



**Land North of Moat
Road, Headcorn**

Proof of Evidence of:
Charles Mylchreest
PG DipLA CMLI

In respect of:
LANDSCAPE MATTERS

On behalf of:
Catesby Strategic Land

PINS Ref
APP/U2235/W/24/3351435

LPA Ref
23/504471/OUT

Volume II
SUMMARY

January 2025
Report Reference
edp5739_r006

Contents

Section 1	Witness Qualifications and Experience	4
Section 2	Summary of Proof of Evidence.....	5

Section 1

Witness Qualifications and Experience

- 1.1 My name is Charles Mylchreest. In my role as a Director of EDP, I provide advice as a Chartered landscape architect and environmental planner. My current project portfolio spans major urban extensions throughout the UK, urban regeneration, masterplanning, renewable energy development, strategic site assessment and some work for Local Authority clients.
- 1.2 My qualifications include a BA (Hons) Degree in Landscape Architecture from the University of Gloucestershire and a Postgraduate Diploma in the same subject. I have been a fully Chartered Member of the Landscape Institute (LI) since 2006.
- 1.3 I possess more than 20 years' experience in professional practice; first as a landscape consultant for Halcrow, and subsequently (from 2005–2011) as a project landscape architect at Derek Lovejoy Partnership in Birmingham. I joined EDP in March 2011, where my role progressed to 'Discipline Lead' for the landscape team (all offices) and my appointment as a Director in 2018. Despite handing over the Discipline Lead role in 2021, I maintain an active involvement in landscape assessment, primarily for larger and more complex schemes.
- 1.4 My portfolio of project involvement includes the management and authoring of numerous landscape and visual assessments and capacity studies, with my primary focus since 2005 being energy and residential projects, including large and small onshore wind farms and single turbines, grid connections and solar developments, and residential and mixed-use developments ranging in scale from single properties up to developments of 7,000 units.
- 1.5 I have provided expert witness inputs on a range of projects, including at Public Inquiry, Informal Hearing and as part of written representation appeals. This includes residential developments of between 30 and 370 units. The methodology and approach I use in this Proof of Evidence has been tested and accepted at numerous public inquiries by Inspectors and Local Planning Authorities.
- 1.6 EDP is a corporate member of IEMA, and a Registered Practice of the LI, and represents private and public sector clients with land and development interests throughout the UK. Since its formation in 2005, my colleagues and I have been involved in over 1,500 projects across the UK, including many mixed-use urban extensions.
- 1.7 The evidence that I have prepared and provide for this inquiry is true and has been prepared and is given in accordance with the guidance of my Professional Institute. I confirm the opinions expressed are my true and professional opinions.

Section 2

Summary of Proof of Evidence

- 2.1 My name is Charles Mylchreest. I have been instructed by the appellant, The Master Fellows and Scholars of the College of Saint John the Evangelist in the University of Cambridge and Catesby Strategic Land Ltd, to provide advice, evidence, and expert opinion with regard to the effects, in landscape and visual terms, of the appeal proposals at Moat Road, Headcorn. Specifically, my evidence explores the landscape matters embedded in RfR 1 and is structured around the main issues that I have derived from a review of third-party representations, the contents of the OCR, the various Proofs of Evidence and my own site appraisals.
- 2.2 I have visited the appeal site and local area on several occasions, both during the summer and winter months, and have therefore been able to reliably consider the location and context of the appeal site and the potential effects that might arise. I have also been involved in the evolution of the proposals from their inception and have been directly involved in consultation with the Local Authority as part of the Local Plan Review process. I also authored the LVIA.

SITE CONTEXT AND CHARACTER

- 2.3 The site is directly adjacent to the existing settlement of Headcorn on two sides (north and east) and is visually and perceptually influenced by this. The modern development to the north at Catkins Gardens provides a useful marker for how modern development would appear in this general location and shows that development can be integrated in this general context without unacceptable landscape and visual impacts. That site was not allocated and is also within the Low Weald LLV (as is the rest of Headcorn).
- 2.4 I am therefore not surprised that the Council chose to allocate the appeal site as part of the Local Plan Review – in a landscape and visual sense it provides a logical and spatially appropriate site for further expansion of the village.
- 2.5 The site is elevated above the surrounding area as my Proof Plans show. However, I strongly disagree with the Council who consider the site to be ‘visually prominent’. My evidence shows that were the site prominent, it would be much more widely visible from receptors in the surrounding area. As it is, the site – and as the photomontages show the developed site – appears as a gently elevated spur extending from the western settlement edge. In physical terms, being only c.15m above the lower lying landscape to the south, I simply don’t see how the appeal site can be considered visually prominent.
- 2.6 In the Inspector’s Final Report (**CD8.1** paragraph 293), the allocation of the appeal site was addressed in this regard as follows, which I consider provides an effective summary of the site and context:

“293. Land at Moat Road to the west of the village is allocated for approximately 110 dwellings at Policy LPRSA310. In spatial terms, the site is well-located, being within walking and cycling distances to the village services and facilities. Whilst the site occupies gently

rising land from the wider valley floor of the River Beult and its tributaries, development would occur against a backdrop of existing housing on higher land. Various requirements in the policy would be effective in seeking necessary landscaping and design responses to the local character.”

PLANNING POLICY

- 2.7 The key policy implication is that the site is allocated for residential development of ‘approximately 110 units’ in the MBLPR. This is critical for my evidence as it infers that a level of change and harm upon the appeal site and local area must be acceptable.
- 2.8 There are no policy restrictions affecting the appeal site other than its location within the Low Weald LLV. Indeed, the site being a residential allocation within the MBLPR indicates to me that there is no in principle constraint (in landscape policy terms) to development of the site – in fact quite the opposite is true; there is specific policy support for development, and importantly, development of precisely the size and scale proposed. There must therefore also be support for an elevated level of landscape and visual impact. The site is now fully within the settlement boundary on the Proposals Map.
- 2.9 I do accept, however, that the allocation requires a range of criteria to be fulfilled for development to be considered ‘acceptable’, with a number of these relating to landscape and visual and design matters. It is therefore not just about the level of change brought about by the proposals, but the way in which they are designed and delivered, that is relevant.
- 2.10 On this basis my evidence necessarily focusses on the extent to which the appeal proposals comply with the criteria under Policy LPRSA310 Land at Moat Road, rather than considering in detail compliance with other landscape- and design-related policies. In doing so I have still considered the extent of landscape and visual harm and the way in which the proposals respect the underlying landscape character.

LANDSCAPE HARM AND POLICY COMPLIANCE

- 2.11 The proposals will result in some harm to the underlying landscape of the site, to the wider area, and to the visual amenity of visual receptors using local PRoW, roads and neighbouring residences. I consider that such a level of harm would have been reasonably expected as a result of the site’s allocation, and I don’t consider there to be any elevated harm which would not result from a scheme of, for example, 100 or 110 units. For a development of this kind of scale, there will inevitably be a fundamental loss of the fieldscape, and a change which permeates beyond the site boundaries.
- 2.12 In a visual sense I consider the change to be relatively contained for a development of this scale. This reflects the retention of the boundary vegetation on the western and southern boundaries and also the internal vegetation, and the enhancement of this as part of the Landscape Strategy. Existing settlement to the north and east restricts visibility and provides a developed context in views. The allocation of the site is unsurprising in this context and appears entirely logical to me.

- 2.13 Having explored all of the relevant factors in my evidence relating to landscape and visual harm I am reassured that the proposals – despite comprising indicatively more units than the approximate number given by the allocation – meet the relevant landscape criteria of LPRSA310 in full. Only two criteria were supposedly in conflict, and I have reviewed these in detail in the previous section. I believe the proposals have achieved through their design and evolution, a scheme which is clearly informed by its context and sensitivities, and has evidently been landscape-led from the outset – as far back as the Local Plan Review in 2019.
- 2.14 Similarly, I consider that the proposals – insofar as they can for an allocated site where fundamental change must be accepted in principle – protect and enhance the natural environment through meeting the aspirations of the LCA and by achieving a high quality of design which respects areas of landscape, ecological and heritage sensitivity.
- 2.15 I therefore consider the appeal proposals meet the relevant criteria of Policy LPRSP14(A) sub part 1b and Policy LPRSP15 sub parts 2, 6 and 7, and also NPPF paragraph 187(a).

CONCLUSIONS

- 2.16 This is an outline application for up to 115 homes, with all matters reserved save for access. There are, therefore, two matters for determination: (i) the principle of development for up to 115 homes; and (ii) the detail of the access. The site is allocated. The principle of residential development of the site is acceptable for approximately 110 homes and is supported in the Plan period. There has been no objection to access being taken from Moat Road – indeed there is no other practical option.
- 2.17 The Council's RFR does not acknowledge, transparently or at all, that this is an allocated site, on which the principle of development is not only acceptable but also promoted in the Plan period. The inevitable impacts of such a residential development on the site and immediate locality cannot rationally justify the refusal of the scheme in landscape and visual terms, as this would frustrate the allocation of the site. RfR1, and the contentions therein, therefore, need to be considered in the context of the site being allocated and the principle of residential development being supported.
- 2.18 I contend that the proposals also comply with the allocation criteria in full, and do not seek to 'over develop' the site in landscape terms. Therefore, I find the levels of impact upon the underlying landscape resource – whether at the site level or as experienced more widely – are within acceptable levels for a site of this size, in this location, and do not go beyond what would have been reasonably anticipated by the allocation of the site.
- 2.19 I therefore consider there to be no landscape and visual reasons that would justify the refusal of the scheme.



CARDIFF
02921 671900

CHELtenham
01242 903110

CIRENCESTER
01285 740427

info@edp-uk.co.uk
www.edp-uk.co.uk

The Environmental Dimension Partnership Ltd. Registered as a Limited Company in England and Wales. Company No. 09102431. Registered Office: Quarry Barn, Elkstone Studios, Elkstone, Gloucestershire GL53 9PQ



**URBAN
DESIGN
GROUP** REGISTERED PRACTICE



**Landscape
Institute**
Registered practice