



**PINS ref APP/U2234/W/23/3329481
LPA ref: 23/500899/OUT**

Appeal by

Wates Developments

in relation to

**LAND NORTH OF THE A20/ASHFORD
ROAD, HOLLINGBOURNE, KENT**

**REBUTTAL ON LANDSCAPE AND
VISUAL MATTERS**

prepared by

Peter Radmall, M.A., B.Phil, CMLI

on behalf of

Maidstone Borough Council

December 2023

Introduction

1. My name is Peter Radmall. I am the Council's witness on landscape and visual matters. Details of my background and the scope of my evidence are set out in my main proof of evidence.
2. The documents issued at exchange by the appellant's landscape witness, Mr Cook, included material that unfortunately either was new or represented a material change to the information available when the application was submitted/determined, or which provided the basis for my proof.
3. This document seeks to highlight the reliability and consistency of that information, before it is formally brought before the Inspector at the inquiry.
4. For the avoidance of doubt, where issues which remain in dispute are not addressed herein, it should not be interpreted as an acceptance of the appellant's position.

Scope of the Information

5. The relevant information is contained in Mr Cook's appendices and comprises the following:
 - Appendix 8: Illustrative Landscape Masterplan Rev E;
 - Appendix 9: Illustrative Landscape Masterplan Rev F;
 - Appendix 10: Field Restoration Plan; and
 - Appendix 11: Photomontages.

Status of the Planting Proposals

6. Illustrative Landscape Masterplan Rev F represents a further iteration of Rev E, in which additional tree planting has been introduced (but the proposed layout appears to be otherwise unchanged). It is my understanding that Rev F is introduced as an "option", should the inspector conclude that this tree planting would be desirable in order to provide further visual mitigation.
7. The Field Restoration Plan proposes tree planting along two boundaries of the field immediately to the south of the A20. This land is outside the red

line, but is understood to be under the control of the applicant. Again, it is my understanding that the Plan is introduced as a further “option”, should the Inspector conclude that more (off-site) tree planting would be desirable in order to provide further visual mitigation.

8. Whilst Appendix 9 represents enhancement of the Illustrative Landscape Masterplan reviewed by the Council and myself, Appendix 10 is wholly new information. Additional tree planting is, of course, broadly welcome in principle, except where that planting may itself become a source of visual obstruction, and I am not seeking to oppose it. However, as set out below, I do not consider that this adequately mitigates the impacts of the proposal.
9. I would also point out that these proposals highlight the inadequacy of the mitigation achieved by the original Illustrative Landscape Masterplan, as demonstrated in my proof.

Technical Accuracy of Mr Cook’s Photomontages

10. The photomontages have been the subject of a desktop review by Mr Spence, of MSEnvision Ltd, who also reviewed the original LVIA material. He has raised the following concerns:
 - The field of view provided by the specified lens will be wider than the 39.6 degrees cited;
 - As a result, the model renders could be inaccurate by a factor of c5%;
 - For VP6 (the view closest to that cited by the Council), the camera location is likely to be inaccurate by c1m for eastings/northings, and >2m for AOD height;
 - Inconsistency in presentation format between VPs 6, 10 and 12; and
 - Ambiguity in approach, combining elements of the Scottish Natural Heritage and Highland Council guidance.
11. It is my opinion that these concerns should be treated as a “health warning” when considering their accuracy and relevance.

12. In addition, it is not clear whether the montages correctly show the relationship between the appeal scheme and the outstanding phase (Phase H) of Woodcut Farm, in terms of the approved height, roofline and planting scheme that will have been implemented for the latter.

Consistency with Previous Visualizations for VP6

13. The montages for VP6 presented in the LVIA and LVIA Addendum included no topographic data relating to the development as modelled.
14. The visualizations appended to my proof were based on a finished floor level (FFL) for the development of 52.5mAOD and a maximum building height of 15m, giving an upper limit at roof level of 67.5mAOD. These levels were agreed with Rory Kemp of Wates Group by email on 28th November, which is appended to this document.
15. Mr Cook's visualizations are based on the following topographic data:
 - The wireline image uses an FFL of 54m and maximum of 67.5m AOD (i.e. a building height of 13.5m);
 - The two images (Year 1/15) without the planting south of the A20 use an FFL of 52m and a maximum of 67.0mAOD (i.e. a building height of 15m); and
 - The two images (Year 1/15) with the planting south of the A20 use an FFL of 54m and a maximum of 67.5mAOD (i.e. a building height of 13.5m, i.e. consistent with the wireline).
16. It is not clear why differing topographic data have now been used, or why these data have been presented at such short notice. It is plainly not possible to compare these montages with those presented in the LVIA/LVIA Addendum. Any comparison of the effectiveness of the mitigation also needs to take these variations into account.

Conclusion

17. As an outline application, it is acknowledged that matters such as FFL, building height and planting details can typically be controlled at Reserved Matters and enforced by condition. However, it is equally important that an appropriate degree of certainty is achieved at the outline stage where these matters are of relevance (as is the case here).
18. The Council wishes to draw the inspector's attention to the difficulty such amendments introduce into any comparative appraisal of the visual impact of the development, specifically in relation to VP6, but also from elsewhere.
19. In my view, these variations in key topographic and landscape parameters send a signal that the proposed design remains unacceptable and reinforce the perception that the scale of this scheme is inappropriate for a site of this size and sensitivity. Indeed, it is my view that despite the attempts to amend the application proposal, the impacts of this scheme are still significantly harmful.

Peter Radmall, 22nd December, 2023.

Attachment: Email from Rory Kemp relating to Maximum AOD/ Building Height

You replied on Tue 28/11/2023 11:05

You replied on Tue 28/11/2023 11:05

RK

Rory Kemp <Rory.Kemp@Wates.co.uk>

To: You; Andrew Cook

Cc: Jonathan Evans

Tue 28/11/2023 10:44

Hi Peter,

That's correct. The finished floor level can be determined through the reserved matters but we are not looking to exceed the max AOD of 67.5m.

Kind Regards,

Rory



Rory Kemp MRICS | Land and Planning Manager | Wates Developments

M: 07562207798

Wates House, Station Approach, Leatherhead, KT22 7SW

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Pronouns: he/him

From: Peter Radmall <peterradmall@outlook.com>

Sent: 28 November 2023 09:28

To: Rory Kemp <Rory.Kemp@Wates.co.uk>; Andrew Cook <Andrew.Cook@pegasusgroup.co.uk>

Cc: Jonathan Evans <Jonathan.Evans@pegasusgroup.co.uk>

Subject: Re: Land N of A20, Hollingbourne

Many thanks Rory. I assume this relates to the roof parapet of the building? Which equates to a finished floor level of 52.5m?

Are you also able to confirm whether these were the AODs used for preparation of the Pegasus visualizations?

Regards,

Peter

From: Rory Kemp <Rory.Kemp@Wates.co.uk>

Sent: 28 November 2023 09:16

To: Andrew Cook <Andrew.Cook@pegasusgroup.co.uk>; Peter Radmall

<peterradmall@outlook.com>

Cc: Jonathan Evans <Jonathan.Evans@pegasusgroup.co.uk>

Subject: RE: Land N of A20, Hollingbourne

Hi Peter,

We are currently setting this out within the Statement of Common Ground and will proposing a condition which state that the finished AOD of the development will not exceed 67.5m.

Kind Regards,

Rory



Rory Kemp MRICS | Land and Planning Manager | Wates Developments

M: 07562207798

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