly residential in character comprising a mix of property types.
- 5.4.6 Given the existing property is within a spacious plot, the size of the proposed plots and their proposed layout, will ensure that overall development will not appear cramped or of a density out of keeping with the prevailing character and pattern of local development. Furthermore, and in accordance with Chapter 11 of the

NPPF, the proposed density makes more effective and efficient use of the plot compared to the original outline permission for three dwellings.

- 5.4.7 It is noted that there is some variety in the local area that includes infill high density developments. For example, planning permission (Reference CA//16/O1975) was granted in 2017 to erect 15 two-storey dwellings with access on land at Aspinall Close, which is located 0.7 miles to the northwest of the application site.

5.5 Impact on Residential Amenity

- 5.5.1 NPPF para 127 sets an expectation that new development will be designed to create places that amongst other things have a 'high standard' of amenity for existing and future users. This is reflected in LP Policy which states that the council will consider the privacy and amenity of neighbouring buildings and future occupiers, including potential overshadowing, loss of outlook and loss of sunlight.
- 5.5.2 The design and siting of the proposed dwellings will ensure there is no unacceptable overshadowing or restriction of light or outlook to the neighbouring properties. It will be designed such that the privacy of occupiers of neighbouring properties is not unacceptably impacted by future occupiers of the new development.
- 5.5.3 With regard to possible noise disturbance from vehicles, the proposed access to the site is in the same position as the existing access. As such it will not detrimentally affect residential amenities owing to the spacious separation distances from the nearest houses. Furthermore, the change in use of the access from farm vehicles to cars would be less intensive and have a lower impact and therefore would be acceptable.
- 5.5.4 Furthermore, while the proposed development would increase the amount of road users within the area, it is considered that this would not be substantially so as to unacceptably impact neighbours' living conditions in regard to noise and disturbance.

Future living standards

- 5.5.5 Local Plan Policy DBE4 states that all new housing proposals should have an acceptable standard of accommodation in terms of internal layout, room sizes and amenity space. The policy then goes on to state that developments should provide storage and space for refuse and cycling, facilities for covered cycle parking, outdoor space for private and/or communal use.
- 5.5.6 In line with Policy DBE4, the internal room sizes of each of the dwellings and their garden sizes provide a good living standard in terms of room sizes. The internal layout of the dwellings provide a good standard of residential accommodation with adequate daylight, sunlight and privacy provision.
- 5.5.7 Similarly, the outdoor amenity areas indicated on the plans are of adequate proportions and would provide acceptable amenity space for future occupiers both in terms of size, accessibility and usability.

- 5.5.8 Overall, it is considered that given the position of the proposed dwellings and the relationship between dwellings, there would not be an unacceptable impact on living conditions for future residents of the development.

5.6 Noise Impact

- 5.6.1 A Noise Impact Assessment has been carried out as part of the application to assess the impact of noise from the new access road and the railway line at the rear of the site.
- 5.6.2 The results of the noise level survey and assessment indicate that the development site is exposed to fairly low levels of noise from passing trains. However, the noise from passing trains during the night-time period will lead to a slight exceedance of the noise criteria for maximum noise levels which means an appropriate scheme of noise mitigation measures is required for Plots 3 and 4 nearest to the railway line.
- 5.6.3 The Report states that the impact of noise from cars using the new access road can be adequately attenuated by the provision of suitable 1.8m high acoustic perimeter fencing along the boundaries with the existing adjacent dwellings.
- 5.6.4 The Report recommends an appropriate noise mitigation scheme for the new dwellings which should provide sufficient noise attenuation to meet the required internal acoustic criteria and fully protect the amenity of future residents.
- 5.6.5 Overall, with the implementation of the scheme of noise mitigation measures outlined in the report, it is concluded that noise impact from the railway line on the new dwellings and the noise impact from the proposed access road will be within acceptable limits with no adverse effect on the proposed and existing residential amenity.

5.7 Highways and Access

- 5.7.1 Paragraph 111 of the National Planning Policy Framework states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. In this case the proposed development would have very limited impact in terms of trip generation on the local road network and therefore it does not raise any highway safety impacts.
- 5.7.2 Local Plan policy T1 requires new development to be assessed against the principles of the Council's Transport Strategy, including managing the environmental impacts of traffic, providing alternatives to the car, and encouraging the use of public transport and seeking new road infrastructure that will contribute to improving environmental conditions and the economic wellbeing of the District. Policy T9 states that Kent County Council's guide to vehicle parking will be applied when assessing new development.
- 5.7.3 LP Policy DBE3 states that when assessing design quality, safe movement within and around a proposed development must be a consideration.
- 5.7.4 DHA Transport has produced a Transport Statement which is submitted as part of the planning application for the proposed development.

- 5.7.5 Access to the site will be achieved via two new shared private drives to the north of Aerodrome Road, with one being in a similar location to the existing drive and serving two dwellings on the site frontage. The location of the access has been determined based on optimum visibility splays.
- 5.7.6 In terms of access for large vehicles within the internal layout of the site, sufficient space is provided within the site to cater for large vehicles such as refuse, delivery and emergency vehicles. Swept path analysis has been completed and is included within the Transport Statement. This demonstrates that the relevant vehicles can enter, turn and exit the site in a forward gear.
- 5.7.7 With regard to parking, the development will provide car parking spaces to adhere to the Canterbury City Council (CCC) guidance, with two spaces provided for each of the seven dwellings proposed (either in car barns or external spaces and two for the current Rosary House (within its existing garage).
- 5.7.8 With respect to cycle parking, this will be provided within the residential curtilage of each dwellings.
- 5.7.9 A trip generation assessment was undertaken for the proposed development as part of the Transport Statement to calculate the level of trips expected to be generated. This demonstrated that the proposals are likely to generate in the region of 32 additional vehicle trips across the 12-hour weekday period. This equates to approximately three movements per hour on average. Based on this, the Transport Statement states that the surrounding highway network is suitable to accommodate this expected uplift and that vehicles will readily dissipate onto the wider network.
- 5.7.10 On this basis, it is concluded that the proposed development should not result in significant detrimental impacts in transport terms thereby according with the NPPF and the Development Plan. In this context, the proposal is considered to be acceptable in relation to parking, access and highway safety.

5.8 Ecology

Preliminary Ecological Assessment

- 5.8.1 A preliminary Ecological Assessment has been submitted in support of the application. The Assessment provides a record of the habitat types and ecological features present on the site and their potential to support protected species.
- 5.8.2 In summary the Assessment states:
- (1) Amphibians - No impact is expected onto great crested newts and thus no further work is recommended for this species;
 - (2) Reptiles - Further reptiles surveys should be undertaken;
 - (3) Birds - Consideration must be given to the timing of the clearance works, if any are to take place;
 - (4) Badger - No impact is expected onto badgers and thus no further work is recommended for this species;

- (5) Bats - One night-time survey should be undertaken for the garage and outbuilding between May and August;
- (6) Other Species - There is some potential for hedgehogs to be present on site. Therefore, it has been recommended that any areas where mammals could be sheltering should be hand searched prior to disturbance. It also states that excavations should not be left open for animals to fall into, or planks of wood should be placed to enable any animals which may fall into such a hole to escape.

Enhancements

5.8.3 A number of biodiversity enhancements have been suggested in the Assessment, including:

- (1) Provision of hedgehog nesting boxes;
- (2) Provision of ready-made bird boxes on retained trees;
- (3) Provision of integrated swift bricks' in new buildings;
- (4) Provision of integrated bat boxes on new buildings or bat boxes on retained mature trees;
- (5) Provision of bat friendly planting within the gardens; and
- (6) Establish wildflower plug/bulb planting in amenity grassland and private gardens.

Reptile Survey

- 5.8.4 In accordance with the recommendation of the PEA, a Reptile Survey has been undertaken to assess the likely impact of the scheme on reptiles.
- 5.8.5 The survey recorded grass snakes *Natrix natrix*, slow worms *Anguis fragilis*² and common lizards *Zootoca vivipara*.
- 5.8.6 The Report goes on to state that the proposal will entail the loss of the reptile habitat, and as it will not be possible to retain the reptile population on site, a receptor site will be required.
- 5.8.7 In this case a 0.42-hectare receptor site has been found locally in Bridge, which is shown on page 5 of the Report and is discussed further in the accompanying 'Proposed Reptile Receptor Site Enhancement Strategy and Management Plan'.
- 5.8.8 The report goes on to recommend that prior to any ground works starting, a translocation exercise will need to take place between April and September during suitable weather conditions.

Proposed Reptile Receptor Site Enhancement Strategy and Management Plan

- 5.8.9 The Report states that the identified receptor site is currently part of a sheep-grazed field, which is along the Nail Bourne stream and adjacent to the A2, which will provide good connectivity to other reptile habitat locally.
- 5.8.10 The Report goes on to state that with enhancements (creation of two hibernacula and six brash/log piles), the site will provide good quality reptile habitat.
- 5.8.11 With regard to long term management, the following measures have been recommended:
- (1) Yearly cut and rake of one third of the site in August-September;
 - (2) A 1m buffer of uncut grass to be left around the brash and log piles and the hibernacula;
 - (3) Information panels explaining the sensitivity of the habitat and species on site to be installed around site to discourage public from accessing the land; and
 - (4) Review of management regime after 3 years and then every 5 years;

Bat Survey

- 5.8.12 In accordance with the recommendation of the PEA, a night-time Bat Survey was undertaken at the application site.
- 5.8.13 The accompanying Report confirms that no bats were seen emerging from the buildings during the surveys. Only a low number of common pipistrelle, soprano pipistrelle and noctule bats were seen and heard commuting and foraging.
- 5.8.14 It therefore concludes that the garage and outbuildings are not considered as being used as a bat roost and no mitigation or licence is expected to be needed prior to their demolition.

Conclusion

- 5.8.15 Given the findings of the Preliminary Ecological Appraisal, the Reptile Survey and the Bat Survey it is clear that the proposed works can be developed with suitable mitigation to ensure that no protected species are harmed. Therefore, the development is consistent with the NPPF and the Local Plan with respect to enhancement for biodiversity.

5.9 Archaeology

- 5.9.1 The NPPF sets out that where development has the potential to affect heritage assets with archaeological interest, LPAs should require developers to submit an appropriate desk-based assessment, and where necessary, a field evaluation.
- 5.9.2 Policy HE11 of the Local Plan sets out that planning applications on sites where there is or is the potential for an archaeological heritage asset, must include an appropriate desk-based assessment of the asset.

- 5.9.3 In this case, the site has demonstrable archaeological potential, as evidenced by existing knowledge of the site and surrounding area. As such an Archaeological Desk-based Assessment has been undertaken and accompanies the application.
- 5.9.4 The Assessment recommends that an archaeological evaluation of the site should take place prior to development to provide actual evidence as to the presence/absence/significance of archaeological remains, on which to base further mitigation strategies if necessary.

5.10 Flood Risk and Drainage

- 5.10.1 In terms of flood risk on referencing the Environment Agency Flood maps the site can be seen to be located within Flood Zone 1 and given the site area is less than one hectare in size a Flood Risk Assessment is not required to support the planning application.
- 5.10.2 However, in terms of drainage, an outline surface water drainage (SuDS) strategy for the proposed development has been provided.
- 5.10.3 With regard to the existing drainage regime the Report states that Southern Water (SW) sewer assets show that the application site is served by a 150mm foul water sewer that runs northerly along Aerodrome Road. With regard to surface water, it is suggested that surface water from the existing residential properties is discharged to ground by infiltration, for example through the use of soakaways. The Report also confirms that there are no main rivers or ordinary watercourses in proximity to the site.
- 5.10.4 Whilst a SuDS strategy is not required for the proposed development, it has been included to deal with surface water runoff and to promote best practices and sustainability, as well as providing benefits on water quality.
- 5.10.5 The proposed SuDS strategy can be seen within drawing 21078-DNG-DP-01-P01 on page 7 of the report. The elements of the strategy include permeable paving (or porous asphalt) over a 450mm deep, 30% void ratio porous sub-base allowing for infiltration through the base; underground geocellular storage with 95% void ratio allowing for infiltration through the base and sides; and check dams maximising the volume stored in the 1:40 section of the porous sub-base.
- 5.10.6 As the Report states, the strategy has been tested using hydraulic modelling software. A 40% climate change allowance has been applied to the 100-year rainfall event, and storm durations ranging from 15 minutes to one week have been simulated. The modelling results show that flooding on-site does not occur.

Stodmarsh Nature Reserve

- 5.10.7 The application site falls within the Upper Stour Operational Catchment, and sewage from the development will be conveyed to Newnham Valley Preston Wastewater Treatment Works (WwTW). Therefore, consideration has been given to Natural England's 'Advice on Nutrient Neutrality for New Development in the Stour Catchment in Relation to Stodmarsh Designated Sites'.

- 5.10.8 A Nutrient Neutrality Part 1 Report therefore accompanies the application. As the report confirms the primary source of nutrients from residential development is from domestic wastewater.
- 5.10.9 The Report states that using the national average of 2.4 people house, the proposed 7 new homes will give a future population of 16.8 people. Based on the Total Nitrogen (TN) (27mgN/l) and Total Phosphorus (TP) (0.90mgP/l) limits at Newnham Valley Preston WwTW, with an average water consumption of 110l/p/d, it has been calculated that the future wastewater nutrient loads from the proposed development will average 18.21kgN/year and 0.61kgP/year.
- 5.10.10 After development, the Report states that the land will be classed as 'urban' under NE Guidance, giving nutrient loads of 7.58kgN/year and 0.44kgP/year. Comparing this against the existing loads from the existing development, the future nutrient loading for the proposed development exceeds the existing nutrient load by 21.08kgN/year and 0.82kgP/year. Including the 20% buffer, these calculations set the 'nutrient budget' for the proposed development as 25.29kgN/year and 0.98kgP/year.
- 5.10.11 To establish nutrient neutrality, the Report outlines the following mitigation strategy to reduce the nutrient loading to zero.
- (1) Installation of Greywater Recycling – The Report states that by decreasing the daily water consumption from 110l/p/d to 85l/p/d, the total wastewater load will decrease by approximately 20%; from 18.21kgN/year and 0.61kgP/year to 14.07kgN/year and 0.47kgP/year;
 - (2) Built design to reduce urban Phosphorus Export – A SuDS strategy has been designed for the proposed development which will reduce the surface water phosphorus load from 0.44kgP/year to 0.13kgP/year;
- 5.10.12 The combination of the (1) and (2) above will reduce the total budget from 25.29kgN/year and 0.98kgP/year to 20.32kgN/year and 0.45kgP/year.
- 5.10.13 To further reduce the budget, the Report states that land use improvements elsewhere within the catchment will be required. Examples include converting agricultural land to woodlands.
- 5.10.14 In this case, as set out in the Report two sites have been identified as being suitable for offsetting. The sites have both been used as grazing pastures in the past and are likely to continue with this use in the absence of any other development.
- 5.10.15 The first site is located in Patribourne and is known as the "Land below Keeper's Field". It consists of 6.24 acres of land, which translates to 2.524 hectares. The second site is located in Bridge and is known as the "Great Pett Farm Site". It consists of 1.32ha of land.
- 5.10.16 The Report states that the exact division of how much each site will be converted to woodlands has not yet been decided and should be added as a pre-occupation condition.

- 5.10.17 It has therefore been concluded that through the implementation of the proposed mitigation and offsetting strategy, the proposed development will not increase nutrient loading in Stodmarsh.

5.11 Sustainable Development

- 5.11.1 The NPPF sets out a presumption in favour of sustainable development and that sustainable development comprises three overarching objectives which the proposal meets as demonstrated below.

Environmental

- 5.11.2 The environmental role includes contributing to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimizing waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.
- 5.11.3 Development here would not involve the loss of land that is of high agricultural or ecological value nor is it within a flood risk area. Furthermore, through the proposed measures of ecological mitigation and ecological enhancement, the biodiversity value of the site will increase.

Economic

- 5.11.4 The proposed development would contribute towards meeting the housing needs, provide job opportunities and sustain the local services and facilities. Providing new homes in the right places is vital for future economic competitiveness.
- 5.11.5 Whilst the proposed development is purely for a residential use it is still able to address the economic aspect of sustainability by providing construction employment opportunities and a need for building materials, with some of those benefits likely to be felt at the local level as well as a local demand for goods and services.
- 5.11.6 The site is also located within close proximity to existing services and amenities and has good, reliable access to broadband services to enable homeworking.

Social

- 5.11.7 The NPPF states that the social element of sustainability includes the provision of a supply of housing which is required to meet the needs of present and future generations and by creating a high quality, built environment with accessible local services. There is a recognised need at both the national and local level to address the current deficit in the amount of new homes being built in the UK. The provision of a new dwelling would make a contribution towards meeting the housing need.

6 Summary and Conclusion

6.1 Summary

- 6.1.1 Overall, the proposed development provides an opportunity to contribute to the sustainable growth of the village of Bekesbourne. The proposed scheme is considered to be acceptable in terms of layout, scale and density and there would be no significant adverse impacts on the character, appearance or visual amenity of the surrounding area or the AHLV. The proposal is also considered to be acceptable in relation to parking provision and in terms of highway safety. The layout will also ensure that the amenities of the neighbouring properties will be protected.
- 6.1.2 The proposal would be sustainable development and paragraph 187 of the Framework states that decision takers should seek to approve applications for sustainable development where possible
- 6.1.3 Overall, given the context of the site, the proposed development is deemed to be acceptable and in accordance with the relevant policies from the Development Plan and the other material considerations. It should thus benefit from the presumption in favour, representing sustainable development in accordance with Paragraph 11 of the NPPF.

6.2 Conclusion

- 6.2.1 Given the above, it is formally requested that planning permission be granted, subject to appropriate conditions.