

TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED) - SECTION 78 APPEAL BY HALLAM LAND MANAGEMENT LIMITED

Land North and South of Kenward Road, Yalding, Kent, ME18 6JP

Proof of Evidence of Stephen Kirkpatrick (BSc BLD CMLI) on Landscape and Visual Matters

> on behalf of Maidstone Borough Council

LPA REFERENCE: 23/505139/OUT PINS REFERENCE: APP/U2235/W/24/3344070

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1.0 INTRODUCTION

1.1 Qualifications and Experience

- 1.1.1 My name is Stephen Kirkpatrick and I provide evidence on landscape and visual matters for Maidstone Borough Council ("the Council"). I hold a Bachelor of Science degree (Biological Sciences) from Dundee University and a Bachelor of Landscape Design degree from Manchester University. I am a landscape architect, a Chartered Member of the Landscape Institute and a Director of Scarp Landscape Architecture Ltd, which is a landscape architectural and environmental planning consultancy based in Henley-on-Thames, South Oxfordshire.
- 1.1.2 My professional experience as a landscape architect spans more than 30 years and includes both the private and public sectors. My experience covers a broad range of project and development types but my main specialisations are in the fields of environmental planning, landscape assessment and landscape and visual impact assessment. I have undertaken numerous consultancy studies concerned with the balance between development and landscape conservation, including landscape sensitivity and capacity studies undertaken on behalf of local planning authorities to inform emerging development plans. I have presented landscape and visual evidence at numerous public inquiries that have considered wind farm, residential, commercial and mixed use development proposals in sensitive rural landscapes.
- 1.1.3 I confirm that the evidence that I have prepared and provide for this appeal ("the Appeal", reference APP/U2235/W/24/3344070) has been prepared and is given in accordance with the guidance of my professional institution. I also confirm that the opinions expressed are my true and professional opinions.

1.2 Background to the Planning Inquiry

Maidstone Borough Council Local Plan Review

1.2.1 Policy LPRSP7(D) of the Maidstone Borough Council Local Plan Review identifies the Appeal Site as an allocation for 'approximately 100 new dwellings' ("the Allocation"). The Allocation is set out in detail in Policy LPRSA248. Paragraph 1 of the Allocation states:

"Land at Kenward Road as identified on the Policies Map, is allocated for the development of approximately 100 dwellings at an average density of approximately 30 dwellings per hectare, together with associated open space and infrastructure on land south of Kenward Road. The following conditions are considered appropriate to be met before development is permitted."

- 1.2.2 Paragraphs 2 7 of the Allocation concern design and layout. Paragraphs 2 5 are of particular relevance to the Appeal:
 - "2. The development shall provide approximately 100 dwellings, only to be provided on land north of Kenward Road at an average density of approximately 30 dph.
 - 3. The land south of Kenward Road shall be laid out as a new community open space, and BNG area, together with SuDS measures to mitigate the residential element, plus pedestrian crossing / access measures.
 - 4. The development shall be subject to a single masterplan which demonstrates phasing and delivery of both built development and open spaces.
 - 5. The layout and form of the housing element shall be informed by an LVIA and incorporate both boundary and internal structural landscaping that responds to the site's topography."
- 1.2.3 Paragraphs 8 15 of the Allocation concern landscape and ecology. Paragraph 15 is of particular relevance to the Appeal:
 - "The development proposals shall be designed to take into account the results of a landscape and visual impact assessment undertaken in accordance with the principles of guidance in place at the time of the submission of an application."
- 1.2.4 **Plate 1** below illustrates how the Local Plan Review Policies Map sub-divides the Allocation Site into two parts, assigning Site A for housing with supporting infrastructure and Site B for open space and drainage. **Plate 1** also illustrates the approximate extent of a local landscape designation: the Greensand Ridge Landscape of Local Value (LLV) (brown cross hatch), the Yalding Conservation Area (solid brown line) and the settlement boundary for Yalding (solid black line), which follows the northern, western and southern boundaries of the Appeal Site.

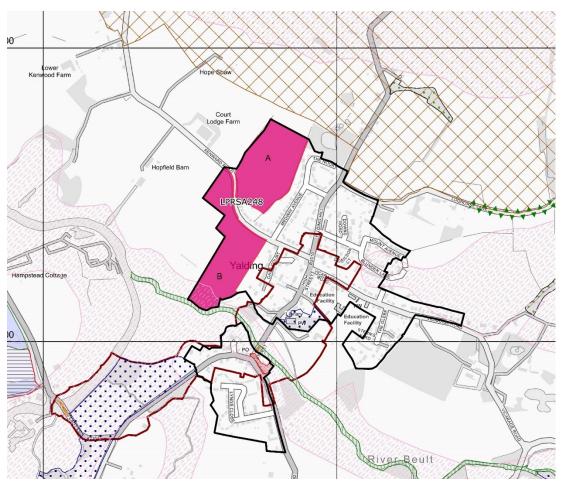


Plate 1: Extract from the Maidstone Borough Council Local Plan Review Policies Map (Map 26)

The Council's approach to the Allocation

1.2.5 The Council highlights the following important matters of approach to the Allocation in its Statement of Case [CD10.2]:

"The Allocation establishes that the Appeal Site – and specifically Site A – is an appropriate location for residential development." (Paragraph 34.1)

"The Allocation permits residential development 'of approximately 100 dwellings at an average density of approximately 30 dwellings per hectare' on Site A. Notably, this is reiterated both in paragraph 1 (as a description of the allocated development) and paragraph 2 (as a condition of granting planning permission). A proposal which is not for 'approximately 100 dwellings' is not in accordance with the Allocation." (Paragraph 34.2)

"Paragraphs 2-27 of the Allocation specify 'conditions' which are 'to be met before the development is permitted'. These conditions must be satisfied (bearing in mind the that the

Application is for outline planning permission) before planning permission can be granted. A failure to satisfy these conditions will cause a proposal to be in conflict with the Allocation, even if it is for 'approximately 100 dwellings'." (Paragraph 34.3)

"During the plan-making process the Council did not undertake landscape sensitivity testing or detailed capacity testing by reference to landscape and visual effects. Instead, the detailed assessment of quantum was left for the application stage – i.e. now – within the parameters set by the Allocation. The conditions within the Allocation support this approach: see, in particular, paragraphs 5 and 15 of the Allocation." (Paragraph 34.4)

"It follows that it is through the application process that the acceptable quantum of development must be established within the parameters of the Allocation, in particular the parameter of 'approximately 100 dwellings at an average density of approximately 30 dwellings per hectare'. The fact that the parameter is 'approximately 100 dwellings' means that an acceptable quantum may be above or below 100 dwellings (whilst always remaining approximate to that number)." (Paragraph 34.5)

"It further follows that whilst the Allocation anticipates a change in the character of the Appeal Site this is only to the extent necessary to accommodate 'approximately 100 dwellings' (bearing in mind that the precise number may be above or below 100 dwellings); and whilst ensuring that a landscape led approach is adopted so that the adverse impacts of any development on the character and appearance of the area are minimised and mitigated so far as possible and the beneficial impacts on the character and appearance of the area are maximised. This is particularly important given the sensitive edge of settlement location of the Appeal Site; as well as the broader strategic imperatives to balance growth with the protection of the environment." (Paragraph 34.6)

The Outline Planning Application

- 1.2.6 The Appellant submitted an outline planning application (Ref: 23/505139/OUT) ("the Application") to the Council in November 2023 for the development of up to 112 dwellings, informal/recreational open space, sustainable urban drainage and associated works on the western side of Yalding ("the Appeal Site"). The appeal ("the Appeal") was submitted by Hallam Land Management Ltd. ("the Appellant") against the non-determination of its application for planning permission ("the Application").
- 1.2.7 The Council's Statement of Case (Paragraph 11, CD9.2) states that that had the Council determined the Application, it would have refused to grant planning permission for five reasons. Landscape and visual issues form part of the first reason for refusal (RfR1), which states:

- "1. The built coverage of the proposal by reason of the quantum of development, its layout and form, and together with the introduction of significant areas of hard landscaping and roads will have a dominant and urbanising effect which is inappropriate in this edge of settlement location with the adjoining residential development being of a significantly lower density and built coverage. The development will therefore be harmful to and fail to respond positively to the rural setting of Yalding and the prevailing pattern of development, and therefore harmful to the setting of the Greensand Ridge Landscape of Local Value contrary to policies LPRSP15 and LPRSA248 of the Maidstone Borough Local Plan Review (2024), and NPPF paragraphs 135 and 180."
- 1.2.8 For the reasons set out in this evidence, I agree with the assertion of harm to the rural setting of Yalding, the prevailing pattern of development and the setting of the Greensand Ridge LLV.

1.3 My Appointment

1.3.1 I was approached by the Council in June 2024 to enquire about whether or not I could provide evidence for this Appeal. I undertook a preliminary review of the RfR1 and the landscape documents submitted as part of the Application and concluded that I could support the Council's case at this Appeal. I was subsequently commissioned by the Council to prepare and present this proof of evidence.

3.0 APPEAL SITE LANDSCAPE CONTEXT

Village location and surrounds

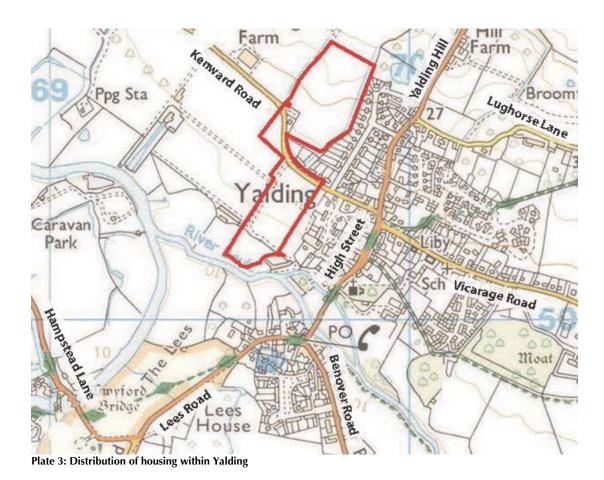
3.1.1 The Appeal Site lies within the countryside on the western edge of Yalding. The village straddles the River Beult and is situated close to its confluence with the River Medway. The northern part of the village occupies the southern sideslopes of the Beult Valley and is located at the foot of the Greensand Ridge scarp. This landform feature is locally prominent and forms the backcloth to the settlement in views towards from the southeast, south and southwest. The southern part of the village partly occupies an area of low-lying land that is dissected by the two rivers. A canal bypasses a shallow meandering section of the River Medway. The canal and river are a focus for tourist and recreational use, including a marina, the Teapot Island Exhibition Centre, waterside cafes/restaurants and the Little Venice Country Park, which includes fixed caravans, a camping area and mooring. The Lees, an area of floodplain meadow and open access land, lies between the Beult and the Medway. A section of the Medway Valley Walk (long distance recreational route) extends south from the village centre and crosses The Lees before running parallel to the canal. Farmsteads are scattered across the agricultural landscape surrounding the village. Orchards and fruit growing (typically in polytunnels or glasshouses) are some of the main land uses (Plate 2).



Plate 2: Polytunnels and glasshouses on the western side of Yalding

Characteristics of existing built form

3.1.2 North of the River Beult, the village is separated into four quadrants by High Street, Kenward Road, Yalding Hill and Vicarage Road (**Plate 3**). The north-south orientated High Street connects the two parts of the village, heading north over Yalding Bridge and passing the Grade I listed St Peter's and St Paul's Church before climbing up to meet Yalding Hill.



- 3.1.3 The relatively old central and western parts of the village are designated as a Conservation Area and contain an attractive mix of building sizes, ages, styles and materials. Other parts of the village are typically modern in origin and have greater uniformity of sizes, styles and materials.
- 3.1.4 South of Kenward Road and Vicarage Road, buildings are typically low-density, including those on both sides of High Street and at Oast Court on the southern side of Kenward Road. Oast Court predominantly comprises detached housing but includes a terrace associated with the converted Hopgarden Oast. The westernmost of the Oast Court properties have deep rear gardens and abut an agricultural field that forms part of the Appeal Site. I calculate that Oast Court has an average new density of 10.44 dph. A higher density cluster of housing (The Glebe)

is located on the edge of the south-eastern quadrant where the land is low-lying and abuts both a wood and the mature trees associated with a moat.

- 3.1.5 The north-eastern quadrant is also characterised by clusters of low density housing, which are located in an area of gently sloping that the land on the western side of Yalding Hill. Low density ribbon development along the northern edge of Vicarage Road protrudes beyond these housing clusters. On the northern side of these clusters, properties with relatively large houses and gardens have been developed along Lughouse Lane, which defines the northern settlement edge. An array of small-scale, well-treed fields lie on the northern and north-eastern sides of this quadrant (LVA Figure 2, CD5.10). The enclosed nature of these fields contrasts with the open pasture field upslope of the Appeal Site.
- 3.1.6 The north-western quadrant consists of housing along (1) the western edge of Yalding Hill, (2) Medway Avenue and (3) the northern edge of Kenward Road. Yalding Hill is lined by modern, two-storey, semi-detached and terraced housing. The Medway Avenue housing comprises modern, two storey, semi-detached dwellings that line both sides of a straight north-south road. The housing that fronts Kenward Road comprises a mix of two-storey detached, semi-detached and terraced dwellings. I calculate that the housing on western side of Yalding Hill / north of Kenward Road (including housing on southern side of Appeal Site) has an average net density of 21.29dph.

Trees and greens

- 3.1.7 Paragraph 11.6 of the Yalding Conservation Area Appraisal [CD4.7] states that "Trees and green landscape are really significant contributors to the feel of Yalding and the quality of the environment and there are many well established specimens. They play an important part as Yalding is approached from any direction and are a key element throughout the northern part of the village and in the meadows adjacent to the river Beult, also around the churchyard. They are also dominant in the layout of the Green and play an important part in the backdrop to views throughout the northern part of the conservation area."
- 3.1.8 The appraisal states that trees along the riverside meadows, in the churchyard and in the Village Green provide a significant contribution to the verdant character of the village.
- 3.1.9 I consider that garden trees also provide a notable contribution to this character and the well-treed skyline of the village.

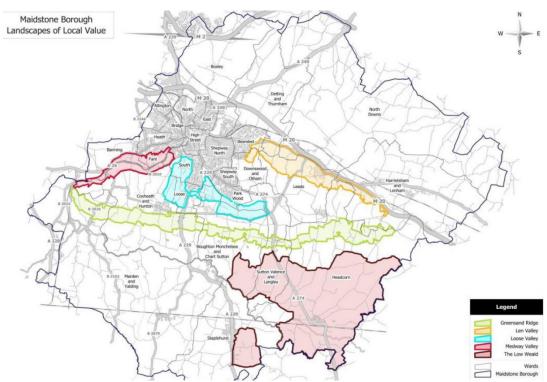
3.1.10 The Village Green (at the junction of Yalding Hill and Vicarage Road) is relatively large in size compared to most other greenspaces within the built-up area of the village (including those lining High Street). It supports half a dozen visually prominent, large-scale trees that contribute to the well-treed skyline of the village.

The approach roads to Yalding

- 3.1.11 The roads leading to Yalding provide an important contribution to people's appreciation of the landscape setting for the village. The views along the approach roads from the north, southwest and southeast are described in the Yalding Conservation Area Appraisal [CD4.7] as follows:
 - From the North: "Approaching Yalding from the north requires the navigation of a winding and sometimes steep descent along a road lined with established trees many of which reach across the road to form a complete canopy. This is picturesque Kent countryside but views are restricted by the curves in the road, the high banks and the tree canopy. Continuing the descent the village comes into view without any pre warning and few outlying properties. As the bend by the Walnut Tree unfolds there is finally a view which takes in initially the northern end of the High St and eventually just about the whole of it with Church House very prominent in the distance and the church tower rising above the buildings lining the High Street."
 - From the southwest: "the road takes you through the flood plain of the river Medway from some way outside the village. This approach allows a crossing of the picturesque Twyford Bridge which marks the southern limit of the conservation area. From here the approach to the village continues over the meadows in the flood plain where there are long views along the shallow Medway valley. Any views of Yalding, which is similarly low lying, are obscured by the constant bends in the road and the trees that line it. At the last moment the village comes into view and there is an interesting arrangement of buildings that exemplifies the range and variety of architecture that is found in Yalding."
 - From the southeast: "The approach from Benover is very different again. Here the road meanders along between trees and hedges carefully selected and manicured fronting the properties which are interspersed along the way. There is no doubt that this is the approach to an urban area and arriving at Yalding simply means an intensification of that".
- 3.1.12 The Conservation Area Appraisal does not describe views from the west. However, I provide a description of views from Kenward Road in Section 5 below.

Designations

- 3.1.13 Paragraph 6.148 of the Local Plan Review [CD2.1] states that "Landscapes of local value have been identified and judged according to criteria relating to their character and sensitivity:
 - a. Part of a contiguous area of high quality landscape;
 - b. Significant in long distance public views and skylines;
 - c. Locally distinctive in their field patterns, geological and other landscape features;
 - d. Ecologically diverse and significant;
 - e. Preventing the coalescence of settlements which would undermine their character;
 - f. Identified through community engagement;
 - g. Providing a valued transition from town to countryside."
- 3.1.14 The Greensand Ridge is one of these LLV, as identified on **Plate 4** below and is located approximately 50 metres to the north of the Appeal Site.



4.0 PUBLISHED LANDSCAPE CHARACTER ASSESSMENT

National Landscape Assessment

4.1.1 The Appeal Site lies in the far northern part of the Low Weald National Character Area (NCA 121), as identified by Natural England's National Character Area Map.

Kent County Council Landscape Character Assessment

4.1.2 At a county level of assessment, the Appeal Site is located within the Valeside Farms and Parklands Landscape Character Area (LCA) (28) as identified in the Kent County Landscape Assessment [CD4.8]. The southern edge of the Greensand Ridge – Maidstone LCA (11) lies close to the northern Appeal Site boundary (see **Plate 5**). The characteristic features of the Valeside Farms and Parklands LCA, as identified in the county assessment, include:

[&]quot;Views over the Beult Valley".

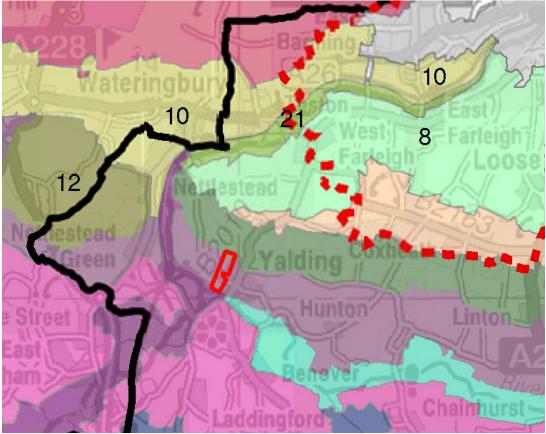


Plate 5: Approximate Appeal Site location (identified by solid red line) in relation to Valeside Farms and Parklands LCA and Greensand Ridge – Maidstone LCA (Extracted from Maidstone Landscape Assessment Figure 10)

[&]quot;Undulating mixed farmlands, residual orchards, hop gardens and pasture";

[&]quot;Strong enclosure from Greensand Ridge";

Maidstone Landscape Character Assessment

4.1.3 The Appeal Site is predominantly located within Landscape Character Area (LCA) 38: Yalding Farmlands, as defined by the Maidstone Landscape Character Assessment (CD3.2). The southern part of the Appeal Site lies in LCA53: Medway Valley Yalding whilst LCA34: Linton Greensand Ridge lies close to the northern boundary of the Appeal Site. The approximate location of the Appeal Site in relation to these LCAs is identified as a solid red area on **Plate 6** below. However, it should be noted that landscape is a continuum and character does not in general change abruptly on the ground.

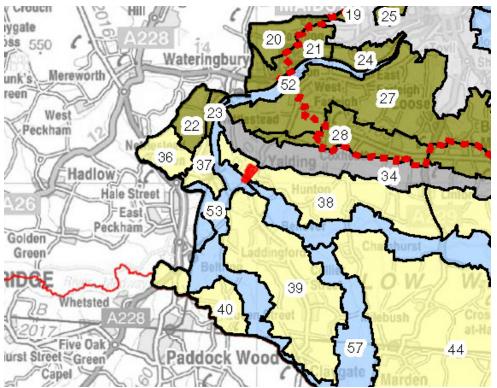


Plate 6: Appeal Site Location in relation to LCAs 34, 38 and 53 (extracted from Maidstone Landscape Character Assessment)

LCA34: Linton Greensand Ridge

4.1.4 The Linton Greensand Ridge forms part of the scarp face of the Greensand Ridge. The key characteristics of this LCA comprise:

[&]quot;Scarp face of the Greensand Ridge"

[&]quot;Extensive views across the Low Weald to the south"

[&]quot;Orchards set within small scale field pattern"

"Historic parkland"

"Very distinctive and historic built environment"

"Series of narrow lanes that run against the contours"

4.1.5 The sensitivity description for this LCA includes "It is the situation along the scarp face of the Greensand Ridge, and the subsequent availability of panoramic views across the Low Weald, which gives this area such a strong sense of place" and "Visibility is high, owing to the scarp topography and subsequent availability of views to and from this landscape" (Paragraph 34.9).

4.1.6 The landscape strategy for this area is to 'conserve' landscape character. The Summary of Actions for this LCA include "Consider the generic guidelines for the Greensand Ridge". These guidelines include "Consider the views towards any proposals across this exposed and elevated landform from the Low Weald to the south".

LCA38: Yalding Farmlands

4.1.7 The Yalding Farmlands LCA forms part of the Low Weald landscape type. The key characteristics of this LCA include:

"Low lying landscape which forms part of the Low Weald"

"Drains running southwards towards the River Beult"

"Enclosed pasture"

"Frequent orchards"

"Historic settlement of Yalding"

4.1.8 The analysis of views at Paragraph 38.6 states that:

"There are views of the steep scarp slope of the Greensand Ridge, which rises immediately to the north of this area. There are extensive views to the south across the Low Weald where intervening vegetation allows...."

4.1.9 The analysis of condition at Paragraph 38.7 states that:

"There is a coherent pattern of elements, provided by the consistency of the Low Weald landform, frequent orchards and reservoirs along the foot of the scarp. There are few visual detractors comprising fruit packing equipment and farms, pylons and polytunnels."

"Orchards appear to be well maintained and in good condition, illustrating low vulnerability to change." and

"Built development has a positive impact on the landscape. There is a strong sense of place, provided by the characteristic use of local materials and local vernacular within settlements and throughout the rural landscape."

4.1.10 The analysis of sensitivity at Paragraph 38.8 states that:

"There are numerous very distinctive characteristics which together provide a strong sense of place. Water bodies are often defined by clusters of vegetation and hedgerows line the lanes and enclose orchards to provide a strong sense of enclosure. The narrow, winding lanes are also characteristic because they broadly follow the contours along the foot of the Greensand Ridge and along the periphery of the Beult Valley."

"Visibility is moderate because although there are some longer views, immediate views are often contained by vegetation."

4.1.11 The landscape strategy for this area is to 'conserve' landscape character. The Summary of Actions for this LCA include:

"Conserve orchards and the traditional small scale field pattern"

"Conserve the largely undeveloped rural landscape and the remote quality of existing development"

LCA53: Medway Valley Yalding

4.1.12 The key characteristics of this LCA include:

"Broad valley landscape containing the River Medway"

"Extensive grassland alongside the river"

"Linear native woodland vegetation"

"Numerous marina developments and a boat yard west of Twyford Bridge"

"Frequent caravan parks"

"Ragstone bridges"

4.1.13 The landscape description at Paragraphs 53.2 to 53.5 state that:

"The River Medway flows through a broad valley which has a remote, secluded character, particularly within the woodland band south of Nettlestead and south west of Yalding across areas of former gravel extraction."

"the river is lined with blocks and ribbons of native woodland vegetation, some of which is ancient, along much of its length"

"There is an abundance of oak and willow, which provides an enclosed, intimate character. Frequent clearings comprise meadows of tall grasses and flowers."

"To the south west of Yalding the area extends to Gravelly Ways, where former mineral extraction has created a consistent continuation of regenerating scrub vegetation around pools of water."

"Further east at The Lees, damp and dry meadows are also designated as a Local Wildlife Site for the extensive range of grass and herb species associated with unimproved grassland."

"The land use is distinctly recreational and most of the valley is accessible via the Medway Valley Walk promoted Long Distance Path which runs along much of this stretch of the river. Numerous marinas are dotted along the river, creating pockets of development which contrast with the largely tranquil and remote character of the valley."

"west of Yalding, jetties and moored vessels line the water, and static caravan parks have developed along the riverside."

"At Yalding, the character of built development is traditional and historic in contrast to some of the recent developments around marinas, and the settlement has a designated Conservation Area. Vernacular style housing, comprising white weather boarding and grey and red chequered brickwork, is scattered between more recent 20th century infill development along Lees Road."

4.1.14 The analysis of views at Paragraph 53.7 states that:

"The Medway Valley Walk follows the line of the river, and from here views are channelled along the valley and the river naturally draws the eye. Historic ragstone bridges at Yalding provide clear landmark features along the valley. There is a significant amount of mature native vegetation which, along with the valley landform, restricts long views out. However, from some of the meadows along the river and from the periphery of the valley, along Hampstead Lane, there are longer views to the east of the opposite horticultural valley side. Plastic sheeting, polytunnels and vibrant fields of lavender stand out in these wider views."

4.1.15 The analysis of views at Paragraph 53.9 states that:

"Despite restricted views within the area, visibility is high because of the dominant valley landform and the subsequent prominence of the skyline."

4.1.16 The landscape strategy for this area is to 'conserve and reinforce' landscape character. The Summary of Actions for this LCA include "Conserve the rural skyline in views from within the valley".

5.0 APPEAL SITE VISUAL CONTEXT

- 5.1.1 I describe below the visual context of the Appeal Site with reference to a set of site appraisal and site context photographs in **Appendix A**. This descriptions focusses on Site A where the proposed housing would be located.
- 5.1.2 Views from the east, southeast and south: views from the Medway Avenue housing are typically enclosed by the tall vegetation along the eastern site boundary. Photograph C, taken from the western edge of the Kenward Road housing, illustrates how views of Site A (including the cypress hedge along its southern boundary) are enclosed by intervening vegetation. The off-site polytunnels are viewed against a backdrop of the well-treed Greensand Ridge and in the context of glasshouses on the southern side of the road. The view has a strong agricultural character. Views of the existing settlement edge are restricted to the line of housing along Kenward Road. An open view of the on-site polytunnels may be obtained from locations near the site entrance (Photograph A). Glimpsed views of the on-site polytunnels are likely to be available from the upper windows of housing on the western edge of Oast Court, with the polytunnels seen against a backdrop of the Greensand Ridge and in the context of off-site polytunnels/glasshouses to the southwest, west and northwest. Northward views from Kenward Road are substantially enclosed by roadside housing but some glimpsed views of polytunnels are available between the houses. Some open views of the polytunnels are available from the rear of the Kenward Road housing.
- 5.1.3 Views from the southwest: Tree/shrub vegetation in the southern part of Site B, alongside rivers and on floodplain meadows south of the rivers partially restrict views towards the Appeal Site. Photographs I and J illustrate how the glimpsed views of the Site A polytunnels are available from the northern and southern parts of The Lees, see against a backdrop of the scarp face. Photograph K illustrates how the glimpsed views of the Site A polytunnels are available from a location on Hampstead Lane near Little Venice Country Park. Closer distance views of the Site A polytunnels are likely to be available from the River Medway and from the caravan, camping and mooring areas at the Little Venice Country Park (https://littlevenicepark.co.uk/the-marina/). The Site A polytunnels may be seen against a backdrop of the Greensand Ridge scarp and in the context of polytunnels/glasshouses on both sides of Kenward Road. Settlement edge housing is typically not visible due to the enclosure provided by the tree/shrub vegetation along the eastern boundary of Site A and by other intervening vegetation. Some scattered housing outside the settlement along Yalding Hill may be seen amongst trees on the rising land to the rear of the Appeal Site.
- 5.1.4 **Views from the west, northwest and north**: The Site A polytunnels are visible on the western approach to Yalding along Kenward Road, seen as a prominent feature at the end of a vista along

this straight section of road (**Photographs M and N**). Trees within the settlement and roofs of the Medway Avenue housing may be seen in the background. Views of roofs are not necessarily an indicator of approaching to, or arrival at, a settlement as the agricultural landscape around the village contains scattered houses and farm buildings. Views of the on-site polytunnels are obtained in the context of polytunnels/glasshouses on both sides of Kenward Road.

- 5.1.5 Views of the Site A polytunnels are not available in any publicly accessible views from the northwest or north.
- 5.1.6 **Views from the northeast**: Some glimpsed views of the Site A polytunnels are available from Footpath KM191 crossing the hillslopes northeast of the Appeal Site. They may be seen in the context of polytunnels/glasshouses on both sides of Kenward Road and against a backdrop of both the river valley southwest of Yalding and the wider Low Weald (**Photograph L**).
- 5.1.7 Other views from Kenward Road: View looking south from the section of Kenward Road within the Appeal Site are dominated by the field within Site B. The views have a strong rural character and include post and wire fencing along the northern boundary of the field, a line of tall poplar trees in the southern part of Site B and a bushy native hedgerow lies along the eastern boundary of Site B (**Photograph G**). Glimpsed views of housing in the western part of Oast Court are available to the rear of this hedgerow.

6.0 LANDSCAPE PLANNING POLICIES

6.1 Maidstone Borough Local Plan Review (2024)

- 6.1.1 **Policy LPRSS1 Maidstone Borough Spatial Strategy**. Paragraph 14 of this policy states, amongst other things, that landscapes of local value will be conserved and enhanced.
- 6.1.2 **Policy LPRSP14(A) Natural Environment**. Paragraph 1(b) of this policy seeks to protect positive landscape character, including Landscapes of Local Value, from inappropriate development and avoid significant adverse impacts as a result of development through the provision of adequate buffers and in accordance with national guidance.
- 6.1.3 **Policy LPRSP15: Principles of Good Design**. This policy seeks to ensure that the scale, height, materials, detailing, mass, bulk, and site coverage of new development relate well, and respond positively, to the context in which they are seen. It states, amongst other things, that proposals should meet the following criteria to be permitted:
 - "2. Respond positively to, and where possible enhance, the local, natural, or historic character of the area. Particular regard should be paid to scale, height, materials, detailing, mass, bulk, articulation and site coverage;"
 - "4. Create high quality public realm and, where opportunities permit, provide improvements, particularly in town centre locations;"
 - "6. Respect the topography and respond to the location of the site and sensitively incorporate natural features such as natural watercourses, trees, hedges, and ponds worthy of retention within the site. Particular attention should be paid in rural and semi-rural areas where the retention and addition of native vegetation appropriate to local landscape character around the site boundaries should be used as positive tool to help assimilate development in a manner which reflects and respects the local and natural character of the area;"
 - "7. Provide a high-quality design which responds to areas of heritage, townscape and landscape value:"
 - "10. Development shall have regard to relevant national and local design guides and codes; "
 - "17. Account should be taken of Conservation Area Appraisals and Management Plans, Character Area Assessments, the Maidstone Borough Landscape Character Guidelines SPD, the Kent Design Guide, and the Kent Downs Area of Natural Beauty Management Plan."
- 6.1.4 **Policy LPRSA248: Land at Kenward Road, Yalding**. This policy sets out how land on the northern side of Kenward Road is allocated for approximately 100 dwellings at an average density of

approximately 30 dwellings per hectare and how the following conditions, amongst others, should be met before development is permitted:

"The land south of Kenward Road shall be laid out as a new community open space, and BNG area, together with SuDS measures to mitigate the residential element, plus pedestrian crossing / access measures."

"The layout and form of the housing element shall be informed by an LVIA and incorporate both boundary and internal structural landscaping that responds to the site's topography."

"Design of the site will need to ensure neighbouring residential amenity is protected."

"The layout and design of new dwelling shall incorporate measures necessary to mitigate the impacts of adjacent agricultural operations."

"Existing tree/ hedgerow margins should be retained/ enhanced in order to provide the opportunity for biodiversity habitat creation/enhancement."

"The development proposals shall be designed to take into account the results of a landscape and visual impact assessment undertaken in accordance with the principles of guidance in place at the time of the submission of an application."

6.2 National Planning Policy Framework (December 2023)

- 6.2.1 **NPPF Paragraph 128**. This policy states, amongst other things, that planning policies and decisions should support development that makes efficient use of land, taking into account:
 - "d) the desirability of maintaining an area's prevailing character and setting (including residential gardens)";
 - "e) the importance of securing well-designed and beautiful, attractive and healthy places".
- 6.2.2 **NPPF Paragraph 135**. This policy states, amongst other things, that planning policies and decisions should ensure that developments:
 - "a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
 - b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
 - c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
 - d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;

- e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks;"
- 6.2.3 **NPPF Paragraph 180**. This policy states, amongst other things, that planning policies and decisions should contribute to and enhance the natural and local environment by "recognising the intrinsic character and beauty of the countryside".

7.0 THE APPEAL SITE

7.1 Appeal Site Description

- 7.1.1 Kenward Road separates the Appeal Site into its two parts: Site A and Site B. Site B ascends gently from the southern site boundary to Kenward Road (at an approximate slope of 1 in 45) whilst Site A ascends more steeply from Kenward Road to the northern site boundary (at an approximate slope of 1 in 18). The slopes on the northern side of the Appeal Site rise more steeply at approximately 1 in 13.
- 7.1.2 Site A comprises a rectangular field that is currently used for growing soft fruit and is predominantly covered with plastic-covered polytunnels. These are temporary structures and the plastic covers can be removed to suit agricultural requirements in any one year. A farm gate lies in the south-western corner of Site A and an on-site vehicular track extends alongside the western site boundary and on through the north-western corner of the field to serve farmland on the northern side of the Appeal Site (**Photograph B**). Trimmed hedgerows of poplar define the western (5m high) and northern (3m high) boundaries (**Photographs B, D and H**). A 6m high cypress hedge and short section of deciduous hedge defines the boundary with Kenward Road (**Photograph F**). The eastern boundary is defined by a stream/drainage channel, with an adjacent 12m high belt of cypress trees and deciduous tree/shrub vegetation (**Photographs D and E**).
- 7.1.3 The northern and central parts of Site B predominantly comprises one large arable field, which is currently lying fallow. The northern boundary of the field is defined by low post and wire fencing alongside a verge of ruderal vegetation alongside Kenward Road (**Photograph G**), the southern boundary is defined by a line of tall poplar trees, the western boundary is partly defined by post and wire fencing and partly by a native hedgerow and the eastern boundary is defined by a bushy native hedgerow. The southern part of Site B comprises an area of scrub and trees which extends to the River Beult. An outlier of Site B includes an irregularly shaped parcel of land on the south-western side of Kenward Road. This land abuts glasshouses to the west and southwest.
- 7.1.4 Most of Site B has an open agricultural character whilst its far southern part has an enclosed, semi-naturalistic character imparted by dense scrub and trees. Site A has a more enclosed agricultural character whilst the polytunnels remain in place. Site A has a strong sense of being separated from housing at Medway Avenue due to the visual enclosure provided by the tall vegetation along the eastern boundary. It has a strong sense of being part of the countryside, which is imparted by (1) the open field on its northern side, (2) the availability of panoramic views across the river corridor and wider Low Weald to the south and southwest (**Photograph H**)

and (3) its strong visual and physical relationship with adjacent off-site polytunnels/glasshouses (**Photographs B and H**). The on-site and off-site polytunnels/glasshouses form an integral part of the character of the local agricultural landscape.

7.1.5 The landscape setting of Yalding has historically included small-scale fields with orchards and arable agriculture along the settlement periphery. As shown on the 19th century Ordnance Survey map at **Plate 7** below, the field in the northern part of the Appeal Site was formerly divided into two parts whilst the southern part was in orchard use.



Plate 7: 19th century Ordnance Survey Map

7.1.6 I provide a commentary in **Table A** on the degree (high/medium/low) to which I consider the Appeal Site and surrounding area is representative of the key characteristics of the Yalding Farmlands LCA.

Table A: Representativeness of Yalding Farmlands LCA Key Characteristics

Key Characteristic	Degree of Representativeness
Low lying landscape which forms part of	High for site and surrounding area.
the Low Weald	
Drains running southwards towards the	High for the site (watercourse along eastern site
River Beult	boundary) and surrounding area:
Enclosed pasture	Not present on site but medium for the surrounding
	area
Frequent orchards	Not present on site but medium for the surrounding
	area
Historic settlement of Yalding	High for site (forming part of the village setting) and
	surrounding area.

7.2 Appeal Site Visual Envelope

- 7.2.1 LVA Paragraph 4.49 states that "The site predominantly lies on relatively flat and low-lying land that is typical of the riverside character of the immediate area. This context limits views of the lower-lying sections of the site within the wider landscape where intervening features provide screening. This topography begins to change as the land begins to rise to the north resulting in the far northern extent of the site begin visually more prominent within the wider context though still with a relatively limited visual envelope." This statement is not correct the visual envelope of the site is much more extensive, as indicated by **Photograph H** and as described in Section 8.3 of my proof below.
- 7.2.2 LVA Paragraph 5.2 states that one of key objectives of the landscape proposals for the scheme was to consider the visual envelope of the site and potential impacts upon the wider landscape setting. LVA Paragraph 6.37 states that "the Approximate Visual Envelope at LVA Figure 6 illustrates the potential area in which the Proposed Development is likely to be visible at the year of completion". The LVA is silent on whether this visual envelope has been manually estimated or prepared using a digital model. Irrespective of the method used, the Appellant has not properly identified the extent of the visual inter-relationship between the Appeal Scheme and the surrounding landscape (including the Greensand Ridge LLV) or the potential impacts upon the wider landscape setting.

7.3 Landscape Susceptibility Issues

7.3.1 Paragraph 1.10 of the LVA methodology (LVA Appendix A, CD5.10) states that "The characteristics of the existing landscape resource are considered in respect of the susceptibility of the landscape resource to the change arising from this development." This is an important

part of any landscape appraisal as it should inform development master-planning and judgements of landscape sensitivity.

LCA 38: Yalding Farmlands

7.3.2 In the case of the landscape sensitivity assessment for LCA 38: Yalding Farmlands, the Landscape Effects Table at LVA Appendix B [CD5.10] identifies a High/Medium landscape sensitivity but does not identify those elements or characteristics that are susceptible to change such as the relationship of the Appeal Site to the "Historic settlement of Yalding" and "views of the steep scarp slope of the Greensand Ridge, which rises immediately to the north of this area." The scarp slope is an important part of the landscape setting for the village and the effects on setting should be fully recognised and assessed. The LVA does not do this. I do not agree with the assertion in the LVA Appendix B Landscape Effects Table that the site has a settlement edge character. On the contrary, I consider that it has a rural, agricultural character with a strong sense of separation from the existing built-up area of the village (my Photographs B, D, I, J and K). It is not clear how the proposals "provide additional buffering for the edge of the village" when the tree/shrub vegetation along the eastern site boundary and within the deep rear gardens of the Medway Avenue residential properties provide a visually and physically robust tree/shrub vegetation structure that allows settlement edge housing to sit comfortably in the local landscape. The housing numbers and density of the Appeal Scheme are such that gardens and greenspaces within the built development area provide a much diminished vegetation structure compared to the existing settlement edge housing.

LCA 34: Linton Greensand Ridge

7.3.3 LCA 34: Linton Greensand Ridge is located within the Greensand Ridge LLV. The Landscape Effects Table (LVA Appendix B, CD5.10) identifies a High/Medium level of sensitivity. It comments on the inter-visibility between the Appeal Site and the LCA but does not identify those elements or characteristics that are susceptible to change.

8.0 THE PROPOSED DEVELOPMENT

- 8.1.1 The Proposed Parameter Plan [CD5.18] fixes, amongst other things, (a) the extent of built development for the residential land use, (b) the maximum height of buildings to ridge above existing ground levels and (c) the extent of 'landscape and open space' outside the residential land use area. It also identifies indicative corridors for 'planting' and the indicative location and extent of open space within the residential land use area.
- 8.1.2 The Proposed Illustrative Site Layout [CD5.19] provides an indication of how a development of up to 112 dwellings could be accommodated on the Appeal Site.

8.2 Design Evolution to Landscape Context

Initial Development Options

8.2.1 The landscape analysis on DAS Page 20 was too limited in its scope and detail to properly inform the development master planning exercise. For example, a landscape and visual analysis at the development master planning stage should have identified a maximum elevation of built form within the Appeal Site and considered the layout of buildings, greenspaces and trees within and adjacent to the village. It is the lack of any in-depth analysis that has led to all the three initial options for development on Site A being very similar: peripheral greenspace corridors surrounding a largely uniform distribution of housing with no or minimal provision of internal greenspaces. The lack of proper analysis is not in accordance with Paragraph 5 of the Allocation, as set out in Policy LPRSA248, which states that "The layout and form of the housing element shall be informed by an LVIA and incorporate both boundary and internal structural landscaping that responds to the site's topography."

Refinement of Option 3

8.2.2 DAS Page 25 states that Option 3 was selected for further refinement "representing the best opportunity for delivering the benefits for the local community and making best use of the site". The set-back of the southern development edge from the Kenward Road housing has moved slightly closer to the Kenward Road housing in spite of a statement to the contrary. The northern extent of development has been aligned with the adjacent settlement edge with the resultant provision of a deeper area of greenspace. This is an appropriate design response to local context that should have been embedded in all three initial design options. The "refinement of the eastern landscaped strip" delivers a narrower greenspace corridor and the continuous peripheral road alongside this greenspace corridor has been removed to expand the built development area,

resulting in the Proposed Illustrative Site Layout [CD5.19] showing house walls and rear garden enclosures immediately adjacent to this communal space. This is not a good approach to design as there will be privacy issues associated with any windows in the sidewalls of houses directly abutting the communal greenspace. The Proposed Illustrative Site Layout shows there is limited space for new trees to be provided within the eastern greenspace, particularly those with sufficient visual mass to contribute to the visual backdrop for the new housing.

- 8.2.3 The photomontages have demonstrated the ineffectiveness of new tree planting along the eastern greenspace. Greenspace would have been more effective had it been concentrated in the western or central parts of the built development area. To this end, the residential land use, as shown on the Proposed Parameter Plan [CD5.18], should have been brought up to the outer edge of the narrow root protection areas for the cypress hedge, as identified in the Arboricultural Assessment [CD5.2]. A continuous peripheral road alongside this relatively narrow eastern greenspace corridor would have provided generous space for maintaining this cypress hedge (incorrectly identified as a native hedgerow on the BNG plan in the Ecological Appraisal, CD 5.5) and would have placed less pressure on the housing layout, with the result that flank walls alongside the greenspace could have been avoided. I note the proposed provision of windows in these flank walls, as set out on Note 10, Page 49 of the DAS.
- 8.2.4 A semi-formal 'arrival' greenspace was also provided at the site entrance but inadequate consideration has been given to how housing on its eastern side relates to views from the western approach road. There has been no design response to the historic presence of an east-west aligned hedgerow on the eastern side of the proposed vehicular entrance with a lost opportunity to develop more of the local historic character into the Appeal Scheme. Other proposed features include: (1) a small central green with a link to the arrival space and (2) a circa 10m width landscape strip along the western frontage (i.e. the width of one large tree).

Responses to Consultations

- 8.2.5 Responses to consultations on DAS Page 27 set out a proposed reduction in the quantum of dwellings from 125 to 112 to allow for (1) enlargements to the northern greenspace and the Kenward Road arrival space and (2) structural tree planting along a central spine.
- 8.2.6 The pre-application enquiry response provided by the Council included advice to enlarge the arrival space at the site entrance but this was not acted on by the Appellant.

Design Principles

- 8.2.7 DAS Page 32 sets out the design principles for the 'Development Envelope' and 'Landscape Framework'. The landscape diagram identifies the peripheral greenspace corridors, a structure of relatively narrow internal greenspace corridors and two small greens: one at the site entrance one in the southern central part of the site. The diagram suggests provision of a unified greenspace area straddling Kenward Road near the site entrance whereas, in reality, it will be functionally and visually sub-divided by the road and adjacent existing/proposed hedgerows.
- 8.2.8 There are no design principles to address potential variation in building heights and density. One of the principles of good design set out in Local Plan Review Policy LPRSP15 [CD2.1] is "Respond positively to, and where possible enhance, the local, natural, or historic character of the area. Particular regard should be paid to scale, height, materials, detailing, mass, bulk, articulation and site coverage". The Proposed Parameter Plan [CD5.18] specifies that building heights would extend up to a maximum 9.5m above existing ground levels. The Parameter Plan also proposes either two storey (majority) or 2.5 storey (some) dwelling houses. I would have expected that a more sophisticated parameter plan to have been prepared bearing in mind the landscape sensitivities associated with the Appeal Site to avoid the potential for delivering a new housing area with minimal or no variation in building heights. Such a plan might include a percentage of built development area to be set at a lower maximum height and potentially, some lower parts of the site to be set at a higher maximum height. This would have gone some way to avoiding the bland uniformity of heights that is associated with so many settlement extensions.
- 8.2.9 Page 14 of the Kent Design Guide [CD4.9] states that good design means "enriching existing character reinforcing local patterns of development and landscape". The proposed increase in density above that set out in Local Plan Review Policy LPRSA248 [CD2.1] is not in accordance with the Kent Design Guide or the principles of good design set out in Policy LPRSP15 as it does not respond positively to the local character of the area and does not embrace sufficient opportunities to enhance that character. Insufficient regard has been paid to the height, scale, massing and site coverage of the proposed housing.
- 8.2.10 Page 61 of the Kent Design Guide [CD4.9] emphasises the importance of variety in housing layouts, including road widths and building set-backs. The proposed housing density has provided less opportunity for this variation to be embedded into the Appeal Scheme. It has resulted in a Proposed Illustrative Site Layout [CD5.19] that has a much tighter grain¹, a much reduced variation in house orientations and a tighter arrangement in terms of pattern compared to other parts of the village, including nearby Oast Court which has a significantly lower density

¹ Grain is defined on Page 110 in the Kent Design Guide as "the layout, pattern and density of existing built environments".

and built coverage. It has also resulted in a reduced opportunity to provide street tree planting on both sides of the internal road. There is a much reduced variation in house setbacks from the internal roads / sizes of front gardens.

- 8.2.11 The proposed housing density also provides for much reduced spacing between houses and smaller front gardens compared to other parts of the village. The rigid, closely spaced array of housing on the eastern side of the proposed internal road particularly, as shown on the Proposed Illustrative Site Layout, demonstrates this point well. Some narrow planting areas have been indicatively shown around these houses but these are not all deliverable once areas of hardstanding have been provided for front door access, rear garden access paths, bin storage etc. Deeper landscape strips along the building frontages would have compensated for visual harshness of streets where large areas of carparking would be required outside the residential plots. The uniformity of plot sizes arising from the proposed density does not provide that positive response to the local character of the area, as required under Local Plan Review Policy LPRSP15 [CD2.1].
- 8.2.12 The peripheral greenspace corridors have been embedded into the Proposed Parameters Plan [CD5.18] but the internal greenspace corridors and southern central green are conceptually indicated with no commitment to their size. The 'Open Setting of Village Retained' graphic, orientated towards the greenspaces on either side of Kenward Road (with views partially truncated by off-site polytunnels), provides an indication of how the Appellants consider they have retained the open setting of the village, as experienced from Kenward Road.

8.3 Effectiveness of the proposed vegetation structure

- 8.3.1 The LVA states that the visualisations provided at LVA Figures 18 to 26 are Type 3. These visualisations are illustrative, not verifiable, as viewpoints have not been precisely surveyed. The Concept Layout Plans shown at the bottom of each photomontage sheet state that (1) buildings have been extruded to 9.5m height; (2) green corridors have been modelled at 6m width and illustrated with photorealistic trees modelled at 10m height; and (3) woodland in the northern part of the site has been illustrated with photorealistic trees at 12m height. My comments are as follows:
- 8.3.2 The Concept Layout Plans include solid block woodland in the northern part of the site. This contrasts with the 'statement of intent' shown on the Proposed Illustrative Layout, where the area is set aside primarily for recreational use and is characterised by 'Informal Open Space' with a relatively narrow tree belt. Solid block woodland cannot be provided whilst still delivering a peripheral recreational greenspace.

- 8.3.3 The predicted growth heights for individual trees provided in the Concept Layout Plans is reasonable but that for woodland is not. The landscape strategy plan in LVA Appendix F sets out how the woodland would be established using 'whips' at 60-80cm and species typical of the area. My **Appendix B** provides an article published by the Institute of Environmental Management and Assessment (IEMA). which describes how (a) newly planted stock is typically planted using 60–80cm high transplants; (b) an average annual growth of 30cm per year in the first five years can normally be assumed and (c) once established the growth rate can be anticipated to reach around 50cm a year for the next 10 years. If planted as transplants, this gives a height of 2–2.5m in the first year and 7–7.5m after 15 years. My **Appendix B** also provides a tree growth rate chart published by CBA Trees: a 6m height is anticipated after 15 years based on planting of transplants and a 7m height is anticipated after 15 years based on planting of whips. I consider that the woodland would reach no more than 7.5m height by Year 15.
- 8.3.4 The existing view for Viewpoint 3B illustrates how the 5m high hedge along the northern site boundary is not visible due to the enclosure by the 4.5m high polytunnels. The Year 0 montage shows the horizonal and visual extent of the 9.5m high built form without mitigation planting. The Year 15 montage includes mitigation planting but this is not a realistic image. Year 15 woodland planting for Viewpoint 3B would not be visible except for a small area on the lower left hand side of the built development area. The continuous corridor of greenery through the central part of the built up area (parallel and downslope of the modelled northern woodland) in this photomontage is also not realistic. It is also unlikely that any of the 10m high trees would be readily noticeable above the 9.5m high housing bearing in mind that the far upper part of any tree canopy typically has a relatively small diameter and is visually less dense than the main part of the canopy. These trees are unlikely to contribute to any breakdown of the visual mass of the built form due to the close proximity of built form on either side of this line of trees. In reality, the Year15 photomontage would be very similar to the Year 0 photomontage.
- 8.3.5 The Year 0 photomontages for Viewpoint 4B and Viewpoint 4C show how the 9.5m high housing would be partially enclosed by intervening polytunnels and by the 5m high hedge along the western site boundary. The Year 15 woodland planting is shown as substantially enclosing the proposed built form. However, in reality, the woodland would be seen rising approximately 2.5m above the boundary hedge The tree/shrub vegetation at the density shown is not realistic as the vegetation is likely to need thinning out by Year 15. The photomontages also show a continuous line of trees on the eastern side of the new housing area. However, as indicated by the Proposed Illustrative Layout, there is little space available for new tree planting alongside the eastern side of the Appeal Site and the roof of one of the Medway Avenue housing have been

shown to the front of the proposed built form at Year 0, showing enclosure where there would be none.

- 8.3.6 I consider that the Proposed Parameter Plan [CD5.18] does not properly address Paragraph 5 of the Allocation, as set out in Policy LPRSA248, which states that "The layout and form of the housing element shall be informed by an LVIA and incorporate both boundary and internal structural landscaping that responds to the site's topography."
- 8.3.7 As noted at Paragraph 36.5.1 of Mr. Scott's Planning Proof of Evidence, the Examining Inspector identified at Paragraph 311 of his report that modifications to the Allocation were necessary 'to identify that landscaping would be an integral aspect of the Area A site for housing both around its boundary and within the development itself'. I consider that the Appeal Scheme does not adequately address the Inspector's concerns.

8.4 Effects of The Appeal Scheme

Effects on the Physical Landscape

- 8.4.1 Any new housing provision on a greenfield site will inevitably result in the removal of some landscape resource. In this case, there would be a significant change to the Appeal Site landscape as one agricultural field with polytunnels in the northern part of the Appeal Site would be transformed into a new area of housing and roads for up to 112 dwellings (mostly two-storeys in scale), with peripheral greenspace identified on the Proposed Parameters Plan [CD5.18]. The agricultural field in the southern part of the Appeal Site would be developed as publicly accessible greenspace. A development proposal based on approximately 100 dwellings would have provided a greater opportunity for incorporating greenspace and additional tree planting within the built development area.
- 8.4.2 The Site Access Plan [CD5.20] and the Tree Retention Plan in the Arboricultural Assessment [CD5.2} both identify that the cypress hedge near the site entrance would be substantially retained. However, this is unlikely to be the case. Kenward Road is 5m wide at this point and the cypress hedge is set back by approximately 0.6m with the result that the outer edge of the new access should be correspond with the outer edge of the hedge. The 2.4m x 70m visibility splay would be set back deeper into the site than shown on the Site Access Plan with the result that the visibility splay would require a greater length of the cypress hedge to be removed.

Relationship between the Appeal Scheme and the Greensand Ridge LLV

8.4.3 LVA Figure 6 (Visual Amenity) identifies the approximate area of visual influence for the Appeal Scheme, noting that (1) views may occur outside the envelope boundary and (2) effects outside the boundary would be negligible as a result of distance and intervening screening. I do not consider this area of visual influence to be accurate. One obvious example is the availability of views from the mooring area at the Little Venice Country Park (https://littlevenicepark.co.uk/the-marina/), which is shown to be outside the area of visual influence and where I consider there would be significant adverse effects. I have tested the potential visibility of the Appeal Scheme using 'broad-brush' digital visibility mapping using Google Earth Lidar data and a single point source at 9.5m height (the maximum height parameter) in the centre of the built development. The digital visibility mapping is illustrated on Plate 9 below. It indicates how the built form would be visible across an extensive area of the Greensand Ridge LLV on the north-western, northern and north-eastern sides of the Appeal Site.



Plate 9: Visibility mapping based in a single point source at 9.5m height

8.5 Implications for Site and Local Character

- 8.5.1 The most obvious effect of the Appeal Scheme would be to transform the majority of the Appeal Site from being part of the countryside to part of the extended settlement. The extent of the built up area would move up to 180m further to the west based on the Proposed Parameters Plan [CD5.18] and would extend no further north than the adjacent Hartfield Avenue properties. The northern part of the Appeal Site would acquire a developed residential character and the open agricultural land in the southern part would predominantly acquire a recreational greenspace character imparted by parkland, an equipped play area set within a new orchard and a SUDS basin.
- 8.5.2 The extent of the built development proposed on this elevated site would result in a visually prominent form of development, as illustrated by the Year 0 photomontages (LVA Figures 18 to 26, CD5.10). It would extend built development into an area of open countryside where it would erode the open rural setting of the village and have an adverse effect on the setting of the Greensand Ridge LLV. The most evident feature of the landscape design proposals is the provision of 'green walls' around the western and northern edges of the new housing area, as illustrated by the Year 15 photomontages (LVA Figures 18 to 26, CD5.10). These 'green walls' would appear as abrupt, dense and visually rigid features of uniform height along the new interface between the expanded settlement and the wider countryside. The built development to the rear of the 'green walls' would be perceived as a dense, visually continuous area of built form with inadequate provision of interstitial tree planting to break up its visual mass. They would, after several decades of growth, serve to partially screen the proposed relatively high density development of 112 No. dwellings but would also detract from the appearance of the local landscape as visually abrupt 'green walls' are not a characteristic feature of the settlement. A looser arrangement of buildings and interstitial vegetation, based on approximately 100 dwellings, could have been provided had the Appellant not opted to seek planning permission for such a high number of dwellings. A new housing area based on the density set out in Local Plan Review Policy LPRSA248 would have been more characteristic of the settlement and better integrated into the local landscape.
- 8.5.3 The density of housing is such that plot sizes are predominantly uniform and garden sizes are generally too small to accommodate trees of sufficiently large scale to break up the visual mass of the built form. A reduction in housing density and associated increases in public realm greenspaces and garden sizes would have provided greater opportunities for delivering a visual mosaic of buildings and trees within the extended settlement. The continuous visual mass of the Appeal Scheme, resulting from the relatively high density of the proposed housing, would not

reflect the prevailing pattern of development in the village and would result in unnecessary harm to the setting of both Yalding and the Greensand Ridge LLV.

8.5.4 The effects of the Appeal Scheme would be particularly evident from the following areas:

From Kenward Road

8.5.5 LVA Paragraph 4.48 notes how settlement edge character "is experienced predominantly from Kenward Road when approaching the village from the west once views become open having passed the recently constructed polytunnels". The on-site polytunnels are the most prominent feature at the end of the vista that is available from the 330m long straight section of road west of the Appeal Site and are in character with the polytunnel / glasshouse landscape on the western side of the village (Photographs M and N). The new housing would truncate and dominate this vista with the result that the new settlement edge would be visually prominent from this long section of approach road, rather than road users stumbling across it at near distance. This is uncharacteristic of other approaches to Yalding, as described in the Yalding Conservation Area Appraisal [CD4.7] and Section 3 above. The removal of the deciduous hedgerow close to the vehicular entrance and the westernmost section of cypress hedge within the entrance visibility splays would provide open views of built form across a wider panorama and at a higher level than the road when the viewer is approaching the vehicular entrance. The new housing would be clearly seen above the retained section of cypress hedge. The Appeal Scheme, as defined by the Proposed Parameters Plan [CD5.18], has missed an opportunity to provide a more substantial greenspace at this key entrance area to avoid new housing dominating the vista and skyline view. This could have been achieved with reduction in housing numbers (e.g. between references 4 and 8 on the Illustrative Site Layout Plan, CD5.19) thereby (1) setting back built form further back in the view and (2) providing space for a larger greenspace area that would extend further into the build development area than shown on the Proposed Parameters Plan [CD5.18]. The Appellants has been advised to adopt this approach as part of the pre-application enquiry discussions. There is also potential for enhancing the visual robustness of this focal greenspace thorough relocation of the site entrance further to the southeast/more towards the centre of the cypress hedge. The vehicular entrance would be removed from the vista along Kenward Road and the degree to which the new entrance would be seen in association with the retained tractor entrance would be diminished. A larger green buffer would be provided between the tractor and housing area entrances with a resultant reduction in the sense of urbanisation along the road. The Appeal Scheme would result in unnecessary harm to the rural setting of Yalding on the basis of the above.

From Hampstead Lane

- 8.5.6 The importance of views of the proposed housing from the relatively low-lying land to the south of the scarp is emphasised by the Summary of Actions for LCA53: Medway Valley Yalding, which include "Conserve the rural skyline in views from within the valley".
- 8.5.7 The most open views of the Appeal Scheme from areas south of the river are those represented by Viewpoints 4B and 4C on Hampstead Lane, overlooking recreational open space used by residents/visitors to the caravan park. The Year 0 photomontages show how the 9.5m high housing would be partially enclosed by intervening polytunnels and by the 5m high hedge along the western site boundary. As noted above, I do not consider that the predicted heights of the woodland planting are realistic. I consider that at Year 15, the proposed housing would be seen as a continuous visual mass of built form with no interstitial vegetation and with only the lower parts of the housing enclosed by the western site boundary vegetation. The new housing area would, at Year 0 and Year 15, be in stark contrast with the well-treed, relatively low density housing clusters in the village. The density of new area, irrespective of the proposed structural vegetation, would be in stark contrast with nearby existing housing areas where residential plots are notably larger.
- 8.5.8 The Year 0 and Year 15 photomontages highlight the importance of creating a visual mosaic of buildings and vegetation on this hillside site. This cannot be achieved by provision of a peripheral wall of vegetation alone. Larger internal greenspaces (and larger gardens) would provide the much needed interstitial vegetation. These can only be delivered through a reduction in housing numbers. The Appeal Scheme would result in unnecessary harm to the rural setting of Yalding on the basis of the above.

From The Lees

8.5.9 The Year 0 photomontage prepared for Viewpoint 3B illustrates how the Appeal Scheme would extend housing upslope from Kenward Road to partially obstruct views of grassland on the Greensand Ridge scarp face, leaving only a narrow corridor of grassland upslope of the housing at Year 0. Visibility of the proposed built form would be accentuated the housing being seen at a similar level to the off-site polytunnels. Although the proposed woodland would not be visible by Year 15, this gap would be completely enclosed by the northern site boundary trees within a few decades thereafter. The near-continuous, dense visual mass of buildings proposed on the Appeal Site would be out of character with the existing settlement and would result in unnecessary harm to the rural setting of Yalding and the Greensand Ridge LLV.

8.5.10 As noted at Paragraph 44 of Mr. Scott's Planning Proof of Evidence, Part 1(b) of Policy LPRSP14(A) speaks of the need for development to ensure the protection of positive landscape character, including Landscapes of Local Value, from inappropriate development, There is a consequential of this policy given the harm to the Greensand Ridge LLV arising from the failure to accord with the Allocation. A more successful approach to achieving landscape and visual integration would have been, as described above, to reduce housing numbers and to distribute a greater number of greenspaces with large-scale trees across the built development area, thereby delivering more of a scattered visual mosaic of building and trees.

From the Greensand Ridge LLV

- 8.5.11 The importance of views of the proposed housing from the Greensand Ridge is emphasised by the Summary of Actions for LCA34: Linton Greensand Ridge LCA53, which include "Consider the views towards any proposals across this exposed and elevated landform from the Low Weald to the south".
- 8.5.12 LVA Appendix B (Landscape Effects Table) notes, in the assessment of effects on LCA34: Linton Greensand Ridge/the Greensand Ridge LLV, that "The existing Yalding development already has a visual relationship with this LCA & LLV the new development will be a small increase to the built form element of this relationship."
- 8.5.13 Plate 9 above indicates how the proposed built form would be visible across an extensive area of the Greensand Ridge LLV on the north-eastern, northern and north-western sides of the Appeal Site. Although publicly accessible views of the Appeal Scheme would be restricted to Footpath KM 191 (LVA Viewpoint 9, with photograph provided at LVA Figure 17, CD5.10), it is important to note how the Appeal Scheme housing would also be seen by residents and workers in agricultural fields. Visibility from the wider Greensand Ridge LLV to the north and northwest would be much more open than views from Viewpoint 9 where enclosure is provided by intervening trees and hedgerows, including mature trees associated with the Medway Avenue rear gardens and adjacent tree/shrub belt.
- 8.5.14 The land upslope of the Appeal Site is relatively open compared to land upslope of the village on the eastern side of Yalding Hill. The Appeal Scheme would be seen in elevated views from the north and northwest as a near-continuous dense visual mass of tightly spaced houses with visually abrupt, 'green walls' and with only a low level of interstitial planting. This compares to the north-eastern quadrant of Yalding where a visual mosaic of buildings and vegetation (created by clusters of low density housing and greater variation of house and garden sizes) would provide the setting to the Greensand Ridge LLV. The harm to the setting of the Greensand Ridge LLV

would arise, not from the "small increase to the built form element" of the relationship between the settlement and the LLV, but from the near-continuous, dense visual mass of buildings on the Appeal Site.

Ability for people to appreciate views across the Low Weald

8.5.15 The ability of people visiting and living in the settlement extension to appreciate "extensive views to the south across the Low Weald" and the sense of place for the new housing area would be diminished by the proposal to develop up to 112 dwellings compared to the Policy LPRSP7(D) allocation for 'approximately 100 new dwellings'.

Other concerns

- 8.5.16 My evidence above has focussed on what I consider to the substantive issues for the planning inquiry. However, I do also have a range of concerns about the robustness of the LVA approach and findings, including for example:
 - The LVA has not adequately teased out the susceptibilities of the local landscape to change.
 - The LVA methodology does not provide any criteria to explain how judgements of magnitude of landscape and visual change and significance of effect are made.
 - The LVA has not adequately teased out the effects on visual receptors. The floodplain on the south-western side of Yalding is a tourist honey spot, attracting large numbers of visitors to the town in the summer months, with car parking spaces in short supply. The Little Venice Caravan Park provides for both fixed caravans and camping. The visual effects table on LVA Appendix C, Page 4 states for Receptor Location H (Residents at Little Venice Caravan Park) that "Any views will be of the southern parcel only as polytunnels located to the west of the site will restrict views further north" and negligible effects are predicted upon completion. I consider that the proposed housing will be clearly visible from this area, as evidenced by the Viewpoint 4C photomontage. The Appeal Scheme would be seen as a dense and visually discordant mass of built form at the foot of the scarp slope, even at Year 15, and would be harmful to views from a large area of land.
 - The visual effects table does not give any consideration to the effects of the proposed built form on people's ability to appreciate the scarp face of the Greensand Ridge LLV.
- 8.5.17 I also share many of the concerns expressed in the LVA Review, undertaken on behalf of the Council by Peter Radmall Associates [CD13.1].

9.0 SUMMARY AND CONCLUSIONS

The Design Proposals

- 9.1.1 Peripheral greenspace corridors have been embedded into the Proposed Parameters Plan [CD5.18] but internal greenspace corridors and southern central green are only conceptually indicated with no commitment to their size. A semi-formal 'arrival' greenspace has been provided at the site entrance but with inadequate consideration given to how housing on its eastern side relates to views from the western approach road.
- 9.1.2 The photomontages have demonstrated the ineffectiveness of the proposed tree planting along the eastern greenspace. The greenspace in this eastern corridor, as shown on the Proposed Parameter Plan [CD5.18], would have been more effective had it been concentrated in the western part of the built development area or distributed across its upper central part.
- PAS Page 32 sets out the design principles for the 'Development Envelope' and 'Landscape Framework' but there are no design principles have been adopted to address potential variation in building heights or density. The Proposed Parameter Plan [CD5.18] specifies that building heights would extend up to a maximum 9.5m above existing ground levels. The Parameter Plan also proposes either two storey (majority) or 2.5 storey (some) dwelling houses. I would have expected that a more sophisticated parameter plan would have been prepared bearing in mind the landscape sensitivities associated with the Appeal Site and to avoid the potential for delivering a new housing area with minimal or no variation in building heights. This would have gone some way to avoiding the bland uniformity of heights that is associated with so many settlement extensions. The Proposed Parameter Plan would result in a development that does not accord with the Local Plan Review Policy LPRSP15 principle of good design: "Respond positively to, and where possible enhance, the local, natural, or historic character of the area. Particular regard should be paid to scale, height, materials, detailing, mass, bulk, articulation and site coverage".
- 9.1.4 Page 61 of the Kent Design Guide [CD4.9] emphasises the importance of variety in housing layouts, including road widths and building set-backs. The proposed housing density has provided less opportunity for this variation to be embedded into the Appeal Scheme. It has resulted in a Proposed Illustrative Site Layout [CD5.19] that has a:
 - much tighter grain²;

² Grain is defined on Page 110 in the Kent Design Guide as "the layout, pattern and density of existing built environments".

- much reduced variation in house orientations;
- tighter arrangement in terms of pattern compared to other parts of the village, including nearby Oast Court;
- much reduced variation in house setbacks from the internal roads / sizes of front gardens;
- reduced opportunity to provide street tree planting on both sides of the internal road.
- 9.1.5 The proposed housing density also provides for much reduced spacing between houses compared to other parts of the village. The rigid, closely spaced array of housing on the eastern side of the proposed internal road, as shown on the Proposed Illustrative Site Layout, demonstrates this point well. The uniformity of plot sizes arising from the proposed density does not provide that positive response to the local character of the area, as required under Local Plan Review Policy LPRSP15 [CD2.1].
- 9.1.6 Page 14 of the Kent Design Guide [CD4.9] states that good design means "enriching existing character reinforcing local patterns of development and landscape". The increase in density above that set out in Local Plan Review Policy LPRSA248 [CD2.1] has resulted in an Appeal Scheme that is not in accordance with the Kent Design Guide or the principles of good design set out in Policy LPRSP15. The height, scale, massing and site coverage of the Appeal Scheme housing does not respond positively to the local character of the area or to the prevailing pattern of Yalding.

Effects of the Appeal Scheme

9.1.7 The Appeal Scheme would result in a visually prominent form of development, as illustrated by the Appellant's photomontages (LVA Figures 18 to 26, CD5.10). It would extend built development into an area of open countryside where it would erode the open rural setting of the village and have an adverse effect on the setting of the Greensand Ridge LLV. 'Green walls' would be provided along the western and northern edges of the new housing area, as illustrated by the Year 15 photomontages (LVA Figures 18 to 26, CD5.10). These 'green walls' would appear as abrupt, dense and visually rigid features of uniform height along the new interface between the expanded settlement and the wider countryside. The built development to the rear of the 'green walls', which would not be visually effective by Year 15, would be perceived as a visually near-continuous area of built form with inadequate provision of interstitial tree planting opportunity to break up its visual mass. This visual mass would be notably more harmful to the rural setting of Yalding and the setting of the Greensand Ridge Landscape of Local Value compared to a development that is in accordance with Local Plan Review Policy LPRSA248. A looser arrangement of buildings and interstitial vegetation could have been provided had the Appellant not opted to seek planning permission for such a high number of dwellings.

9.1.8 A new housing area based on the density set out in Policy LPRSA248 and associated increases in public realm greenspaces and garden sizes would have provided greater opportunities for delivering a visual mosaic of buildings and trees that would be more characteristic of the settlement and better integrated into the local landscape.

Conflict with Planning Policy

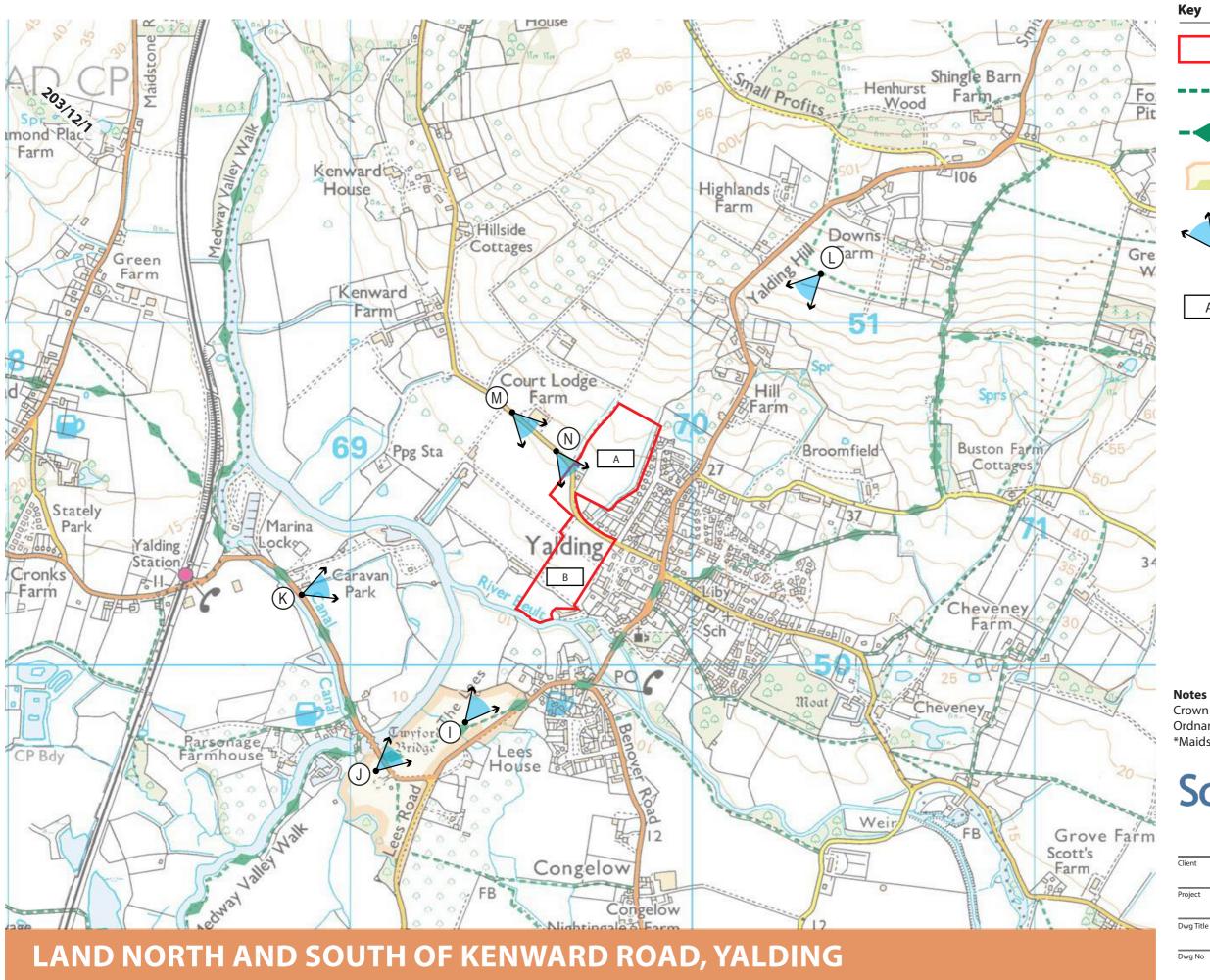
9.1.9 I consider that RfR1 is fully justified as it summarises the adverse effects of the Appeal Scheme and its resultant policy conflict with:

LPR Policy LPRSS1 (paragraph 14)
LPR Policy LPRSP15 (paragraphs 2, 6, 7 and 17)
LPR Policy LPRSP14(A) (paragraph 1b).
LPR Policy LPRSA248

NPPF paragraph 128 (d) and (e) NPPF paragraph 135 (c) NPPF paragraph 180 (b)

APPENDIX A

Site Appraisal and Site Context Photographs



Appeal Site Boundary

Public Footpaths



Long Distance Recreational Paths



Open Access Land



Photographic Viewpoint Locations



Site Sub-division References*

Crown copyright and database rights (2024) Ordnance Survey 0100031673 *Maidstone Borough Council Local Plan Map 26



landscape architecture environmental planning

July 2024

Client	Maidstone Borough Council
Project	Land North and South of Kenward Road,
	Yalding
Dwg Title	Appeal Site Context Photographic
	Viewpoints

NTS



Key



Appeal Site Boundary



Photographic Viewpoint Locations



Site Sub-division References*

Votes

2024 Google Earth/Landsat/Copernicus *Maidstone Borough Council Local Plan Map 26



landscape architecture environmental planning

Maidstone Borough Council

Project Land North and South of Kenward Road, Yalding

Dwg Title Appeal Site Appraisal Photographic Viewpoints

Dwg No

NTS July 2024



Photograph AView looking northeast towards Site A entrance from Kenward Road



Photograph BView looking northeast from western part of Site A



Photograph C
View looking northwest towards Site A from Kenward Road



Photograph DView looking north from eastern part of Site A

Photograph EView of drainage ditch along eastern edge of Site A



Photograph FView of cypress hedge along southern edge of Site A

Photograph GView looking south across Site B from Kenward Road



Photograph HView looking south from western part of Site A



Photograph I
View looking northeast towards Appeal Site from northern part of The Lees



Photograph J
View looking northeast towards Appeal Site from southern part of The Lees



Photograph K
View looking northeast towards Appeal Site from location on Hamstead Road near Little Venice Country Park



Photograph L
View looking southwest towards site from Footpath KM191



Photograph MView looking east towards site from Kenward Road (1)



View looking east towards site from Kenward Road (2)

APPENDIX B

Tree Growth Rates

VIEW ALL TOPICS

Predicting tree and hedge growth

Transform Home (/transform) / Energy (https://www.iema.net/energy) / Predicting tree and he...

24th October 2013

Related Topics

Energy (https://www.iema.net/energy)

Business & Industry (https://www.iema.net/business-and-industry)

Related tags

Local government, Construction, Consultancy, Ecosystems, Biodiversity

Author

IEMA

Chris McDermott, from The Landmark Practice, describes how to predict the growth of tree and hedge planting when determining the effectiveness of mitigation

Landscape mitigation for schemes in the UK is often provided in the form of native hedge and tree planting. It is usual practice to predict the effect of such mitigation (http://www.environmentalistonline.com/article/2013-10-15/mitigation-applying-best-practice) after set periods, such as five or 15 years after planting. To do this, forecasting is required of the likely extent of growth, particularly height, for these periods. This is particularly important if preparing photomontages to show the effectiveness of the mitigation over time.

The third edition of the Guidelines for landscape and visual impact assessment

(http://landscapeinstitute.org/knowledge/GLVIA.php) states that: "Assumptions about plant growth or other changes over time should be realistic and not over optimistic. The design concept for the mitigation has to have a good chance of being achieved in practice to be taken seriously by the competent authority."

There are many variables active in achieving this, and this article explores the issues that must be considered.

Predicting plant growth and height

The growth of native trees and shrubs is influenced by many factors, such as soil type, climate, species, seasonal weather, maintenance and management.

Much can be learned from examining the conditions on a site. For example, is the soil a lowland arable rich loam or a poor thin stony soil? Is the site cold and exposed, or sheltered? Is the vegetation shaped by the wind? Are the leaves scorched by salt spray?

Growth can also be impeded if planting is on soils that have been compacted by construction activities, practitioners should ask whether amelioration is possible.

A good indication of likely annual growth at a site can be gained by examining the growth patterns of nearby vegetation. Annual extension growth is not difficult to measure on young trees or hedges in autumn when the fresh green or light brown shoots are easily distinguished from the older weathered bark of the previous season.

Certain species, such as willows, poplars and alders have a "sustained" growth pattern and can grow continuously throughout the growing season, extending up to 200cm if conditions are favourable.

Other species, such as oak and conifers, have "preformed" growth patterns which are determined by bud development in the previous year. They tend to put on a 20–60cm growth surge in spring and then slow down.

While it may be tempting to plant faster-growing, sustained growth species for quick effect, it is often preferable to plant species typical of the location or which support ecological objectives.

Planting a solid line of willow or poplar will rarely be appropriate, however, temporary use of these fast-growing nurse species to provide shelter for slower species could be considered.

Preformed growth species are usually longer lived and stronger than sustained growth species.

Extension growth also varies depending upon the maturity of the plant. Newly planted trees can require between two and five years to overcome the shock of being transplanted. Once established, however, they can go through a phase of maximum extension growth before slowing towards maturity.

Browsing by deer, drought and disease can further limit growth. Good management is important. Grass growing around the base of new planting can restrict growth to a significant degree and, if plants are planted densely and not thinned, competition will reduce growth.

To establish a good thick twiggy hedge it will be necessary to clip it annually and increase height slowly. Since hedges often only need to be 2–3m high (above head height) to provide effective mitigation, this is not necessarily problematic. Such a hedge can be achieved in four years in the right conditions, but between five and seven years is a good estimate.

A rule of thumb?

Newly planted stock is unlikely to have any significant screening effect in the first year since it is typically planted as 60–80cm high transplants. It can be useful to include some feathered trees and standards 2–3m in height for a more instant effect. Stakes and shelters could be considered to have a negative visual effect.

Given that most UK mitigation planting will be of mixed natives in largely unexposed conditions, an average annual growth of 30cm per year in the first five years can normally be assumed.

Once established the plants' growth rate will increase and this can be anticipated to reach around 50cm a year for the next 10 years. If planted as transplants, this gives a height of 2–2.5m in the first year and 7–7.5m after 15 years.

For more exposed locations it is recommended that annual growth is calculated by taking clues from the existing trees and hedges in the locality.

This article was written as a contribution to the EIA Quality Mark (https://www.iema.net/qmark)'s commitment to improving EIA practice.

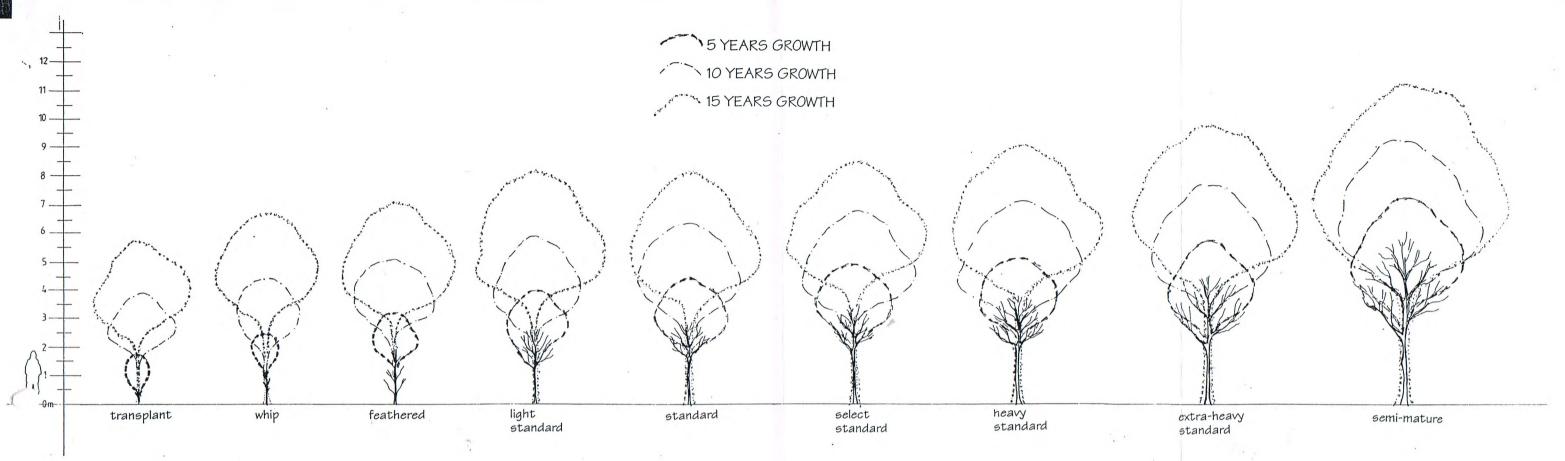
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Transform articles



EXTENSION GROWTH PATTERN

YEAR 1 - ZERO YEAR 2 - 200 TO 300MM YEAR 3 & 4 - 300MM YEAR 5 - 300 TO 450MM (UP TO 500MM FAST GROWING SPECIES) YEAR 6 TO 15 - MAINTAINED AVERAGE GROWTH OF YEAR 5 INCREMENT GROWTH - RADIAL GROWTH OF TRUNK

YEAR 1 - <3MM
YEAR 2 - 3 TO 5MM
YEAR 3 ONWARDS - 3 TO 6.5MM
(DEPENDANT UPON MICRO-CLIMATIC & ENVIRONMENTAL CONDITIONS)

DRAWING TITLE

Approximate Tree Growth Rates

DRAWN

March '98

SCALE as shown

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