

Urban Design Comments – March 2024	
Re: 21/503914/EIOUT Highsted Park, Land to the South and East of Sittingbourne (Highsted South)	
Background	Response by Milton Studio
The application seeks outline planning application for a large-scale mix use development with all matters reserved for future consideration. The proposed development is for up to 7,150 dwellings on land located to the south and east of Sittingbourne between the M2 and A2.	Commentary: Noted
The application site is predominantly undulating farmland with areas of woodland on the dip slope the North Downs and North Kent Plain. The southernmost part of the site lies within higher ground in the Kent National Landscape with the land broadly falling northwards towards the coastal plain. The comprises arable and pasture fields, commercial fruit growing areas and orchards subdivided by hedgerows, fences, roads, lanes, and farm tracks with pasture fields, with a scattered settlement pattern of farmsteads, hamlets, and isolated dwellings. Also within the site boundary is the Kent science park. The site extends so that it is near a range of settlements including Sittingbourne, Bapchild, Teynham, Rodmersham & Rodmersham Green, Lynsted, Highsted Village etc.	Commentary: Noted
The development would be arranged across new ‘village’ areas described as Oakwood Village North & South and Highsted Village East & West. A range of non-residential uses are also proposed including, commercial, community, leisure and educational uses that together amount to around 209,430 sqm (GIA). Additionally, an area of land up to 1.5 ha has been identified for a future Household Waste Recycling Centre.	Commentary: Noted
With respect highways infrastructure, a Southern Relief Road (SRR) is proposed to link the A2 and M2 and will form part of an eastern bypass to Sittingbourne. A new junction to the M2 motorway (Junction 5a) is proposed to connect with the Strategic Road Network (‘SRN’). The junction proposes on and off slips to the M2 and overpass to link with land north of the M2. Part of the new junction is located within the Kent Downs National Landscape. A Sustainable Movement Corridor is shown running alongside the SRR.	Commentary: Noted
The indicative landscaping strategy proposes a network of green infrastructure encompassing a range of open space typologies and planting.	Commentary: Noted
The application is submitted concurrently with a separate application for 21/503906/EIOUT – Land to the west of Teynham (Highsted North).	Commentary: Noted
Assessment	
Application structure & processes for achieving good design.	
The application is accompanied by a masterplan, parameter plans and a Design and Access Statement (DAS) (with Addendums) which sets out the key design principles and requirements that will apply to future Design Coding and at the reserved matters stage. These build upon extensive contextual analysis both in the DAS and within a Local Study. The vision, design and placemaking principles set out within the DAS are clear and well defined, drawing upon a range of best practice documents, including the National Design Guide and Building for a Healthier Life, together with best practice examples. In addition, the DAS clearly defines the Garden City/Community principles that will inform the design development.	Commentary Only. Noted

<p>The design and access statement explains the proposal has been peer reviewed on multiple occasions by Design South East which provided independent scrutiny and challenge through design evolution. Matters raised by Design South East, and through subsequent consultations, regarding the assumptions, narrative and approach of the proposals have been tested and changed, resulting in a more refined masterplan with clearer function and identity.</p> <p>Despite this, there remain several areas within the proposal that are not adequately explained or linked back to that background analysis. These areas will be highlighted below.</p>	<p>Commentary Only. Noted</p>
<p>It is anticipated that the design principles set out in the DAS, will be expanded upon, and managed by future design codes that reserved matters would be expected to comply with to ensure that design quality is achieved through subsequent applications. The NPPF encourages the use of design codes to help create well design places and this echoed in the Kent Design Guide. The Government has also published the National Model Design Code which sets out how Design Codes can be delivered with input from the local community.</p>	<p>Accepted that Design Codes are part of the process going forward</p>
<p>Should officers be minded recommend approval structural conditions are recommended to ensure design quality. These could be refined at a later stage but could include the following:</p>	<p>Condition Recommendations: all noted and accepted in principle</p>
<ul style="list-style-type: none"> • Prior to the submission of the first application for Reserved Matters for the first phase of the development hereby permitted the following shall be submitted: <ul style="list-style-type: none"> o A site wide detailed Masterplan, Strategic Design Principles and overarching Open Space Strategy - substantially be in accordance with the indicative masterplan, design principles contained within the DAS and Greenspace Structuring Plan. <ul style="list-style-type: none"> • The Masterplan should be informed by a Design Review Outcome Report following a design review process involving the Local Planning Authority carried out by Design South East or another appropriate design review panel that has been approved in writing by the Local Planning Authority. • Design Code for each phase or each village area - in accordance with and informed by: <ul style="list-style-type: none"> o Approved Masterplan, Strategic Design Principles and Overarching Open Space Strategy (conditions above) o The National Design Guide (Amended 2021 to align with National Model Design Code and Guidance Notes for Design Codes). o The National Model Design Code (2021). o Any other relevant Design Guide or Code that is adopted at the time; and o A Design Review Outcome Report following a design review process involving the Local Planning Authority carried out by Design South East or another appropriate design review panel that has been approved in writing by the Local Planning Authority. • Any applications for Reserved Matters shall be accompanied by: <ul style="list-style-type: none"> o A Masterplan and Design Code Compliance Statement which demonstrates how that phase of the development has been brought forward in accordance with the approved Masterplan, Strategic Design Principles, Open Space Strategy and Design Code pursuant to the conditions above. 	<p>Draws on information submitted</p> <p>OK</p> <p>OK</p> <p>OK</p>
<p>The conditions to secure the preparation and approval of a design code, detailed masterplan, overarching open space strategy and for the scheme to be tested by a design review panel would be</p>	<p>Acknowledged that the Design Review Process will be an integral part of the progression of the</p>

<p>necessary to ensure the development delivers a high-quality design and place making. To ensure good design is embedded at the outset the above conditions above are necessarily pre-commencement. These conditions would accord with the objectives and aspirations of the Local Plan and NPPF to create high quality, beautiful and sustainable places.</p>	<p>scheme. A consistent Panel and structured Workshops and Reviews will be agreed</p>
<p>Relief Road</p>	
<p>One of the objectives of the development is to deliver highly permeable and walkable neighbourhoods. The transport initiative that will have the most significant impact on the success of this objective would be the new strategic link road, with sustainable movement corridor alongside. This road is intended be a relief road between the M2 and A2. It would act as the primary movement corridor through the site and into the development areas from access points along its route.</p>	<p>Commentary. Noted</p>
<p>The SRR is a significant piece of infrastructure that, given its location relative to development parcels and open spaces, has the potential to act as a barrier separating new development parcels and wider integration of Oakwood Village East and Highsted Village East with Sittingbourne and Bapchild.</p> <p>Indeed, there is an inherent tension between the need to distribute traffic efficiently between the M2 and A2 at speeds of 50mph, integration between the development parcels arranged either side of the road and connectivity to nearby urban centres. Additionally, there is a need to design the relief road and movement corridor to be a high-quality environment for all users, particularly where there is a relationship with development parcels.</p>	<p>This has been one of the key considerations of the scheme design.</p> <p>The route has been established through and optimisation process.</p> <p>Access to development areas is constrained to realise the primary function of the SRR. Access and connectivity to development areas was a key topic of Design Reviews</p>
<p>With respect to connectivity, it has not been wholly demonstrated that linkages across the SRR would result in high levels of integration between development parcels, proposed open spaces and habitats (including country park), or meet the core objective of delivering a highly permeable and walkable neighbourhood.</p> <p>Connectivity across the SRR road is limited to few new junctions, existing bridleways & PRoW's, with a lack of clarity as to how the PRoW's will cross road infrastructure. Some development parcels are significantly separated from crossing features and/or connected by indirect circuitous walking and cycling routes.</p> <p>Also, there are inaccuracies in the drawings such as the absent PRoW ZR208 with potential additional SRR crossing. In view of the above, there is a high chance that pedestrian and cycle movement is discouraged in favour of car use and the link road will act as a barrier between the east and west of the site.</p> <p>It is advised that additional information is sought, together with updated/accurate drawings, to demonstrate that the different parts of the site are adequately connected. Leaving this to tier 2 or 3 approval process will mean the road infrastructure is established in principle but not the connectivity across it which is an undesirable outcome at this stage.</p>	<p>Access to development areas is constrained to realise the primary function of the SRR. Access and connectivity to development areas was a key topic of Design Reviews</p> <p>The submission plans have been amended to show more detail in relation to:</p> <ul style="list-style-type: none"> • Dev Parcel Connections • Open Space • Habitats <p>Plans featuring feature PRoWs show external connectivity and how these cross the SSR</p> <p>Plans amended to correctly reference PRoWs</p> <p>Noted</p>
<p>Although the design of the link road would change from dual to single carriageway and transition through development parcels, semi-rural and rural locations, there is very limited information on the different characters of the link road or its relationship with townscape or landscape.</p> <p>The D&A provides design frameworks for the villages, movement hierarchy and street design (primary, secondary, and tertiary) with indicative cross sections, but is unclear what the high-level principles are for the different parts of the link road.</p>	<p>MW have described character and approach in their submissions. The SSR adopts a Landscape led approach.</p> <p>Noted</p>

<p>There is some information in the TA based on information presented to Design Review some years back, but this needs to be updated and presented in the D&A so we can be sure that the high-level placemaking principles and changes in character along its length have been adequately considered – not simply the infrastructure design.</p> <p>This information is also necessary to understand the height and density responses outlined and how they contribute to the place being created. Given the importance of the SRR to the success of the scheme we would have expected more information and explanation on how the SRR relates to the wider development.</p>	<p>Review information and bring forward</p> <p>Height and Density have been reviewed / revised per later commentary</p>
<p>It is noted that the alignment of the relief road would result in a loss of ancient woodland and is likely to be a highly visible urbanising element within the landscape given its route along the side of a dry valley and the variable land levels across the site. You are advised that these matters should be considered in the planning assessment.</p>	<p>Very limited loss of AW.</p> <p>Noted</p>
<p>General movement and circulation</p>	
<p>Design of the street system comprises a network of primary, secondary, and tertiary streets that has the potential to provide a clear and legible structure for the area, particularly for vehicles.</p>	<p>Commentary. Noted</p>
<p>With regard sustainable travel, including walking and cycling, the proposal contains a range of measures to that would promote sustainable transport choices, which is commendable. However, despite the good potential, these measures could be better structured so that pedestrians and cyclists can be move freely and directly to between all parts of the layout, both locally and on a wider scale.</p> <p>Currently, submitted information does not show how different places are connected with each other. Routes to transport infrastructure, services, and facilities both inside and outside the site have not been clearly shown and Framework Plans terminate routes at the site boundary limiting understanding of integration and connectivity beyond the site.</p> <p>One example is the connectivity to Teynham station which is clearly a desirable link for the Oakwood villages, and is discussed in the Sustainable Transport Strategy, but is not committed to within any Framework Plans.</p> <p>Another is the lack of pedestrian and cycle connectivity between the centre of Oakwood Village East and Rodmersham, or cycle/pedestrian route through the commercial area in Highsted to the south.</p>	<p>Plans reviewed and revised to show ped and cycle movement. Key routes outside development parcels only show on plans. Further ped / cycle routes will be incorporated into Parcels at Design Code / RM Stage</p> <p>Update framework plans show onward connections where possible</p> <p>To be viewed in context with North Site, which provides connectivity to station.</p> <p>Difficult to make any connections in this area, other than to north and south of the village.</p>
<p>While it is acknowledged that cyclists would be segregated from the traffic on primary roads, cycling routes in general appears to have limited separation to highways, and where shown the routes proposed do not necessarily follow the most direct and convenient course through development parcels.</p> <p>Additionally, the scheme does not make the most of the existing walking and cycling framework by strengthening connectivity between existing PRoW's and bridleways. These limitations are likely to discourage future residents from walking and cycling to local services and facilities and attractions.</p>	<p>Framework plans don't show routes through parcels – only strategic and key routes.</p> <p>Routes and connectivity reviewed. Revised plans presented.</p>
<p>Overall, the location and alignment of the SRR would act as a barrier between the different development areas which would be compounded by circuitous walking/cycling routes and failure to fully capitalise on exiting PRoW and bridleway network.</p> <p>As such, the proposed development cannot be described as well served by walking and cycling opportunities as it not highly connected</p>	<p>New pedestrian / cycle routes, interrelated to existing roads and lanes show potential for connectivity within development area and external villages and town</p>

across the SRR or in accessing the surrounding area except predominantly by private car.	
<p>In terms of street design and quality, several indicative cross sections have been submitted within the D&A showing how primary, secondary, and tertiary streets could be laid out. Whilst generally acceptable, we think that there could be greater commitment to street trees, particularly in the tertiary street typologies and secondary street – local street.</p> <p>These should be in build outs and verges and not front gardens where they could be lost. This is mindful that this application was submitted before the latest NPPF version which says that trees make an important contribution to the character and quality of urban environments and can also help mitigate and adapt to climate change.</p> <p>Accordingly, planning decisions should ensure that new streets are tree-lined unless, in specific cases, there are clear, justifiable, and compelling reasons why this would be inappropriate. There is no justification in this case, so we request that a stronger commitment to trees feature more strongly in the design principles and apply to street design, particularly given the garden community approach advocated.</p>	<p>Acknowledge comments and NPPF Objectives.</p> <p>We can update street sections (show more trees) and provide more details as separate study.</p> <p>This would however be a fundamental part of the initial Design Coding.</p>
Spatial configuration, density, and height	
Highsted Park is proposed to be a series of new places in a dispersed pattern of development. The following section analyses each of these 'villages' in turn in respect to configuration, density, and height.	Commentary: Noted
Oakwood Village South	East
<p>Oakwood village south would be a new neighbourhood that would extend from the A2 southwards. The development of would be within the open countryside within an undulating landscape that has historically been used for agricultural purposes including arable and orchards for local settlements such as Rodmersham and Bapchild.</p> <p>The development's significant scale and distribution across this part of the site would result in a substantial urbanisation, detracting and degrading the characteristics of the rural landscape and eroding the countryside setting to those settlements</p>	Commentary. Noted
<p>This is particularly notable around Rodmersham where the substantial scale and extent of development is wholly disproportionate to the village.</p> <p>Despite the proposed green buffer, the extent of built development and its proximity would result in the loss of landscape setting to the village and harmfully coalesce Rodmersham and the new development.</p> <p>Moreover, the scale and distribution of development proposed is completely divorced from the modest scale, form and layout of the village and is therefore not responsive to existing character or local distinctiveness.</p>	<p>Key Issue: Coalescence / proximity to Rodmersham.</p> <p>Rodmersham is a linear village with dwelling fronting road. Large areas of open space form the eastern boundary. A buffer of between 40m and 70m is proposed, with woodland forming the landscape buffer. The proposed development would fundamentally change the existing character</p> <p>Plans now denote lower density / scale in this area.</p>
The impact on the village would be exacerbated by an abrupt change in building heights close to the village from 10m to 15m, urbanising relief road to the west, change in landscape character to accommodate country park and the noise, lighting and activity associated with the new uses.	Building Heights parameters reviewed and revised to graduated heights and densities.

These changes will be visible from a range of public viewpoints given the undulating nature of the topography and would thus be harmful to settlement setting and character.

In terms layout, the proposal would be arranged around a new district centre containing a range of retail, community and commercial services and facilities. Although in principle this may be appropriate, in practice accessing the centre by sustainable modes may be difficult.

Cycling/pedestrian routes are shown as circuitous in places, where direct routes would be more successful. Northerly development parcels are located some distance from the centre and pedestrian and cycle routes are not extended to Rodmersham despite the proximity.

Moreover, there is limited information on connectivity to this centre from areas outside the site boundary and it is noted that PROW ZR208 is missing from the drawings (and may require an additional SRR crossing given its alignment).

Commentary. Noted

Reviewed routes and relationship to local centre. Connectivity between Rodmersham and new LC can only occur to north and south of existing village

Reviewed and PRoW added.

Other facilities, including proposed community gardens, primary school, and sports facilities are located on the southern periphery near Rodmersham Village. Whilst this may help soften the transition to the open countryside, these facilities are more removed from the new village. The new sports facilities, in particular, appear isolated from the new community.

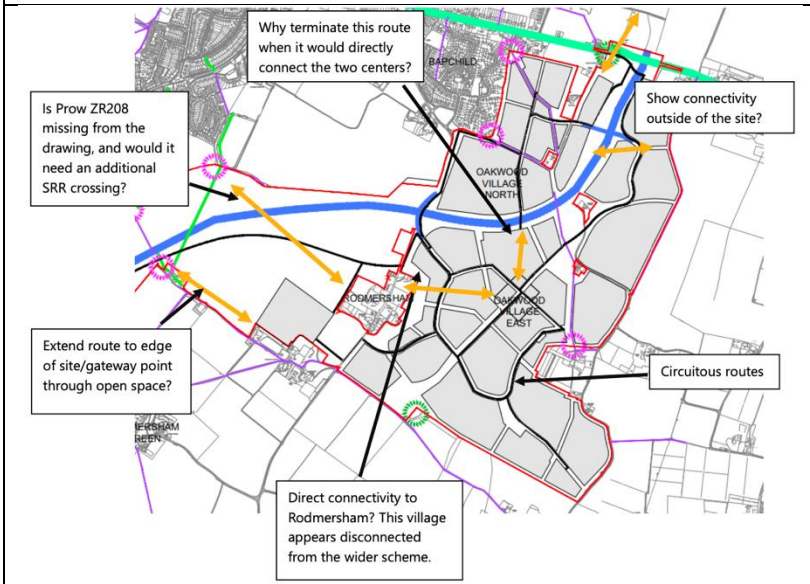
Could these elements be integrated more effectively into the development and this area used to preserve agricultural/landscape setting to the village?

We also question why a potential direct link between the Oakwood centres has been terminated after the SRR crossing (image below).

Aim was to associate the sports provision with the new country park

Sports Hub Facilities are too large to easily integrate into development areas and better placed in a centralised location, accessible from external town and vilalges.

Plan amended.




Higher densities and build heights will be primarily focussed on the central zones, around the new local centre and SRR, with densities graduating outward so that lower densities and heights are positioned at the edges to help transition to the countryside. This is a reasonable approach in principle that will allow multiple design responses to the different site characteristics.

However, it is unclear how the development blocks have been informed by the undulating land levels as heights and densities appear broadly applied with little gradation. It is thus likely that elements of development parcels would be visually prominent in wider views.

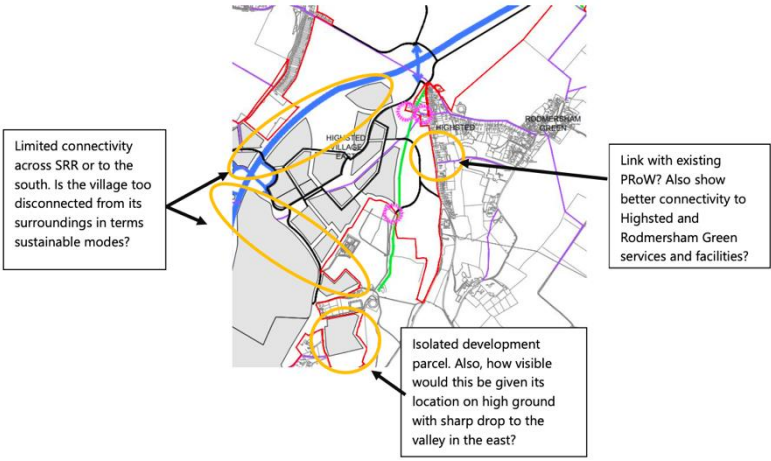
Commentary noted



Density and height plans reviewed and revised

<p>Further, the rationale for lower heights at the edges are not consistently applied. For instance, the southern edge includes higher densities and heights next to the countryside where a smoother transition may be more appropriate. Also, there are a series of potentially awkward relationships with neighbouring buildings outside of the site boundary that need further consideration (shown on plan below).</p>	<p>Density and height plans reviewed and revised</p>
 <p>What is the anticipated character of the SRR corridor and how to the density and heights proposed contribute to these?</p> <p>Relationship between density and height and existing properties not explained. Both appears high in quite close proximity – should the densities and heights be more nuanced to reflect these relationships?</p> <p>Abrupt increase in height and density close to Rodmersham where a more refined transition would prove more appropriate to preserve setting of village and heritage assets?</p> <p>Why the higher density and heights on the southern boundary when transition to countryside may be more appropriate?</p> <p>Plot O.R09 (Development Structuring Plan Oakwood) adjoins large farm buildings and is sandwiched between these and road and sheds causing poor relationship to both.</p>	
<p>Oakwood Village North</p>	
<p>Bapchild is enclosed on its eastern and southern sides by Panteny Lane which forms a clear edge to the main part of the village and the farmland beyond contributes positively to its agricultural setting. The significant scale and extent of development proposed to the south and east of Bapchild would be disproportionate to the size of the village, particularly the limited amount of development that currently exists on the east and south of Panteny Lane. It divorces Bapchild from its agricultural setting and, taken with Oakwood South, would result in continuous urban development along the A2 towards Teynham and southwards to Rodmersham.</p> <p>This cannot be considered a sympathetic or appropriate response given the resulting visual and perceived coalescence between Bapchild, Teynham and Rodmersham and a loss of agricultural setting to these villages.</p> <p>The scale of development proposed would therefore be disproportionate and out of context to the size and landscape setting of existing settlements and thus fail to reinforce local distinctiveness or sense of place.</p>	<p>View was to expand Bapchild. Design Review encouraged this – previously proposals showed greater separation.</p> <p>Noted</p> <p>Existing Environment will fundamentally change with proposals, merits and demerits considered in the round</p>
<p>Development parcels would be arranged around several community, commercial and educational uses. These new uses are close to pedestrian and cycle routes, points of access from Bapchild and within reasonable distance to new bus routes, which ensure that they could serve both existing and proposed new communities.</p> <p>Although the development parcels are separated from Bapchild beyond planted buffer we think there is potential for some integration with the existing village at these points, although detailed connections with Bapchild is currently not clear.</p>	<p>Noted</p> <p>Connectivity possible along Panteny Lane, at Randle way and School Lane. Otherwise Panteny Lane is a closed barrier to Bapchild</p>
<p>Density is sequenced so that higher and medium densities are arranged around the local centre and SRR with lower densities and along the interface with Bapchild. It is noted that those densities are not defined at this stage. Heights are lowest (up to 10m) along the northern edge stepping up to 12m for residential parcels across the remainder of the site and 15m for the mixed-use local centre.</p> <p>Variations in density and height is a reasonable approach and can respond to the different characteristics within the site and to suit the</p>	<p>Noted</p> <p>Lower heights and densities are proposed adjacent o existing urban</p>

<p>context and surroundings. However, it is unclear from the submission how the densities and heights were informed by the context, particularly Bapchild.</p> <p>It should be demonstrated that the character study has informed the distribution of density and height across the site. Similarly, the density and height along the southern edge should be informed by the anticipated character of the SRR and movement corridor, however these have not been defined so the outcome along this edge is uncertain.</p>	<p>areas, to interrelate to prevailing scale</p>
<p>Science Park/commercial uses</p>	
<p>It is proposed that commercial uses would be consolidated to the south and west of the existing science park close to the proposed new junction with the M2 and SRR. The close proximity to the existing science park, motorway and new proposed junction would ensure commercial uses would benefit from good vehicular connectivity to the wider strategic road network and commercial advantages associated with business clustering. Also, the positioning of commercial uses, which are less sensitive to noise close to busy roads is sensible, particularly in this case where commercial units would help act as a barrier to noise and disturbance to residential uses located further north.</p>	<p>Commentary. Noted</p>
<p>However, positioning commercial units towards the southern edge of the site on some of the highest ground levels of the site would mean visibility and impact on the setting of the Kent Downs National Landscape, notwithstanding a proposed reduction in heights towards this more sensitive edge, new bund earthworks and planted screening.</p> <p>Indeed, commercial units with significant heights (up to 13.25-16.5m above existing ground levels) and footprints would, together with creation of a new junction to the M2 motorway and relief road, introduce considerable new built infrastructure and development within the boundary and immediate setting of the Kent Downs National Landscape.</p> <p>This would change landscape character in this area, and the experience of users of that landscape, that is unlikely to be fully mitigated against.</p>	<p>All justified in C+W Reports and LVIA</p>
<p>In addition, the commercial development parcels would not benefit from good cycling and pedestrian connectivity. It would be good practice to ensure that walking and cycling routes are incorporated into the commercial areas, not simply at the edges, to facilitate commuting by sustainable modes and enable workers in the area to be active on their breaks to promote healthy and active lifestyles for all users.</p>	<p>KSP is a Secure Environment – cross site links will not be easily possible. Currently, no Public Access to the site is allowed, Could be reviewed in the future</p>
<p>Another sensitive edge that needs considering is the position of commercial units to the south of Bex Wood ancient woodland. It is noted that the commercial units will be set back the minimum 15m buffer to the ancient woodland but given the southerly orientation of these units and significant heights (13.25m above existing ground levels) and footprints you may need to check with the Tree Officer whether a larger buffer would be appropriate to provide additional protection, reduce indirect impacts and provide space for natural regeneration.</p>	<p>Noted</p>
<p>There are clearly benefits and disbenefits in locating the commercial users at this location and scale. As planning decision maker, you will need to weigh these in the balancing process.</p>	
<p>Highsted North</p>	

<p>Residential development is proposed to the east of Highsted Road, immediately north of a disused quarry (a former chalk pit and locally significant wildlife habitat). This part of the site is orchard which is a landscape characteristic of the historic pattern and use of land within this part of the Kent countryside.</p> <p>Indeed, orchards are shown at this site on historic maps of the early 20th century and in aerial photos from 1946. As such, its undeveloped nature and orchard use provide a landscape setting to this part of Sittingbourne that contributes to local distinctiveness.</p> <p>The site also forms part of the Important Local Countryside Gap within the Local Plan which seeks to retain and protect the individual character and setting of settlements and prevent coalescence between Sittingbourne and its satellite villages.</p> <p>The site also borders Highsted Quarries Local Wildlife Site to the south and is an area of high landscape value.</p>	<p>Consented Gladman Scheme now shown on plans – this reduces Countryside Gap.</p> <p>Successive developments have reduced the presence / impact of orchards, including Eden Park adjacent to Highsted Road</p>
<p>Whilst developing this area for housing would read as an urban extension to Sittingbourne with connectivity with Highsted Road, it would effectively transform the site into a housing estate contrary to the nature and overall character of the site.</p> <p>Development here would be at odds with the rural character of the site, diminishing its countryside setting and infilling part of the Important Countryside Green Gap.</p> <p>This change in character would be perceptible from both Highsted Road and PROWs. Additionally, it has not been explained why the densities and heights shown for this development parcel are appropriate on the edge closest to the wildlife site – should these not step down along this sensitive edge?</p>	<p>Consented Gladman scheme changes this.</p> <p>Design Review encouraged an expansion to the edge of Sittingbourne</p>
<p>Highsted Village East</p>	
<p>Highsted Village East constitutes a residential area with district centre located north of the science park and west of Highsted Valley Road. The site includes Highsted Wood and lies close to Bex Wood and Cromer Wood – all ancient woodlands.</p> <p>Part of the site also forms part of the important countryside gap which, as set out above, seeks to retain and protect the individual character and setting of settlements and prevent coalescence between Sittingbourne and its satellite villages. The northern section is also an area of high landscape value. Highsted and Rodmersham Green are located further east.</p>	<p>Commentary. Noted</p>
<p>This part of the site is recognisably part of the open countryside that lies beyond the defined settlement. It is therefore inevitable that a scheme of this significant scale, would give rise to an erosion of the important countryside green gap and result in a loss of the special qualities that make up the area of high landscape value as it results in sizable development where there was previously none.</p>	<p>Countryside Gap and prevailing Landscape Character assessed under LVIA. Impact evaluated and influenced proposed build form and new urban areas</p>
<p>It also forms an important part of the countryside setting of Highsted and Rodmersham Green and would position significant levels of urbanised development closer to these settlements, notwithstanding the open space and woodland proposed along the eastern edge.</p> <p>The proposed development would therefore have an urbanising effect that would be markedly at odds with the site as it is at present and with the rural character of the wider area. It would also compromise the rural setting that currently exists between Sittingbourne and the villages of Highsted and Rodmersham Green, leading to a degree of coalescence that conflicts with LP policies.</p>	<p>Urbanisation is part of the proposal through the provision of the new village areas.</p>

<p>It would also undermine the character of rural lanes within the vicinity given the increased car journeys expected and the alignment of relief road here would result in a partial loss of ancient woodland (Highsted Wood).</p>	<p>Rural Lanes are retained throughout the development area</p>
<p>Regarding proposed layout, most development parcels are grouped and clustered appropriately around the new district centre, which is located so that it can also serve commercial uses, and educational uses.</p> <p>The exception to this is Plot H.R38 (Development Structuring Plan - Highsted) which is unacceptably fragmented and isolated from Highsted Village East.</p>	<p>Commentary</p> <p>This Parcel is for Self-Build and envisaged as a Stand-alone development area.</p>
<p>For the most part the proposed densities and heights appear a reasonable response to the site and surrounds, although not evidenced in the D&A.</p> <p>It is noted, however, that housing in higher densities is proposed close to Highsted Wood ancient woodland. These dwellings would be set back the minimum 15m buffer, however given the proximity and density of housing here it is likely that the woodland will experience additional recreational pressures unless managed appropriately.</p> <p>It may be a larger buffer would be suitable to provide additional protection, reduce recreational impacts and provide space for natural regeneration however you are advised to liaise with KCC Ecology and the Councils Tree Officer on this point.</p>	<p>Noted</p> <p>Proposals have been reviewed and amended- reducing height and density</p> <p>Approach to buffer and context agreed with Ecologist and Arboriculturalist</p>
<p>Pedestrian and cycle connectivity within the village appears to be good however links outside of the village appear limited.</p> <p>The SRR acts as a barrier to the west with limited crossings. Similarly, there is limited connectivity to the commercial units in the south.</p> <p>There is opportunity to better connect with Highsted and Rodmersham Green which has a range of community facilities and services although links to these are not shown and providing extensions to existing footpaths have not been capitalised upon. Can walking and cycling be improved to areas outside of the village?</p>	<p>Noted</p> <p>A principal connection is envisage in the form of a Green Bridge. KSP is secure environment and not accessible to public</p> <p>This area has steep slopes. Large area of new woodland envisaged. Existing Prow's and Restricted Byway provide routes to the existing communities, where possible</p>
	
<p>Highsted Village West</p>	
<p>The Highsted West area forms the westernmost neighbourhood area into the development with access from the new SRR. Part of the site lies within the area of high landscape value and its special qualities that contribute to the landscape will be significantly eroded by the scale and extent of the proposal.</p>	<p>Commentary. Noted</p>

<p>The development would also result in coalescence between the new village and existing development at Dove's Croft on Bredgar Road and reduce the undeveloped landscaped setting to Tunstall.</p> <p>There is very limited information on the relationship between the new development and houses outside the development site, for example on Ruins Barn Lane, which is a concern given the heights and densities proposed along the boundaries with those properties.</p>	<p>Proximity to existing Doves Croft reviewed and gap to dwellings increased</p> <p>Reviewed heights and density. Plans amended accordingly</p>
<p>In terms of layout, the new village would comprise a number of development parcels situated around a district centre and focussed on a new village green. The arrangement and disposition of density and building height are graduated across the site with highest concentrations around the district centre and primary routes which may be appropriate.</p> <p>However, it is unclear how the development blocks have been informed by the undulating land levels, some of it steeply sloping in this area, as heights and densities are broadly applied. As such it is likely that the development as set out would be visible within the landscape.</p>	<p>Noted</p> <p>Assessed under the LVIA</p>
<p>Also, higher heights and density has been extended away from the centre and primary roads across other development parcels. For instance, towards Ruin Barns Road where plots H.R25 & H.R31 (Development Structuring Plan Highsted) are spatially separated from the centre and primary roads, framed by amenity space, and abuts existing development of a smaller scale.</p> <p>This is not only inconsistent but would completely change the rural lane character of Ruins Barn Road. The approach outlined is therefore not wholly responsive to existing or proposed site context and should be reconsidered.</p>	<p>Heights and density reviewed and re-assessed and plans modified, and relationship to rural lane improved</p> <p>Context and character reviewed. Rural Lane will be re-inforced</p>
	
	
<p>Furthermore, there is no real drop in building heights to the sensitive southern edge despite the rising land levels. As with the commercial units, this area forms part of the setting to the national landscape and forms areas of higher ground, so you will need to consider the relationship of this height and position of flood lights serving the sports pitches to the national landscape.</p>	<p>Heights reviewed and adjusted to introduce more gradation, particularly at edges and interfaces</p>

<p>As with the other parts of the site, the village will border the SRR however its character at this point has not been adequately articulated. It is therefore unclear how the density and heights would relate to this edge.</p>	<p>Heights reviewed and adjusted to introduce more gradation, particularly at edges and interfaces</p>
<p>In terms of permeability and connectivity for pedestrians and cyclists, we think there is good links through the village and the potential for connections westwards towards Sittingbourne.</p> <p>Unfortunately, there are errors on the pedestrian and cycling Framework Plans which show PRow's that do not exist and misalignment of another.</p> <p>Also, there are additional opportunities for connectivity by making improved connections with existing PRow's and showing the connectivity beyond the site particularly to the south (across the M2) and westwards.</p>	<p>Noted</p> <p>Plans reviewed and anomalies corrected</p> <p>Plans revised to show improved connectivity</p>
<p>Appearance</p>	
<p>This is a matter to be reserved, however given the scale of development it is anticipated a range of character areas building upon the D&A framework would give substance to built form and character.</p> <p>Although the D&A framework concentrates on village areas and landscape, a key missing element is the approach to the SRR movement corridor. It would be beneficial to understand this area in more depth this stage and its relationship to the submitted parameter and framework plans.</p>	<p>Noted</p> <p>MW reports outline approach to character and open space principles</p>
<p>Landscaping</p>	
<p>The landscaping proposes a series of formal and informal open spaces across the site. Broadly, it would comprise a large area of public open space which follows the route of the SRR (Highsted Country Park), landscape buffers and planting around existing settlements and development, and on the boundaries of the site. Areas of sports pitches, community gardens and play areas are shown within or close to the proposed villages together with amenity, natural and semi natural green spaces.</p>	<p>Commentary. Noted</p>
<p>A principle of the scheme is to retain existing landscape structure and those elements lost to be replaced by new planting. Despite this, the proposal would result in quite significant loss of woodland, some of it ancient, tree lines and hedgerow.</p> <p>It is regrettable that more of these key landscape features were not retained and incorporated into the new landscape structure. This loss should be considered by the Councils Tree Officer and in the context of the planning balance.</p>	<p>Dispute "significant loss".</p> <p>Plan to be produced to denote loss of vegetation</p>
<p>Many of the major landscape areas are shown at the edges of the development.</p> <p>We think there is an opportunity to integrate open-space more effectively into the built development, although acknowledge that the larger landscaping elements can help transition the scheme to its wider rural setting and can potentially help to augment and reinforce habitats outside of the site, although there is very limited information on this.</p> <p>We also think there is an opportunity to increase connectivity between Highsted wood, Cromer Wood, and the woodland east of the Kent science park. This could inform and define character and setting for Highsted Village East and help mitigate loss of woodland and fragmentation caused by the SRR.</p>	<p>Landscape and open space will feature in the Parcels. Work into Design Codes etc</p> <p>Input from Ecologist's Aspect was provided and resulted in links across existing green spaces and habitat areas</p>

We welcome the open space interfaces between development parcels as this can help support biodiversity, soften development, and reinforce character. Similarly, blue infrastructure including SuDS would be integrated into the streets and network of open spaces. The neighbourhoods themselves will include street trees, provided the suggestions above are actioned, and front and rear gardens ensuring the proposal includes a balance between public and private open spaces to soften built form, reinforce character and increase biodiversity which is acceptable.

Noted

One of the key landscaping issues is how to repair the severance caused by the SRR. This infrastructure bisects and fragments a range of open spaces and habitats with only limited pedestrian and wildlife crossings.

MW / Aspect to respond

Also, noise and disturbance caused by the road may compromise its rural and tranquil character. Although there is a good level of detail regarding the country park submitted it has not been demonstrated that the connectivity is there for people and wildlife to make this a genuinely connected and integrated place.

Should Officers be minded to approve, an Open Space Strategy by condition could build upon the principles outlined, and provide a strategic approach for the provision, development, maintenance, and management of open space within the scheme. The reserved matters and future landscaping conditions will be expected to comply with this strategy ensuring that the quality of landscaping is embedded at an early stage and delivered throughout the various phases.

The following are observations and suggestions for the village areas:



These plans are not submission versions. They appeared in earlier version of DAS, and subsequently superseded by later resubmissions

