

## Application: 20/501475/FULL Response from Newington Parish Council

Application: 20/501475/FULL Land Rear Of Eden Meadow, High Street Newington ME9 7JH  
Proposal: Erection of 40 No. residential dwellings including affordable housing and associated car parking, hardstanding, landscaping and open spaces, infrastructure including SuDs and earthworks accessed from the existing junction serving Eden Meadow from the A2 High Street

Newington Parish Council opposes this application.

Our submission outlines our objections, referencing these to relevant reports (from Swale planning officers, SBC policy documents, planning inspectorate decisions and other applicable documents). We show how these material considerations are substantiated in SBC policy and the National Planning Policy Framework.

Newington Parish Council was pleased to be invited to attend 18 June 2019 Swale Design Review Panel meeting. On 14 January 2020 Newington Parish Council held a Planning Committee Meeting to hear Esquire Developments' draft proposals. Residents of the Village were vocal and united in their opposition to the proposed development. Newington Parish Council shares that view.

### Planning decisions for this site and nearby

The original application, 16/505861/OUT, for this site (9 dwellings) was rejected at the 2 February 2017 Swale Borough Council Planning Committee meeting on the advice of officers.

Extract from Officer report

- i. It is outside the defined urban boundaries of Newington
- ii. Newington is considered a less sustainable settlement (services, transport and access to employment)
- iii. There would be significant adverse impact on the landscape character, quality and value of the rural setting.
- iv. There would be significant, permanent and unnecessary loss of a large area of best and most versatile agricultural land.
- v. 'As such it is considered that the proposed development does not accord with the National Planning Policy Framework' (see report to 2 February meeting (10.1) for detail

Newington Parish Council believes this was an accurate and balanced report. The reasons for refusal, above, apply – in greater measure – to the current proposal.

The subsequent Appeal (non-determination ) was allowed. Decision date 31 March 2017 Appeal Ref: APP/V2255/W/16/3162806

7. The appeal site lies adjacent but outside the built-up area for Newington as defined in the “Swale Borough Local Plan 2008” (the LP). Saved Policy H2 states that residential development in the countryside will only be permitted where it meets one of the exceptions listed in Policies E6 and RC3. The provision of 9 open market dwellings does not fall within any of the exempted categories and consequently there would be conflict with the LP in this regard.

8. However, the LP is now time-expired and whilst this does not mean that it cannot carry weight, its policies need to be considered in relation to their consistency with the Framework.

NB This site was not in the June 2016 proposed modifications to the Swale Plan, examined in public and found to be sound in Summer 2017. It is therefore a premature application.

The March 2017 Inspector report continues:

15. Policy E9 of the LP sets out the relevant criteria when considering the effect of a development on landscape character. Since Policy E9 is concerned with general design considerations, it is not a policy for the supply of housing and its aims and language accord with the fifth bullet of paragraph 17 of the Framework. Accordingly I attach full statutory weight to Policy E9 which states that proposals in the countryside should consider guidelines in the Council's "Landscape Character and Biodiversity Appraisal SPD 2011" (the LCA). The appellant points out that the site is within the Landscape Character Area known as 'Newington Arable Farmlands', which has lost much of its traditional character and is noted for its poor condition and low sensitivity.

33. In environmental terms, the scheme would incur loss of an open parcel of land close to the edge of the village resulting in landscape harm and conflict with Policy E9 of the LP. However, the appeal site has no special designation and views of the development would be limited in the wider landscape. Moreover, the visual harm could be partially mitigated over time by a net increase in green infrastructure. The site occupies a sustainable location where future residents would have a realistic choice to walk, cycle and use public transport to access essential day-to-day services and facilities. Based on the foregoing, I find that the overall level of environmental harm would be moderate.

However, a later appeal for 3 homes on an adjacent site (100 metres closer to the Village centre, also south side of the A2) at 148 High Street, Newington, was dismissed by the Planning Inspectorate.

Decision date 17 January 2018 Appeal Ref: APP/V2255/W/17/3185369

4 ...the area in which permission is sought to construct three new dwellings lies beyond the settlement boundary. For planning purposes the site is therefore within the countryside.

6. Although the commercial activities to the east have encroached to a small degree into the area to the rear of the High Street, the remainder has retained its open, rural character. Any other existing buildings appear to be part of the agricultural activities that previously took place in the area and are typical of those that can be seen in the countryside. There is therefore a significant change of character between the development which fronts the High Street and the area to the south.

7. The largest of the proposed dwellings would be a clear incursion into the open, rural landscape and countryside to the south of the High Street.... the introduction of the proposal as a whole with its access road, garages, parking areas, gardens and associated residential paraphernalia, would significantly erode the open, rural character of the area.

8 ...Consequently, the development as a whole would represent an unacceptable incursion into the countryside which would be harmful to the area's open, rural character and appearance. This would be the case regardless of the precise details of the layout or design of the individual buildings.

9. I therefore conclude that the proposal would harm the character and appearance of the countryside, contrary to Policies ST3, CP3, CP4 and DM14 of the Local Plan, all of which seek to conserve and enhance the countryside.

10. Notwithstanding the fact that Newington is an accessible village with a significant range of services, the Local Plan has defined its built-up area boundary. The supporting text of Policy ST3 recognises that development opportunities within the village are limited for a variety of reasons, including poor air quality and the surrounding high quality agricultural land. Any residential development beyond the boundary established by the Local Plan would therefore conflict with the aim of providing homes in accordance with the Borough's identified and agreed settlement hierarchy.

15. I am aware that an Inspector granted planning permission for development of nine dwellings at Ellen's Place in March 2017. However, that scheme was assessed against different policies and when the Council was unable to demonstrate a five year housing land supply. The Inspector found that even though that scheme did not conform to the development plan, the adverse

impacts did not significantly and demonstrably outweigh the benefits. The particular circumstances of that site and the policies which applied at the time therefore justified allowing the appeal.

We understand that Swale currently has a 4.6 year supply (ie an annual shortfall of 310 homes) and would submit that this is close enough for the harm from this proposed development to outweigh the need.

### Swale Borough Council and NPPF Policies relevant to this proposal

This proposal is not part of the Swale Borough Council plan; a document thoughtfully prepared by those with local knowledge to identify locations for development that would not increase air pollution, exacerbate traffic problems or reduce 'greenfield' land whilst 'brownfield' sites remained available. This 'windfall' proposal ignores the principles that underpin the local plan.

The proposed development was rejected in appeal for sites

Rejected at Local Development Framework Panel – May 2016

(SW/732 Ellen's Place, High Street 65 dwellings [ranked Tier D, SHLAA sweep 0]).

3.180 SW/732 at Ellen's Place (Figure 23), to the east of the village, is a pleasant area of pasture with attractive views southward to higher ground. This site could give rise to moderate to significantly adverse visual impacts, but it has fairly poor physical connectivity and accessibility to the village and relates less well to its form than other sites. An allocation here would read more as a consolidation of A2 ribbon development and the filling of a pleasant gap rather than as a logical extension to the village. It is not recommended as a priority for allocation at Newington

In the Local Plan Policy ST 3 identified Newington as a Tier 4 Rural Local Service Centre with noted limitations to expansion, so the village was allocated a growth rate of 1.3%. Even in the 2017 edition of the Local Plan, the restrictions on growth were reiterated with the single exception of "Land North of the High Street".

The following facts emphasise the extent that Newington has already played in fulfilling the targets of the Local Plan:

1. Total already built in Newington 2014 to now is 180 properties
  - a. For the target six years to date that is **297.5%**
  - b. Or for the full 17 year quota that is already **105.3%**

Since the Census in 2011 (population 2551 in 1089 household spaces), this village has grown by 18%. (for detail used in the calculation please see appendix 1)

The Parish Council is sure that Members will understand the cumulative effect of this increase and that of the proposal for a further 40 homes

This application is outside the built-up area and would create ribbon development (see policies E6 RC3). The exception –

where a proposal is '*able to demonstrate that it would contribute to protecting and where appropriate enhancing the intrinsic value, tranquillity and beauty of the countryside, its buildings and the vitality of rural communities*'.

does not apply.

This proposal does not enhance the countryside or the *vitality of the rural community*.

*We believe there is an error in the planning statement: it is our understanding that the defined built-up area ends at 152 High Street; and that the proposed development site is not adjacent to this.*

The proposal does not meet the definition of sustainable development in rural areas

*“To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities.*

It does not provide housing for agricultural workers in the neighbouring fields and so is contrary to the principle.

The land is not a ‘brownfield’ site. Instead it is ‘Best and most versatile’ agricultural land that has been left idle possibly in the hope of future permission for building.

Policy DM31: Agricultural Land – confirms development on agricultural land will only be permitted when there is an overriding need that cannot be met on land within the built-up areas.

Development on BMV will not be permitted unless:

1. The site is allocated
2. There is no alternative site on land of a lower grade than 3a
3. The development will not result in the remainder of the agricultural holding becoming not viable or lead to likely significant losses of high-quality agricultural land

Esquire Developments have made no secret of their ambition to expand the site further which would lead to significant loss of high quality agricultural land as well as a seriously detrimental effect on the rural character of the area, its landscape and the visual amenity of views from the footpaths beside and behind the site. The cumulative effect of the proposed development, in addition to the existing nine homes would result in serious loss of visual amenity.

This proposal would lead to serious loss of visual amenity (footpaths ZR65 and ZR67/1) The proposed site would be visible from the Boyces Hill footpath, the Cranbrook Lane footpath, from Callaways Lane, which leads to Cranbrook and Cromas Woods (known locally as Monkey Island), is near to listed buildings and adjacent to the Newington Manor conservation area. This is a very popular bridleway and footpath, well-used by residents and hikers due to the fine views.

See Pond Farm Inquiry - Appeal decision date 9 January 2016 Appeal Ref:

APP/V2255/W/15/3067553 and APP/V2255/W/16/3148140 (subsequently upheld by the High Court and Court of Appeal): Third of the nine main issues ‘The effect of the appeal proposals on landscape, character and the form of Newington’

The Inspector decision was that the proposals would have caused substantial harm to landscape character

Swale Borough Council’s October 2019 Landscape Sensitivity Assessment

Pp 478-479 A1.214-A1.215

Natural Character: ‘Cranbrook Wood is priority habitat deciduous woodland’

Overall Assessment: ‘The landscape has a very undulating topography, a moderate sense of rural character with limited modern human influences, limited time depth with some heritage assets, limited valued natural features and semi-natural habitats, is visually enclosed and acts as an important rural gap between Sittingbourne and Newington. These attributes, in combination with the absence of landscape designations, indicate a moderate overall sensitivity to future change from residential development’

In the Preliminary Ecological Appraisal:

6.1 Identifies that the site survey took place on 20th February between 10:00 and 11:30, the authors describe the conditions as:

‘8 degrees C, 100% cloud cover, breezy, no rain, ground damp”

6.25 Acknowledges:

*“The survey was conducted at a time of year when some plant species may not be conspicuous.”*

6.26 States:

*“In accordance with CIEEM guidance, consideration should be given to the validity of survey data after a period of 12 month from the date of the survey. This may require a site visit to assess whether ecological conditions within the site have changed and may require further ecological survey work due to the transient nature of some protected species.”*

We note that this Appraisal is preliminary and an Ecological Impact Assessment is therefore yet to be completed.

#### Reptiles

- 10.1 "Further survey work is currently being undertaken for reptiles.
- 10.2 A reptile presence / likely absence survey is being undertaken within the Site.
- 10.3 Thirty artificial cover objects (ACOs), comprising a mixture of bitumen felt and corrugated, were placed within areas of suitable reptile habitat within the Site. ACOs will be left for at least 10 days prior to the first survey visit, which is scheduled to commence in March 2020.
- Survey effort and timing:
  - March - September (July and August sub-optimal)
  - Seven visits to be undertaken in appropriate weather conditions on non-consecutive days."

Presumably the first of these has now been undertaken. We await the findings

We welcome the mitigation recommendations for nesting boxes for house sparrows and starlings and that bat boxes should be integrated within the proposal.

Also 11.7

"It is recommended that boundary vegetation is retained as part of proposals and that measures are designed into a Landscape Strategy to enhance boundary habitat for foraging and commuting bats."

The report (7.6 Ancient Woodland) describes woodland 0.9km north but not the adjacent Cranbrook and Cromas Woods (known locally, jointly as Monkey Island) to which the footpath and bridleway leads

Please see the Swale Borough Council's October 2019 Landscape Sensitivity Assessment above which classifies : 'Cranbrook Wood is priority habitat deciduous woodland'

The proposal would be detrimental to the health of residents of Newington.

Air quality cumulative effect of 124 homes nearing completion at Watling Place, the existing 9 Homes in Eden Meadow, and now the proposed 40 additional homes increases problems of air quality in Newington - one of the two reasons why the Pond Farm appeal was refused after the Planning Inquiry in November 2016

See Pond Farm Inquiry - Appeal decision date 9 January 2016 Appeal Ref:

APP/V2255/W/15/3067553 and APP/V2255/W/16/3148140 (subsequently upheld by the High Court and Court of Appeal):

'even after taking into account the proposed mitigation measures, the appeal proposals would have an adverse effect in air quality, particularly in the Newington and Rainham AQMAs (proposals conflict with NPPF paragraphs 120 and 124)'

Forty homes may seem a modest proposal – but the cumulative effects of other recent developments already has a significant effect on the health of village residents, especially children walking through the village centre on their way to school.

Traffic through Newington passes to and from Rainham.

There is only scant consideration of the potential effect on Medway in the Lustre report.

In addition to the objection lodged by the MP for Rainham and Gillingham please see:

Letter from Head of Planning Medway Council to Planning Officer at Swale Borough Council 24 February 2017 in response to the application for 124 homes opposite this site

Neither the submitted Air Quality Assessment, as amended, nor the letter from the applicant's Air Quality Consultants, has assessed the impact of the development on the Rainham Air Quality Management Area, which is located approximately 1.8 miles (2.9km) west of the application site. Without evidence to the contrary and in the absence of an appropriate assessment Medway Council is unable to assess the full impact the development would have upon the Rainham Air Quality Management Area and as such, the development would be contrary to the provisions of paragraph 124 of the National Planning Policy Framework, the National Planning Practice Guidance in regard to Air Quality and Policy BNE24 of the Medway Local Plan 2003.

NB There were sporadic roadworks due to emergency gas repairs along the A2 through 2018 and into 2019. Newington High Street was closed completely for 5 weeks in summer 2019 for further emergency work to replace pipework. A larger 42 week scheme to replace all pipework began in September 2019 with one-way operation on different stretches since. The High Street is currently (April 2020) closed again for a 4 week period to relocate a main valve. There is also lighter traffic due to the Covid-19 emergency. We therefore submit that air pollution readings over the past two years are not typical and cannot be considered when estimating future pollution levels. Newington Parish Council is working with MidKent Environmental Services on the installation of new, more accurate (PM10 and PM 2.5) monitoring equipment in the village centre. In addition to the vehicle numbers please consider also recent evidence of increased harm to those who have suffered Covid-19 from vehicle pollution. Newington Parish Council intends to submit further detail of our opposition to this proposal on air pollution grounds when we have had time to study the Lustre consulting report data thoroughly.

We note that the submitted Air Quality assessment proposes no significant mitigation measures

6.5 Using the guidance issued by Swale Borough Council, it is recommended the following mitigation measures be implemented, some of which are standard mitigation for all developments as outlined in the Councils Air Quality and Planning Technical Guidance:

- 1 Electric Vehicle charging point per dwelling with dedicated parking or 1 charging point per 10 spaces (unallocated parking). EV charging technology should be the best available technology at the time of planning approval.

We applaud the inclusion of electric vehicle charging points but evidence points to the fact that, given the expense and short range of these vehicles, few can afford them after the expense of moving and new mortgage. Any benefits to pollution would therefore not be felt for several years. Electric charging points are only effective where in dedicated spaces adjacent to each property. Any 'shared' points inevitably lead to a conflict between charging and parking. The proposed site is outside the village and any pedestrians would walk along the busy, dangerous and polluted A2, as would cyclists; public transport infrastructure is poor with a limited train and bus service and no buses in the evening or on Sundays.

Para 108 of the NPPF - In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

- a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;
- b) safe and suitable access to the site can be achieved for all users; and
- c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.

Nowhere in the Transport Statement does it actually state how *appropriate opportunities to promote sustainable transport modes* have been– or can be – taken up, given the type of development and its location.

## Other concerns from documents submitted with this planning application

The proposal would be likely to create problems of access with a new, dangerous junction with the A2 almost opposite the new junction for 123 Persimmon homes at Watling Place. In their presentation to the public on 14 January 2020 Esquire Developments were explicit about a wish to extend the development further south from the High Street with the possibility of a second junction to the A2

The access / egress at the A2 into Eden Meadow is 5.5m, which is acceptable. However, with the current residents parking their cars outside their properties, and with visitors' vehicles parked beside kerbs, there is a restricted width for vehicles to pass. The actual access into the proposed rear of Eden Meadow is only 4.8m, which does not allow sufficient width for certain vehicles. The quoted '*Kent Design Guide: Designing for Movement*' states 'carriageway width not necessarily constant but there should be sufficient space for two cars to pass each other at least every 40m'. The Council believes that the existing access / egress cannot support both the current site with its day to day activities and the proposed development. Any proposal to be offered by the



developer to utilise a secondary road to be installed to the west of the application site would cause further concern to the Parish Council as this adds weight to the rumoured future estate lying to south of the A2 from Callaways Lane to Eden Meadow.

Figure 2.3 highlights vehicles parked close to the entrance with the A2 Newington High Street and clearly show the narrowness of the junction. With vehicles wishing to exit the current 9 house site of Eden Meadow it shows the possible queuing and hold up of traffic on the A2. Photographs submitted by existing residents of Eden Meadows reinforce this, showing there is already a shortage of parking. This suggests that parking allocations in the original, 9 home allocations were under-calculated. We have concerns that the same may apply to the statistical data to extrapolate predicted vehicle movements for the current application: eg in 6.32 the proposed development has been identified as resulting in an additional 183 vehicle trips across a 12hr period. This is not considered to represent a significant or 'severe' highway impact in accordance with Paragraph 109 of the NPPF. However there are concerns that if the proposed development were subsequently expanded, as is Esquire's stated ambition, this might result in a misrepresentation of data by not considering the cumulative effect as per the NPPF.

The proposed number of parking places will be insufficient for both household and visitors. The proposal provides a total of 76 residents' parking spaces for 40 dwellings with just 8 parking spaces for visitors. The proposal comprises a mix of 1, 2, 3, & 4-bedroom properties in a rural location. Unsurprisingly, the highest levels of car ownership are found in the most rural parts of the Borough where the choice of travel modes and accessibility to local services by means other than the private car is reduced. We would submit that smaller properties typically have more vehicles (eg 2 cars + 1 van) than larger properties (2 cars) with the latter having the benefit of a larger driveway. Evidence show that garages (11 in this proposal) tend to be used for storage rather than parking and this is generally accepted in the Borough Council's parking standards. This proposal seems to prioritise the wish for a design that appears attractive on paper above the requirement of meeting the actual needs of people who would live there. It may comply with the requirements of current regulations but does not meet the terms or spirit of standards currently in consultation by Swale Borough Council.

We believe some information in the transport assessment is inaccurate

As stated above there is a poor train services and buses do not operate in the evening or on Sundays. It should be noted that bus services are roughly hourly, with 'direct' routes alternating with those via other local villages and taking an hour to Chatham. On weekdays there is a four hour gap between the more direct service to Chatham at 6.31am (terminates at Medway Hospital) and the next at 10.26am

The Transport Statement states that services to London Victoria are provided twice hourly. Monday to Friday there is a service to London Victoria at 05:50, 06:56, 07:29, 08:03, 08:48 and 09:18. Trains are then hourly until schools close when there are 2 additional trains at 15:48 and 16:49, hourly thereafter and hourly at weekends.

Section 2.3.4 states that the National Cycle Route is reached via A2 and Church lane, which are "subject to reduced speed limits". This is untrue. This section of the A2 is 30mph (reduced from 40mph), Church Lane 30mph; all lanes (National Cycle Route) leading off Church Lane are National Speed Limit (ie 60mph).

Section 2.5.1 – 2.5.3 suggests the village primary school is a 1,100m 14 minute walk. We doubt that children 4yrs-11yrs would reach the stated speed of 80m per minute. It should be noted that these young children would have to walk along the busy, polluted A2 and cross long before the pedestrian crossing in order to reach a pavement for the remainder of their journey. The Transport Statement gives not adequate measures to mitigate against the effects of vehicle traffic on the health of pedestrians. We believe many residents would choose not to walk into the village and, once in their car, would carry on to Rainham or Sittingbourne instead. We therefore challenge the assumptions on likely vehicle movements given in the assessment.

Therefore it is unclear how this Transport Statement meets the requirements of Paragraph 110 of the NPPF

“Applications for development should:

- a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;
- b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;
- c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;
- d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and
- e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.”

We question the effectiveness of measures proposed to encourage cycling and walking (welcome packs etc).

There is nothing here to address the needs of those with disabilities of reduced mobility; indeed, an estate development outside the village is very unhelpful to these.

We question the ‘safe’ – *‘minimising conflict between pedestrians, cyclists and vehicles’* due to the location outside the village.

As states above, questions remain about the effectiveness of facilities to enable charging of vehicles

The Archaeological Assessment is a helpful and comprehensive document. We would only wish to comment that the initial assessment of the Persimmon development expected little of interest and resulted in significant finds. This document comments 5.3.3 ... *It was also thought that the current A2 was not aligned with that of the Roman Road, which could be south of the present road.*’ In the event of planning permission being granted we would expect a full site assessment to be carried out.

Newington Parish Council requests that, in the event of the planning officer recommending approval, this response be forwarded to all members of planning committee as well as the customary summary in the officer report.

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Appendix 1:

Properties with planning permission in Newington since 2011

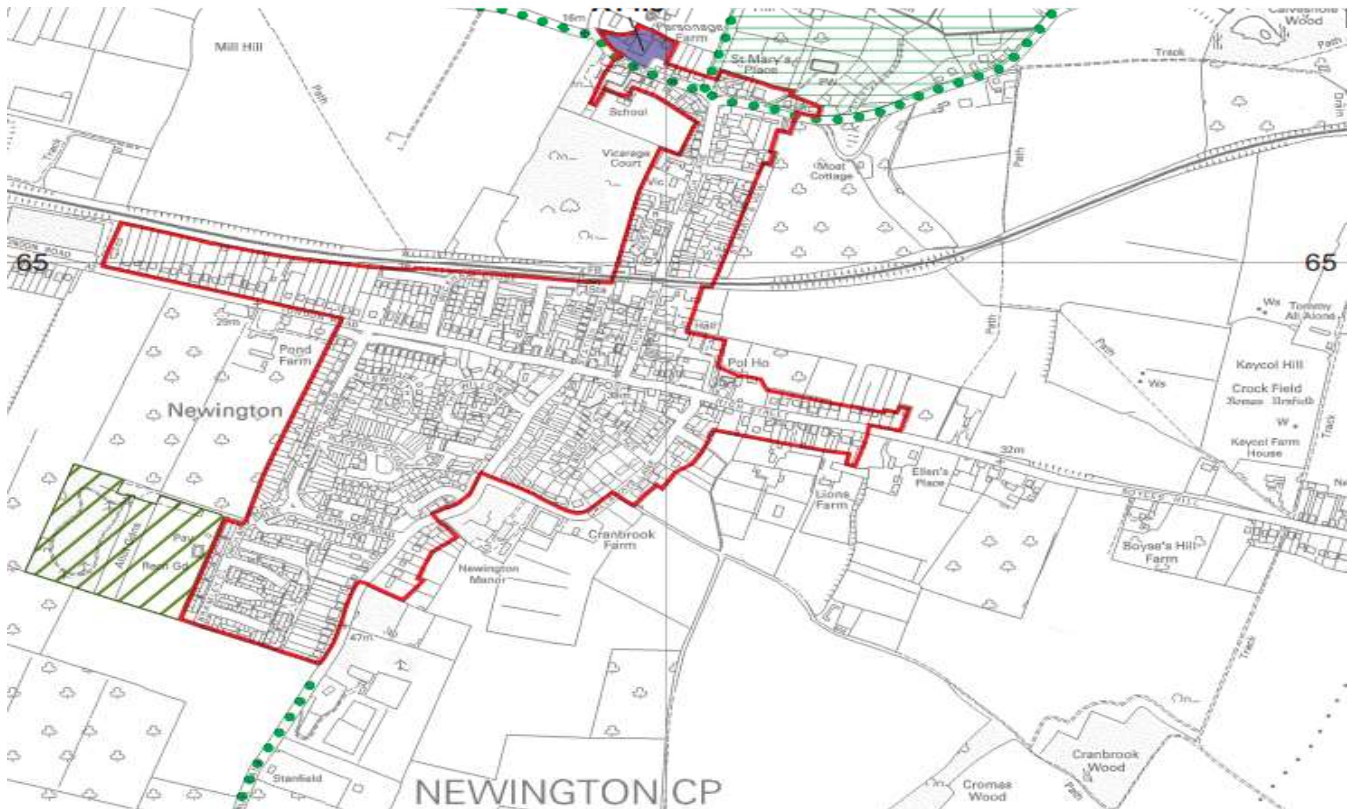
<b>Known As</b>	<b>Properties Count</b>	<b>Decision Issued Date</b>	<b>Planning Reference</b>
Playstool Close	4	Feb-11	SW/10/1630
Vicarage Court	10	Jul-11	SW/10/1629
Hidden Mews	4	Dec-12	SW/12/0637
<b>Total 2011 pre 2014</b>	<b>18</b>		
School Lane (Parsonage Farm)	14	May-15	SW/14/0486
Tractor shed (Bull Lane)	1	Oct-15	15/504706
Church Lane	1	Oct-16	16/505663
Former Workingmen's Club	11	Jul-17	16/506166
Chesley Oast	5	Aug-17	16/506159
Eden Meadow	9	Sep-17	16/505861
High Oak Hill (Harbex)	6	Nov-17	17/504376
The Willows (?9 London Road)	1	Dec-17	17/503349
Land N. of the High Street (Persimmon)	124	Apr-18	60/501266
Callaways Lane	1	Sep-18	18/503564
The Tracies	5	May-19	18/505315
Car Wash (studio flat)	1	Jul-19	17/504813
Cromas (Land Adjacent)	1	Jan-20	19/506356
<b>Total 2014 to 2020 (March)</b>	<b>180</b>		
<b>Overall Total Since 2011</b>	<b>198</b>		

## Appendix 2:

- Pre 2017 amendments to included "Land North of the High St" - also shows Cranbrook and Cromas Woods
- Post 2017 with Persimmon and Eden Meadow x 9
- The risk of expansion showing a linked up estate south of the A2

2a)

### Newington Built Up Boundary Pre 2017



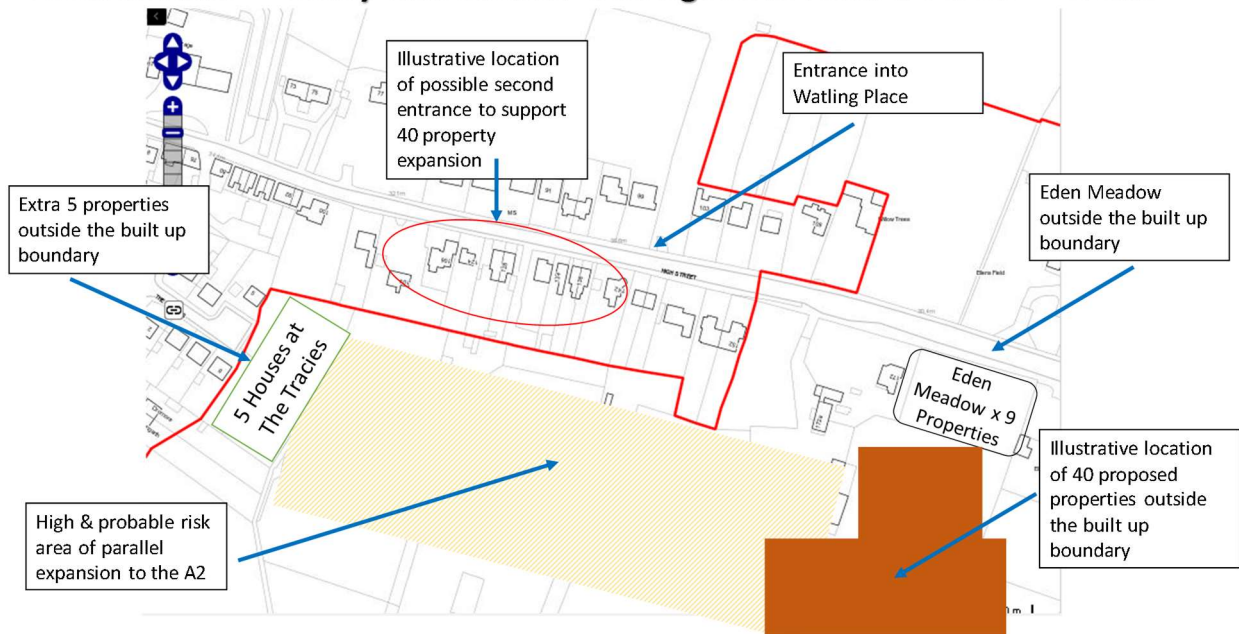
2b)

### Newington Built Up Boundary With "Land North of High Street"



2c)

### An Illustration – “Likely accumulated and significant loss of...land” – DM31



### Appendix 3

Photographs taken from the footpath south of the proposed development to show current views of the proposed development site; northwards to the A2; and towards the estuary

3a)





3b)



3c)



3d)



#### **Summarised Objections – Eden Meadow – 20/501475/FULL**

1. Newington is considered a less sustainable settlement (services, transport and access to employment) which is recognised in the limitations set out in ST3
  - a. The village has accommodated 180 new homes since 2014. Well beyond its target
2. This proposal is outside the defined urban boundaries of Newington
3. There would be significant adverse impact on the landscape character, quality and value of the rural setting.
4. There would be significant, permanent and unnecessary loss of an area of best and most versatile agricultural land.
5. A development here would read more as starting a consolidation of A2 ribbon development and the filling of a pleasant gap rather than as a logical extension to the village.
6. Serious loss of visual amenity (footpaths ZR65 and ZR67/1). The proposed site would be visible from the Boyces Hill footpath, the Cranbrook Lane footpath to Cranbrook Woods.
  - a. The developer has failed to show the actual impact of their proposal instead just loosely indicating an area on the skyline – where's the 3d impact so the damaging extent can be fully realised
7. Cumulative effects of this and other developments will have an adverse impact on Air Quality Management
  - a. A "city tree" will not abate the damage to the health of the residents of Newington
8. The data used by the developer in their last application has already proved incorrect for parking and numbers of vehicles. This development will create a high volume of traffic going east and west once egressing onto the A2
9. The existing junction is insufficient to support both the existing residents and the build phase. A secondary point of access nearer the village is unacceptable solution

10. There would be significant further adverse impact on the visual amenity to and from a listed building
11. Adverse impact on the ecology of the area and research still not completed
12. The impact on any archaeology has to be fully understood
13. Claims by the developer that 5-11 year olds can safely walk to school are inaccurate