



**WHITSTABLE ROAD  
CANTERBURY  
KENT**

**Landscape representations for regulation 18 consultation.**

**by**

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**for**

**Hallam Land Management Ltd**

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**Appendix A:** Extract from the assessment table associated with the SLAA addendum

## 1. Introduction

1.1 Hankinson Duckett Associates (HDA) was appointed in April 2024 by Hallam Land Management Ltd (HLM) to provide landscape representations for the regulation 18 consultation, for the emerging Local Plan. This is in the context of promoting circa 12.1 acres of land west of Whitstable Road, Canterbury (ref: SLAA 00176 – Whitstable Road) hereafter referred to as the site. These representations are intended to be read in conjunction with the initial Landscape and Visual Appraisal (ref 2079.40, revision 03), also produced by HDA in May 2024.

1.2 The site was not considered suitable for allocation within the regulation 18 Local Plan, with the primary reason for exclusion relating to the perceived landscape harm associated with the development of the site. This report seeks to consider these reasons for exclusion in the context of the draft allocation of the University of Kent site (ref: SLAA 00319 – Land north of University of Kent, Canterbury, Kent), located within the vicinity of the site. This is a draft allocation for approximately 2000 dwellings, associated facilities and infrastructure.

## 2. Council response to site promotion

2.1 The site was reconsidered within the SLAA addendum<sup>1</sup> following representations by HLM. The nature of representation was described as: *‘Disputing assessment outcome, additional comments detailing how landscape harm would be minimised.’*

2.2 Landscape commentary included the following analysis:

*‘Landscape: The western part of the site is surrounded by open countryside and the eastern part of the site is within the Green Gap. The submitted Landscape Assessment states that any landscape impacts would reduce as proposed landscape planting becomes established and that open space could be provided to the north of the development to maintain separation to Blean. However there are still concerns that development on the site would contribute to the coalescence of Blean and Rough Common and protrude into the countryside to the west, negatively impacting the landscape.’*

2.3 It is noted that the Proposed Concept Layout (Ref: 301\_P6) submitted with the HLM representations, provides additional open space to the south of the site (in comparison to the earlier submitted design analysed within the SLAA addendum), to maintain the separation between Blean and Rough Common. It is considered that the mitigation potential demonstrated by the concept layout should be considered in the same manner as for the University site.

2.4 The outcome following the review simply stated that: *‘The site remains unsuitable due to landscape concerns’*. There is a lack of evidence / rationale for this decision making, which is disappointing, given the evidence provided to the council with which to reassess the site. It is

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<sup>1</sup> Strategic Land Availability Assessment Addendum, December 2023.

unclear who has carried out the landscape elements of the SLAA assessment on behalf of the council and whether they are a qualified landscape professional.

2.5 Appendix A provides an extract of the assessment table associated with the SLAA addendum, displaying the results for both the HLM site and the University of Kent site. Both sites are considered to be comparable in terms of landscape constraints, but the council have responded much more positively to identified constraints in the case of the University Land. It is our submission that the HLM site (SLAA 00176) has constraints that are surmountable (as with the University site (SLAA 00319) and should be considered in the same positive light. HDA's comments on the addendum findings have been included in red within Appendix A.

2.6 Additional evidence and the latest Concept Layout (Ref: 301\_P6) have been provided with this submission in order to try to respond to comments and re-emphasise the suitability of the site from a landscape and visual perspective.

### **3 The University of Kent Site**

3.1 The draft allocation of the University of Kent site (SLAA319) would change the landscape context for the HLM site. In our view the HLM site could be complimentary to the SLAA319 allocation. There is a discrepancy between the recommended SLAA yield (1,806) and the quantum within the allocation (approximately 2000). The allocation of the HLM site in combination, could compensate for any shortfall within the SLAA319 allocation and allow for a sensitive response to constraints within the draft allocation site.

3.2 There is a degree of parity between the two sites. Both are either carried forward or recommended for inclusion within the 'Canterbury District Local Landscape Designations Review and Recommendations' regarding the Blean Woods candidate Local Landscape Designation. Both would require vehicular access through the Green Gap and both are considered to have a similar overarching landscape sensitivity, although the University Site is arguably more sensitive in some locations. The University site has a rural context, whereas the HLM site is heavily influenced by existing settlement.

### **4 The landscape sensitivity of the HLM site**

4.1. The Canterbury Landscape Character Assessment and Biodiversity Appraisal (2021) categorises the District into broad landscape types which are sub-divided into local Landscape Character Areas. The site lies within the Stour Valley Slopes: F2

4.2 The site land uses comprise horse paddocks and small-scale pasture. The site has little internal landscape structure or landscape features of merit. With the exception of a short section of tarmacked footpath, CB30, footpaths do not cross the site but do lie adjacent to the southern and parts of the eastern and western site boundaries. The land uses are commonplace in the

local area, and are urban edge in character. The site is enclosed and relatively quiet but not tranquil as it lies adjacent to the urban edge and Whitstable Road, a busy route into Canterbury. The site has been assessed as being of moderate landscape quality.

- 4.3 The boundary features, the western tree belt, northern and eastern hedgerows and small trees groups along the southern edge of the site are more significant and long-standing landscape features and add to the wider landscape infrastructure. They are of moderate- high landscape quality.
- 4.4 Visually, the site is generally contained and inward looking. There are some views of the northern and eastern parcels of the site from the adjacent housing which lies within the Hothe Court conservation area, however the majority of the site does not form part of the immediate landscape setting. The wooded context and flat topography of the landscape to the west and south of the site precludes views of the site from the wider area. The visual envelope of the site is very limited, and includes views from Whitstable Road, Moat Lane, footpaths CB9, 10 and 30, which have partial or open views into parts of the site. The site as a whole is not visible from one public vantage point.
- 4.5 There are no national landscape designations that cover the site or its immediate environs. The Kent Downs National Landscape (formally referred to as AONB) lies to the south, beyond Canterbury and well outside the context of the site. The site does lie within the Blean Area of High Landscape Value (AHLV), although the site as a whole, is not reflective of the valued landscape associated with Blean Wood AHLV. Within the emerging local plan, the AHLV is being taken forward, but re-named as a Local Landscape Designation.
- 4.6 'Canterbury District Local Landscape Designations Review and Recommendations' carried out in January 2021 by LUC, looks at the designation in detail. The site lies within 'The Blean woods' candidate Local Landscape Designation. It is noted that the University of Kent draft allocation (SLAA319) is recommended for inclusion / consideration with regards to the Local Landscape Designation.
- 4.7 The site lies in Landscape Character Area F2, the Stour Valley Slopes, which represents a very small part of the designation. The Kent College land, including the site, paddock to the north and playing fields to the south-west, are the only elements of this character area that are included within the draft Local Landscape Designation. Other Landscape Character Areas fall entirely within the locally designated landscape.
- 4.8 The special qualities of the Blean Woods are set out in table format at pages 32 and 33 of the report and are represented below along with a commentary on the contribution of the site to these special qualities. The site displays few – if any – of the special qualities outlined within the

Canterbury District Local Landscape Designations Review and Recommendations for the Blean woods candidate Local Landscape Designation.

Special qualities	Evaluation	HDA comments
Local distinctiveness and sense of place	<p><i>A strong sense of place created by large and continuous belts of deciduous woodland on elevated ground. The Blean forms a prominent wooded ridge between Canterbury and the coast. It is a highly distinctive and unique landscape within the district forming a discrete recognisable area, with its pattern of woodland blocks, areas of heathland and acid grassland. North-south former drove routes cross the ridge between Canterbury City and coast, and evidence of history linked to the medieval period reflecting past ownership and management by Canterbury Cathedral.</i></p> <p><i>The Blean sense of place extends across the ridge including adjacent and intervening agricultural land and is not limited to the areas within woodland. It also includes areas of agricultural land, such as around Amery Court which were opened up as clearings in the forest in the medieval period. This central agricultural area is recommended for consideration for inclusion within the LLD, despite intensive agricultural/horticultural land use in parts. It includes medieval field patterns, remains of medieval settlement, Church of St. Cosmus and Damian, and recreational routes (Crab and Winkle Way). The valley of the Sarre Penn and including the adjacent small woodland blocks on the valley slopes are a logical extension to the LLD.</i></p>	<p>The site does not contain any existing woodland, although it does have a mature tree belt at the western boundary. The field in pasture to the north of the site (Blean pastures) has a stronger contribution to the treed character and species rich grassland that contribute to sense of place.</p> <p>The site is located at the upper edge of the valley side slopes.</p> <p>Amery Court lies to the north of the site and has stronger associations with the Kent University draft allocation (SLAA319) to the north-east of the site.</p>
Landscape quality	<p><i>Strong ecological integrity represented by the continuous and intact blocks of ancient woodland and extensive designation at local, national and European level. The majority of The Blean is being actively managed by Conservation organisations including The Wildlife Trust, Woodland Trust and RSPB as well as active productive management for timber by Forestry England.</i></p> <p><i>Much of the woodland is within traditional coppice with standards, with areas of commercial forestry at Clowes Wood and Thornden Wood. The entire area is considered to have a high landscape quality.</i></p> <p><i>The intervening agricultural areas on the edges of woodland include a mix of modern arable fields and areas of fruit production and are characterised by their strong wooded backdrop and retain a Blean character and sense of place.</i></p> <p><i>There is an absence of detracting elements throughout, although a number of solar farms have been developed adjacent to the woodlands and a pylon line is prominent ascending the slopes at Clowes Wood. Wealdon Forest Park is a small</i></p>	<p>Woodland is not a feature of the Site, which is currently horse grazed pasture. The fields to the north contain signage and are influenced by Whitstable road and adjacent housing. The fields to the south are influenced by adjacent housing and the phone mast, which is a significant detracting feature. There are urban edge land uses to the east and south-west (playing fields), with the land to the north-east having a stronger association with the rural wooded edge to the north.</p>

	<p><i>commercial area cut into the woodland at Canterbury Road.</i></p> <p><i>The extended modern linear settlements at Blean and Tyler Hill are excluded from the designation, while to the north the A299, in a minor valley, generally marks clear boundary with the agricultural land beyond extending to the edge of the coastal settlements.</i></p>	
Scenic qualities and perceptual aspects	<p><i>A strong sense of tranquillity and relative insularity created by the continuous expanses of woodland as part of one of the most extensive semi-natural woodland complexes in south east England. The pattern of woodland and open farmland, contained by a wooded backdrop, creates a strong visual character.</i></p> <p><i>The majority of The Blean is entirely undeveloped forming extensive tracts of land only accessible on foot offering a rare experience of remoteness and isolation and experience of dark skies at night. There is a general absence of incongruous/detracting features.</i></p> <p><i>Bigbury is included as part of The Blean landscape type but by virtue of its views out over Canterbury and the Cathedral is recommended for inclusion within the Canterbury City LLD.</i></p>	<p>The site has limited tranquillity, due to the noise and activity associated with the road and adjacent settlement. This is illustrated on Figure 3.9 of the Canterbury Landscape Character Assessment and Biodiversity Appraisal.</p> <p>Figure 3.10 (of the same document) demonstrates that the site does not lie within a dark sky area.</p> <p>The site has relatively strong associations with existing settlement. The telephone mast is a detracting feature.</p>
Natural and cultural qualities	<p><i>The continuity in woodland cover has resulted in a rich habitat. Almost all of the woodland is classified as ancient origin, with clearings and rides containing heathland and acid grassland habitats. Value for wildlife is recognised at a national level and European level with over half of The Blean being designated a SSSI and approximately one third as a SAC (East Blean Wood, Ellenden Wood and Blean woods NNR).</i></p> <p><i>The matrix of woodland grassland and heathland habitat supports the rare heath fritillary butterfly and diverse and rare woodland birds including nightingales and nightjar.</i></p> <p><i>The landscape provides a living record of past woodland management practices. Much of the land was endowed to the Abbey of St Augustine and the Cathedral, with rights of pannage for pigs and herbage for cattle. Archaeological features present within the ancient woodland include bronze age barrows, sites of tile kilns and claypits. Medieval woodbanks mark boundaries of woods belonging to different religious houses in Canterbury, with associated areas of coppice and pollards. The Radfall is a distinctive example of a linear earthbank marking a former droveway for herding cattle and</i></p>	<p>The site does not contain any woodland or species rich grassland. There are opportunities to create these habitats within the open space areas of the site.</p>

	<i>pigs, while the entrances to the Blean marked by 'gates' as at Radfallgate.</i>	
Recreation value	<i>The Blean as a whole provides a highly valued recreational resource between the coastal towns and Canterbury, offering extensive promoted routes along connected PRow. Areas owned by the Wildlife Trust, Forestry England and RSPB provide car parking facilities and a network of linked trails for cycling, riding and walking.</i>	There are no rights of way within the proposed development area of the site. A public right of way does run through the proposed northern space, which would be retained and supplemented with additional informal routes and connections. There are rights of way at the perimeter of the site, with good links to wider routes and local facilities.
Associations	<i>A historic landscape with strong associations with the medieval period of management, which can still be read in the landscape today.</i>	The field pattern in proximity to the site has been disrupted by development and changes in land-use. Footpath 30 follows a historic alignment. The field to the north-west of the site and the playing fields to the south-west of the site, used to be part of the wider Blean Woodland complex (OS map 1830-1880). The field systems within the draft university allocation frequently follow historic boundaries.

4.9 The sensitivity of the site to residential development is determined by a combination of landscape value and the susceptibility to development. The site is a green field site, but it contributes little to the character and appearance of the wider landscape. It has a small visual envelope and has some urban edge influence from the adjacent residential and educational land uses. The communications tower to the south-west of the site is also a detracting factor. The overall sensitivity of the site is judged to be Medium.

4.10 Draft policy DS19 (Habitats, landscapes and sites of local importance) is of particular relevance to the site. Guidance within the policy is split into six sections, with each section relating to a type of local designation. Section 3 (regarding Local Landscape Designations) permits development subject to a range of criteria. The wording of this section is considered to be positive and is set out as follows:



*'3. Within the Local Landscape Designation areas at Seasalter Marshes, North Downs, Blean Woods, Wantsum Channel and Stour Valley, as defined on the policies map, proposals for development will only be permitted where they conserve and, where appropriate, enhance the special qualities of the landscape. Consideration will be given to*

- (a) the extent to which the developments location, scale, design and materials would impact on, or protect, the local landscape character and its special qualities;*
- (b) whether the proposal would enhance the future appearance of the designated landscape; and*
- (c) whether there are significant impacts on the historic setting, archaeological or nature conservation interests.*

4.11 The proposals respond to criteria a-c of point 3 in the following ways:

- a) The development would be appropriate for the area and would respond positively to the guidelines set out within the Canterbury Landscape Character Assessment and Biodiversity Appraisal (2021);
- b) The proposals include woodland and tree planting, which are a key component of local landscape character and would reduce the urban influence of adjacent settlement. There is the potential for the proposals to enhance the future appearance of the Blean Woodland.
- c) Further specialist work would be required; however it is considered possible for the proposals to come forward without significant impacts on the historic setting, archaeological or nature conservation interests of the site.

4.12 If it is (rightly) possible to address the development of a site through the application of policy, then it is considered that the same designation should not be seen as a complete constraint to the site being allocated.

## **5. Predicted Landscape Effects**

5.1 The landscape proposals for the site have been derived from an assessment of local landscape character, settlement pattern and the setting to the Hothe Court conservation area. The proposed development is located outside of the Green Gap but accessed from Whitstable Road. The paddocks fronting the road would be retained as semi-natural open space typified by woodland and tree planting, which would maintain and enhance the separation between settlement. The paddock to the north of the existing pitches (also within the Green Gap) would become an area of open space, with a children's play area and recreational routes, which would complement existing land uses. The southern part of the site (outside the Green Gap) would also be retained as open space, maintaining a 100m landscape buffer to Rough Common.

5.2 The proposals would not affect the Blean Woods Complex directly or the Blean Pastures which lie adjacent to Church Wood, which form the immediate setting to the woods. The existing oak

and hornbeam tree belt which lies between the site and Blean Pastures would be retained and enhanced, to provide a visual buffer and enhance the habitat connectivity required of the policy. It should also be noted that the site lies within, and is characteristic of, the Landscape Character Area F2 The Stour Valley Slopes, and is not reflective of the more rural landscape characteristics associated with Blean Wood AHLV.

- 5.3 The Initial Landscape and Visual Appraisal (LVA - ref 2079.40, revision 03), submitted in addition to this report, identifies how the site could be developed sensitively, whilst complying with adopted and emerging policy. The report concludes that the character of the site would change from a field in pasture and paddocks to residential development. This would have an initial adverse effect on the character of the site, although the changes would not have a significant effect on wider landscape character areas. The adverse effects would reduce as the proposed landscape planting becomes established. Open space to the north of the development would provide a suitable buffer between the new development and the conservation area and maintain the sense of separation between Blean and Rough Common.

## **6. Potential effects on the Green Gap**

- 6.1 The site includes part of the Green Gap between Blean and Rough Common, designated within the adopted Local Plan and proposed for retention within the emerging Local Plan. The rationale for retention is set out within the Natural Environment and Open Space Topic Paper 2024:

*'Green Gap between Blean and Rough Common*

*3.33. Of those who answered the 2021 Draft district vision and Local Plan options consultation question on the Green Gap between Blean and Rough Common, the majority agreed with the preferred option of: Option NE5R (preferred option) - keep the existing green gap identified in the current Local Plan.*

*3.34. Through the Regulation 18 draft Local Plan consultation (2022), no comments were received regarding the 'Green Gap between Blean and Rough Common', and so no amendments have been made to the green gap following the 2022 consultation.'*

- 6.2 The gap is not easily seen from the road (as confirmed by the 2015 Local Plan Inspector), however no housing development is proposed on the Whitstable Road frontage, or within the wider green gap policy area to the south-east.

- 6.3 The current extent of the Green Gap between Blean and Rough Common, and its relationship with the HLM proposals, is identified on the submitted plan: 'Existing Green Gap with Proposed Concept Masterplan' (Ref: 104\_01). The gap is 7.28ha in total, with approximately 1.22ha (roughly 1/5) that overlaps with the site boundary. With the exception of the proposed access road 0.06ha in area), the remainder of the Green Gap within the HLM site is proposed as open space land uses. This is demonstrated on the submitted plan: 'Extent of Site showing Green Gap Land Areas (Ref: 103\_01).

- 6.4 In recognition of the council's desire to maintain settlement separation and to maintain the undeveloped character of the 'green gap' and avoid the sense of coalescence, the HLM proposals have demonstrated the inclusion of an appreciable gap, outside of the green gap policy area of more than 100m between the development proposals and the nearest edge of Rough Common. By way of comparison the existing gap between settlement boundaries as defined in the Local Plan is approximately 30m and between built development, on the edge of the settlements on the Whitstable Road, is circa 60m. This additional land (approximately 0.54ha in area) could be included within the Green Gap in the future, increasing the overall area of the Green Gap to 7.88ha, as shown on plan: 'Proposed Gap with Proposed Concept Masterplan (Ref: 105\_01).
- 6.5 Section 5 of Draft policy DS19 relates to Green Gaps and states that:  
*'5. Within the designated Green Gaps, as defined on the policies map, only proposals for sports and recreation uses will be permitted, and only where the development:*  
*(a) Is kept to the minimum necessary to support the proposed use; and*  
*(b) Does not significantly affect the open character of the Green Gap, or affect the separating function leading to coalescence between existing settlements; and*  
*(c) Is sensitively designed, including in terms of form and lighting; and*  
*(d) Is sensitively located and does not result in isolated and obtrusive development.*  
*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.'*
- 6.6 This seems overly prescriptive and would not allow for beneficial land uses associated with habitat creation or other land uses that would not necessarily affect the openness of the gap. For example, national policy relating to Green Belt, allows certain other forms of development *'provided they preserve its openness and do not conflict with the purposes of including land within it'* (paragraph 155 of the December 2023 NPPF). These other forms of development include local transport infrastructure and changes in land use, with examples given of outdoor sport, recreation, cemeteries and burial grounds.
- 6.7 The proposals would seek to introduce new recreational provision within the gap, in accordance with the emerging policy, but would also look to enhance the character and appearance of the gap through new semi-natural tree and woodland planting. This would enhance habitat connectivity and would enhance perceived separation by reducing the intervisibility between the two settlements. The proposed site access would pass through the gap; however, this is located within an area of the gap that is already compromised by settlement to the east and would have a limited effect on the openness of the gap. The approach would be consistent with the

proposals for the regulation 18 draft allocation associated with the University of Kent, which also proposed a vehicular access within / through the Green Gap.

6.8 The latest Concept Layout (Ref: 301\_P6) would not have an adverse effect on townscape character, would maintain separation between settlements and would avoid the sense of coalescence between Blean and Rough Common.

## **7. Conclusions**

6.1 The conclusions drawn from analysis of the proposals and the council's evidence to date are that:

- The site has a Medium landscape and visual sensitivity to development.
- It lies within the draft local landscape designation but contributes little to the special qualities of the designation.
- Part of the site lies within the Green Gap between Blean and Rough Common, however, with the exception of the proposed vehicular access, the land within the Green Gap would be retained as open space land uses.
- The proposals could be designed to comply with draft policy DS19 (Habitats, landscapes and sites of local importance), which considers development within local designation.
- The proposals would respond positively to the landscape context of the site and emerging policy.
- The proposals would provide opportunity for enhancements within the Green Gap, which would maintain and enhance the separation between Blean and Rough Common.
- An additional area of open space (0.54ha), could be introduced to the south of the site, in order to maintain a minimum 100m gap (larger than the existing gap to the north-east) between the proposed development and Rough Common.
- Landscape should therefore not be considered a valid reason to prevent the site from being allocated.
- The allocation of the site could complement the draft University of Kent Allocation, allowing a more holistic and sensitive approach to the wider Blean Woods landscape.