



# Land to the North of Whitstable Road, Herne Bay

Local Plan Representations (Regulation 18)

**Boyer**

Prepared on behalf of Wates Development | June 24

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**REPORT CONTROL**

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## **APPENDICES**

**Appendix 1 – Development Management Policies Commentary Document**

**Appendix 2 – Site Location Plan**

**Appendix 3 – Landscape Sensitivity & Green Gap Appraisal**

**Appendix 4 – Site Concept Plan**

# 1. INTRODUCTION

- 1.1 These representations have been prepared on behalf of Wates Developments Limited (“Wates”) in response to Canterbury City Council’s (CCC) Local Plan (Regulation 18) Consultation (the “draft Local Plan”) & to promote the site known as ‘*Land to the North of Whitstable Road*’ (the “Site”).
- 1.2 Firstly, these representations explore the overall housing need within CCC & the Council’s proposed spatial strategy, in respect to the delivery of new housing. In addition, representations have also been prepared to provide comments on the proposed development management policies (see [Appendix 1](#)).
- 1.3 Secondly, these representations provide an overview of the Site, which Wates Development Ltd have an interest in, which we consider represents an appropriate & sustainable location for new development.
- 1.4 On this basis, our representations are structured as follows:
  - [Section 2](#) provides comments on the overall housing context;
  - [Section 3](#) provides our response to the proposed spatial strategy;
  - [Section 4](#) provides an overview of the Site,
  - [Section 5](#) summarises why we consider the Site should form a residential allocation in the draft Local Plan & the benefits of the Site;
  - [Section 6](#) sets out our conclusions.
- 1.5 The following documents which accompany this representation include:
  - [Vision Document](#) (prepared by A2);
  - [Development Management Policies Commentary Document](#) (prepared by Boyer) (see [Appendix 1](#));
  - [Site Location Plan](#) (prepared by A2) (see [Appendix 2](#));
  - [Landscape Sensitivity & Green Gap Appraisal](#) (prepared by SLR Consulting) (see [Appendix 3](#)); and
  - [Site Concept Plan](#) (prepared by A2) (see [Appendix 4](#)).

## 2. HOUSING CONTEXT

### Housing Requirement

- 2.1 As set out in the National Planning Policy Framework (NPPF) (2024), strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance (paragraph 61). The Council is seeking to deliver its standard methodology housing need figure in full over the plan period.
- 2.2 We consider that this is the minimum the Council should be planning to meet, and we note that several proposed changes have been made to the Council’s spatial strategy since the previous consultation (e.g. reducing the plan period from 2044/45 to 2040/41 with the consequential reduction in planned new housing). Draft Policy SS3 sets out a revised plan-period starting in 2020/21 and ending in 2040/41 (totalling 21-years). This compares to a 25-year plan period proposed in the October 2022 Reg.18 draft plan.
- 2.3 These changes which represent a reduction in ambition is disappointing as several social & economic benefits associated with the previous level of planned new housing will now not be realised.
- 2.4 Notwithstanding this, the emerging Local Plan proposes to make provision for 1,149 homes per year, creating a need for a total of 24,129 new homes over the Local Plan period of 2020-2041. As set out in the Development Topic Paper (DTP) (2024), *“the standard methodology includes a cap, which this year would put the LHN at 1,146 homes per year, on the basis that the adopted Local Plan became over five years old after 17 July 2022. Therefore, for Canterbury district, the highest of the two options in the PPG is ‘40% above the projected household growth for the area over the 10-year period identified in step 1’3 . 2.15. However, as there is a high need for affordable housing within the district and the difference is only 3 dwellings per year, the council is not proposing to include a cap”*.
- 2.5 In any case, this level of delivery represents a significant uplift on the number of homes delivered in recent years as set out by Table 8.4 in the DTP, replicated below:

**Table 8.4: HDT last three years housing requirement and completion figures**

HDT	2020/21	2021/22	2022/23	Total
Housing requirement	599 <sup>23</sup>	900	1,070 <sup>24</sup>	2,569
Total completions	463	682	693	1,838

- 2.6 Furthermore, we do not consider the Council has demonstrated that it has followed relevant policy & guidance in respect of setting its housing requirement. Specifically, we consider the Council has not considered whether it should exceed its standard methodology figure.
- 2.7 The Sustainability Appraisal (2024) sets out the Council’s reasons for the rejection of an alternative housing growth options. Paragraph 5.3.21 of the SA states *“the PPG clearly*

identifies that any deviation from the standard method must be supported with robust justification and only used in exceptional circumstances. There is currently no robust evidence to justify an alternative methodology and include a 10% or 20% uplift in the standard method figure as proposed under the alternative options. The level of growth required under the standard methodology will help facilitate affordable housing, infrastructure, and employment growth”.

2.8 We consider that the Council should consider planning for a higher housing delivery for the following reasons:

- Affordable Housing – the DTP acknowledges affordability of housing in the district continues to present a significant challenge to those seeking to buy or rent housing. Furthermore, table 8.13 (re-provided below) identifies that the plan will leave 3,264 homes worth of affordable housing need going unmet (in the 21-year plan period). As such, there needs to be strong consideration as to whether additional housing is required to address the levels of unmet affordable housing need.

**Table 8.13: Future supply of affordable housing**

	Total affordable housing
Remaining 2020-2041 requirements	6,321
Carried Forward 2017 Local Plan allocations <sup>33</sup>	491
Draft 2020-2041 Local Plan allocations	2,566
Outstanding requirement	3,264

- Other Groups – the Council should consider the needs for other types of housing as per paragraph 63 of the NPPF. The Council will need to ensure it has undertaken assessments for other groups, such as students, to enquire whether an uplift in its housing requirement is required.
- Economic Growth - The Council is planning to deliver a supply of employment land (31ha), in line with the ‘Labour Demand’ projection in the ‘Canterbury Economic Development and Tourism Study Focused Update’ Supplementary Note (2023) (prepared by Lichfields) (paragraph 3.3). However, the labour supply growth scenario, “generates an employment land requirement equivalent to 60,320 sqm or 13.2 ha over the 21-year Plan period to 2041, again driven mainly by distribution (B8) and light industrial (E(g)(iii)) uses” (paragraph 3.5). It is therefore evident that there is a significant gap between the employment land required, and the number of homes allocated.

2.9 We therefore consider the Council should consider whether it should plan for additional homes above local housing need given the reasons above.

## Housing Supply

- 2.10 In terms of looking forward, as set out at Table 8.8 (page 96 of the DTP), the Council anticipate a significant jump in housing completions from 2023/24.

*Table 8.8: Summary table of housing land supply*

Components of Housing Land Supply	2023 /24	2024 /25	2025 /26	2026 /27	2027 /28	2028 /29	2029 /30	2030 /31	2031 /32	2032 /33	2033 /34	2034 /35	2035 /36	2036 /37	2037 /38	2038 /39	2039 /40	2040 /41	Total No. of units
2017 carried forward Allocations	714	724	879	969	982	1016	962	875	959	672	568	391	370	370	360	300	300	50	11,461
Draft New Allocations	0	10	39	68	228	471	682	730	750	730	690	690	690	670	555	410	340	320	8,073 <sup>28</sup>
Planning Permissions	110	249	197	65	140	140	140	120	0	0	0	0	0	0	0	0	0	0	1,161
Windfall				49	170	170	170	170	170	170	170	170	170	170	170	170	170	170	2,429
Student permissions	196	-5	74	103	226	0	0	0	0	0	0	0	0	0	0	0	0	0	594
Older persons permissions	138	-9	103	90	0	44	0	0	0	0	0	0	0	0	0	0	0	0	366
Draft New Allocations for older persons homes	0	0	0	0	0	17	0	0	88	56	236	34	0	0	0	0	0	0	431
<b>Total</b>	<b>1,158</b>	<b>968</b>	<b>1,292</b>	<b>1,344</b>	<b>1,746</b>	<b>1,858</b>	<b>1,954</b>	<b>1,895</b>	<b>1,967</b>	<b>1,628</b>	<b>1,664</b>	<b>1,285</b>	<b>1,230</b>	<b>1,210</b>	<b>1,085</b>	<b>880</b>	<b>810</b>	<b>540</b>	<b>24,514</b>

- 2.11 Based on the above table, completions in 2023/24 are expected by the Council to be 60% higher than in 2022/23 which we consider to be overly optimistic and ultimately unrealistic. Even if completions are at this level, paragraph 8.120 of the Topic paper states “*applying the housing land supply calculation methodology, as set out in this statement, the current forecast for the next five-year period 2023 - 2028 indicates a housing land supply of 4.40 years which equates to an undersupply of 884 units over this 5-year period.*”
- 2.12 In the first instance, to ensure the plan accords with national policy and is effective, additional sites need to be allocated to ensure that a five-year supply can be demonstrated both on adoption & over the plan-period. This is to ensure a sufficient rolling supply can be demonstrated as required by paragraph 76 of the NPPF.
- 2.13 Based on the above, we consider additional sites need to be allocated to ensure the plan is both positively prepared & effective.

### Additional Need

- 2.14 As set out above, the Council should plan for additional homes above local housing need given the affordable housing need, economic growth projected & demand from other types of housing.

### Large-Scale Allocations

- 2.15 The Council acknowledges its shortfall within the first five years, however, states that the number of homes per annum is anticipated to increase as the Local Plan progresses. The Council notes it has included several large strategic sites, and as such “*the applied phasing*”

*therefore cautiously reflects their size, complexity and the amount of infrastructure that is required.”*

- 2.16 As such, the Council expects that prior to Regulation 19 consultation many of these larger sites will be capable of earlier phasing, for instance due to applications being submitted as the plan will be closer to adoption, or permissions being granted. The Council, therefore, expects it will be able to demonstrate a comfortable five-year housing land supply at Regulation 19 stage, on top of the already evidenced significant buffer over the housing need for the entire plan period. We note the Council’s commentary, however, whilst some of the larger allocations might be capable of earlier phasing, this is by no means a certainty.
- 2.17 In relation to the above, Lichfield’s ‘Start to Finish’ study, highlights the risks/delays with allocating large-scale developments. It states *“only sites of 99 dwellings or fewer can, on average, be expected to deliver anything in a five-year period from validation of a planning application, with delivery of the first dwelling on average taking 3.8 years. By comparison, sites of 1,000+ dwellings take on average five years to obtain detailed planning permission, then a further 1.3 - 1.6 years to deliver the first dwelling.”* This highlights the significant lead in times associated with large scale/urban extension schemes.
- 2.18 These risks are referenced within the DTP at various points. Firstly, paragraph 8.3 states *“many of the circumstances put forward during the 2017 Local Plan examination still remain relevant due to delays caused by appeals, judicial reviews, covid-19 and the Stodmarsh Water quality issues.”*
- 2.19 Paragraph 8.6 states *“we recognise that the large-scale strategic allocations will take a number of years to complete (as has been seen at longer rates than anticipated due to the quantity of appeals and judicial reviews) and this together with the fact that the district is heavily constrained in terms of landscape and other conservation policies.”*
- 2.20 Paragraph 8.17 states that windfall sites have been the main supply of housing within the district since the last Local Plan was adopted, thereby demonstrating the difficulties which can be faced with the delivery of large urban strategic sites. It is also noted that, following the Regulation 18 draft Local Plan (2022) consultation, several site allocations have been removed from the Draft Local Plan due to concerns around deliverability and/or unresolved fundamental technical constraints (paragraph E14 of the DTP).

#### **Unforeseen Delays**

- 2.21 Paragraph 8.3 of the DTP details that there have been many circumstances experienced which have delayed delivery of housing, including delays caused by appeals, judicial reviews, covid-19 and the Stodmarsh water quality issues.
- 2.22 Furthermore, the construction of several of the strategic housing sites granted at Sturry & Herne Bay have been delayed as they are reliant on the construction of a new relief road for Sturry.



- 2.23 The above clear demonstrates that the Council is fully aware of the risks associated with allocating too many larger scale sites and the past issues which has caused delays in strategic sites being delivered.

**Summary**

- 2.24 National policy is clear on this issue, with the NPPF stating planning policies should identify a supply of specific, deliverable sites for five years following the intended date of adoption (paragraph 69a). At this stage it is not possible to say with any certainty that the Council will be able to demonstrate a 5-year housing land supply on adoption.
- 2.25 In light of the Council's overly optimistic expectations on delivery & acknowledgement that even based on the stated trajectory the Council is unable to demonstrate a five-year supply on adoption, we consider a more proactive approach in identifying & allocating additional suitable sites (small, medium & large) for residential development should be taken.
- 2.26 In doing so this will ensure that the Council is able to meet its required housing target and demonstrate a rolling five-year supply of housing across the whole plan period, specifically during the first five years of the plan. This will ensure the draft Local Plan can be found sound (in all the dimensions of that test) as set out at paragraph 35 of the NPPF.

## 3. SPATIAL STRATEGY

### Overview

- 3.1 Chapter 3 in the DTP explains the rationale behind the Council's chosen spatial strategy. During the early stages of the draft Local Plan, the Council consulted on six spatial growth options, as part of its 'Issues' consultation in 2020 & 'Draft District Vision & Local Plan Options' consultation in 2021. These six options included:
- Preferred growth option (Canterbury Focus C), Canterbury Focus A, Canterbury Focus B - these three options involved growth focused on Canterbury with more limited growth at the coast and villages. Options B and C both included providing an additional 5,000 - 8,000 homes, above LHN, to fund significant infrastructure.
  - Coastal Focus - growth focused in Whitstable and Herne Bay with more limited development in Canterbury.
  - Rural Focus - growth focused in sustainable rural areas, with some growth at villages and hamlets, and more limited growth at Canterbury, Whitstable, and Herne Bay.
  - New Freestanding Settlement - growth focused at a new freestanding settlement, with more limited growth in Canterbury, Whitstable and Herne Bay and rural areas.
- 3.2 Following the previous Regulation 18 consultations & Call for Sites, the Council acknowledged that a blend of the six spatial growth options was the preferred strategy for the draft Local Plan.
- 3.3 As such, within this draft Local Plan, policy SS3 (Development Strategy for the District) sets out the Council's preferred spatial strategy. It states that between 2020/21 & 2040/41, provision is made through the granting of planning permission and the allocation of sites for an average of 1,149 new dwellings. The Council's spatial strategy can be summarised as follows:
- Canterbury Urban Area as the principal focus for development in the district.
  - Whitstable and Herne Bay Urban Areas as the secondary focus, where development will be principally driven by the need for new infrastructure including schools and improved transport connectivity.
  - A new freestanding community will be pursued to meet a proportion of growth.
  - Proportionate development will be allocated at Rural Service Centres at a suitable scale which supports the function and character of the settlement.
  - A limited amount of growth will be allocated at Local Service Centres, where suitable sites are available, at a suitable scale which supports the function of the settlement.
  - No residential development will be allocated in the countryside.
- 3.4 As set out above, the Council's development strategy primarily focuses on Canterbury Urban area for development in the district and a new rural settlement is planned for land north of University of Kent campus. In addition, Whitstable Urban Area & Herne Bay Urban Area will

be the secondary focus for development in the district, with new development supported on suitable sites within these urban areas.

3.1 Within chapter 1 of the draft Local Plan, the Council sets out its visions for the District over the plan period. These include:

- *A range of new homes will meet the needs of the district, ensuring the right type of homes are delivered in the right places to improve affordability and support our communities.*
- *Support the sustainable growth of our rural communities through the provision of affordable housing, community facilities and public transport infrastructure while taking advantage of opportunities to protect and grow the rural economy.*

3.2 To achieve these objectives, new development will need to be dispersed across the District, and not just focused on the main urban area of Canterbury. We are therefore encouraged by the Council's approach which seeks to deliver new development at Whitstable & Herne Bay, stating "*new development will be supported on suitable sites within these urban areas.*"

3.3 Furthermore, paragraph 1.43 of the draft Local Plan makes specific reference to this stating "*in line with the council's vision for growth, this plan focuses growth proportionally at the most sustainable settlements within the district - principally at Canterbury and the coastal towns of Whitstable and Herne Bay, along with proportionate growth at the rural settlements.*"

3.1 We are fully supportive of the Council's preferred strategy for housing delivery & agree that a blend of the six spatial options is the most appropriate strategy for the District. A blend of the six spatial options is by far the most appropriate strategy for new sustainable development and will provide the ability for a variety of housing sites to be delivered in sustainable locations across the District.

3.2 This spatial strategy would be consistent with the presumption in favour of sustainable development as outlined at paragraph 11 of the NPPF and will also increase the ability to deliver a consistent supply of homes across the plan period rather than being reliant on a few large sites/settlements being brought forward. Subject to the allocation of appropriate additional sites this will ensure that the Local Plan is able to deliver a rolling 5-year supply of new housing.

### **Herne Bay**

3.3 Chapter 4 of the draft Local Plan sets out the vision for Herne Bay. Emerging policy HB3 (Herne Bay Urban Area) states that "*within the urban area, and outside of the town centre boundary, new developments and proposals for regeneration will be supported where these accord with other policies in this plan.*"

3.4 We are supportive of the strategy of Whitstable & Herne Bay being the secondary focus for delivering new development over the plan period however we do not consider that this should be restricted to within the existing urban areas as there be appropriate sites immediately adjacent to the existing settlements that could contribute to meeting the development needs of the town.

- 3.5 In light of this as Herne Bay has been targeted as a secondary area for growth, we consider the Council should seek to allocate additional sites for housing within this location & diversify the size of the allocations which are proposed.

### **Previously Developed Land**

- 3.6 Paragraph 1.12 of the draft Local Plan states “*wherever possible, the council will prioritise the redevelopment of previously developed land and this plan includes a range of brownfield allocations as part of a brownfield-first approach.*”
- 3.7 Furthermore, paragraph 4.7 of the DTP states that to maximise the potential of previously developed land, all brownfield sites identified in the SLAA as suitable, available & achievable are proposed for allocations or as broad locations/ opportunity areas for development. We consider that on this basis, previously developed land both within existing settlements or well related to these settlements should be looked upon favourably by the Council.
- 3.8 In summary, we are fully supportive of the Council’s approach to give priority to brownfield sites proposed for allocations and maximise the potential of previously developed land, albeit this source of supply alone cannot meet the development needs of the City.

### **Summary**

- 3.9 In summary, we have several comments with the general approach being taken by the draft Local Plan.
- We are fully supportive the Council’s approach to its chosen spatial strategy and agree that a blend of the six spatial options is the most appropriate strategy for the District.
  - We agree that new development should be allocated throughout the District across with growth dispersed proportionally to the most sustainable settlements.
  - We support the strategy to focus growth to both Whitstable & Herne Bay and deliver new development on suitable & sustainable sites within and adjacent to these towns.
  - We consider the Council should be taking a proactive approach in identifying & allocating additional suitable sites (small, medium & large), for residential development to ensure it can meet its required housing targets.
  - We agree with the Council’s ‘Brownfield’ first approach and consider the Council should be seeking to allocate development on all available brownfield land in suitable & sustainable locations.

## 4. LAND TO THE NORTH OF WHITSTABLE ROAD, HERNE BAY

### Site Description

- 4.1 Wates have a controlling interest in approximately 4.54 hectares of Land to the North of Whitstable Road, Herne Bay. The extent of the Site is shown on the Site Location Plan (see [Appendix 2](#)).
- 4.2 The Site is situated between the Studd Hill estate which sits within the urban boundary of Herne Bay to the west and agricultural fields to the east. The Site sits within the Herne Bay & Whitstable Green Gap.
- 4.3 In close proximity to the Site there are a range of services, including Hampton Primary School and Little Hedgehogs Nursery, Herne Bay High School, a Lidl Supermarket, Studd Hill Community Centre, St Andrews Church, and Hampton Pier recreation ground.
- 4.4 In terms of public transport there are four bus stops located along this portion of Whitstable Road (B2205), providing connections to Green Hill, Herne Bay Town Centre, and Whitstable. Herne Bay railway station is approximately a six-minute drive or 30-minute walk from the Site.
- 4.5 The Site lies within Flood Zone 1, meaning that the Site has the lowest risk of flooding. The Site is located within Landscape Character Area C1: Chestfield Gap and Greenhill. There are no protected trees on Site.
- 4.6 The Site lies outside the catchment of the Stour Vally River area, meaning that any proposal for development on the Site would not need to demonstrate any mitigation regarding Nutrient Neutrality.

### Previously Developed Land

- 4.7 The Site currently comprises the Hampton Bay Caravan Park, which has been operating at the Site since 2013. The Site comprises several permanent structures including a house, clubhouse, and utility building, alongside hardstanding throughout the Site.
- 4.8 The Site is located to the immediate west of Herne Bay's existing settlement boundary and directly abuts residential development on two sides (north & east). The immediate surrounding area is therefore characterised by residential development, which is predominantly in the form of bungalows and two storey semi-detached dwellings.
- 4.9 As such, given the existing built form on Site, our view is that the Site should be considered as previously developed land or a 'Brownfield' site. This is in line with the NPPF definition of "previously developed land" which states "land which is or was occupied by a permanent structure, including the curtilage of the developed land".
- 4.10 Furthermore, alongside the built form, the Site is used intensely as a caravan/campervan park, with capacity of up to 45 pitches. Furthermore, the Site includes a bar (the Old Garage Bar) and a concert room which hosts events such as quiz nights, open mic nights & music gigs.

4.11 It is therefore apparent that Site is used intensely for a variety of uses all year round. And lies on the backdrop of dens residential development to the north & east. Whilst not all the Site is built up, it is clear the Site is a heavily managed area, with a variety of uses taking place, various vehicle trips taking place within the Site and comprising various ancillary paraphernalia associated with the business & its customers. The former alongside the existing built form & storage areas to the centre of the Site, demonstrate the Site is clearly not a 'Greenfield' or 'Open Countryside'.

### **SLAA Assessment**

4.12 The Site was submitted to the Council previous Regulation 18 consultation in January 2023, with further email correspondence sent to the Council in June 2023. The Site has been assessed within the SLAA Addendum, as a new SLAA submission. The Site's reference is SLAA305 (Heymar).

4.13 Within the SLAA assessment, the Council noted the sustainability of the Site, citing a variety of services/facilities that are located either within 15 minutes of the Site (walking), within 15 minutes of the Site (Cycling) and within 5 minutes of the Site (driving). The Council noted there within a 5-minute drive of the Site there were:

- Seven Key Services (Community Hall, GP's, Nursery, Primary School, Train Station, Bus Stop and Convenience Store).
- Five Strategic Services (Town Centre, Existing Employment Area, Hospital, Local Centre, and Secondary School).
- Six Additional Services (Dentist, Place of Worship, Post Office, Pub, Recreation Ground, and Vet).

4.14 The assessment also notes that the site has a flat topography, and the Site is free from trees (and TPOs), but the site boundary is lined with hedges. In addition, the Site is not located within any of the following designations: SSSI, NNR, AONB, Ancient Woodland, NE Priority Habitat or Flood Zone 2 & 3.

4.15 The assessment also notes that from a townscape perspective, the northern & eastern boundaries of the Site abuts the western edge of Herne Bay, which comprises dense residential dwellings. In addition, the Council acknowledges that the Site could be designed in way to not unacceptably impact on the residential amenity of nearby residential occupiers & notes that there are no incompatible uses located nearby.

4.16 It should also be noted that the assessment states the Site is 'Greenfield'. This is incorrect. The Site comprises previously developed land & is therefore 'Brownfield' land.

4.17 In summary, the full assessment for the Site did not find any technical reasons or constraints which would prevent development from being delivered on the Site. However, despite this the Council concluded the Site was not suitable for development in terms of existing policies due to the Site's location within the Green Gap.

- 4.18 We disagree with the Council 's conclusion & consider the Site can accommodate a residential scheme without compromising the functionality of the gap between the settlements of Herne Bay & Whitstable.

### Strategic Gap

- 4.19 As set out above, save for the Site's location within the Green Gap it was very positively assessed by the SLAA. To accompany these representations, SLR have undertaken a 'Landscape Sensitivity & Green Gap Appraisal' (see [Appendix 3](#)).
- 4.20 The Appraisal provides a comparative landscape sensitivity appraisal of three potential housing sites within the draft Local Plan. One of which is the Site, and the other two (below) which are both identified as potential housing sites. All three sites are located within a green gap.
- Land to the West of Thornden Wood Road, Herne Bay (Policy HB4); and
  - Land at Bodkin Farm, Herne Bay (Policy W6).
- 4.21 Regarding the Site, the appraisal demonstrates how development on the Site would not significantly affect the open character of the green gap, nor would it lead to a sense of coalescence. Furthermore, development here would not result in the material expansion of the built-up areas in the locality of the Green Gap, significantly affect the open character of the gap, or result in isolated development. It is therefore concluded that development of this site would still allow the Green Gap to function fully and could be consistent with policies OS6 and OS7.
- 4.22 In contrast, the appraisal concludes that development of either or both of the two proposed allocations (W6 and HB4) would significantly affect the open character of the Green Gap, resulting in the material expansion of the built-up area, and significantly affecting the open character of the gap. If both sites were to be developed this, combined with the existing Red House Farm solar farm, would lead to a perception of coalescence between the settlements. It is therefore concluded that development of both proposed allocations W6 and HB4 would not allow the Green Gap to function fully and would not comply with policies OS6 and OS7.

### Site Assessment

#### Overview

- 4.23 We consider the Land to the North of Whitstable Road, Herne Bay is capable of accommodating circa 115 new homes. A Site Concept Plan has been prepared and accompanies these representations (see [Appendix 4](#))
- 4.24 The Vision Document, prepared by A2, which accompanies this representation demonstrates how the Site can be developed as a sustainable extension to Herne Bay.
- 4.25 The Site lies immediately adjacent to the settlement boundary of Herne Bay and is therefore a suitable & suitable location for development. The development would be contiguous with the settlement boundary of Herne Bay to the north and east. The Site would be a natural extension to the already built-up area of Herne Bay.

- 4.26 Development at the Site would therefore be in line with the Council's chosen Spatial Strategy which aims to deliver development as a secondary focus around Whitstable & Herne Bay. The Site provides the Council with the opportunity to allocate an additional 115 new homes on a Site with no technical constraints.

#### **Previously Developed Land**

- 4.27 In addition, the Site provides the opportunity for the Council to allocate new housing on a previously developed or 'Brownfield Site', again in line with the Council's chosen spatial strategy which takes a 'Brownfield First' approach. The Site currently comprises Hampton Bay Caravan Park and contains several permanent buildings and hardstanding areas throughout the Site. This is therefore a unique opportunity to the Council to deliver development in line with its chosen spatial strategy, both on a brownfield site, and adjacent the built-up area of Herne Bay.

#### **Site Delivery**

- 4.28 The Site lies outside the catchment of the Stodmarsh SPA meaning that any proposal for development on the Site would not need to demonstrate any mitigation regarding Nutrient Neutrality. This is an extremely positive aspect of the Site.
- 4.29 The Site provides the Council with a fantastic opportunity to allocate additional housing on a Site that can deliver immediately, without having to go through the process of demonstrating and securing mitigation regarding Nutrient Neutrality.
- 4.30 As such, development at the Site is capable of being delivered within the first five years following adoption of the Plan, with a reduced risk of unforeseen delays holding up deliver, such as Nutrient Neutrality.



## 5. DEVELOPMENT POTENTIAL

- 5.1 We consider that the Site has the potential for residential development to deliver circa 115 new homes, including much needed affordable homes, in a range of house types and sizes, as illustrated on the Site Concept Plan appended to these representations. The Site comprises a natural and logical extension to the existing settlement of Herne Bay, which could be delivered quickly to positively assist with Canterbury City Council's supply of homes.
- 5.2 Development at the site also has the potential to create significant landscape and biodiversity/ecological enhancements, areas of public open space / play space alongside an attractive and sustainable living environment for future residents.
- 5.3 In terms of sustainability, the Site is located close to existing services & facilities (summarised above), including Hampton Primary School and Little Hedgehogs Nursery, Herne Bay High School, a Lidl Supermarket, Studd Hill Community Centre, St Andrews Church, and Hampton Pier recreation ground.
- 5.4 Any development at the site including the delivery of new homes would provide a range of public benefits including:
- Provision of circa 115 new homes (market & affordable) in a mix of housing size & type;
  - Provision of circa 35 affordable homes (30%) in a mix of rented & shared ownership;
  - Swift delivery of housing given the Site is both available & deliverable now, therefore contributing to the Council's short term housing supply;
  - Provision of a sensitively designed scheme that is both attractive and sustainable and will make use of previously developed land, acting as a natural extension to the settlement of Herne Bay;
  - Ability to provide a high-quality living environment for future residents through ample private amenity space and communal area;
  - Ability to provide a Biodiversity Net Gain (BNG) at a minimum of 10% in line with the Environment Bill; and
  - Provision of economic benefits in relation to construction of the site and longer-term local spending & jobs.
- 5.5 We consider the Site provides the Council with a fantastic opportunity to allocate circa 115 new homes. The Site is previously developed and lies immediately at the edge of an existing settlement, utilising & enhancing the existing infrastructure in place, as well as providing links to existing services & facilities.
- 5.6 The Site could make a significant contribution towards housing land supply and would form part of a sound spatial strategy for the district. On the above basis, we consider the Site should be allocated for residential development within the Council's Local Plan.

## 6. CONCLUSION

- 6.1 These representations have been prepared on behalf of Wates in response to CCC's draft Local Plan & to promote the site known as '*Land to the North of Whitstable Road*'.
- 6.2 We are supportive of the Council's chosen spatial strategy which is a blend of the initial six spatial options considered at the infancy of this plan. The strategy primarily focuses on urban areas for growth, including Whitstable & Herne Bay, the latter of which is a sustainable settlement benefiting from several existing facilities & services.
- 6.3 However, we consider the Council have overly optimistic expectations on the delivery of its housing supply. To this end, the Council acknowledge that even based on the stated trajectory the Council is unable to demonstrate a five-year supply on adoption of the plan.
- 6.4 We therefore consider the Council should be taking a proactive approach in identifying & allocating additional suitable sites (small, medium & large), for residential development to ensure it can meet its required housing targets. In doing so this will ensure that the Council is able to meet its required housing target and demonstrate a rolling five-year supply of housing across the whole plan period, specifically during the first five years of the plan.
- 6.5 In relation to the above, we agree with the Council's 'Brownfield' first approach and consider the Council should be seeking to allocate development on all available brownfield land in suitable & sustainable locations.
- 6.6 A suitable & available site for development is the Site known as '*Land to the North of Whitstable Road*'. The Site lies immediately adjacent to the settlement boundary of Herne Bay & would act as a natural extension to the already built-up area of Herne Bay. Development at the Site would therefore be in line with the Council's chosen Spatial Strategy which aims to deliver development as a secondary focus around Whitstable & Herne Bay.
- 6.7 Furthermore, the Site provides the opportunity for the Council to allocate new housing on a brownfield site, again in line with the Council's chosen spatial strategy. The Site currently comprises Hampton Bay Caravan Park & contains several permanent buildings & hardstanding areas throughout the Site.
- 6.8 The Site lies outside the catchment of the Stour Vally River area, meaning that any proposal for development on the Site would not need to demonstrate any mitigation regarding Nutrient Neutrality. As such, development at the site is capable of being delivered within the first five years following adoption of the Plan.
- 6.9 The Site provides the Council with a fantastic opportunity to allocate new residential development in line with its chosen spatial strategy, both on a brownfield site, and adjacent the built-up area of Herne Bay.
- 6.10 On the above basis, whilst we support the proposed spatial strategy within the draft Local Plan, we encourage the Council to allocate the Site known as *Land to the North of Whitstable Road* for residential development.

## **APPENDIX 1 – DEVELOPMENT MANAGEMENT POLICIES COMMENTARY DOCUMENT**



# Development Management Policies Commentary

Local Plan Representations (Regulation 18)

**Boyer**

Prepared on behalf of Wates Development | June 24

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**REPORT CONTROL**

<b>Project:</b>	Development Management Policies Commentary
<b>Client:</b>	Wates Development
<b>Reference:</b>	24.5036
<b>Document and revision number</b>	Document No. IMS-F-18, Revision 2
<b>File Origin:</b>	C:\Users\bpope\lrg.co.uk\Boyer - 24.5036 - North side of Whitstable Road, Herne Bay\2. Project Work\2.2 Site Promotions\2.0 Regulation 18 (June 2024)\4.0 DMD Reps
<b>Primary Author</b>	BP
<b>Checked By:</b>	PA

Issue	Date	Status	Checked by
1	13/05/24	Draft	PA

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## 1. INTRODUCTION

- 1.1 These representations have been prepared on behalf of Wates Developments Limited (“Wates”) in response to Canterbury City Council’s Local Plan (Regulation 18) Consultation (the “draft Local Plan”).
- 1.2 This document provides commentary on the various Development Management Policies which are being considered through this consultation. They should be read on conjunction with representations we have made in respect of the proposed Spatial Strategy for the draft Local Plan as well as site specific representations submitted.
- 1.3 Section 2 of these representations make specific comments on the following policies of the draft Local Plan.
- Policy SS1 - Environmental Strategy for the District;
  - Policy SS2 - Sustainable Design Strategy for the District;
  - Policy R19 – Countryside;
  - Policy DS2 - Housing Mix;
  - Policy DS6 - Sustainable Design;
  - Policy DS7 - Infrastructure Delivery;
  - Policy DS19 - Habitats, Landscapes & Sites of Local Importance;
  - Policy DS21 - Supporting Biodiversity Recovery; and
  - Policy DM11 - Residential Design.
- 1.4 Notwithstanding these representations, Wates reserves the right to comment on any other policies not commented upon here during future stages of the consultation of the Local Plan.

## 2. DEVELOPMENT MANAGEMENT POLICIES

2.1 This section considers several of the Development Management policies within the draft Local Plan and where necessary suggests several modifications to them.

### Policy SS1 – Environmental Strategy for the District

2.2 Wates support the Council's strategy to improve biodiversity across the district, where this does not have an impact on a development's viability.

2.3 Part 5 of the emerging policy states "*development across the district will need to incorporate measures to deliver a minimum 20% biodiversity net gain in line with Policy DS21, having regard to Biodiversity Opportunity Areas and/or Nature Recovery Networks.*"

2.4 This BNG figure does not reflect the Government's minimum mandatory 10% BNG target figure (within the Environment Act 2021) that took effect in respect of major developments as of 12<sup>th</sup> February 2024.

2.5 We note that the viability implications of providing either 10% or 20% BNG has been considered within the 2022 Viability Study, however, this is necessarily based on a high-level assessment informed by assumptions, for example it is assumed that provision will be on-site on greenfield sites and off-site on brownfield sites (paragraph 8.50).

2.6 We do not consider that this is realistic as the ability to deliver BNG on-site is, amongst other things, based on existing conditions and it is likely that for greenfield sites especially, baseline conditions will vary site by site. Those sites with a high baseline value may mean that achieving any net gain on-site challenging, let alone 20%, which if required to be provided on-site is almost certainly likely to have an impact on development capacity (contrary to the statement at paragraph 8.52). Furthermore, costs of off-site biodiversity units will vary (based on the type of habitats being created and location) which reduces the reliance that can be placed on the supporting viability evidence.

2.7 In light of the above, Wates do not consider that the proposed minimum 20% BNG is adequately justified. We consider there are significant uncertainties as to the cost of delivering BNG above the mandatory 10% net gain.

2.8 As such, we consider that there needs to be greater flexibility in the Policy to make it clear that the 20% net gain is aspirational and that alongside this the Council should work with developers and other stakeholders to ensure that the mandatory 10% BNG can be delivered within the district.

2.1 We consider the policy should be amended to state "*development across the district will need to incorporate measures to deliver a minimum **10%** biodiversity net gain, **and where possible up to 20%**, in line with Policy DS21, having regard to Biodiversity Opportunity Areas and/or Nature Recovery Networks.*"

2.2 Fundamentally, this is in line with the requirements for BNG as set out by the Government in the Environment Act (2021).



### **Policy SS2 - Sustainable Design Strategy for the District**

- 2.3 Part 1 of this policy establishes that new residential development in the district should be designed to achieve net zero operational carbon emissions.
- 2.4 We consider the policy wording should signpost the reader to the requirements of Policy DS6 (Sustainable Design) which sets out the detailed requirements in relation to sustainable design.

### **Policy R19 – Countryside**

- 2.5 The first sentence of this policy states “*outside of urban or rural settlement boundaries, as defined on the policies map, within the countryside, new housing development will only be supported where it protects the rural character and appearance of the countryside.*”
- 2.6 Criterion 1 then goes onto list development proposals that are considered essential and justifiable in a countryside location i.e. represents appropriate infill development; supports the needs of agriculture or forestry; existing rural building conversion; rural exception sites; or meets the requirements for an isolated home in the countryside.
- 2.7 This is in effect a blanket policy that seeks to prevent all development that is not essential to its countryside location. It seeks to protect the countryside for its own sake and is clearly intended to be used to restrict or impose a blanket ban on housing outside settlement boundaries even though it might be needed on housing land supply grounds.
- 2.8 The approach is not consistent with national policy & is contrary to paragraph 60 of the National Planning Policy Framework (NPPF) (2024). This confirms that the Government's objective is to significantly boost the supply of homes. To support this, it is important that a sufficient amount and variety of land can come forward where it is needed. This is especially the case where a local planning authority is not able to demonstrate a sufficient housing land supply and additional land in sustainable locations in the countryside is required for development.
- 2.9 We therefore consider this policy should be made more flexible. This should include the uses cited in criterion 1a) to e) and allow for other forms of developments where there is an identified need for them, and they are in a sustainable location i.e. on the edge of existing settlements. This could be achieved by replacing the word “protected” with “recognised”.

### **Policy DS2 – Housing Mix**

- 2.10 This policy states “*development proposals should accord with the requirements of the council's most up-to-date Housing Strategy.*”
- 2.11 However, in some instances, the housing needs evidence can be out of date & often reflects the generic district-wide situation rather than on a settlement-by-settlement basis. Housing need and the types of accommodation required can often be fluid and constantly changing.
- 2.12 We therefore consider that dwelling mix should also be informed by local demand, evidenced by local estate agents, and experienced developers like Wates to provide an appropriate mix

and density for market homes, and by Registered Social Landlord (RSL) providers in respect of the affordable mix.

- 2.13 Furthermore, the policy provides housing mix requirements for new market housing based on four locations across the District: Canterbury, Coastal Towns, Rural North, and Rural South. However, the Policy does not contain guidance as to the boundaries of these locations, which would assist in the identification of specific sites. We suggest that the map of these boundaries is signposted within the policy.

### **Policy DS6 – Sustainable Design**

- 2.14 Part 5 of the emerging policy requires proposals for ten or more homes to achieve a per capita water consumption of 90 litres per person per day. However, Part G of Building Regulations requires new developments to ensure that no more than 110 litres of water will be used per person per day. On this basis, the policy wording should be updated to accord with Building Regulations requirements.
- 2.15 Part 11 of the Policy also requires proposals for major development across the district to submit an assessment of the accessibility and quality of mobile data networks affecting the site and, where appropriate, examine opportunities to improve mobile data networks affecting the site.
- 2.16 It is important that in preparing emerging policies recognition is given to the need to ensure that any emerging planning policies are deliverable and achievable. In particular, ensuring that policies do not place onerous requirements on future developments. It is considered that this requirement should be proportional to the scale of the development being proposed, as it may not be feasible for a developer to improve mobile data networks for a development which is not providing significant infrastructure improvements.

### **Policy DS7 – Infrastructure Delivery**

- 2.17 Wates agrees that the provision of infrastructure is an important element of the development process. Part 1 of the policy states *“where development creates a requirement for new or improved infrastructure beyond existing provision, developers will be expected to provide or contribute towards the additional requirement being provided to an agreed delivery programme.”*
- 2.18 Overall, this approach is generally acceptable provided the need for new infrastructure development is directly related to the development. In addition, it should not undermine the delivery of the plan as set out in paragraph 34 of the NPPF.
- 2.19 However, for consistency & clarity, we consider there should be recognition within the policy that *“the need for new infrastructure development must be directly related to the development and should not undermine the delivery of the plan.”*

### **Policy DS19 - Habitats, Landscapes & Sites of Local Importance**

- 2.20 Part 5 of the policy sets out that within the designated Green Gaps, *“only proposals for sports and recreation uses will be permitted”*.

- 2.21 However, this is not consistent with emerging Policy R19, which states *“the council will protect the network of valued open spaces, green infrastructure and sports and recreation opportunities that exist within the countryside and will resist development which affects the openness of designated green gaps which would erode the separation between, or the character or setting of, individual settlements.”*
- 2.22 At present, policy DS19 is too restrictive and only allows proposals for sports & recreation within strategic gaps. The policy goes on to state *“proposals for development within the Herne Bay and Whitstable Green Gap will be subject to the criteria above, however education, outdoor leisure or allotments may also be considered as suitable uses. Any proposal must not result in a material expansion of the built confines of the urban areas of Herne Bay or Whitstable.”*
- 2.23 Wates consider that flexibility needs to be applied in relation to development within Green Gaps, as exceptional circumstances may apply where any form of development may not harm the openness of the designated green gap, nor erode the functionality of the separation of the settlements.
- 2.24 We therefore consider that the wording of the policy should be updated to state *“within the designated Green Gaps, as defined on the policies map, **development will only be permitted where [...]**”*.

### **DS21 – Supporting Biodiversity Recovery**

- 2.25 As set out in further detail in relation to emerging policy SS1, the proposed requirement to deliver a minimum of a 20% net gain would introduce significant challenges for future development. Wates therefore consider that Policy DS21 should seek to secure a minimum of 10% BNG from applicable planning applications, in line with the Environment Act (2021) and in accordance with national policy.
- 2.26 Furthermore, in relation to BNG, part 3(c) states, *“should provision not be secured entirely on-site it must be demonstrated that on site biodiversity opportunities have been maximised, including consideration of whether the amount of development proposed is appropriate”*.
- 2.27 This requirement is considered to be too onerous. If more land is required on-site for biodiversity enhancement, less land may be available for other uses which could make more efficient use of a site. Some areas of public open space (such as sports pitches, for example) cannot be readily utilised for ecological gain.
- 2.28 As such, prioritising BNG on-site risks creating tension between the supply of new infrastructure to support healthy & active communities and the legitimate aspirations to promote environmental betterment.
- 2.29 We therefore suggest part 3 (c) is removed from the emerging policy.

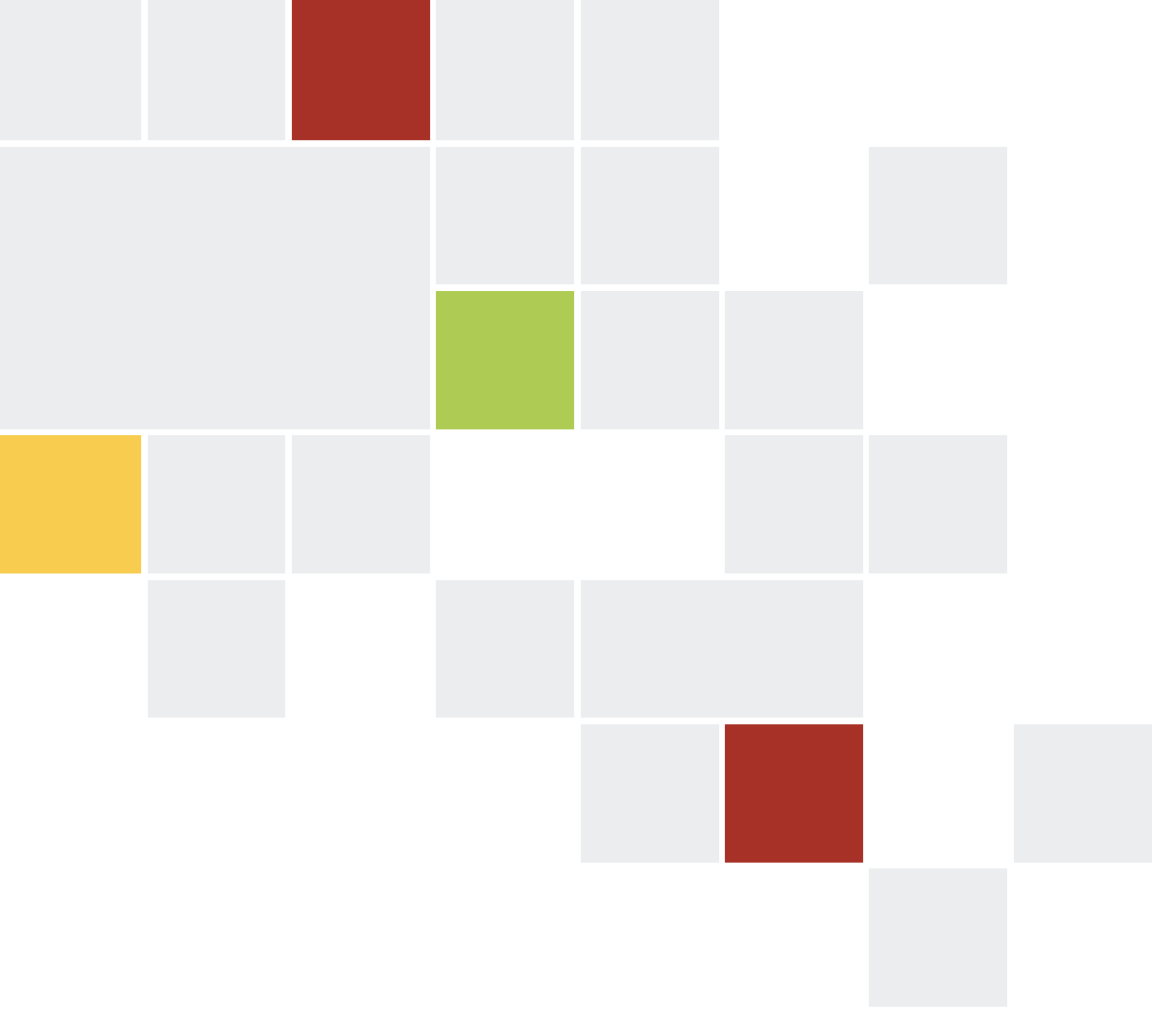
### **Policy DM11 - Residential Design**

- 2.30 This policy states new dwellings should be in accordance with the Nationally Described Space Standards (NDSS), and we agree with this inclusion. However, we do not consider a need to

provide “*space to allow for home working such as a home office, or space for a desk in a secondary bedroom*” (Part 2(c)). There is no specific national guidance which requires such a space to be delivered and we consider this should be removed as a policy requirement.

2.31 Part 2(l) states “*all homes with gardens should include a minimum of one fruit tree in the front or rear gardens.*” This aspect of the policy is far too onerous and there is absolutely no need for above to be included as a requirement for all new dwellings.

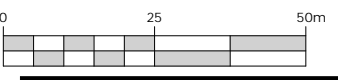
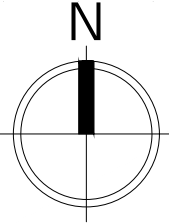
2.32 It is important that in drafting emerging policies, recognition is given to the need to ensure that any emerging policies are deliverable & achievable. This therefore ensures that any policy requirements do not place onerous requirements on future developments which may detrimentally impact the viability of development. This will ensure the overarching vision of the Plan can be achieved and sustainable growth can be achieved.





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# Boyer

## **APPENDIX 2 – SITE LOCATION PLAN**



<p>CLIENT:</p> 	<p>PROJECT:</p> <p>Land to the North of Whitstable Road, Canterbury, CT6 8BL</p>	<p>DRAWING:</p> <p>Location Plan</p> <p>STATUS:</p> <p>Conveyance</p>	<p>REV:</p> <p>DATE:</p> <p>REFERENCE:</p> <p>24047</p> <p>SHEET NO:</p> <p>L01</p> <p>DATE:</p> <p>MAY   2024</p>	<p>SCALE:</p> <p>1:1250@A3</p> <p>DRAWN BY:</p> <p>JM</p> <p>REVISION:</p> <p>-</p>	<p style="text-align: right;">2</p>  <p>ARCHITECTURE &amp; DEVELOPMENT</p> <p><small>W: A2AD.co.uk E: Info@A2AD.co.uk T: 01489 290035 A: 16-18 Barnes Wallis Road, Fareham, PO15 5TT</small></p>
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Do not scale for any other purpose than stated in title. Use annotated dimensions only. All dimensions to be checked on site & any discrepancies/errors to be reported to A2 before work commences. This drawing is to be read in conjunction with all other relevant materials. Copyright exists on this plan and information displayed on this drawing. Reproduction of plan is not permitted without written consent. Company registration no: 1287267

## **APPENDIX 3 – LANDSCAPE SENSITIVITY & GREEN GAP APPRAISAL**





# Herne Bay Landscape Sensitivity and Green Gap Appraisal

Wates Developments Limited

Prepared by:

**SLR Consulting Limited**

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SLR Project No.: 403.065049.00001

29 May 2024

Revision: 01

## Revision Record

Revision	Date	Prepared By	Checked By	Authorised By
1	29 May 2024	Jeremy Smith	Jeremy Smith	Jeremy Smith
	Click to enter a date.			
	Click to enter a date.			
	Click to enter a date.			

## Basis of Report

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## Appendices

### Appendix A Methodology for Assessing Landscape Sensitivity

- A.1 Introduction: Objectives and Definitions
- A.2 Scope of this Sensitivity Assessment



### A.3 Assessment of Landscape Sensitivity: Defining Landscape and Visual Susceptibility, and Landscape Value

#### A.3.1 Assessing Landscape Susceptibility

#### A.3.2 Assessing Visual Susceptibility

#### A.3.3 Assessing Landscape and Visual Value



## 1.0 Introduction

### 1.1 Objectives

SLR Consulting Limited (SLR) was instructed by Wates Developments Limited (Wates) to provide a comparative landscape sensitivity appraisal of three potential housing sites in Canterbury District, Kent.

Two of the sites assessed in this report have been identified as potential housing sites in the regulation 18 Local Plan:

- Land to the West of Thornden Wood Road, Herne Bay (Policy HB4)
- Land at Bodkin Farm, Herne Bay (Policy W6)

The remaining site, Land North of Whitstable Road, Herne Bay, is not included as a draft allocation but is being promoted by Wates.

All of the sites included within this assessment are currently designated as being within a Green Gap, the primary objective of which is to prevent the coalescence of settlements. Consequently, this report also provides a review of the degree to which each site contributes to this separating function.

### 1.2 Planning Policy Context in Relation to Green Gaps

In the Canterbury District Local Plan (2017) the functionality of Green Gaps in general is defined by Policy OS6, and Policy OS7 relates specifically to the Green Gap between Witstable and Herne Bay.

Policy OS6 states that:

*“Within the Green Gaps identified on the Proposals Map ... development will be permitted where it does not:*

- a. Significantly affect the open character of the Green Gap, or lead to coalescence between existing settlements;*
- b. Result in new isolated and obtrusive development within the Green Gap”*

Policy OS7 states that:

*“Within the Herne Bay and Whitstable Green Gap identified on the Proposals Map ... development will be permitted where it does not:*

- a. Result in a material expansion of the built-up confines of the urban areas of Herne Bay or Whitstable; or*
- b. Significantly affect the open character or separating function of the Green Gap; and*
- c. Result in new isolated development within the Green Gap”.*

### 1.3 Methodology

The methodology for the Landscape Sensitivity Assessment is based upon guidance prepared by Natural England (*“An Approach to Landscape Sensitivity Assessment – to Inform Spatial Planning and Land Management”*, Natural England, June 2019). The methodology also refers to new guidance prepared by the Landscape Institute on landscape value (*“Assessing Landscape Value Outside National Designations”*, Landscape Institute Technical Guidance Note 02/21).



A detailed methodology for the assessment process is set out at **Appendix A** to this report.

The assessment for each site is based upon a desk top assessment of existing policies, designations and character assessments, as well as a site visit undertaken in May 2024. All work was undertaken by an experienced chartered landscape architect.

Given that all of the sites are also located within the Green Gap between Whitstable and Herne Bay it is also appropriate to consider the degree to which each parcel contributes to the function of maintaining the separate identities of these settlements.

One frequently used methodology for assessing the effectiveness of land in separating of settlements is the application of the **Eastleigh Criteria**. These criteria were first devised by the Inspector for Eastleigh Borough Local Plan Inquiry, and were then cited in a report prepared for the Office of the Deputy Prime Minister ("*Strategic Gap and Green Wedge Policies in Structure Plans, Main Report*", ODPM, 2003, paragraph 4.15). The Inspector concluded that the robustness of a gap between settlements depends on much more than just the physical distance, or visibility between settlement edges. In fact, he defined nine inter-related criteria which all affect the robustness of a gap:

- ***Distance;***
- ***Topography;***
- ***Landscape character/type;***
- ***Vegetation;***
- ***Existing uses and density of buildings;***
- ***Nature of urban edges;***
- ***Inter-visibility (the ability to see one edge from another);***
- ***Intra-visibility (the ability to see both edges from a single point);***
- ***The sense of leaving a place [and arriving somewhere else].***

Careful application of the Eastleigh Criteria means that the gaps between settlements will vary in their size and character – some may be over a kilometre wide and others just a few hundred metres – the key is whether the factors above work together to maintain a perception of separation between the settlements. Equally importantly, the careful application of the Eastleigh criteria means that some development within a designated gap could be possible, provided that the sense of separation between settlements is not undermined.

This approach has been confirmed in various Policy frameworks including: The Policy Framework for Gaps produced by the Partnership for Urban South Hampshire (known as PUSH, produced in 2008), The Fareham Landscape Assessment 2017 (LDA) and Core Strategy (adopted 2011), the Horsham District Planning Framework (adopted 2015), the Basingstoke and Deane topic paper on the function of strategic gaps (2014) and resulting strategic gap policy and Tonbridge and Malling Local Plan policy CP5. It has also been applied at numerous appeals.<sup>1</sup>

A brief review of these criteria is therefore included for all of the sites.

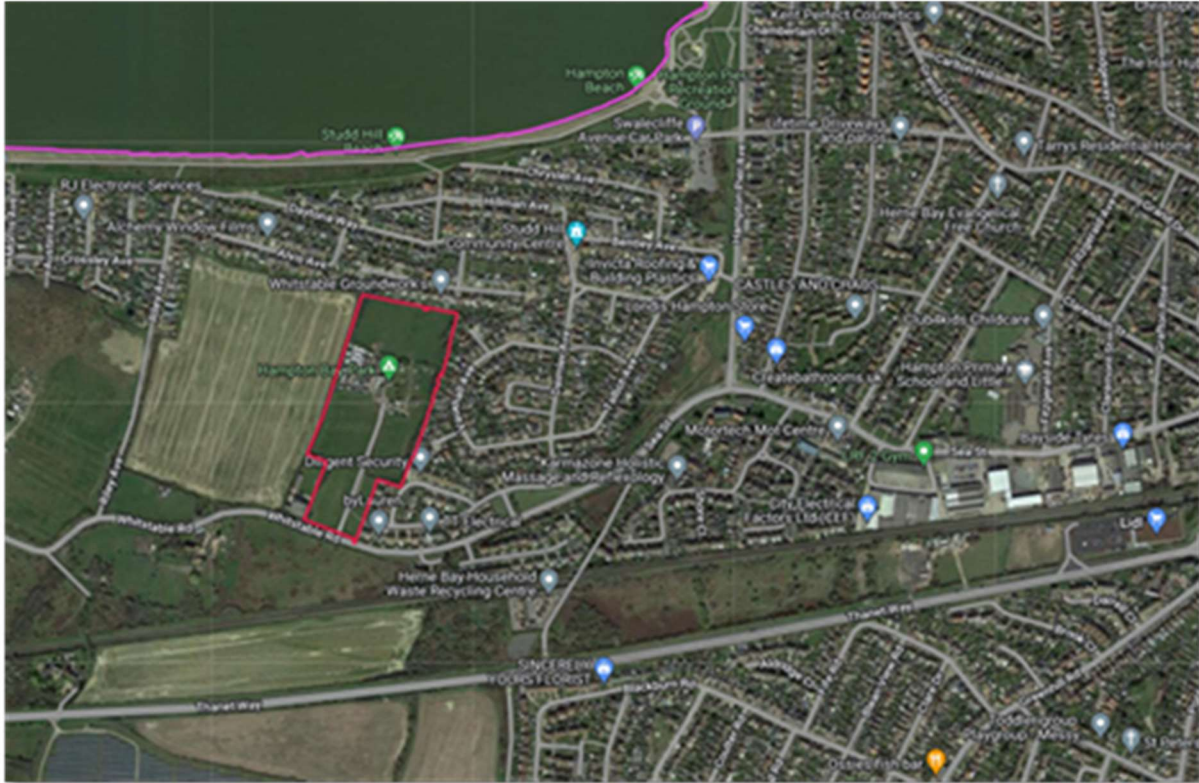
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<sup>1</sup> Examples include Land South of Winterfield Lane, East Malling (APP/H2265/W/20/3256877); Posbrook Lane, Titchfield (APP/A1720/W/20/3254389); Land East of Gleneagles way, Hatfield Peverel (APP/Z1510/V/17/3180729); Land South of Green Lane, Chesterton (APP/C3105/W/23/3331122; also the allocation of 2500 homes in a strategic gap between Horsham and Crawley, Horsham Local Plan EiP.



## 2.0 Assessment of Land Parcels

### 2.1 Land North of Whitstable Road, Herne Bay



**Plate I: Red line defines the proposed residential site at Land North of Whitstable Road, Herne Bay**

#### 2.1.1 The Site and its Context

Currently used as the Hampton Bay Park, a caravan and camping facility. The site is largely grassland, contained by hedgerows on all sides, with a central surfaced area adjacent to a small number of single storey buildings. At the time of the site survey the site was partially occupied by caravans. Existing single storey housing is clearly visible to the east of the site, as well as a two storey house to the west of the site. 1.5 storey houses are prominent to the north of the site. Traffic noise is audible across the site.

#### 2.1.2 Designations

No landscape or landscape-related designations on the site itself. Forms part of the Green Gap. Grade II listed Studds Farmhouse over 160m to the south-west of the site at the closest point.

There is no open public access to the site, and it is not crossed by any rights of way.

#### 2.1.3 Published Landscape Character Assessments

At a regional scale the site is included in the North Kent Plain National Character Area. In the Canterbury Landscape Character Assessment (October 2020) classified as landscape character area C1, Chestfield gap and Greenhill (part of the Coastal Hinterland Landscape Type). C1 is described as “an agricultural landscape of predominantly arable fields with some



*pasture. It provides an important gap between the settlements of Chestfield and Greenhill, which form the eastern and western boundaries*". Key characteristics of C1 include:

- A low-lying gently undulating landscape;
- Small blocks of priority habitat deciduous woodland, including ancient woodland at Purchas Wood
- Large fields used for arable farming with smaller plots managed as pasture,
- Open rural landscape separating the settlements of Whitstable and Herne Bay between the edges of Swalecliffe, Chestfield, Studd Hill and Greenhill.
- Crossed and subdivided east-west by transport corridors of London to Ramsgate railway, A2990, A229 Thanet Way creating a fragmented landscape.
- Large solar farm at Red House Farm.

As **Plate II**, below, illustrates, whilst the site is currently largely laid to grass is also contains buildings, is influenced by adjacent buildings, and is also used for camping/caravanning. The site does not, therefore, possess the "*open rural landscape*" which typifies character area C1.



**Plate II: Looking north from Whitstable Road. Existing bungalows are visible to the right of the view, and there are existing buildings at the centre of the site. At the time of the site visit, caravans filled the northern and central parts of the site.**

#### **2.1.4 Visibility and Views**

The site is visually enclosed by a combination of existing hedgerows and existing houses (particularly to the north and east). The potential for wider views is further limited by local topography, since the low ridge to the west of the site contains views from and towards Swalecliffe. There are no rights of way crossing the site so the potential for publicly accessible views is limited to glimpsed views from Whitstable Road.





### 2.1.5 Assessment of Landscape and Visual Sensitivity

- **Landscape Susceptibility:** the assessment parcel is already characterised by some built form, hard standing, caravans, and the visual influence of adjacent housing. Consequently, the landscape of the site has a **medium-low** susceptibility to residential development on the scale proposed.
- **Visual Susceptibility:** views of development would be highly localised and would affect few views from publicly accessible locations. Visual susceptibility is therefore **low**.
- **Landscape/Visual Value:** the site is not within or near to a landscape or landscape-related designation, and its condition is reduced by existing built form and caravans. The site is therefore of **low** value.
- **Landscape Sensitivity:** Overall landscape sensitivity is therefore **Medium/Low**. This parcel can accommodate small scale residential development without significant change or adverse effects.

### 2.1.6 Contribution of the Site to the Green Gap (with Reference to the Eastleigh Criteria)

The site is located to the south of Studd Hill, which is a residential neighbourhood within Herne Bay. Studd Hill extends further south than the boundaries of the site, and also further to the west. The narrowest part of the Green Gap between Studd Hill and Swalecliffe (which is a residential neighbourhood of Whitstable) is approximately 440m, although this gap is partly occupied by static caravan parks which create a sense of visual coalescence between the two settlements.

The main routes linking the settlements – and thus two of the main ways in which the separate identities of the settlements can be experienced – are Whitstable Road (B2205) to the south of the site, (distance approximately 890m) and the Saxon Shore Way to the north, a recreational route and regional trail along the coast (distance approximately 1km). However, the most direct pedestrian/cycle route between the two settlements is a byway leading from the western edge of Studd Hill, through the caravan park, to the eastern edge of Swalecliffe (approximately 615m). There is also a byway to the west of the site which links Studd Hill with the Whitstable Road.

If the site were to be built out the narrowest part of the gap would remain the same, and the route along the Saxon Shore Way would also remain unchanged. The journey distance via the Whitstable Road route would reduce by approximately 75 metres (the width of the site frontage, which constitutes approximately 8% of the total journey. Importantly, this would still leave a significant area of open landscape for over 800 metres of this route. In addition, this 75m reduction in the width of the perceived settlement gap could be removed if sufficient stand-off and/or landscape buffer is provided at the southern end of the site.

In terms of topography within this part of the Green Gap, the highest point is above 15m AOD at Riley Avenue, to the west of the site, and the edges of the gap slope to below 10m AOD at both Studd Hill to the east and Swalecliffe to the west. The site itself is at around 10m AOD. The landscape of the locality is therefore broadly flat, with the site itself being at a relative low point and land to the west being relatively prominent. Topography therefore accentuates the sense of separation between the settlements.

The site is already characterised by caravans as well as permanent built form, both within the site as well as the influence of existing housing, particularly to the north and east. Fundamentally the site does not, therefore, appear to be entirely open. As a result, the



development of housing in this location would not mean the loss of an entirely open area of land. In contrast, fields to the west of the site, which form the majority of the Green Gap north of the Whitstable Road, are largely open and agricultural in nature.

Inter and intra visibility between the settlement edges is limited by the low ridge to the west of the site, as well as by existing hedgerows and other vegetation.

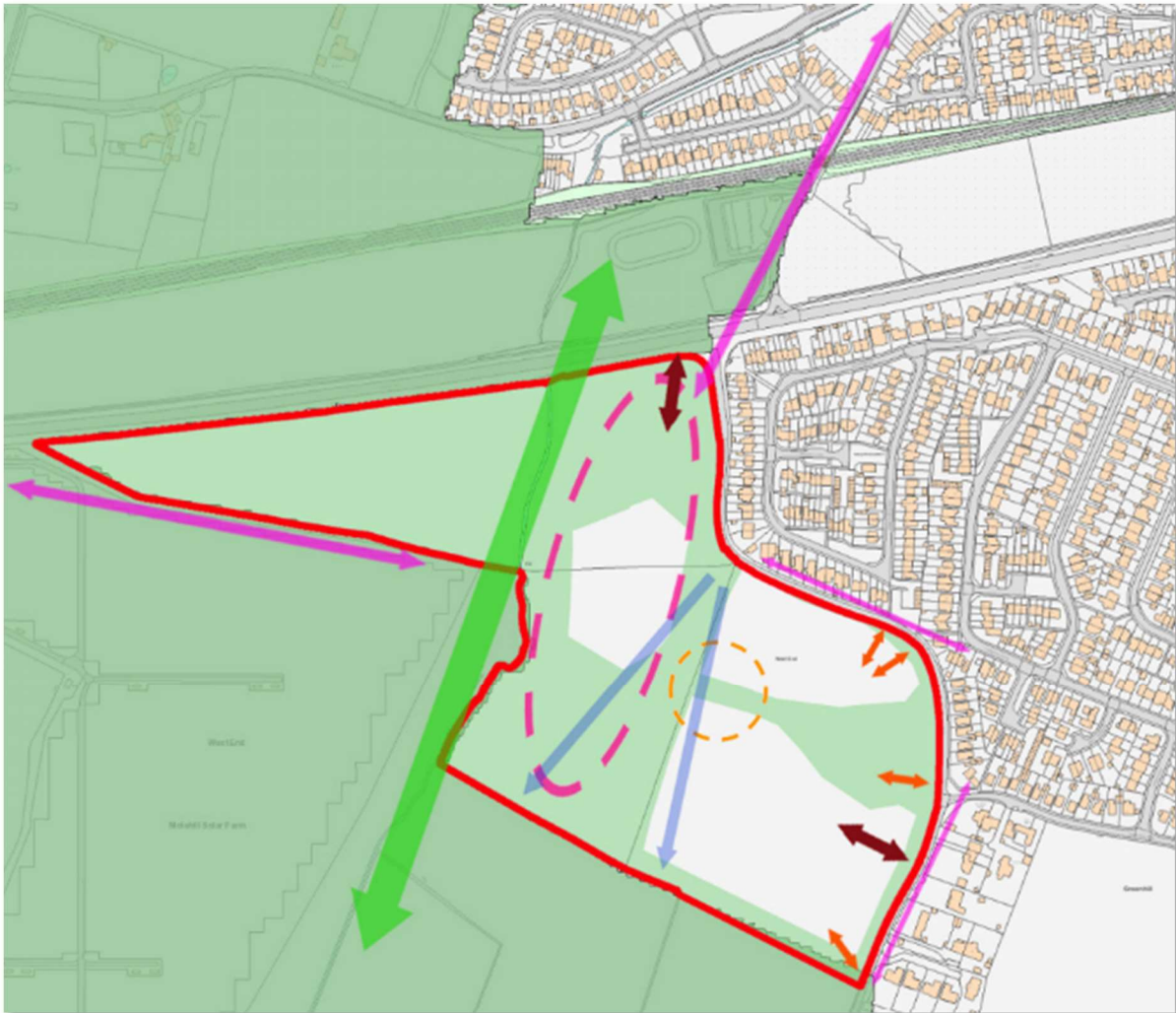
Importantly, development of the site would not significantly affect the sense of leaving one settlement, travelling through an intermediate landscape, and arriving somewhere else. There would remain a clear difference between the mainly residential settlement edges and the intervening agricultural grassland, and the slightly elevated levels of the centre of this gap accentuate the prominence of the agricultural land and reduce inter and intra visibility.

**In summary development on this site would not significantly affect the open character of the green gap, nor would it lead to a sense of coalescence. Nor would development here result in the material expansion of the built-up areas in the locality of the Green Gap, significantly affect the open character of the gap, or result in isolated development.**

**It is therefore concluded that development of this site would still allow the Green Gap to function fully, and could be consistent with policies OS6 and OS7.**



## 2.2 HB4: Land to the West of Thornden Wood Road



**Plate III: Position of HB4, extracted from the reg 18 Local Plan. Buff areas denote areas of development, whereas green areas define potential areas of green infrastructure.**

### 2.2.1 Site Description

Draft allocation in regulation 18 Local Plan, potentially able to accommodate approximately 150 new homes, 6FE secondary school, new local shopping and community facilities, POS.

Currently the site is in arable use, with fields bound by breached/gappy hedgerows. Housing to the east, on Thornden Wood Road and Close, is visible across the site, and road noise is clearly audible.

### 2.2.2 Designations

No landscape or landscape-related designations on the site itself. Forms part of the Green Gap. Grade II listed The Share and Coulter Public House approximately 400m to the south of the site at the closest point.

Public footpath passes through the centre of the site, linking Greenhill with Studd Hill. There is byway on Thornden Close, along the eastern edge of the site.



## 2.2.1 Published Landscape Character Assessments

At a regional scale the site is included in the North Kent Plain National Character Area North Kent Plain National Character Area. In the Canterbury Landscape Character Assessment (October 2020) classified as landscape character area C1, Chestfield gap and Greenhill (part of the Coastal Hinterland Landscape Type). C1 is described as “*an agricultural landscape of predominantly arable fields with some pasture. It provides an important gap between the settlements of Chestfield and Greenhill, which form the eastern and western boundaries*”. Key characteristics of C1 include:

- A low-lying gently undulating landscape;
- Small blocks of priority habitat deciduous woodland, including ancient woodland at Purchas Wood
- Large fields used for arable farming with smaller plots managed as pasture,
- Open rural landscape separating the settlements of Whitstable and Herne Bay between the edges of Swalecliffe, Chestfield, Studd Hill and Greenhill.
- Crossed and subdivided east-west by transport corridors of London to Ramsgate railway, A2990, A229 Thanet Way creating a fragmented landscape.
- Large solar farm at Red House Farm.

As **Plate IV**, below, illustrates, the site is in agricultural use but with some visual influence from existing housing to the east. Field boundaries are largely missing to the east, but intact to the south and west.



**Plate IV: View from footpath at centre of site towards existing housing at Thornden Close, to the east.**

## 2.2.2 Visibility and Views

The site enclosed by mature vegetation to the south and west, and by housing to the east, and consequently there is therefore very little potential for views outside of the site. A footpath



provides access across the centre of the site, and from here walkers are able to obtain clear views across much of the site.

### 2.2.3 Assessment of Landscape and Visual Sensitivity

- **Landscape Susceptibility:** the site contains no existing built form and is largely rural in character, with some influence of existing housing to the east. The site therefore has a **medium** susceptibility to residential development on the scale proposed (increasing to the west).
- **Visual Susceptibility:** views of development would be largely localised but would affect both residents to the east and walkers on the footpath that crosses the site. Visual susceptibility is therefore **medium**.
- **Landscape/Visual Value:** the site is not within or near to a landscape or landscape-related designation. The site is open and in arable use, but hedgerows are partially breached (especially to the east) and there are views of houses at Thornden Close. The site is therefore of **medium/low** value.
- **Landscape Sensitivity:** Overall landscape sensitivity is therefore **Medium**. This site therefore has potential to accommodate the proposed uses without significant character change, although the sensitivity of the site increases further from the settlement edge.

### 2.2.4 Contribution of the Site to the Green Gap (with Reference to the Eastleigh Criteria)

The site is located at the eastern end of the gap between Chestfield and Greenhill. The existing straight line distance between these settlements is a minimum of 1.09km, and the main ways of travelling between the two settlements are on the A2990 (Thanet Way) to the north (approximately 1.8km) or via Molehill Road to the south (approximately 1.6km). Pedestrians/walkers can use a combination of footpath and Molehill Road to move between the settlement edges, a distance of approximately 1.4km. However, it is notable that at the centre of the gap between these settlements is the solar farm at Red House Farm (**Plate V**).



**Plate V: Red House Farm Solar Farm is prominent in views from footpaths in the Green Gap, as well as Molehill Road**



If the site were to be developed in isolation then the distance between the nearest parcels of built form at either settlement edge would reduce to approximately 930 metres. If both this and the proposed allocation at Bodkin Farm were to be developed then the minimum straight line distance would reduce to around 750 metres. Of this 750 metres, around 500 metres would comprise the existing solar farm at Red House Farm. Thus, **only approximately 250 metres of open fields would remain between the two settlements if both this and Bodkin Farm were to be developed as illustrated in the draft policies.**

The effects of the development upon the travelling distances between the two settlements would be reduced by the proposed open space/landscape buffers shown on the illustrative masterplans in the draft policies. However, development of this site would still cause a projection of development from the settlement edge, and this would be perceived to abut the existing solar farm at its western edge.

The topography between the two settlement edges is gently undulating, with a maximum elevation of over 20m AOD near Chestfield dipping to below 10m AOD at the eastern edge of the site.

As noted above, the character of the intervening landscape is a key consideration for this site. As **Plate V**, above, illustrates, Red House Farm solar farm occupies the middle of this gap and is clearly visible from footpaths crossing the Gap. The solar farm introduces an extensive area of built form which significantly reduces the openness of this part of the Green Gap. The site itself is in arable use and of largely rural character, and therefore currently performs a clear role in helping to separate the two settlements. The development of this site would cause a continuous area of development to extend from Greenhill to the western edge of the solar farm. If both sites were to be developed (including Bodkin Farm, W6), then there would be an almost continuous belt of development to the south of Thanet Way.

There is no potential for inter and intra visibility between the settlement edges due to mature hedgerows and also the presence of Purchas Wood.

The development of this site would significantly reduce the sense of leaving one settlement, travelling through a different landscape, and arriving somewhere else, particularly when viewed cumulatively with the Red House Farm solar farm. With this site developed, only the land to the west of the solar farm (and Purchas Wood) would remain as open, rural countryside.

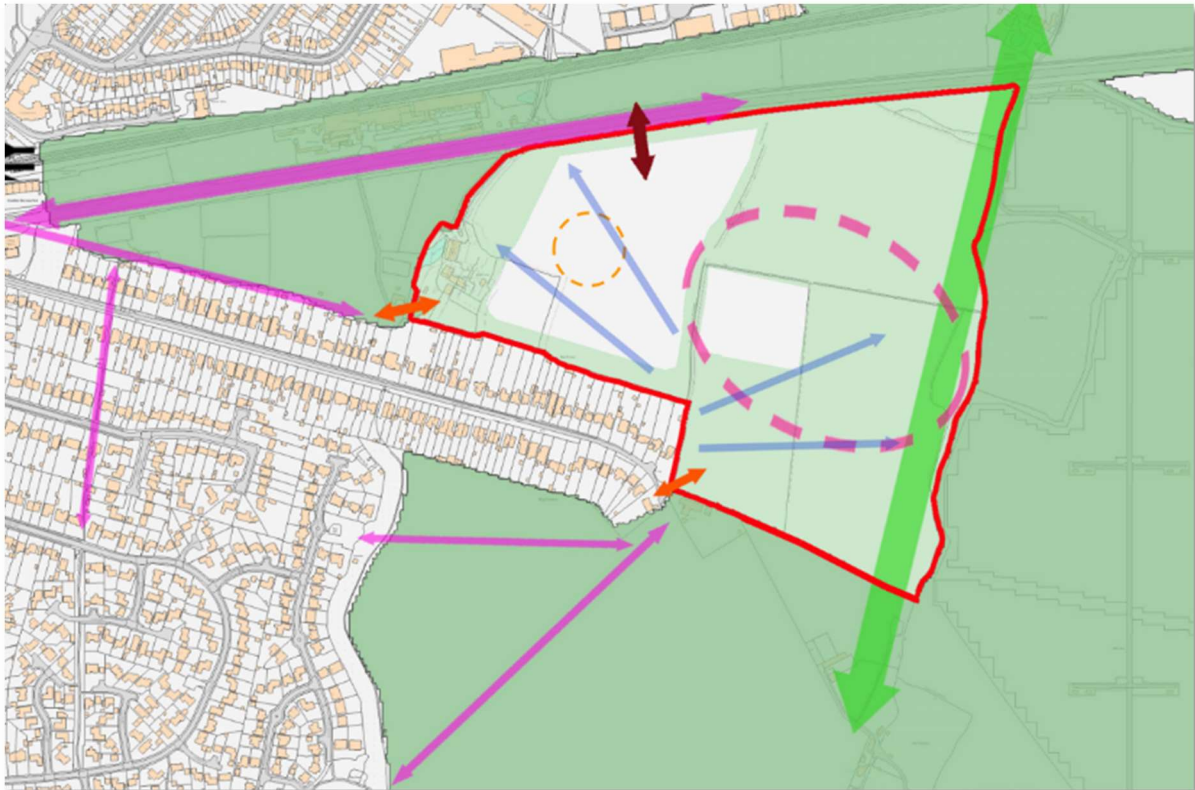
The development of this site in addition to the proposed allocation at Bodkin Farm would completely undermine the sense of leaving one settlement, travelling through an intermediate landscape and arriving somewhere different. In this scenario drivers and footpaths would perceive a continuous belt of development between the settlements (including the solar farm).

**In summary development on this site would significantly affect the open character of the Green Gap, resulting in the material expansion of the built-up area, and significantly affecting the open character of the gap. If both this site and the proposed allocation at Bodkin Farm (W6) are developed this, combined with the existing Red House Farm solar farm, would lead to a perception of coalescence between the settlements.**

**It is therefore concluded that development of this site would not allow the Green Gap to function fully, and would not comply with policies OS6 and OS7.**



## 2.3 W6: Bodkin Farm



**Plate VI: Position of W6, extracted from the reg 18 Local Plan. Buff areas denote areas of development, whereas green areas define potential areas of green infrastructure.**

### 2.3.1 Site Description

Draft allocation in the regulation 18 Local Plan, potentially able to accommodate approximately 250 new homes, 6FE secondary school, new local shopping and community facilities, POS.

Currently the site is in arable use, with well-established hedgerows and the Ancient Woodland of Purchas Wood at the eastern boundary. The settlement edge to the south-west is well vegetated and therefore has little effects on the character of the site.

### 2.3.2 Designations

No landscape or landscape-related designations on the site itself. Forms part of the Green Gap. Ancient Woodland at Purchas Wood immediately to the east of the site. Grade II listed Colewood Farmhouse approximately 75m to the north-east of the site at the closest point.

Public footpath passes along southern boundary of the site, linking Chestfield with Greenhill via Molehill Lane.

### 2.3.3 Published Landscape Character Assessments

At a regional scale the site is included in the North Kent Plain National Character Area North Kent Plain National Character Area. In the Canterbury Landscape Character Assessment (October 2020) classified as landscape character area C1, Chestfield gap and Greenhill (part of the Coastal Hinterland Landscape Type). C1 is described as “an agricultural landscape of predominantly arable fields with some pasture. It provides an important gap between the



*settlements of Chestfield and Greenhill, which form the eastern and western boundaries*". Key characteristics of C1 include:

- A low-lying gently undulating landscape;
- Small blocks of priority habitat deciduous woodland, including Ancient Woodland at Purchas Wood
- Large fields used for arable farming with smaller plots managed as pasture,
- Open rural landscape separating the settlements of Whitstable and Herne Bay between the edges of Swalecliffe, Chestfield, Studd Hill and Greenhill.
- Crossed and subdivided east-west by transport corridors of London to Ramsgate railway, A2990, A229 Thanet Way creating a fragmented landscape.
- Large solar farm at Red House Farm.

As **Plate VII**, below, illustrates, the site demonstrates many of the characteristics noted above. The site comprises large arable fields with the ancient woodland of Purchas Wood prominent to the east. The settlement edge is well vegetated and therefore the site appears largely open and rural in character. Traffic noise is audible but not prominent.



**Plate VII: View from the public footpath at the southern edge of the site, looking north-east towards Purchas Wood.**

### 2.3.4 Visibility and Views

The site is enclosed by mature vegetation on all sides, and there is therefore very little potential for views outside of the site. A footpath provides access to the southern edge of the site, and from here walkers are able to obtain clear views across the site.

### 2.3.5 Assessment of Landscape and Visual Sensitivity

- **Landscape Susceptibility:** the site contains no built form and is almost entirely rural in character and is only slightly influenced by views of existing housing to the south-west. This parcel therefore has a **high/medium** susceptibility to residential development on the scale proposed (increasing to the east).





- **Visual Susceptibility:** views of development would be largely localised but would affect both residents to the south-west and walkers on the footpath that crosses the site. Visual susceptibility is therefore **medium**.
- **Landscape/Visual Value:** the site is not within or near to a landscape or landscape-related designation. The site is open and in arable use, with hedgerows generally in good condition and Ancient Woodland forming part of the eastern boundary. The site is therefore of **medium** value.
- **Landscape Sensitivity:** Overall landscape sensitivity is therefore **Medium**. This site therefore has potential to accommodate the proposed uses without significant character change, although the sensitivity of the site increases further from the settlement edge.

### 2.3.6 Contribution of the Site to the Green Gap (with Reference to the Eastleigh Criteria)

The site is located at the western end of the gap between Chestfield and Greenhill. The existing straight line distance between these settlements is a minimum of 1.09km, and the main ways of travelling between the two settlements are on the A2990 (Thanet Way) to the north (approximately 1.8km) or via Molehill Road to the south (approximately 1.6km). Pedestrians/walkers can use a combination of footpath and Molehill Road to move between the settlement edges, a distance of approximately 1.4km. However, it is notable that at the centre of the gap between these settlements is the solar farm at Red House Farm, and as **Plate V**, above, illustrates this is a prominent built feature which reduces the sense of openness within the Green Gap.

If the site were to be developed in isolation then the distance between the nearest parcels of built form at either settlement edge would reduce to approximately 965 metres. If both this and the proposed allocation at Thornden Wood Road were to be developed then the minimum straight line distance would reduce to around 790 metres. Of this 790 metres, around 490 metres would comprise the existing solar farm at Red House Farm. Thus, **only 300 metres of open fields would remain between the two settlements if both this and Land West of Thornden Wood Road were to be developed as illustrated in the draft policies.**

The effects of the development upon the travelling distances between the two settlements would be reduced by the proposed open space/landscape buffers shown on the illustrative masterplans in the draft policies. However, there would remain a sense that the edges of the settlements have converged, particularly since much of the remaining intervening landscape is occupied by the solar farm.

The topography between the two settlement edges is gently undulating, with a maximum elevation of over 20m AOD to the south of the site dipping to below 10m AOD at the western edge of Greenhill.

The character of the intervening landscape is a key consideration. As is noted above, the Red House solar farm occupies the middle of this gap, and introduces an extensive area of built form which significantly reduces the openness of this part of the Green Gap. The site itself is in arable use and of rural character, and therefore currently performs a clear role in helping to separate the two settlements. The development of this site would create an almost continuous area of development from Greenhill to the eastern extent of the solar farm of development. If both sites were to be developed then there would be an almost continuous belt of development between the settlement edges to the south of Thanet Way.

There is no potential for inter and intra visibility between the settlement edges due to mature hedgerows and also the presence of Purchas Wood.



The development of this site would significantly reduce the sense of leaving one settlement, travelling through a different landscape, and arriving somewhere else, particularly when viewed cumulatively with the Red House Farm solar farm. With this site developed, only the land to the east of the solar farm (and Purchas Wood) would remain as open, rural countryside.

The development of this site in addition to Land West of Thornden Wood Road (H4) would completely undermine the sense of leaving one settlement, travelling through an intermediate landscape and arriving somewhere different. In this scenario drivers and footpaths would perceive a continuous belt of development between the settlements (including the solar farm).

**In summary development on this site would significantly affect the open character of the Green Gap, resulting in the material expansion of the built-up area, and significantly affecting the open character of the gap. If both this site and the proposed allocation at land West of Thornden Road (H4) are developed this, combined with the existing Red House Farm solar farm, would lead to a perception of coalescence between the settlements.**

**It is therefore concluded that development of this site would not allow the Green Gap to function fully, and would not comply with policies OS6 and OS7.**



### 3.0 Summary and Conclusions of the Landscape Sensitivity Appraisals

#### 3.1 Summary of Landscape Sensitivity Assessments

The SLR Landscape Sensitivity Appraisal provides a comparison of the sensitivity of three parcels on the edge of Herne Bay. All of the parcels are located within the Green Gap designation. Two of the parcels, at Bodkin Farm and Land west of Thornden Wood Road, are proposed allocations in the Regulation 18 Canterbury Local Plan. The third site, Land North of Whitstable Road, promoted by Wates, is not a proposed allocation.

**Table 1**, below, summarises the landscape sensitivity assessments of each of the parcels considered. **The two proposed allocations were assessed as having a medium sensitivity to residential development**, since although these sites are on the settlement edge, and close to busy roads, they remain largely rural in character and are free from buildings. In contrast, **Land North of Whitstable Road is of medium/low sensitivity to residential development**, since this site is influenced by existing residential development on two sides, Whitstable Road to the south, and also contains some existing buildings and hard standing as well as being used as a camping and caravan park.

**Table 1: Summary of Landscape Sensitivity of Assessment Parcels, ranked from lowest to highest sensitivity.**

Ranked Parcel references (Lowest to Highest in Sensitivity)	Landscape Sensitivity Assessment
Land North of Whitstable Road	Medium/Low
HB4: Land to the West of Thornden Wood Road	Medium
W6: Bodkin Farm	Medium

#### 3.2 Summary of Green Gap Appraisals

An assessment of the potential effects of development on the functionality of the Green Gap was carried out for each of the three sites, using the Eastleigh Criteria.

It was concluded that development of the Land North of Whitstable Road would not significantly affect the open character of the Green Gap, nor would it lead to a sense of coalescence. Development in this location would not result in the material expansion of the built-up areas in the locality of the Green Gap, nor would it significantly affect the open character of the gap, or result in isolated development. **It was therefore concluded that development of Land to the North of Whitstable Road would still allow the Green Gap to function fully, and could be consistent with policies OS6 and OS7.**

In contrast it has been concluded that development of either or both of the two proposed allocations (W6 and HB4) would significantly affect the open character of the Green Gap, resulting in the material expansion of the built-up area, and significantly affecting the open character of the gap. If both sites were to be developed this, combined with the existing Red House Farm solar farm, would lead to a perception of coalescence between the settlements.



**It was therefore concluded that development of both proposed allocations W6 and HB4 would not allow the Green Gap to function fully, and would not comply with policies OS6 and OS7.**





# **Appendix A    Methodology for Assessing Landscape Sensitivity**

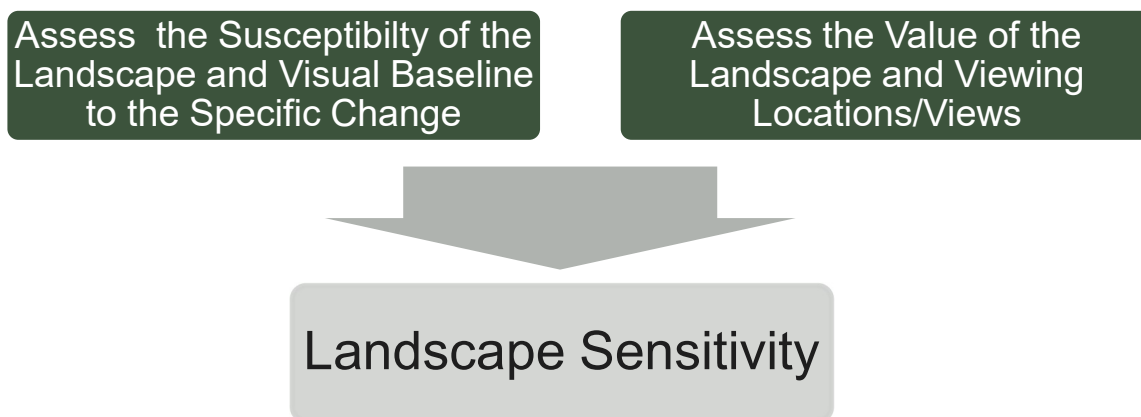
## A.1 Introduction: Objectives and Definitions

Landscape Sensitivity Assessment is a landscape planning tool used to inform strategic Spatial planning and land management. By assessing variations in landscape sensitivity across a number of assessment parcels it is possible to determine which areas have the highest and lowest sensitivity to a particular type of development.

**Landscape Sensitivity** is determined by assessing each of the following combines the following key elements:

- The **susceptibility of landscape character** to a particular type of development;
- The **susceptibility of the visual baseline** to a specific type of change;
- The **value of the landscape/viewing locations and views**.

This principle is illustrated in **Figure A.1**, below.



**Figure A1: Assessing Landscape Sensitivity, Adapted from “An Approach to Landscape Sensitivity Assessment - to Inform Spatial planning and Land Management”, Figure 1, Natural England, June 2019.**

Landscape Sensitivity can therefore be defined as “*a measure of resilience, or robustness, of a landscape to withstand specified change arising from development types or land management practices, without undue negative effects on the landscape and visual baseline and their value*” (“An Approach to Landscape Sensitivity Assessment - to Inform Spatial planning and Land Management”, Natural England, 2019).

It is important to note that Landscape Sensitivity Assessment is not carried out at the same level of detail as a landscape and visual appraisal, (LVA), or a landscape and visual impact assessment (LVIA): these forms of assessment would provide a detailed analysis of how a specific form of development would affect the landscape and visual baseline of a particular site. The methodology used for LVA and LVIA is as advised in the “Guidelines for Landscape and Visual Impact Assessment”, Third Edition, also known as GLVIA3.

It follows that the definition of landscape sensitivity within GLVIA3 needs to be modified for carrying out Landscape Sensitivity Assessment. In an LVA/LVIA context, landscape sensitivity is assessed by combining the susceptibility of the landscape with its value. In Landscape Sensitivity Assessment, landscape sensitivity also takes into consideration the susceptibility of the visual baseline to the proposed type of development.

It is also important to note that a Landscape Sensitivity Assessment differs from a Landscape Capacity Assessment, which seeks to define how much development an assessment parcel may be able to accommodate. Natural England's "*Approach to Landscape Sensitivity Assessment*" notes that defining the capacity of a parcel for development at an early stage of the assessment process is "*too simplistic*" since it does not necessarily take into account important details of site design specific to that particular location.

## **A.2 Scope of this Sensitivity Assessment**

This assessment compares the landscape sensitivity of 3 assessment parcels in Herne Bay, Canterbury District.

For the purposes of this assessment, the development type which is being considered is mostly residential development up to 2.5 storeys high (approximately 10 to 12 metres to ridgeline, and at densities varying between 30 and 50 dwellings per hectare (dph). For the two proposed allocations a secondary school and community hub is also envisaged, and it assumed that these could also be limited to a maximum height of 12 metres.

## **A.3 Assessment of Landscape Sensitivity: Defining Landscape and Visual Susceptibility, and Landscape Value**

As noted above, Landscape Sensitivity is defined by assessing the susceptibility of the landscape, the susceptibility of the visual baseline and the value of the landscape. The following paragraphs set out the assessment process for each of these elements.

### **A.3.1 Assessing Landscape Susceptibility**

As set out in GLVIA3, landscape susceptibility refers to the ability of the landscape receptor to "*accommodate the proposed development without undue adverse consequences for the baseline situation and/or the achievement of landscape planning policies and strategies*". Judgement of susceptibility is particular to the specific characteristics of the proposed development and the ability of a particular landscape or feature to accommodate the type of change proposed and makes reference to the criteria set out in **Table A1**, below.

Aspects of the character of the landscape that may be affected by a particular type of development include landform, skylines, land cover, enclosure, human influences including settlement pattern and aesthetic and perceptual aspects such as the scale of the landscape, its form, line, texture, pattern and grain, complexity, and its sense of movement, remoteness, wildness or tranquillity.

For example, an urban landscape which contains a number of residential buildings may have a low susceptibility to buildings of a similar scale and character. Conversely a rural landscape containing only remote farmsteads is likely to have a high susceptibility to large-scale built development.

**Table A1: Landscape Susceptibility to Change**

Susceptibility	Criteria
<b>High</b>	The landscape receptor is highly susceptible to the proposed development because the key characteristics of the landscape have no or very limited ability to accommodate it without transformational adverse effects, taking account of the existing character and quality of the landscape.
<b>Medium</b>	The landscape receptor is moderately susceptible to the proposed development because the relevant characteristics of the landscape have some ability to accommodate it without transformational adverse effects, taking account of the existing character and quality of the landscape.
<b>Low</b>	The landscape receptor has low susceptibility to the proposed development because the relevant characteristics of the landscape are generally able to accommodate it without transformational adverse effects, taking account of the existing character and quality of the landscape.

### A.3.2 Assessing Visual Susceptibility

When determining the Visual Susceptibility of a site it is necessary to consider the following:

- **Overall visibility of the site:** how visible is the existing site, and does its visual influence extend beyond the site boundary? What is the potential for visibility if the site were developed for residential uses?
- **Potential for mitigation of visual impacts:** what scope is there for introducing screening elements such as landform, standoffs and vegetation?
- **Number of viewers who commonly use viewpoints in and around the site:** some viewpoints are commonly used by the public, such as formal viewing platforms, picnic areas or recreational rights of way. Other viewpoints may be difficult to gain access to.
- **Nature of viewpoints:** Residential properties are sensitive to visual impacts as the residents experience the impacts on a regular and prolonged basis. Public footpaths can also be sensitive, since the users' attention is often focused on the landscape. By contrast, views from outdoor sport facilities, transport routes or places of work are less sensitive.
- **Proximity of viewpoints to the site:** for example, viewpoints which are closer to the site are generally more sensitive.
- **Movement of viewers at the viewpoints:** more transitory views, for example from a motorway, are generally less sensitive than views experienced from residential properties and footpaths.

**Table A2, below**, summarises the criteria that can be used for assessing different levels of visual susceptibility.



**Table A2: Visual Susceptibility to Change**

Susceptibility	Criteria
<b>High</b>	Development would be visible over a wide area, far from the site itself. Views would be possible from a number of sensitive viewing locations such as regional trails, well-used public footpaths and residential areas. There would be very little or no potential for mitigation of potential visual effects.
<b>Medium</b>	Visual effects would be largely contained largely within an area close to the site itself. There would be potential for views from only a small number of sensitive viewing locations, such as footpaths, residential areas. There is some potential for mitigation of visual effects with careful design.
<b>Low</b>	Visibility would be highly localised and contained largely within the site itself. No or few views from publicly accessible locations. Considerable potential for mitigation of effects, for example by careful design or planting.

### A.3.3 Assessing Landscape and Visual Value

Since Natural England’s guidance on Landscape Sensitivity Assessment was produced in 2019, the Landscape Institute has provided new guidance on the “*Assessment of Landscape Value Outside National Designations*” (Technical Guidance Note 02/21, 2021). This guidance sets out a series of factors should be considered when assessing landscape value (see **Table A3**, below).

**Table A3: Factors Considered in Assessing the Value of Non-Designated Landscapes**

Factor	Definition (with Examples for Clarification)
<b>Natural Heritage</b>	Landscape with clear evidence of ecological, geological, geomorphological or physiographic interest. Presence of wildlife and habitats that contribute to the sense of place. Landscape which contains valued natural capital assets that contribute to ecosystem services.
<b>Cultural Heritage</b>	Landscape with clear evidence of archaeological, historical or cultural interest. Landscape which contributes to the significance of heritage assets. Landscape which offers a dimension of time depth.
<b>Landscape Condition</b>	Landscape which is in a good physical state both with regard to individual elements and overall landscape structure. Absence of detracting/incongruous features.

<b>Associations</b>	Landscape which is connected with notable people, events and the arts.
<b>Distinctiveness</b>	Landscape that has a strong sense of identity or place. Presence of distinctive features that are characteristic of a place, or presence of rare/unusual features that confer a strong sense of place. Includes landscape that makes an important contribution to the character or identity of a settlement.
<b>Recreational</b>	Landscape offering recreational opportunities where experience of landscape is important. Includes open access areas, common land and rights of way where appreciation of the landscape is an important element of the experience. Landscape that forms part of a view that that is important to the enjoyment of a recreational activity.
<b>Perceptual (Scenic)</b>	Landscape that appeals to the senses, primarily the visual sense. Distinctive features, or distinctive combinations of features. Strong aesthetic qualities. Visual diversity or contrasts. Memorable/distinctive views or landmarks, or landscape that contributes to these.
<b>Perceptual (Wildness and Tranquillity)</b>	Landscape with a strong perceptual value notably remoteness, wildness, tranquillity and/or dark skies.
<b>Functional</b>	Landscape which performs a clearly identifiable and valuable function, particularly in the healthy functioning of the landscape. Natural hydrological systems, important parts of the green infrastructure network, pollinator rich habitats. Landscapes that have strong physical or functional links with an adjacent national landscape designation or are important to the appreciation of the designated landscape and its special qualities.

In addition to this it is important to consider the value conferred by landscape and landscape-related designations on both landscapes and viewing locations. **Table A4**, below, illustrates the relative value of different landscape and landscape-related designations, and also shows how these can be considered in the context of undesignated landscapes.

**Table A5**, below, summarises some of the key criteria that can be used for assessing different levels of landscape and visual value. It is important to note that some undesignated landscapes may still have particular value and that these can sometimes be considered to be of community or even Local Authority value.

**Table A4: Interpretation of Landscape Designations**

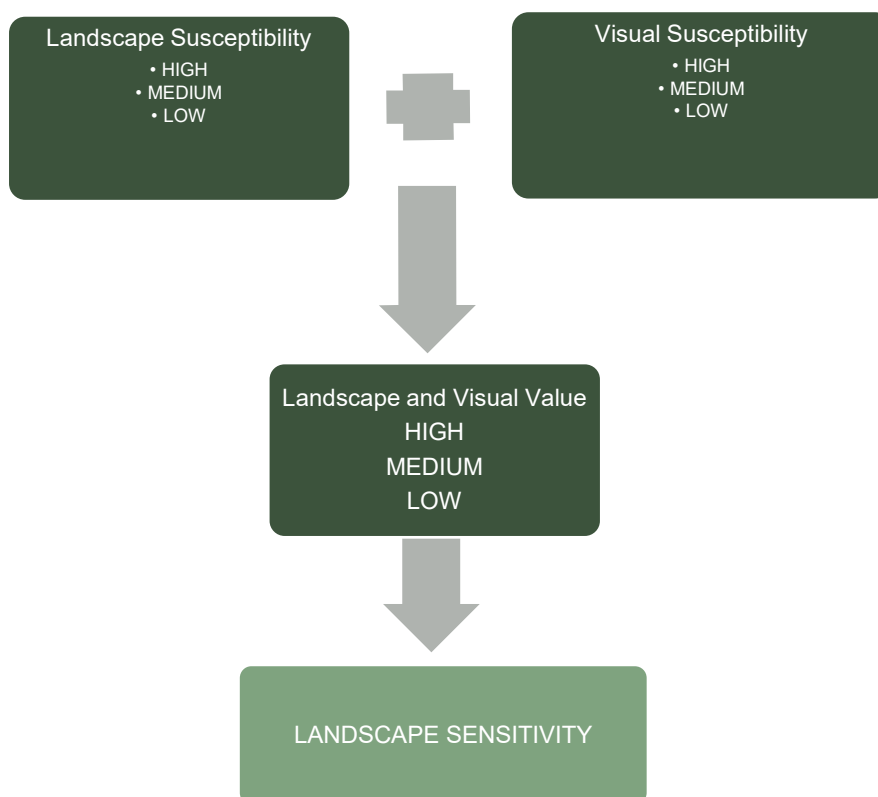
<b>Designation</b>	<b>Description</b>	<b>Value</b>
<b>World Heritage Sites</b>	Unique sites, features or areas identified as being of international importance according to UNESCO criteria. Consideration should be given to their settings especially where these contribute to the special qualities for which the landscape is valued.	International
<b>National Parks, National Landscapes (formerly Areas of Outstanding Natural Beauty), National Scenic Areas</b>	Areas of landscape identified as being of national importance for their natural beauty (and in the case of National Parks the opportunities they offer for outdoor recreation). Consideration should be given to their settings especially where these contribute to the special qualities for which the landscape is valued.	National
<b>Registered Parks and Gardens of Special Historic Interest</b>	Gardens and designed landscapes included on the Register of Parks and Gardens of Special Historic Interest as Grade I, II* or II.	National
<b>Local Landscape Designations (such as Special Landscape Areas, Areas of Great Landscape Value and similar) included in local planning documents</b>	Areas of landscape identified as having importance at the local authority level.	Local Authority
<b>Undesignated landscapes of community value</b>	Landscapes which do not have any formal designation but which may possess some/several indicators of value.	Local Authority/ Community
<b>Landscapes of low value</b>	Landscapes in poor condition or fundamentally altered by presence of intrusive man-made structures. Landscapes which possess few or no indicators of value.	Low

**Table A5: Assessing Landscape and Visual Value**

Susceptibility	Criteria
<b>High</b>	Landscapes and Viewpoints within National Parks, National Landscapes, National Scenic Areas, World Heritage Sites, Registered Parks and Gardens
<b>Medium</b>	Areas of landscape and viewing places identified as being of importance at Local Authority level, such as local landscape designations, conservations areas, non-designated landscapes of high quality (valued landscapes).
<b>Low</b>	Community or Low value landscapes and viewing places. landscapes which contain some, few or no indicators of landscape value.

### A.4 The Assessment Process

**Figure A2**, below, illustrates how judgments on Landscape Susceptibility and Visual Susceptibility judgements are initially combined. The resultant composite landscape and visual judgement is then combined with landscape and visual valley to give overall landscape sensitivity.



**Figure A2: The Landscape Sensitivity Assessment process**

**Table A6**, below, illustrates how landscape susceptibility and visual susceptibility can be combined to create a composite landscape and visual factor. It must be stressed that this is not an arithmetic process, but instead a matter of professional judgment.

**Table A6: Illustration of how Landscape Susceptibility and Visual Susceptibility are combined to create a composite Landscape and Visual Factor**

Landscape Susceptibility	Low	Medium	High
Visual Susceptibility			
Low	Low	Low/Medium	Medium
Medium	Low/Medium	Medium	Medium/High
High	Medium	Medium/High	High

Similarly, Table 7, below, illustrates how the composite landscape and visual factor can be combined with landscape and visual value to define overall Landscape Sensitivity. Again, this is not an arithmetic process but a question of professional judgement by an experienced chartered landscape architect.

**Table A7: Illustration of how the composite Landscape Susceptibility and Visual Susceptibility factor can be combined with Value to define Landscape Sensitivity**

Composite Landscape and Visual factor	Low	Low/Medium	Medium	Medium/High	High
Value					
Low	Low	Low/Medium	Low/Medium	Medium	Medium
Medium	Low/Medium	Low/Medium	Medium	High/Medium	High/Medium
High	Medium	Medium	High/Medium	High/Medium	High

**Table A8**, below, defines the five levels of Landscape Sensitivity that are found in Table A7. These definitions are the same as those found in Natural England’s guidance on Landscape Sensitivity Assessment, (An Approach to Landscape Sensitivity, Natural England, 2019, *op.cit.*)

**Table A8: Definitions for the Resultant Levels of Landscape Sensitivity (based upon Natural England’s Approach to Landscape Sensitivity Assessment, page 20, 2019)**

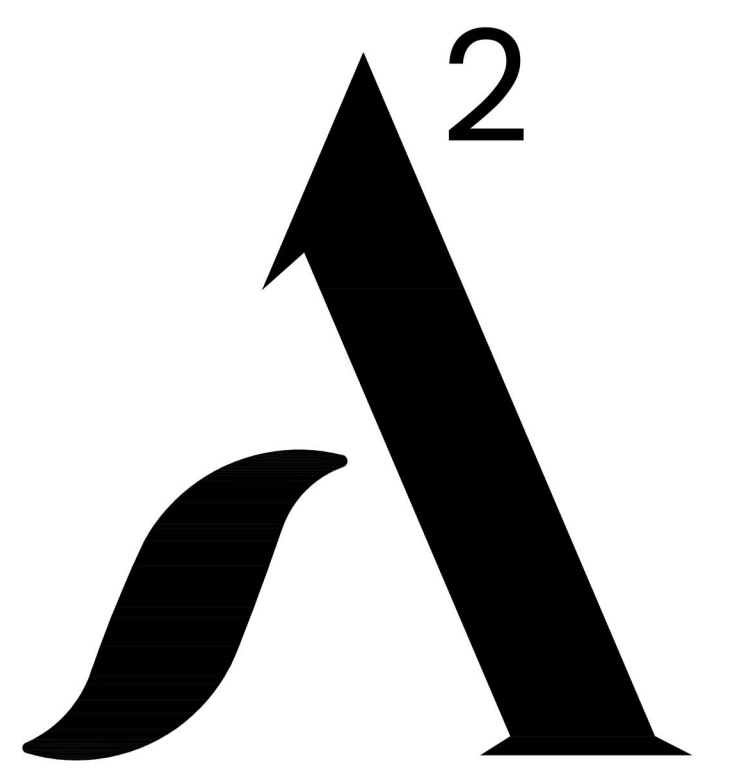
Susceptibility	Criteria
<b>High</b>	Landscape and/or visual characteristics of the assessment unit are highly susceptible to change and/or its values are high and it is unable to accommodate the relevant type of development without significant character change or adverse effects. Thresholds for significant change are very low.
<b>High/Medium</b>	Landscape and/or visual characteristics of the assessment unit are susceptible to change and/or its values are medium through to high. It may be able to accommodate the relevant type of development but only in limited situations without significant character change or adverse effects. Thresholds for significant change are low.
<b>Medium</b>	Landscape and visual characteristics of the assessment unit are moderately susceptible to change/or its values are high/medium through to medium/low or it may have potential to accommodate the relevant type of development in some defined situations without significant character change or adverse effects. Thresholds for significant change are intermediate.
<b>Medium/Low</b>	Landscape and/or visual characteristics of the assessment unit are resilient and of low susceptibility to change and/or its values are medium/low or low and it can accommodate the relevant type of development without significant character change or adverse effects. Thresholds for significant change are high.
<b>Low</b>	Landscape and/or visual characteristics of the assessment unit are robust or degraded and are not susceptible to change and/or its values are low and it can accommodate the relevant type of development without significant character change of adverse effects. Thresholds for change are very high.



Making Sustainability Happen

## APPENDIX 4 – SITE CONCEPT PLAN





ARCHITECTURE & DEVELOPMENT

WEBSITE: www.A2AD.co.uk  
EMAIL: info@A2AD.co.uk  
TELEPHONE: 01489 290035  
ADDRESS: 16-18 Barnes Wallis Road  
Foreham  
PO15 5TT

CLIENT:



PROJECT:

Land to the North of  
Whitstable Road,  
Canterbury, CT6 8BL

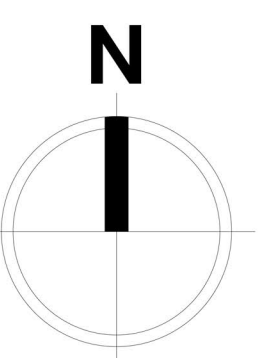
DRAWING:

Coloured Site Layout

STATUS:

Concept

Do not scale for any other purpose than stated in title. Use annotated dimensions only. All dimensions to be checked on site & any discrepancies/ errors to be reported to A2 before work commences. This drawing is to be read in conjunction with all other relevant materials.  
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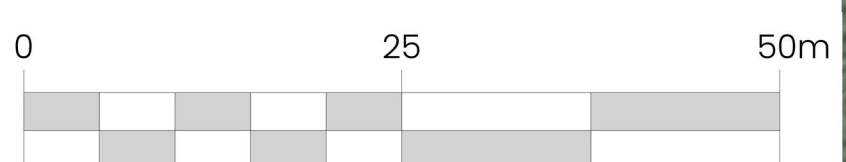
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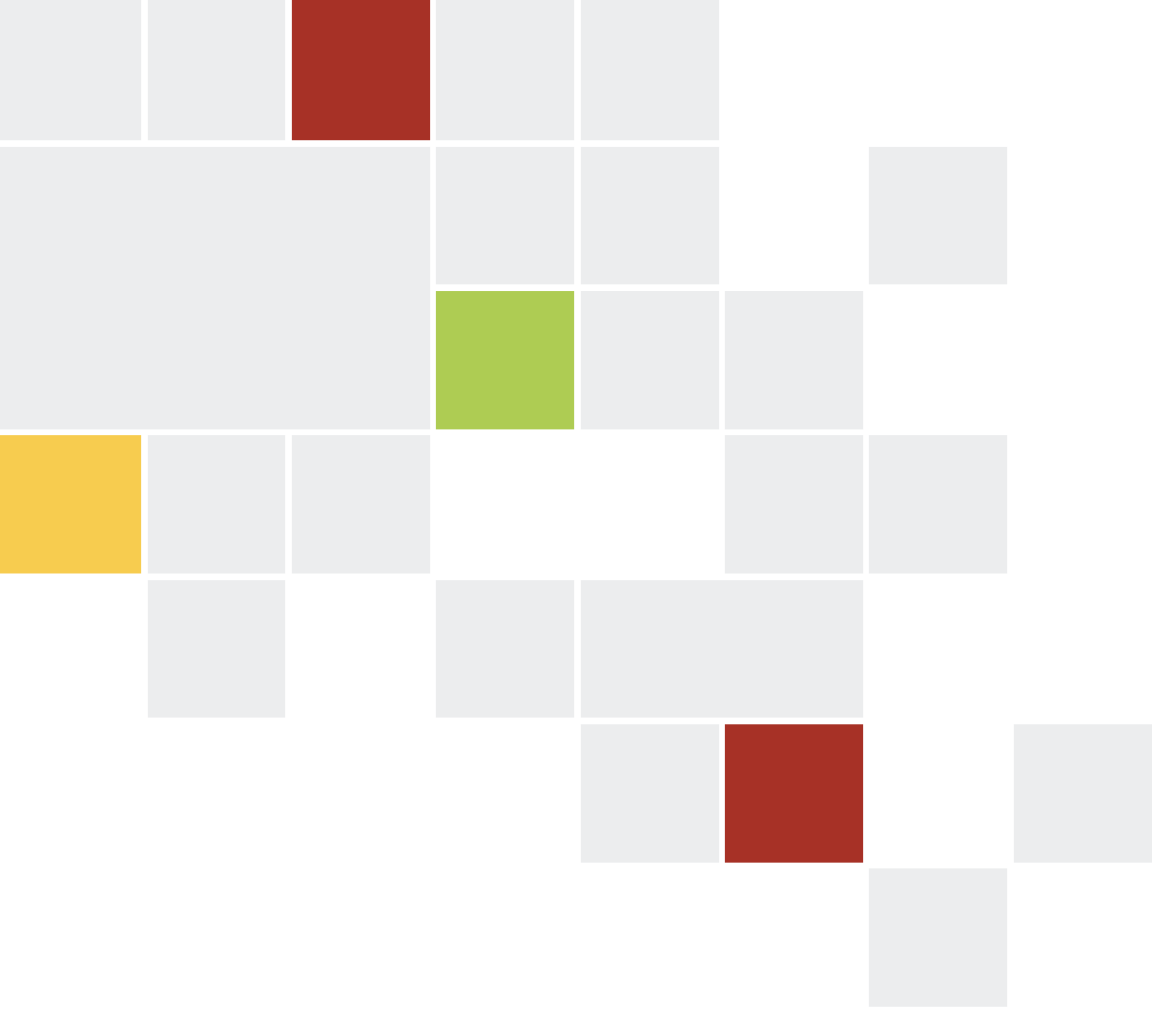
SCALE: DATE: DRAWN BY:

1:500@A0 MAY | 2024 TB

REFERENCE: SHEET NO: REVISION:

24047 C01 -





Boyer