

Regulation 18b – Land west of Whitstable Road, Canterbury

Introduction

1. The representations have been prepared by Nexus Planning, on behalf of Hallam Land Management (“HLM”), in response to the Canterbury City Council Draft District Local Plan 2020 to 2045 consultation.
2. HLM is promoting the Land at Whitstable Road (SLAA ref: SLAA 00176 – Whitstable Road) (“the Site”), which is located to the northwest of Canterbury and currently forms part of surplus Kent College land, to the west of Whitstable Road and north of Moat Lane.
3. The Site is located within a highly sustainable location on the edge of Canterbury, adjacent to Blean Primary School, public transport links and close proximity to shops and facilities. This is a location which the draft Plan, Spatial Strategy (Policy SS3) and the Sustainability Appraisal identifies as a principal focus for development in the District. A position that HLM fully supports.
4. HLM are undertaking detailed technical survey works and have prepared a masterplan to demonstrate how the Site could be developed, which can be found at Appendix 1. It is envisaged the Site would be a small to medium allocation that HLM considers can deliver approximately 90 dwellings and substantial open space within the first five years of the Plan period. The number of dwellings on the Site has been reduced from the initial concepts in order to accommodate a better landscaped area and to address the Council’s concerns regarding the impact of the development on the Green Gap and coalescence.
5. HLM would welcome the opportunity to discuss the Site in further detail with the Council having regard to the demonstrable shortfall in housing allocations measured against the draft Local Plan housing requirement, as outlined below.
6. HLM acknowledge the prospective changes to the National Planning Policy Framework (“the Framework”), which is subject to consultation, closing 2nd March 2023. The draft Plan will need to take account of any changes within the Framework that come into force and to this end HLM reserve their right to comment at a later date on such matter. We would however comment that in the context of housing need, HLM does not consider there to be any ‘exceptional circumstances’ that would justify the calculation of housing need other than in accordance with the Government’s standard method, which is indeed the approach the Council is currently taking.

Policy SS3 – Development Strategy for the District

Housing Needs

7. The Council’s Housing Needs Assessment (HNA) identifies a local housing need (“LHN”) of 1,120 dwellings per year for Canterbury over the period 2020-2040 (although we note that the plan period is 2020 – 2045). However, the Council’s Development Topic Paper (2022) identifies a higher figure of 1,252 dwellings per annum on that basis of no cap being applied. This is based upon the Government’s Standard Method, which sets minimum housing figures, and we are therefore satisfied this is the correct starting point at the present time. HLM therefore support this approach and we note the Council’s Sustainability Appraisal Report (2022) finds positives effects with this option. Despite this, we note that the consultation Plan does not set out a housing target over the Plan period. To this end, we suggest reference is made to the total housing requirement as a minimum, as required by paragraphs 35a and 61 of the Framework.
8. The housing need figure will however need to be kept under review as the emerging Local Plan progresses to ensure it is based upon the latest available data at the point of submission for examination. The Planning Practice Guidance (PPG) notes that the standard method figure can be relied upon for a period of 2 years from the time that a plan is submitted to the Planning Inspectorate for examination in public (ID: 2a-008-20190220).

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9. The ONS Affordability Ratio dataset shows a worsening picture for Canterbury, with a material worsening of affordability over the last decade. In this context, the Council should consider increasing the provision of dwellings over the plan period to address this underlying issue.
10. The Government's standard methodology approach does include an affordability adjustment; however, the PPG is clear that the affordability adjustment applied to the standard methodology formula is not a solution to problems of affordability as outlined below.

"The affordability adjustment is applied in order to ensure that the standard method for assessing local housing need responds to price signals and is consistent with the policy objective of significantly boosting the supply of homes. The specific adjustment in this guidance is set at a level to ensure that minimum annual housing need starts to address the affordability of homes." (Paragraph: 006 Reference ID: 2a-006-20190220)

11. As such, if the draft Plan is to genuinely help address the underlying affordability crisis within the District, the Council should incorporate an upward adjustment factor of its own to address the specific problems of affordability and thus allocate additional sites.
12. In order for plans to be positively prepared, and therefore 'sound', the Framework at paragraph 35a requires unmet need from neighbouring areas to be accommodated where practical. The Council's Duty to Cooperate Compliance Statement 2022 indicates that each authority is working towards their own individual housing targets and will provide these in full within their own administrative area.
13. This situation will therefore need to be kept under review and fully considered during the continued preparation of the Plan.
14. Notwithstanding the above, completions, commitments and allocated sites within the Plan provides for merely 37 units above the identified housing requirement across the Plan period (1,252 dpa, based upon an uncapped figure, as confirmed within pages 4 and 5 of the Development Topic Paper (October 2022)). This results in a 0.1% buffer over the proposed requirement and as such, the Plan lacks any resilience should some of the sites not be developed, under-deliver against their allocated numbers or trajectories slip. The Framework is clear the strategic policies should, as a minimum, provide for objectively assessed needs (para 11b) and therefore it is recommended the Council increase the number of site allocations to ensure sufficient flexibility exists. HLM considers that a 10% buffer should be applied to ensure the housing requirement is achieved.

Spatial Strategy

15. HLM supports the Plan's spatial and development strategy for the district in principle, with Canterbury, considered to be the most sustainable settlement in the District and therefore being the principal location for development growth (SS3(2)).
16. We support the development strategy in strategic terms in so far Canterbury and its edges form the principal focus for new development, as per the settlement hierarchy, followed by the coastal towns.
17. This position is supported through paragraph 6.1.7 of the Sustainability Appraisal Report, which sets out that the spatial strategy has a principal focus within Canterbury City area, and this preferred option would have significant positive effects on housing, employment and economic effects, a conclusion we agree with.
18. The Plan indicates Canterbury will continue to be the economic hub of the District and we support the position that it has the most significant infrastructure links to accommodate further growth to allow links throughout the Southeast region, to London and further afield to Europe, through travel and movement, and its educational status with numerous universities.
19. In view of this, it is right that additional growth should be focused in and around at Canterbury over the Local Plan period to maintain the settlement's status within the hierarchy and to facilitate further sustainable growth.

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20. It is however clear from the Council's Strategic Land Availability Assessment (SLAA) that sufficient growth cannot be accommodated within the existing urban area and growth will need to include urban extensions on greenfield sites that have the capacity to accommodate meaningful growth and green infrastructure. Such sites would also provide greater opportunities to accommodate the specific housing needs of Canterbury, which the Council's HNA advises is for 4-bedroom homes due to the growth in older age groups and decline in younger age groups and for affordable home ownership, larger 2-bedroom houses are needed. It is noted that brownfield sites are likely to be more suitable for higher density development and therefore smaller 1- and 2-bedroom units.
21. The District settlement hierarchy identifies Canterbury as an urban area at the top of the settlement hierarchy and Blean as a Rural Service Centre, which are the next most sustainable locations after urban areas. The Council's Rural Settlement Study (2020) identifies that Rough Common sites within the 'Blean Cluster' and defines this as a Local Service Centre that includes some facilities to meet day to day needs, with Blean providing further facilities. In this context, it is noted that land at Whitstable Road (the Site) is only less than one mile away from the centre of Blean, which is easily accessible by walking, cycling or public transport (bus).
22. The Local Plan also confirms that Blean is well connected to Canterbury and has good access to key and strategic community facilities and services, a conclusion that HLM supports.
23. However, it has been identified that the Council has provided a wholly insufficient buffer to provide sufficient flexibility and resilience in the Plan and ensure an up-to-date Local Plan can remain in plan for as long as possible. In fact, we note that the Government's latest Housing Delivery Test results (2021) show a worsening picture for Canterbury with a result of only 65%, due in part to the lack of said up to date Plan and reliance on allocations which have not delivered as quickly as anticipated. Furthermore, and detailed later on in these representations, it is clear that the Cooting Farm strategic allocation will need to be deleted from the Plan, leaving a substantial shortfall in allocated sites against the identified housing requirement.
24. In this context, additional allocations will be required. Such allocations should follow the settlement hierarchy and be located in sustainable locations such as land being promoted by HLM at Whitstable Road, which represents a wholly logical extension to the existing built-up area that could accommodate approximately 90 dwellings, and substantial green infrastructure.

Policies SS3(4) and R1 Cooting Farm

25. Policy SS3(4) of the Plan identifies a new Garden Community Broad Location at Cooting Farm, Adisham Road, which forms a major strategic area of growth in the District. This is allocated at Policy R1 - Land at Cooting Farm.
26. It has been identified that the site will provide new homes (in the region of 3,200 homes), jobs, services and infrastructure.
27. To be included within the Plan, the Framework is clear that deliverable, developable or broad locations need to be identified (paragraph 68b). The site does not meet the definition of deliverable, not least due to the lead in times associated with a new settlement of this nature, and also to be developable or a broad location for growth, there must be a reasonable prospect of development coming forward. To this end, it is understood that the landowner has not made the site available and as reported, have contacted Officers to confirm that they do not wish for the land to come forward for development.
28. Furthermore, it is noted that paragraph 3.6. of the SLAA has excluded four potential sites on the basis that despite being suitable for development with purported no policy conflicts, they had not been made available by the landowner for the development use proposed. The same approach must therefore also be taken for Cooting Farm.
29. The draft policy had anticipated completions would commence in 2030 and therefore it is assumed that the draft Plan was expecting all or the majority of the allocation to be delivered within the Plan period until 2045 – although there is not yet any trajectory to confirm this. In any event, it is clear that additional allocations must now be made to address this substantial shortfall. These should be made in accordance with the spatial strategy outlined at Policy SS3 and paragraph 1.18 of the draft Local Plan, namely focusing growth proportionally at the

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most sustainable settlements i.e. the majority of growth in and around the main urban areas of Canterbury, Whitstable and Herne Bay, followed by the Rural Service Centres, such as Blean and then Local Service Centres such as Rough Common. Smaller and less sustainable villages and hamlets are identified after this.

30. As detailed earlier and below, HLM are promoting the land on the edge of Canterbury which is suitable for housing development and could contribute to this shortfall, as a small to medium allocation within the first five years of the plan period.

Land at Whitstable Road, Canterbury (SLAA 176)

31. As referenced above, HLM are promoting the Land at Whitstable Road, Canterbury, to the southern end of Blean and located adjacent to the Rough Common settlement, near Canterbury. In summary, the Site is suitable, available and achievable as follows:

- **Suitable** – the Site represents a wholly suitable location for development in a highly sustainable location, which can be sensitively designed to respond to the landscape.
- **Available** – the Site is under the promotion of HLM, and it is available for development in the short term.
- **Achievable** – the Site is viable and can accommodate approximately 90 dwellings. These could be delivered, in full, within the first five years of the Plan period.

32. The Concept Masterplan (Appendix 1) shows a scheme for approximately 90 dwellings, comprising 27 x affordable dwellings (30%) and 63 x market houses, with a mix of one, two, three and four bed flats / houses. The development would be accessed from Whitstable Road and includes parking for 15 cars for access to the Blean Primary School via the existing crossing point; enhanced open space and new recreational routes and planting; new children's' play area; sustainable drainage basin; swales; spine streets; retention and enhancement of trees; and pedestrian access.

33. Whilst HLM have identified specific reasons why the Council need to make additional allocations within the Local Plan, irrespective of these reasons, the Council must also do so to address the deletion of Cooting Farm as a draft allocation. Omission sites, such as that promoted by HLM, must therefore be reconsidered for allocation.

34. As detailed earlier, the District settlement hierarchy identifies Canterbury as an urban area at the top of the settlement hierarchy and Blean as a Rural Service Centre, which are the next most sustainable locations after urban areas. The Council's Rural Settlement Study (2020) identifies Rough Common sites within the 'Blean Cluster' and defines this as a Local Service Centre that includes some facilities to meet day to day needs, with Blean providing further facilities. In this context, it is noted that the Site is only located less than one mile away from the centre of Blean, which is easily accessible by walking, cycling or public transport (bus).

35. The Local Plan also confirms that Blean is well connected to Canterbury and has good access to key and strategic community facilities and services, a conclusion that HLM supports. The Site therefore has good access to both Canterbury and Blean and is therefore sustainable in location, meeting the three overarching objectives of the Framework to achieve sustainable development – economic, social and environmental, by ensuring development would be in the right place, is supported by the provision of infrastructure and has the opportunity to create a strong and vibrant development which can integrate into the community.

36. Paragraph 68 of the Framework states

“Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:

- a. *specific, deliverable sites for years one to five of the plan period; and*

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b. specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.”

37. Within the Annex 2: Glossary of the Framework, the government clearly defines ‘deliverable’ and ‘developable’ as follows:

Deliverable: To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

a. sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans)

b. where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.

Developable: To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.

38. The Site is medium sized and HLM confirm that the Site is available for development and can delivered, in full, within the first five years of the Plan, thus meeting the deliverable test set out in the Framework. This is owing to HLM’s control over the Site, suitability for development and absence of any material issues which would be detrimental to its viability. Furthermore, HLM has already commissioned the preparation of a masterplan (see Appendix 1) and other technical survey works, demonstrating HLM’s intention to progress the Site at the earliest opportunity.
39. The Framework promotes the use of small and medium sized sites making an important contribution to meeting housing requirements in an area due to the quick build out rate (paragraph 69) and the low-risk nature in respect of infrastructure and land ownership – factors which wholly apply to this Site.

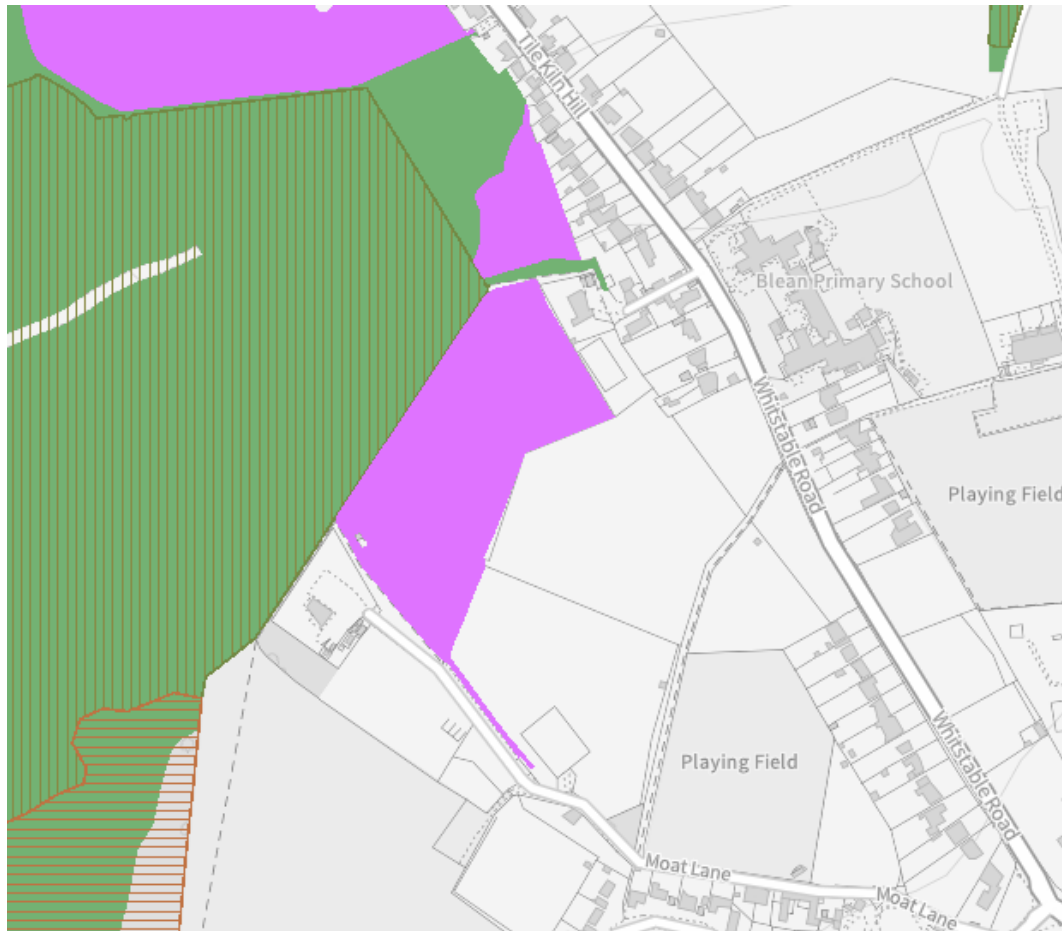
Strategic Land Availability Assessment (“SLAA”)

40. The Site was assessed through the Council’s SLAA (July 2022) following the Call for Sites submission. The Site’s SLAA reference is SLAA 176.
41. It appears that the Site was discounted due to the perceived negative landscape impacts in relation to the location within the Green Gap and purported coalescence of Blean and Rough Common. The revised masterplan prepared by HLM responds to these concerns, reducing the net developable area, accommodating an improved landscaped area and providing substantial screening to the road frontage, which ensures the Green Gap is not harmfully impacted and therefore overcomes the Council’s concerns. Further detail is provided below.
42. HLM support the methodology and criteria of the SLAA as it is in line with general good practice, however, we do disagree with some of the findings and conclusion on SLAA 176.
43. The SLAA considers the proposed use of the Site to be mixed, with market, affordable and older persons housing; community facilities; and potential car parking for Blean Primary School. The submitted masterplan (Appendix 1) currently incorporates approximately 90 dwellings, substantial open space for the benefit of the community and potential car parking for Blean Primary School, although we would welcome the opportunity to discuss the components of the scheme in further detail with the Council. Nevertheless, this scheme will deliver significant benefits, including site specific benefits other sites cannot offer.
44. The SLAA states that a small area of the southern part of the Site is within the Natural England Priority Habitat Inventory. The map below, taken from the Council’s interactive planning constraints maps, shows land to the

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west and south identified as good quality semi-improved grassland (non-priority) (pink), which would be protected through the redevelopment and could be retained as open space. HLM therefore do not believe this is a constraint to the development of the Site that should negatively impact upon its overall assessment.

45. The Blean Woods National Nature Reserve, Site of Special Scientific Interest, Special Area of Conservation, and Ancient Woodland is located outside the Site to the west (Green and hatched). The masterplan (Appendix 1) shows that a buffer would be retained between the development on Site and the designated protected areas, thus resulting in no physical impacts. Furthermore, due to limited connectivity and provision of open space on Site, in combination with the overall modest scale of development, there would be no material recreational impacts arising either.



46. HLM agrees with the SLAA in respect of the Agricultural Land Classification Grade and confirm that the Site is classified within Grade 3, as set out in the DEFRA Spatial Map. As considered within the HDA Landscape response to the SLAA176 assessment which can be found at Appendix 2, SA objective 11 identifies the development of the Site results in - the avoidance of the unnecessary loss of Best and Most Versatile (BMV) land. Potential indicators of BMV land in the Sustainability Appraisal are identified as loss of Grade 1 and 2 agricultural land. The development of the Site would not result in the loss of BMV land as identified in the Sustainability Appraisal objective.
47. The Council's Policy Map shows the Site to be partially within a KCC Mineral Safeguarding Area for River Terrace Deposits. The site does not include a geologically important Site such as a Regionally Important Geological site. The eastern portion of the Site lies on the western edge of the KCC Minerals Safeguarding area, for river terrace deposits, the main safeguarded area lies to the east of the Whitstable Road. The Site is in close proximity to existing residential areas, small in extent and would be unviable to extract, given the necessary standoffs for noise, residential amenity and access. Therefore, this does not represent a constraint in terms of overall site suitability and the desire or need for prior extraction would have to be balanced against its impacts and the need to deliver housing.

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48. HLM confirm the Site has proposed access from Whitstable Road up to the public highway in the form of a priority junction. There are not considered to be any highways safety or capacity impacts of the proposed development, indeed the provision of parking space for Blean Primary School could improve highway safety by limiting ad hoc parking along Whitstable Road.
49. A car parking survey was undertaken by HLM in November 2021, along Whitstable Road and The Oaks Nursery which showed the majority of the primary school drop offs occurred between 08:36 and 08:59, with the peak cumulative total recorded as 11. Based on the results of the traffic survey, a car park of circa 15 spaces will be provided to adequately cater for the parking demand of the primary school, this could be provided on-site.
50. The SLAA indicates that off-site transport mitigation is likely to be required, due to highway capacity constraints. However, this appears to be a generic comment as there is no evidence to outline the specific impacts that arise, the scale of such improvements and whether such impacts cannot be mitigated through off-site improvements. Given the scale of the proposed development at approximately 90 dwellings, HLM do not consider that insurmountable highway capacity constraints would exist and that any impacts could therefore be suitably mitigated.
51. A PRoW runs along the eastern and south-western sides of the Site; however, this does not intercept the proposed developable area of the Site and improved access could be reached to the areas of public open space proposed through the development. As such, no adverse impacts would rise to the use of this PRoW.
52. In respect of heritage, the Hothe Court Conservation Area is located to the east of the Site, however as shown in the illustrative masterplan, the area directly adjacent to the conservation area would be free from built form. Accordingly, HLM agree with the SLAA conclusions that the Site could be sympathetically designed to ensure the conservation area is preserved and thus no adverse impacts would arise.
53. One of the key concerns identified by the Council within the SLAA is related to the potential negative impact on the landscape and specifically to the reduction of the Green Gap between Blean and Canterbury, and the purported coalescence of Blean and Rough Common, by reason of development protruding into the countryside to the west.
54. The proposed Green Gap is shown within the proposals map for Blean and at its minimum is 30m in width and alternatively a 60m distance from the nearest residential dwelling at Rough Common and Blean. The proposed access would be through the northern most part of the Green Gap, with the rest of the Site predominantly located outside of this Green Gap. HLM have produced a revised masterplan / landscape plan (Appendix 1) reducing the net developable area and providing additional land to the Green Gap with open spacing retained to the front of the Site and also between the proposed development boundary and Moat Lane to the south. The masterplan also illustrates existing and further screening to the Whitstable Road boundary, thus screening the development from this area, and preserving the length of the Green Gap. HLM therefore consider the Council's concerns have been overcome through the revised masterplan.
55. Furthermore, HLM have commissioned a Landscape Appraisal for the Site. This concludes at 9.1.1 of the report (Appendix 3) that the design and layout has been derived from the assessment of local landscape character, settlement pattern and setting of the Conservation Area. The Landscape Appraisal confirms the existing landscape features would be retained and protected during the course of development, with informal open space, tree planting, hedgerows and scrub and wetland habitat creation, which would provide a soft landscape setting to the development. Consequently, the proposal is not considered to have significant adverse effects on the landscape character of the local landscape and the separation between Blean and Rough Common would be maintained, as would the landscape setting to the conservation area.
56. The Landscape Appraisal confirms, that on the eastern side of the development, dense and regularly maintained hedgerows are a feature and if continued to mature to 4-5m would provide significant and effective screening to the new development. Further planting would supplement and enhance all existing trees and hedgerows, thus softening the southern edges of Blean village and reinforce habitat connections to the Blean Woods and buffer the pastoral setting of Church Wood.

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57. The Landscape Appraisal recognises the change of the Site from a field in pasture and paddocks to residential and therefore having an initial adverse effect on the character of the Site (noting the Council accept greenfield sites are required to meet development needs), but these would not have a significant effect on wider landscape character areas, and the adverse effect reducing as the proposed landscaping establishes to temporarily moderately adverse, then to minor adverse after 15 years. The layout ensures suitable buffers between the new development, the conservation area and allows for a sense of separation to Blean and Rough Common.
58. Given the above, HLM does not consider that the allocation of the Site would diminish the effectiveness of the Green Gap, nor would there be a long-lasting adverse impact. The proposals would seek to enhance the benefit of this Green Gap for the community by making it useable public open space.
59. The revisions therefore ensure no significant landscape impact to the open countryside to the west or south of the Site.
60. Impacts upon the landscape and Green Gap do of course in any event need to be considered in the context of the Council's acceptance that development in the countryside will be necessary to accommodate the requirements of the emerging Local Plan. Furthermore, the District contains a range of environmental constraints including some 27% designated at the Kent Downs Area of Outstanding Natural Beauty (AONB). Paragraph 172 of the Framework is clear that *"Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues"* (emphasis added).
61. There are more local designations including Green Gaps and Areas of High Landscape Value. However, the paragraph 175 of the Framework is clear that *"Plans should distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework"*. In this context, local landscape designations would fall into a category of lower environmental or amenity value and must be balanced against other objectives of the Framework, for example *"providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs"* (paragraph 35a) and supporting the Government's objectives of *"significantly boosting the supply of homes"* (paragraph 59). Accordingly, local landscape designations should not in principle be seen as a reason to prevent otherwise sustainable development.
62. Whilst the Site is in close proximity to Blean Pastures Wildlife Site and being within an orange area for Great Crested Newts, matters regarding protected species could be mitigated during the course of the planning process and are not therefore seen as 'showstoppers'.
63. HLM agree with the SLAA that the design of the scheme could address residential amenities of neighbouring occupiers.
64. Based on the above, HLM consider the Site is technically suitable for development and landscape matters have been addressed through the revised landscape masterplan.
65. In light of the Council's concerns regarding the impact on the landscape, the SLAA fails to take the Site beyond Stage 2 and therefore does not respond to other matters regarding suitability, availability, viability and achievable.
66. As outlined earlier, the Site is considered to be suitable in location for development having regard to relevant policy considerations: HLM are promoting the Site and it is therefore available with a realistic prospect that housing will be delivered on the Site within five years; and there are no known constraints or issues that would affect the viability and achievability of the scheme.
67. HLM consider that the scheme is acceptable in all these respects and would request that the Site is re-appraised in light of the additional evidence supplied and shortfall in allocations.

Sustainability Appraisal

68. Appendix G of the Sustainability Appraisal (“SA”) assesses the Site and provides the following summary:

“Site is identified as unsuitable in the SLAA. There are concerns regarding landscape impact. The SA has identified significant and minor negative impacts and when reviewed alongside the SLAA there are concerns that these impacts cannot be suitably addressed.”

69. Notwithstanding the above, the SA identifies significant positive effects of the Site development on flooding, housing, employment and sustainable communities. HLM concur with these findings.

70. HLM has considered the overall scoring for the Site and whilst full regard is had to Appendix M – Definitions of Significance, it is considered that it should be scored more favourably. HLM agree with the scores for SAO 1 (Air Quality), SAO 6 (Water), SAO 7 (Flood Zone), SAO 9 (Heritage), SAO10 (Dwellings), SAO 12 (Employment) and SAO14 (Sustainable Communities). Where we disagree, this is outlined below

	SAO 1: Air Quality	SAO 3: Biodiversity	SAO 4: Geology	SAO 5: Landscape	SAO 6: Water	SAO 7: Flood Zone	SAO 9: Heritage	SAO10: Dwellings	SAO 11: Land use	SAO 12: Employment	SAO 13: Transport	SAO 14: Sustainable Communities
CCC SA Score	0	-	-	-	0	++	0	++	-	++/?	++/-	++
HLM SA Score	0	0/+			0	++	0	++	-	++/?	++/+	++

SAO 3: Biodiversity

71. The SA sets out significant negative effects on biodiversity. At this stage of the process, the effect on biodiversity cannot be determined, and HLM disagree that there would be significant residual negative effects, given that the design and mitigation could address the biodiversity and historic environment issues, with the SLAA confirming this. The definitions for significance scores within the SA are set out in Appendix M and in respect of biodiversity, a negative score is given if a biodiversity net loss is delivered. However, this is not the case here. Indeed, Policies SS1 and DS21 of the draft Local Plan requires a 20% net gain in biodiversity across the Site.

72. The Natural England Priority Habitat Inventory identifies the Blean Pastures as good quality semi-improved grassland and a non-priority habitat. Natural England’s technical note TIN 110 identifies semi-improved grassland as ‘non-priority habitat, National Vegetation Classification communities considered as semi-improved grassland are listed as these swards are often the starting point for grassland restoration’, or improvement ‘and may lie on the transition from semi-improved grassland to semi-natural grassland, a priority habitat’.

73. As part of the masterplan proposals the public footpath and its immediate habitat would be retained in-situ, and separation can be achieved from the Blean Pastures Wildlife Site, Blean Woods National Nature Reserve, Site of Special Scientific Interest, Special Area of Conservation, and Ancient Woodland, ensuring no physical impacts and due to limited connectivity and provision of open space on Site, there would be no material recreational impacts arising. HLM present that matters regarding protected species could be mitigated during the course of the planning process and a net gain could be achieved on Site and therefore SAO 3 should be Neutral at worst; with appropriate management a positive effect may be achieved.

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SAO 4: Geology

74. The SA sets out significant negative effects on geology. The Council score geology at significant negative, which according to Appendix M indicates there would be significant negative effects on protected geological important sites. However, there is limited evidence to support this position.
75. However, the HDA Landscape Response outlines that the Site does not include a geologically important site such as a RIG. The eastern portion of the Site lies on the western edge of the KCC Minerals Safeguarding area, for river terrace deposits, the main safeguarded area lies to the east of the Whitstable Road. The Site is in close proximity to existing residential areas, small in extent and would be unviable to extract, given the necessary standoffs for noise, residential amenity and access. In terms of SAO 4, the Site would have a Neutral effect in respect of protected geological sites and a minor – Negative effect in relation safeguarding mineral resources. This does not represent a constraint in terms of site suitability and the desire or need for prior extraction would have to be balanced against its impacts and the need to deliver housing.

SAO 5: Landscape

76. The SA sets out significant negative effects on landscape.
77. The Site sits within the Blean AHLV and the policy supporting text identifies the following:

“The Blean Woods AHLV identifies landscapes important to the character and setting of the Blean Wood Complex. It is an important objective of the Council and other agencies to preserve and enhance this landscape, with long term objectives to meet habitat network potential for woodland and heathland, particularly where it improves habitat connectivity of the Blean woodlands.”
78. The HDA Landscape Response details that 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.
79. The SLAA refers to the site being surrounded by ‘open countryside’. Aerial photography clearly illustrates that the site is surrounded by Kent College’s playing fields to the east and south of the site and residential development to the south-east, east and north. In a wider context the site is contained to the south and west by the Blean Woods. The woodland visually contains the site limiting the potential landscape and visual effects to the immediate environs of the site.
80. The SLAA townscape assessment identifies the north-eastern part of the site, fronting Whitstable Road, as part of the ‘Green Gap’ between Blean and Canterbury. 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.
81. The SLAA landscape assessment concludes that the development of the site would contribute to the coalescence of Blean and Rough Common. However, to maintain the undeveloped character of the ‘Green Gap’ and avoid the sense of coalescence, HLM have prepared a revised Masterplan / Landscape Plan (Appendix 1) showing improved relationships and enhancement to the Green Gap, and new planting and screening to the eastern boundary to Whitstable Road. The outline masterplan has been revised to maintain an appreciable gap, between the two settlements, noting that the existing gap between settlements on the Whitstable Road is less than 60m between the built settlement edges.
82. An area of open grassland, similar in extent to the field in pasture south of the Site would be laid out as a common or green. To reinforce the sense of openness and separation between the settlements the existing hedge to the east of the proposed open space would be reduced in height to afford views, from the adjacent

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public footpath, of the open space and landscape to the south and west of Rough Common as well as the green gap to the east of the site.

83. The additional open space would also provide the opportunity to improve the grassland at the southern end of the site and potentially extend the Blean Meadows grassland habitat and provide greater habitat connectivity, in line with AHLV policy objectives. The effects on the local landscape would be negative, an effect consistent with most green field sites assessed in the SLAA and SA (see Appendix B of the SA), however the effects would be limited to the immediate environs of the site. The development would not have a noticeable effect on the Blean Wood complex or the wider AHLV beyond the woodland.
84. In respect of SAO 5, in relation to settlement pattern, the revised outline masterplan would maintain separation between settlements and avoid the sense of coalescence and the proposals would not have an adverse effect on townscape character. The effects on land / townscape as set out in the SA would therefore be neutral in line with the SA.
85. This neutral score in fact is better than many of the significant negative scores given to existing allocations, such as Merton Park Mill Field (Policy R4), Ayelsham South (Policy R20) and Land adjacent to Valley Road Barham (Policy R23).

SAO 11: Land Use

86. The SA sets out significant negative effects on land use. In regard to land use, HLM accept the scheme would result in the loss of Grade 3 level agricultural land. SAO 11 identifies the avoidance of the unnecessary loss of Best and Most Versatile (BMV) land. Potential indicators of BMV land in the SA are identified as loss of Grade 1 and 2 agricultural lands. The development of the Site would not result in the loss of BMV land as identified in the SA. As such, the resultant effect on land use would be a Negative rather than a Significant Negative effect.

SAO 13: Transport

87. The SA scores mixed impacts on transport (significant positive effects on access to public transport; and minor negative effects on transport highways). The proposal would increase the number of vehicles using the Site; however, the Site is located within a sustainable location, therefore it is contested the impact on transport highways would be negative, without substantiated evidence. Furthermore, the scheme includes a significant community benefit through the provision of primary school parking, thus removing stationary and parked vehicles on Whitstable Road, which reduces the potential hazards within the highway. As such, HLM suggest this is revised from minor negative to positive and thus the overall score shifted to positive.

Summary

88. In light of this revised scoring, it is noted that the Site would, for example, score better than allocations sites – Land North of Cockering Road (Policy C9), Land on Bekesbourne Lane (Policy C14), Folly Farm (Policy C20), Wincheap (Policy C23), but additional allocations are in any event required, following the deletion of Cooting Farm.

Policy SS1(4) and DS21 Biodiversity Net Gain

89. Policy SS1 (Environmental strategy for the district) (4) requires development across the District to incorporate measures to deliver a minimum 20% biodiversity net gain, which shall be in line with Policy DS21 (Supporting biodiversity recovery).
90. We support the principle of Policy SS1 and DS21 seeking to improve biodiversity improvements in developments. However, we note that this far exceeds the 10% requirement of the Environment Act 2021. In proposing the 10% requirement the Government considered evidence and discounted proposing, amongst other things, a 20% net gain requirement. Whilst this is a laudable ambition, compelling local evidence must be presented to justify a 20% net gain. The Viability Appraisal (May 2022) confirms that a 20% biodiversity net gain will be 50% more expensive than 10%, but remains a viable prospect, albeit other policy obligations may impinge on viability.

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However, there is no evidence to further justify why such a significant uplift on recently published legislation is appropriate in this location. It is therefore recommended that Policy SS1 and DS21 is modified to require sites to achieve at least a 10% net gain in biodiversity above the baseline value.

Policies SS2(2) and DS6 Carbon Net Zero

91. We support the principle of the Plan in seeking a shift towards net-zero, and Policies SS2 (Sustainable design strategy for the district) (2) and DS6 (Sustainable Design) requires all new development to be designed to achieve Net Zero operational carbon emissions and endorse the requirements of the Framework for a transition towards a low carbon future. This is laudable, however, we question the deliverability of this in the timescales envisaged.
92. It is also recognised that the Future Homes Task Force has examined how the house building industry can work towards delivering net zero homes by 2050, a target date, well beyond that of the draft Local Plan, and identifies a low carbon position by 2025, with substantial progress towards production and construction methods that are net zero and sustainable between 2025 and 2030, however this does not require a net zero position.
93. In light of the above and the onerous nature of the Policy, we therefore recommend that Policies SS2(2) and DS6 are substantiated with further evidence being required to show how it is feasible.

DS1 Affordable Housing

94. Policy DS1 sets out the affordable housing requirement for the District and is supported by HLM. It is however recommended that the wording is amended and made flexible to ensure that the requirements are based upon and respond to the Council's latest housing needs assessment evidence base, noting the plan period covers 25 years.

DS2 Housing Mix

95. Policy DS2 sets out the housing mix requirement for the District and this is supported by HLM. It is however recommended that the wording is amended and made flexible to ensure that the required mix and is based upon and respond to the Council's latest housing needs assessment evidence base, noting the plan period covers 25 years.

Summary

96. In summary, it is evident that whilst the Council's proposals to meet local housing need in full are calculated using the Government's standard method, further allocations are required in order to ensure there is sufficient buffer against potential non-implementation of sites or delays in delivery to ensure sufficient certainty exists that the minimum figure will in fact be achieved. Furthermore, additional allocations are required to compensate for the circa 3,200 dwellings lost as a result of the Cooting Farm allocation being removed. The Council will therefore need to review further and alternative allocations for the Regulation 19 submission Plan.
97. Land at Whitstable Road, Canterbury (SLAA ref: SLAA 176), which is being promoted by HLM, is suitable, available and achievable for approximately 90 dwellings. The Site is within a highly sustainable location, on the wider the edge of Canterbury and close to facilities and services. This is a general location the Council is seeking to focus growth in the District, as confirmed by the draft Plan, Sustainability Appraisal and other evidence based documents.
98. The Site received a relatively positive assessment within the SLAA, and further work has been undertaken by HLM to ensure the perceived landscape concerns can be overcome, through changes to the indicative masterplan, such as reduced net developable area and retention and strengthening of Site screening to preserve and enhance the Green Gap. To this end, HLM do not consider the development of the Site would result in unacceptable landscape issues, nor a diminishing of the Green Gap, resulting in a neutral landscape impact overall. In fact, HLM consider that through the application of the SA process, the Site scores better than existing allocations, notwithstanding the need for additional allocations.

Representations to the Regulation 18 Consultation – January 2023


99. HLM would welcome further discussions with the Council to discuss the merits of the Site following the conclusion of the Regulation 18 consultation period.

Appendices:

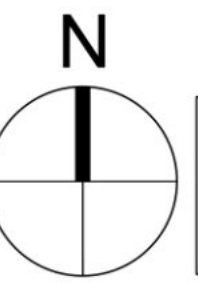
- Appendix 1 – Concept Masterplan
- Appendix 2 – HDA Landscape Response to the SLAA176 Assessment
- Appendix 3 – Landscape Appraisal

Appendix 1 – Concept Masterplan

Contractors and consultants are not to scale dimensions from this drawing

Extent of site 

1. New vehicular access off Whitstable Road
2. Parking for 15 cars with access to primary school via adjoining existing crossing point
3. Existing open space enhanced with new recreational routes and planting
4. New childrens' play area
5. Sustainable drainage basin
6. Swale providing conveyance to basin
7. Spine street through centre of residential layout
8. New homes face outwards onto site boundaries
9. Existing boundary trees retained and enhanced with new tree and shrub planting where appropriate
10. Pedestrian access point into residential layout



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Client
Hallam Land
Project
**Land west of Whitstable Road
Canterbury**
Description
**Proposed
Concept Layout**

Status
Preliminary
Scale 1:1250@A1
Job Number 35740
Drawn By MJ
Drawing Number 301
Date Jan 23
Revision P4

Appendix 2 - HDA Landscape Response to the SLAA176 Assessment

Landscape response to SLAA176 assessment: Canterbury Regulation 18b Consultation

Introduction

The SLAA review for site SLAA176, as approved by Canterbury City Council (October 2022), includes a number of references to landscape, Green Gap and potential coalescence of settlements. These representations provide a response to the council's SLAA site review and Sustainability Appraisal, and assesses a revised outline masterplan against the relevant assessment criteria. The assessment of the revised masterplan indicates that the site would be suitable for development and that landscape concerns identified in the SLAA and SA can be addressed.

Site description

The site is assessed as agricultural land. The site has an established use as paddocks (primarily horse and sheep associated with the school farm) and whilst the land can be considered agricultural land it includes an artificially surfaced menage and horse shelters. The site lies adjacent to Blean Pastures which extends as a narrow strip of land across the southern edge of the site (circa 5m wide) which follows the public footpath alignment to the south of the field (see attached extract from the DEFRA Magic web site.)

Biodiversity

The Natural England Priority Habitat Inventory identifies the Blean Pastures as good quality semi-improved grassland and a non-priority habitat. Natural England's technical note TIN 110 does not identify semi-improved grassland as 'priority habitat', National Vegetation Classification (NVC) communities considered as semi-improved grassland are listed are often the starting point for grassland restoration', or improvement 'and may lie on the transition from semi-improved grassland to semi-natural grassland, a priority habitat'.

As part of the masterplan proposals the public footpath and its immediate habitat would be retained in-situ, and in terms of SA objective 3, there would be at worst a Neutral effect; with appropriate management a positive effect may be achieved.

Land Use

The site is ALC rating Grade 3. SA objective 11 identifies; the avoidance of the unnecessary loss of Best and Most Versatile (BMV) land. Potential indicators of BMV land in the SA are identified as loss of Grade 1 and 2 agricultural land. The development of the site would not result in the loss of BMV land as identified in the SA objective. The resultant effect on land use would be a Negative rather than a Significant Negative effect.

Geology

The site does not include a geologically important site such as a Regionally Important Geological site (RIG). The eastern portion of the site lies on the western edge of the KCC Minerals Safeguarding area, for river terrace deposits, the main safeguarded area lies to the east of the Whitstable Road.

The site is in close proximity to existing residential areas, small in extent and would be unviable to extract, given the necessary standoffs for noise, residential amenity and access. In terms of SA objective 4, the site would have a Neutral effect in respect of protected geological sites and similarly, a Neutral effect in relation safeguarding mineral resources.

Landscape

The site sits within the Blean AHLV and the policy supporting text identifies the following:

“The Blean Woods AHLV identifies landscapes important to the character and setting of the Blean Wood Complex. It is an important objective of the Council and other agencies to preserve and enhance this landscape, with long term objectives to meet habitat network potential for woodland and heathland, particularly where it improves habitat connectivity of the Blean woodlands.”

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.

The SLAA refers to the site being surrounded by ‘open countryside’. An aerial photograph (attached) clearly illustrates that the site is surrounded by Kent College’s playing fields to the east and south of the site and residential development to the south-east, east and north. In a wider context the site is contained to the south and west by the Blean Woods. The woodland visually contains the site limiting the potential landscape and visual effects to the immediate environs of the site.

The SLAA townscape assessment identifies the north-eastern part of the site, fronting Whitstable Road, as part of the ‘Green Gap’ between Blean and Canterbury. 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.

The SLAA landscape assessment concludes that the development of the site would contribute to the coalescence of Blean and Rough Common. To maintain the

undeveloped character of the 'green gap' and avoid the sense of coalescence, the outline masterplan has been revised to maintain an appreciable gap, outside of the green gap policy area of more than 100m between the built development within the two settlements. 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.

An area of open grassland, similar in extent to the field in pasture south of the site would be laid out as a common or green. To reinforce the sense of openness and separation between the settlements the existing hedge to the east of the proposed open space would be reduced in height to afford views, from the adjacent public footpath, of the open space and landscape to the south and west of Rough Common as well as the green gap to the east of the site.

The revised outline masterplan would maintain separation between settlements and avoid the sense of coalescence. In respect of SA objective 5, in relation to settlement pattern, the proposals would not have an adverse effect on townscape character. The effects on townscape as set out in the SA would be Neutral.

The additional open space would also provide the opportunity to improve the grassland at the southern end of the site and potentially extend the Blean Meadows grassland habitat and provide greater habitat connectivity, in line with AHLV policy objectives. The effects on the local landscape would be Negative, an effect consistent with most green field sites assessed in the SLAA and SA (see appendix B of the SA), however the effects would be limited to the immediate environs of the site. The development would not have a noticeable effect on the Blean Wood complex or the wider AHLV beyond the woodland.

The revised masterplan and an amended SA summary sheet are attached for consideration given the clarification to matters of landscape provided as part of the HLM consultation response and a revised outline masterplan.

BD 10.01.2023

Appendix 3 – Landscape Appraisal

**WHITSTABLE ROAD
CANTERBURY
KENT**

Initial Landscape and Visual Appraisal:

by

Hankinson Duckett Associates

for

Hallam Land Management Ltd

HDA ref: 2079.40

Issue: 01

Date: August 2022

hankinson duckett associates

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HDA Document Control and Quality Assurance Record

Plans

HDA 1: Site Survey

HDA 2: Site Location and designations

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Supporting photographs

Appendix 1: Extract from the Canterbury Landscape Character Assessment and
Biodiversity Appraisal 2020

Appendix 2: Extract from Local Landscape Designations
Review and recommendations 2021

1 INTRODUCTION

1.1 Instructions

- 1.1.1 Hankinson Duckett Associates (HDA) was appointed in July 2022 by Hallam Land Management Ltd to undertake an initial Landscape and Visual Baseline Assessment for the development of circa 12.1ha of land west of Whitstable Road, Canterbury.
- 1.1.2 This report assesses the existing landscape baseline and context for the site; the contribution the site makes to the identity and character of adjacent settlements and provides a high-level assessment of the likely landscape and visual effects of residential development on the character and appearance of the countryside around Rough Common and Blean. The development assessed includes residential housing, access roads, planting, a Sustainable Urban Drainage Scheme (SuDS), and open space. Further to the initial assessment, recommendations are made as to how identified effects may be further mitigated through scheme design and a suitable landscape strategy.
- 1.1.3 The site comprises horse paddocks and a field in pasture, located to the west of Whitstable Road, adjacent to existing housing on the south-side of Blean village and west of the playing fields of the Kent College campus, adjacent to the village of Rough Common. The site is bordered, to the south by Moat Lane which provides access to the playing fields and the telecommunications tower to the west of the site. The Blean Woods lie to the west and north of the Kent College campus.

1.2 Methodology

- 1.2.1 National landscape guidance uses landscape character as a basis for policy. Natural England has established the current methodology for the character-based approach to landscape assessment. This provides a foundation, with adaptation, for use in project-specific landscape assessment. It describes the application of landscape character assessment at different scales: the national/regional scale, local authority scale and local scale. The third edition of the 'Guidelines for Landscape and Visual Impact Assessment' sets out landscape assessment methodology, which provides the basis for use in project-specific landscape assessment.
- 1.2.2 The approach to this Landscape and Visual Assessment is based upon the latest guidance, and upon HDA's extensive practical experience of assessment work. The baseline site survey was undertaken in August 2022 and included assessment of the wider area.

2 LANDSCAPE PLANNING POLICY CONTEXT

2.1 Introduction

2.2.1 The landscape and visual assessment has regard to the requirements of the development planning process. The planning framework assists in the identification of the issues related to landscape, particularly in relation to landscape designation and policy objectives.

2.2 National Planning Policy

The Framework

2.2.1 The National Planning Policy Framework (NPPF) revised in July 2021 covers all aspects of planning policy in one succinct document including the natural environment, green infrastructure, open space, recreation and play.

2.2.2 Para 174. “Planning policies and decisions should contribute to and enhance the natural and local environment by inter alia:

a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);

b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;

d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;

e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental

2.2.3 Section 12 of the NPPF relates to ‘Requiring good design’ and it is the Government’s objective that developments:

a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;

b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;

c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);

d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;

- e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
 - f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience (Para 130).
- 2.2.4 Section 15 of the NPPF also addresses 'Habitats and biodiversity' which requires Local Plans to: promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity (Para179).

2.3 National Planning Practice Guidance (NPPG)

2.3.1 The NPPG was launched as a web-based resource on 6th March 2014. The guidance supports and informs the framework and sets out further specific guidance in relation to landscape assessment and green infrastructure.

2.3.2 Guidance within the NPPG on Green Infrastructure states that:

"Green infrastructure opportunities and requirements need to be considered at the earliest stages of development proposals, as an integral part of development and infrastructure provision, and taking into account existing natural assets and the most suitable locations and types of new provision." (Paragraph: 008 Reference ID: 8-008-20190721, Revision date: 21 07 2019).

This guidance is relevant to potential mitigation for the site.

2.4 Local Policy

2.4.1 The site falls within the administrative area of Canterbury City Council. The Canterbury District Local Plan 2017 covers a period up to 2031. A Local Plan review is underway with a further call for sites to cover the plan period 2020-2040. The evidence base for the Local Plan currently includes a Landscape Character and Biodiversity Appraisal 2020 Appendix 1, Local landscape

Designation review and Recommendations 2021 Appendix 2, Review of Landscape Character Areas against policy 2021 and a Green Gaps and Local Green Space Review 2021.

2.4.2 The Current Local Plan policies that are of relevance to this assessment are:

2.4.3 Policy LB2 Areas of High Landscape Value

“The following Areas of High Landscape Value are defined on the Proposals Map and Inset Maps:

- a. The North Kent Marshes;*
- b. The North Downs;*
- c. Blean Woods;*
- d. Wantsum Channel;*
- e. Canterbury (the valley of the River Stour around Canterbury).*

Within these areas, development will be considered in relation to the extent to which its location, scale, design and materials would impact on or protect the local landscape character and enhance the future appearance of the designated landscape and its heritage and nature conservation interest. Development proposals that support the landscape character (including settlement character), and have no significant impact upon historic setting, archaeological or nature conservation interests, where relevant, will be permitted.”

2.4.4 The site lies within the Blean Woods complex and the policy supporting text identifies the following:

“b. The Blean Woods AHLV identifies landscapes important to the character and setting of the Blean Wood Complex. It is an important objective of the Council and other agencies to preserve and enhance this landscape, with long term objectives to meet habitat network potential for woodland and heathland, particularly where it improves habitat connectivity of the Blean woodlands.”

2.4.5 Policy LB4 Landscape Character Areas

“Proposals for development, and associated land use change or land management, should demonstrate that they are informed by, and are sympathetic to, the landscape character of the locality. In considering development proposals, the City Council will take every opportunity to reinforce, restore, conserve or improve, as appropriate, the landscape character of the area in which development is proposed.

Development will be permitted if the following criteria are satisfied:

- a. Development would be appropriate to the economic and social wellbeing of the area;*
- b. The site selection can be adequately justified, with the siting of development minimising the impact;*
- c. Development would safeguard or strengthen tranquillity, features and patterns that contribute to the landscape character and local distinctiveness of the area;*

d. The scale, design, materials and landscaping measures are appropriate and would lead to an enhancement of the character of the landscape; and

e. Development will promote maintenance, enhancement, and restoration of biodiversity as appropriate in accordance with policy LB9.

All development should take into account the sensitivity of the particular landscape to accommodate change. Development, or associated land use change or land management, which does not significantly adversely affect the landscape character of an area, will normally be allowed. The development should have regard to the Canterbury Landscape Character and Biodiversity Appraisal to identify the character areas and features affected”.

2.4.6 *“The text supporting the policy identifies the following at 10.19:*

The planning system needs to accommodate change, whilst retaining and where possible, strengthening the pattern and diversity of the landscape. In essence the landscape character appraisal process can be used to identify and prevent the destruction of inherent landscape character or take advantage of opportunities to strengthen the character and thus enhance local distinctiveness. Context and local distinctiveness must be considered in all proposals for new development and the Council will seek to ensure that landscape character is reinforced, restored, conserved or improved as appropriate.

Distinguishing features and patterns in the landscape are key to the character and distinctiveness of a landscape and might include settlement patterns and roads, the pattern, height and composition of hedgerows (and other field boundaries), woodland and trees and the types and distribution of wildlife habitats”.

2.4.7 **Policy OS6 Green Gaps**

“Within the Green Gaps identified on the Proposals Map (see also Insets 1,3 and 5) 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. Proposals for open sports and recreational uses will be permitted subject to there being no overriding conflict with other policies and the wider objectives of the Plan. Any related built development should satisfy criteria (a) and (b) above and be kept to a minimum necessary to supplement the open sports and recreation uses, and be sensitively located and of a high quality design.”

2.4.8 The supporting text particularly relevant to the Blean – Rough Common gap is set out at para 11.45:

“The green gaps have been specifically identified between built up areas, such as villages or urban areas, which are gradually expanding, particularly along the road frontages. The

designations have been limited to 'pinch points', where settlements, often due to linear expansion, are at a particular risk of coalescence."

2.4.9 Policy HE6 Conservation Areas

"Development within a conservation area should preserve or enhance its special architectural or historic character or appearance. Development, in or adjoining a conservation area, which would enhance its character, appearance, or setting will normally be permitted. Important features or characteristics, which contribute to its special character and setting, that need to be protected, include; plan form, buildings, architectural features, built form, archaeological sites, materials, trees, streets and spaces and the relationships between these features.

New development in a conservation area should aim to preserve and enhance the character and local distinctiveness of the historic environment and respect its surroundings in terms of height, massing, volume, scale, form, materials, details, roofscape, plot width and the design of any new pedestrian, cycle or vehicular access.

Development within, affecting the setting of, or views into and out of, a conservation area, as shown on the Proposals Map and all Insets, should preserve or enhance all features that contribute positively to the area's character, appearance or setting. Particular consideration will be given to the following:

- a. The retention of buildings, groups of buildings, existing street patterns, historic building lines and ground surfaces;*
- b. Retention of architectural details that contribute to the character or appearance of the area;*
- c. The impact of the proposal on the townscape, roofscape, skyline, landscape and the relative scale and importance of buildings in the area;*
- d. The need to protect trees and landscape;*
- e. The removal of unsightly and negative features; and*
- f. The need for the development."*

3 SITE CONTEXT

3.1 Location and Settlement Pattern (Plan HDA 1)

- 3.1.1 The site lies on the south-western edge of Blean village, adjacent to the Kent College farm and college playing fields. Beyond the college estate lies Church Wood part of the Blean woods complex to the west and the settlement of Rough Common to the south. The centre of Blean village is located to the north of the site, a semi-nucleated settlement straddling the A290. The village extends south along the A290, Whitstable Road, to include Blean Primary School and adjacent houses which lie to the east of the main road and the site.

3.1.2 Blean and Rough Common are separated by the college playing fields, horse paddocks and the sports facilities associated with Kent University. Settlement along Whitstable Road, between the settlements, is linear, ribbon development, with a narrow open gap (less than a small field in width) between residential development on opposing sides of the road. The gap between settlements, as perceived from the road, is strengthened by the open land immediately adjacent to the Whitstable Road to the west of the road, north of Rough Common and to the east of the road, south of Blean village. The full extent of the gap between settlements, as perceived from the Whitstable Road, is screened from view by roadside hedgerows and mature field boundary hedgerows.

3.2 Geology and Soils

3.2.1 The soils form a complex pattern of flinty coarse loams over gravelly brown earths. The soils are generally of Grade 3 ALC.

3.3 Landform and Drainage (Plan HDA 2)

3.3.1 The site and its environs sit on the north-western edge of the Stour Valley Slopes on the North Kent Plain. The landform is essentially flat, lying between 75 and 73m AOD. There are no open water features within the site, drainage is limited to field-side ditches which at the time of survey were dry features.

3.4 Local Land Use and Vegetation

3.4.1 The countryside local to the site is a mix of playing fields and paddocks with grazing for horses and cattle, and recreational facilities. Villages and the University of Kent and Kent College are set within a small-medium scale landscape, interspersed with parkland and woodland copses. The field pattern is defined by a limited and degraded hedgerow network, post and wire fencing and domestic garden boundaries. Woodland forms a key element in the landscape with substantial areas of Ancient Woodland around Blean to the north and west of the site.

3.5 Designations (Plan HDA 3)

Landscape Designations

3.5.1 There are no national landscape designations that cover the site or its immediate environs. The Kent Downs AONB lies to the south, beyond Canterbury and well outside the context of the site.

3.5.2 The site does lie within the Blean Area of High Landscape Value (AHLV), although the site which lies in LCA F2, The Stour Valley Slopes, as a whole, is not reflective of the valued landscape associated with Blean Wood AHLV.

Historic Landscape and Cultural Heritage

3.5.2 There are no designated or non-designated heritage assets on the site or registered parks or gardens. The site sits adjacent to the Hothe Court conservation area, sharing a common boundary along a short section of Whitstable Road.

3.5.4 Listed buildings - There are no listed buildings within the site, Moat House lies to the south-east of the site off Moat Lane and Blean House lies to the east beyond Whitstable Road. Listed buildings in the immediate area, most closely associated with the site, are indicted on HDA 1.

3.6 Trees and Ecology

3.6.1 Ancient Woodland – Church Wood, part of the Blean Wood complex, lies to the west of the site. It is part of a National Nature Reserve and a SSSI. The woodland is separated from the site by a semi-improved field in pasture of species rich grassland, a Local Wildlife site referred to as Blean Pastures. The southern extent of the Local Wildlife Site includes a pond feature. The woodland forms a substantial enclosing landscape feature to the west of the site.

3.7 Public Rights of Way

3.7.1 There are a number of public rights of way (PRoW) close to the site and in the surrounding area, and one footpath crosses the eastern corner of the site.

- Footpaths CB9 runs through Church Wood to the north-west of the site and continues along the southern site boundary where it joins Moat Lane.
- Footpath CB30 runs north from Oaks Park in Rough Common alongside the site's eastern boundary and crossing the eastern corner to join Whitstable Road.
- Footpaths CB10 runs north from CB9/Moat Lane across the Blean Pastures LNR to the north-eastern edge of Church Wood.
- Footpath CB29A links CB9 and CB10 within Church Wood and runs east to join Whitstable Road in Blean.

4 LANDSCAPE BASELINE

4.1 Landscape Character

4.1.1 The guidance for Landscape and Visual Impact Assessment (GLVIA) defines Landscape Character as:

“A distinct, recognisable and consistent pattern of elements in the landscape that makes one landscape different from another, rather than better or worse”,

National Character Areas

4.1.2 The site sits within the National Character Area Profile 113: The North Kent Plain. The key characteristics relevant to the site and its local environs are listed below.

- *An open, low and gently undulating landscape, characterised by high quality, fertile, loamy soils dominated by agricultural land uses.*

- *The area's geology is dominated by Palaeogene clays and sands, underlain by the Chalk.*
- *Large arable/horticultural fields with regular patterns and rectangular shapes predominating, and a sparse hedgerow pattern.*
- *Woodland occurs on the higher ground around Blean and in smaller blocks to the west, much of it ancient and of high nature conservation interest.*
- *Other semi-natural habitats include fragments of neutral, calcareous and acid grassland, and also heathland.*
- *The area has rich evidence of human activity from the Palaeolithic period. Key heritage assets include Roman sites at Canterbury, Reculver and Richborough; the Historic Dockyard at Chatham; military remains along the coast; and historic parks and buildings.*
- *Large settlements and urban infrastructure (including lines of pylons) are often visually dominant in the landscape, with significant development around Greater London and the Medway Towns, as well as around towns further east and along the coast. Major rail and road links connect the towns with London.*

4.1.3 The NCA profile includes statements of environmental opportunity which includes the following:

- *SEO 3: "Protect the distinct wooded areas of the landscape, particularly through the management of nationally important, ancient semi-natural woodlands, increasing the area of broadleaved woodland where appropriate, while increasing the connectivity of the mosaic of associated habitats notably wooded heath and semi-improved grassland while enhancing the recreational resource."*

County Landscape Character Areas

4.1.4 *The Landscape Assessment of Kent (2004) describes the landscape of the site as part of The Blean.*

"This local area is defined by the limits of an outcrop of London Clay that includes Whitstable and Herne Bay on the north coast and the domed landscape of the Blean woodlands which drops down to the outskirts of Canterbury. The landscape rises to over 80 metres in the west around the village of Blean, gradually dropping eastwards to the 20 metre contour, towards the Wantsum and lower Stour Marshes and the coast.

4.1.5 *Wooded areas include Thornden, Clowes, and Honey Wood near Tyler Hill, Church Wood and East Blean Wood. Small pockets of Grade 2 land reflect the overlying drift deposits such as Head Brickearths found around Amery Corner and Cutballs Farm, and those deposited in the old channel of the Sarre Penn through Chislet Park, Rushbourne Manor and Hoades Court."*

4.1.6 *"The landform of the Blean is clearly defined from the open, flat coastal plain to the rounded, wooded hills in the south of the area. The landscape elements are coherent, but piecemeal*

development and unsympathetic land use interrupts some of the woodland, and coastal development with road links detract from some open views. The ecological value is strong in the woodland and at the coast, but weaker in intermediate areas, despite areas of rough grassland - links between the two are also weak. Built development has a moderately negative impact on the area as a whole.”

District Landscape Character Areas

4.1.7 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. Key characteristics of the landscape type are:

- Sloping topography underlain by a relatively complex geology, rising from 10m AOD to a distinct ridgeline in the north at 75m AOD.
- Blocks of priority habitat deciduous woodland connect to the Blean Woods to the north and north-west.
- Mixed land use including orchards, arable and sloping pasture fields plus educational establishments set within parkland and sports grounds.
- Historic field pattern including post-Medieval and Parliamentary enclosure and remnant parkland, supported by fragmented hedgerows.
- Residential development concentrated within Rough Common and Broad Oak villages, with a number of Grade II listed large farmhouses and halls, with modern infill suburban development.
- Disturbed landscape which includes the Shelford former quarry and landfill site. v University of Kent campus creates a campus parkland landscape setting for buildings.
- Good PRoW network, which provides connections to the Blean Woods and between settlements.
- Views south to Canterbury Cathedral and the Kent Downs AONB contrast with the more contained views north-east and west from woodland cover.

4.1.10 Key sensitivities for the area include the following;

- *“Distinctive sloping topography and largely undeveloped ridgeline/skyline which encloses views from, and containment for, Canterbury City – a backdrop in views over a wider area including views across the Stour Valley and the rural ridgeline setting for the Cathedral in long views from the south.*
- *Long views south over the Stour Valley and Canterbury City to the Kent Downs AONB with the Cathedral as a focal point. Cathedral is seen in a rural valley setting.*
- *Ecologically valued priority habitat deciduous woodland connected to the Blean Woods.*
- *Historic field pattern and remnant parkland character at Hales Place provides time depth.*
- *Scattered farmsteads and small halls designated nationally, and locally as listed buildings and Conservation Areas provide time depth.*

- *Rural landscape which provides a gap between adjacent small settlements including Rough Common, Tyler Hill, Broad Oak, Sturry and the University of Kent.*
- *Recreational value through a strong network of PRow including part of the Crab and Winkle Way link to Whitstable.*
- *Open parkland of the University of Kent campus.*
- *Transition to the more rural undeveloped Blean landscape to the north.”*

4.1.14 The guidelines that follow the analysis of landscape condition, sensitivity and character set out below:

Development Management

- *Conserve the local distinctiveness of historic buildings and their rural setting, particularly within the Hothe Court, Harbledown, Tyler Hill and Allcroft Grange Conservation Areas.*
- *Conserve the rural character of the landscape ensuring that it continues to play a role in the separation of Rough Common and Blean; the University of Kent and Tyler Hill; and Sturry and Canterbury City.*
- *Conserve and enhance the integration of urban edges, through native wooded boundaries and mature trees to provide visual screening and reduce the impact of built development on the open and exposed landscape.*
- *Assess new building proposals within and adjacent to the urban area to ensure that an attractive and integrated edge is formed with the adjacent rural and open recreational landscapes.*
- *Avoid extension of development on and beyond the ridgeline into the more rural Blean landscape to the north.*

4.2 Site Character and Features (HDA)

4.2.1 The site is situated on the southern edge of Blean village, and forms three parcels of land, currently accessed from Moat Lane. The northern parcel lies adjacent to Whitstable Road and has a long road frontage. The parcel is a narrow field in pasture, contained to the north-east by a roadside hedge 1.2m high and a parallel mature hedgerow 3-4m high) with hedgerow trees (7-8m high) to the south-west. The south-eastern and north-western boundaries are defined by housing on the edges of Rough Common and Blean village respectively. A tarmacked public footpath (CB30) runs through the parcel between Whitstable Road and Moat Lane. The field is strongly related to the Whitstable Road and forms part of the setting and separation between Blean and Rough Common.

4.2.2 The south-eastern parcel is a field in pasture used as a horse paddock and lies adjacent to the northern roadside parcel, the Kent College playing fields lie to the south. The parcel has a common hedgerow boundary to the north-east with the road-side field and post and wire fences to the adjacent public footpath (CB30) and the playing fields. Garden boundaries to properties

on the Whitstable Road are generally hedged and includes a number mature trees. The paddock and adjacent playing fields form the immediate setting to the urban edge of Rough Common.

- 4.2.3 The western parcel forms the majority of the site. It comprises two grass fields used for grazing and horse paddocks, the southern field includes a surfaced menage. The parcel is bounded by a tree belt to the west, comprising largely mature oaks (20m high) and occasional hornbeam and willow (18-20m high). The southern boundary is in part a native hedgerow (1.2-1.5m high) with occasional gaps, fronting onto Moats Lane and footpath CB9. The eastern boundary is a continuous, mature and maintained native hedgerow (2.0m high). The hedgerow follows the western side of footpath CB30 from Moat Lane through to the northern roadside field.
- 4.2.4 Beyond the western parcel, adjacent to the western boundary, a field in pasture separates the site from Church Wood, which forms part of the Blean Wood NNR complex. The field is grazed by cattle and comprises semi-improved grassland, and isolated groups of mature trees. It is designated as a Local Nature Reserve (LNR), Blean Pastures. The pasture and LNR continues along the southern boundary of the site, beyond Moat Lane. Further south the pasture gives way to more playing fields. Trees and a partly intact hedgerow bound the fields in pasture.
- 4.2.5 Church Wood, which lies to the west of the site, is a mixed deciduous woodland of oak, ash, and hornbeam, and includes an understorey with a high proportion of evergreen holly. The woodland is designated as Ancient Woodland and forms part of the Blean Woods complex, a National Nature Reserve (NNR) and SSSI. Footpaths CB9, CB9A and CB10 run within or are adjacent to the woodland. A telecommunications mast and compound lie adjacent to the woodland edge and sit adjacent and between the Blean Pastures LNR.
- 4.2.5 The site's character is consistent, in broad terms, with aspects of the National, County and District scale landscape character assessments, however it is not part of the Stour valley or the prominent ridge line to the north of the district character area and it is not part of an open parkland with extensive or long views. The site is level, contained by Church Wood and mature hedgerows and mature trees. It is a mixed landscape of recreation, horse paddocks and grazing. The telecommunications tower, to the south-west of the site, is a significant detractor to the site and the local area.
- 4.2.6 As noted in the District assessment the site benefits from an extensive footpath network and the links to the Blean Woodlands. The site and its immediate environs form a transition to the more undeveloped Blean Landscapes to the north and west. There is little sense of place and tranquillity, particularly close to the Whitstable Road and playing fields. Tranquilly and a sense of place is experienced within the woodland within a relatively short distance from the site largely as a result of the closed understorey of holly. The green infrastructure, in the form of hedgerows and mature trees does serve to compartmentalise the site and the surrounding landscape such

that the road and adjacent housing are contained and visually separate, which reduces their effects on the wider landscape.

5. VISUAL BASELINE

5.1 Visual Assessment Methodology

5.1.1 The visual baseline serves to establish the type of Visual Receptor (VR) that may be affected by the proposed development, the extent and character of existing views, the contribution that the site makes to each view/local visual amenity and the susceptibility to change in views. This in part correlates with the degree to which the site is visible from a VR.

5.1.2 A visual appraisal of the site was undertaken from public roads and footpaths. Views were assessed based on 1) existing visibility 2) views after development. Views of the proposed development were estimated by visualising the scale and form of the proposed dwellings, car parking and associated tree planting. Views from properties could not be assessed from the houses themselves; in most cases, the likely extent of the view could be adequately estimated from adjacent roads or paths. Views from some properties were identified using a reverse view, i.e. an assessment of the extent to which a property was visible in views from within the site (or its perimeter) looking outwards.

5.1.3 The visual appraisal is based on a grading of degrees of visibility. There is, in any visual appraisal, a continuity of degrees of visibility from not visible to fully open in the view. To indicate the degree of visibility of the site from selected locations, that continuum has been divided into four categories, as follows:

- None: No view (no part of the site or proposed development is discernible);
- Glimpse: Only a minor area of the site or proposed development is discernible and/or the view is transient or at such a distance that it is difficult to perceive in the wider view, or sequence of views;
- Partial: The site or proposed development forms a relatively small proportion of a wider view. There are open views of part of the site or proposed development such that it is easily visible as part of the wider view;
- Open: There are open views of the site or proposed development such that it forms a substantial part (is a dominant element) of the overall view and affects its overall character and visual amenity; or the site or proposed development is the dominant feature of the view, to which other elements become subordinate and where the site/proposed development significantly affects or changes the character of the view.

5.1.4 The third edition of the Guidelines for Landscape and Visual Impact Assessment, GLVIA 3, (2013) is well established as providing 'best practice guidance' when undertaking landscape

and visual impact assessment (LVIA). With respect to visual impact the focus of GLVIA3 and LVIA is on public views and public visual amenity.

5.1.5 Residential Visual Amenity Assessment (RVAA) is a stage beyond LVIA and focusses exclusively on private views and private visual amenity. A RVAA may be used by the decision maker when weighing potential effects on Residential Amenity in the planning balance.

5.1.6 In March 2019, The Landscape Institute published technical guidance on Residential Visual Amenity Assessment (RVAA) (Appendix 6). Residential visual amenity is defined within the guidance as:

'The overall quality, experience and nature of views and outlook available to occupants of residential properties, including views from gardens and domestic curtilage. It represents the visual component of Residential Amenity.'

5.1.7 Paragraphs 1.5 and 1.6 of this technical note state that:

'Changes in views and visual amenity are considered in the planning process. In respect of private views and visual amenity, it is widely known that, no one has 'a right to a view.' This includes situations where a residential property's outlook / visual amenity is judged to be 'significantly' affected by a proposed development, a matter which has been confirmed in a number of appeal / public inquiry decisions.'

5.1.8 It is not uncommon for significant adverse effects on views and visual amenity to be experienced by people at their place of residence as a result of introducing a new development into the landscape. In itself, this does not necessarily cause particular planning concern. However, there are situations where the effect on the outlook / visual amenity of a residential property is so great that it is not generally considered to be in the public interest to permit such conditions to occur where they did not exist before.'

5.1.9 Having regard to the distinction drawn in planning determinations between public views and private views, the likely changes that may be expected to be experienced by private residents in terms of whether the changes to the views experienced by local residents are of sufficient severity that it may reach the Residential Visual Amenity Threshold are assessed. The 'threshold' is defined in the technical guidance as:

'The threshold at which the visual amenity of a residential property is changed and adversely affected to the extent that it may become a matter of Residential Amenity and which, if such is the case, competent, appropriately experienced planners will weigh this effect in their planning balance.'

5.1.10 The baseline visual appraisal was carried out in August 2022. Views of the site are likely to increase in winter months when vegetation is not in leaf.

5.2 Existing Site Visibility (HDA Plan 5)

5.2.1 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.

Views from the south and west (VP photograph locations 1-5 and 9 and 10)

5.2.2 Photograph 2 illustrates the view north from Moat Lane/PRoW CB9, across the main part of the site and the extent of the proposed development area. The view includes glimpses of housing in Blean and Rough Common, set within a treed backdrop to the site. Whitstable Road and the associated traffic is screened from view by the site's internal hedgerows. The extent to which there is a small gap between settlements is illustrated on photograph 1. Views from the south are contained by hedgerows and the southerly extension of Church Wood (photograph 3) there are no views of the site from New Road south of Rough Common or the associated public footpath.

5.2.3 View 1 illustrates the view north along PRoW CB 30, a tarmacked route to Whitstable Road. The view includes the playing fields and paddock to the north, which form the majority of the land within the green gap policy area south of Whitstable Road. Housing along Whitstable Road, in Rough Common, backs onto the playing fields although the boundary is softened by hedges and mature trees. The gap area has an urban edge character to it by virtue of the housing and recreational land uses. The site lies to the west and is contained by the mature oak trees to the south and the continuous hedgerow to the west of the PRoW.

5.2.4 To the west of the site the communications tower has a detracting influence on the local landscape (photograph 4), being visible from the local footpaths and roads. Beside the tower enclosure the fields, Blean Pastures, form a pastoral buffer between the site and Church Wood. The filtering effect on the mature oak tree belt along the western boundary of the site adds to the separation between the woodland and the proposed development area (photograph 5). From within the woodland there are very limited views out to the adjacent pastoral field and the site as a result of the dense understorey (photograph 10). Views from the edge of the wood along footpath CB9 are restricted by intervening trees and scrub (photograph 9).

5.2.6 Footpath CB10 affords glimpses and partial views of the proposed development area from Blean Pastures, however these views decrease in extent towards the northern end of the path (photograph 6).

Views from the north

- 5.2.7 Views from public vantage points to the north are limited to views from Whitstable Road. Footpaths north of the site are either located between residential houses or behind substantial trees and continuous established hedgerows. Viewed from the southern end of Blean village, on the north-side pavement, the northern parcel of the site is open to view above the boundary hedgerow. The more substantial internal hedgerow to the south of the parcel precludes views of the remaining areas of the site. Given the height of the hedgerow and hedgerow trees, as compared with the height of two storey housing (as evidenced by no. 30 Whitstable Road - see photograph 7) the proposed development would be substantially screened by the existing green infrastructure. There would also be a section of the frontage which would be free of development.
- 5.2.8 Viewed from the southern edge of Blean (Photograph 8) the existing gap between Blean and Rough Common can be seen as a relatively narrow feature largely appreciated to the south of the road. Whilst residential development is apparent and open to view to the north side of the road, the site adjacent to the road provides some additional depth to the gap. Foreground trees and scrub, together with the more substantial internal hedgerows largely screen the majority of the site from view from the Whitstable Road.
- 5.2.9 Views from footpath CB30, south of the road-side field include the Paddock and playing field together with the college buildings and Park Cottage. The views are localised, long views being truncated by the tree and woodland cover around the site.

6 ASSESSMENT OF BASELINE CONDITIONS

6.1 Landscape Quality

- 6.1.1 The site land uses comprises 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 common place 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.
- 6.1.2 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.

6.2 Landscape value

- 6.2.1 The site is part of a designated area of high landscape value although the site sits outside the landscape character areas which most contribute to the qualities and character of the Blean Wood AHLV. The site lies within area F2 the Stour Valley Slopes, an area not assessed in the LUC reappraisal of the Blean Woods AHLV. Assessment of LCA F2 identified low landscape value and its main function was considered to be the contribution to views towards Canterbury and the open character of the LCA. The site does contribute to either function, rather it is an enclosed landscape. The paddocks, grazing and playing fields that make up the site and its immediate environs are unremarkable and common place features in the local landscape and there are no semi-natural habitats within the site. The site does however make a limited contribution to the continuity of landscape around the adjacent LNR and Church Wood, part of the Blean Woods complex.
- 6.2.2 There is limited public access within the site and moderate visual access from public footpaths which overlook the site. The enclosing nature of the boundary vegetation and the wooded character of the local landscape and existing residential development surrounding the site contain many views out from the site, to the wider countryside. There is no inter-visibility between the site with Canterbury or the AONB to the south. There are a limited number of views from roads in the local area and the site is not widely visible in the local landscape. Its contribution to the visual context of the wider landscape character is very limited. Overall the landscape and visual value of the site has been assessed as Medium.

6.3 Landscape and Visual Sensitivity

- 6.3.1 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 Moderate.

6.4 Perceptual/Experiential Landscape

- 6.4.1 The site forms part of an enclosed landscape of paddocks and urban edge land uses and recreation. To the west it lies relatively close to the Blean Woods complex but is buffered by existing pasture and a native tree belt. The site is largely excluded from views from the edge of the woodland, and from within the woodland by an evergreen understorey and treed margins extending out into adjacent pasture. The site does not contribute to the character or tranquillity of the woodland.
- 6.4.2 To the north and east the site's value, in terms of its scenic beauty, tranquillity and remoteness is limited by its current land uses, its proximity to the villages of Blean and Rough Common and

the Whitstable Road and the equestrian paraphernalia in the south-west of the site. The communications tower is also a detracting feature in the local landscape.

- 6.4.2 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.

7 LANDSCAPE AND VISUAL APPRAISAL

7.1 Description of the Proposals

- 7.1.1 The proposed development for the site would include approximately 118 two storey dwellings at an average density of 35 dwellings per hectare. The main road access would be via the Whitstable Road. A new local public open space would include play provision, wetland features and tree and shrub planting set out as informal open space. New pedestrian footpath links, across the park, would link to the public rights of way network and linear open spaces running to the west and south of the site. SuDS attenuation basins would be constructed with associated open space and tree planting along with the retention and enhancement of the majority of the existing trees and boundary hedgerows. Avenue tree planting and trees within the development are proposed together with native and amenity shrub planting.

7.2 Predicted Landscape Effects

- 7.2.1 The scheme would retain all the existing trees along the site's boundary and will retain the majority of the hedgerows. In order access the development, a section of the hedgerow that forms the boundary to Whitstable Road and the parallel hedgerow would be removed.
- 7.2.2 The most noticeable landscape effects would be following construction. There would be the loss of a field in pasture and a number of horse paddocks. The site would change to housing enclosed by boundary hedgerows and trees, fronted by a new public open space improving the outlook from Whitstable Road and maintaining the open character of the immediate environs of the road. The park would also provide a landscape buffer to the Hothe Court conservation area and the adjacent properties on Whitstable Road.
- 7.2.3 The magnitude of change within the site and adjacent fields is likely to be Medium adverse following construction, when the changes are most pronounced. 15 years post completion, the proposed landscape scheme would have established. The existing and proposed planting within the site would largely contain the site and internal tree planting filter residual views of new housing. Within the site, retention of the majority of the northern hedgerow together with extensive new planting would result in an overall increase in characteristic features and improve the habitat and landscape diversity within the site. The adverse landscape effects would be temporarily Moderately adverse, reducing to Minor adverse after 15 years.

7.3 Predicted Visual Effects

- 7.3.1 The site has a very limited visual envelope and the proposed development would not have a visual impact on the wider landscape. Close to the site there would be open and partial views from footpaths CB9, 10 and 30. Views to the south and east would include views of Rough Common and playing fields which have an urban edge character, views to the west are more rural in character. Initially there would be a Moderate adverse effect on views. However with the establishment of new tree and hedgerow planting and with the management of existing hedgerows (allowing maintained hedgerows to grow out to 4-5m) the new housing would be visually contained and the visual effects reduced. After 15 years the effects are likely to reduce to Minor adverse.
- 7.3.2 Viewed from Whitstable Road, the scheme would be substantially screened from view by the retained internal hedgerows. Existing trees within the hedge are 6-8m in height and would substantially screen the new development. New tree and shrub planting to the proposed public open space would, once established further filter and screen the new houses. The sense of an undeveloped frontage to the road, between Blean and Rough Common would be maintained. The initial visual effects are likely to be Minor adverse and following the establishment of the park and proposed landscape planting there would be an enhancement to the road scene with a Moderate beneficial effect.
- 7.3.3 Views from with Church Wood would be unaffected by the development, however footpaths at the margins of the woodland would have glimpses of new houses at completion of the scheme, a Minor adverse effect. With the maturing of the landscape proposals there are unlikely to be any residual adverse effects.
- 7.3.4 Properties backing onto the college playing fields are likely to have glimpsed views of the proposed development. A change in the management of the existing hedgerow to the eastern boundary of the site, to allow it to grow up to 4-5m, would substantially screen the new housing from view. The outlook from properties on the north-side of Whitstable Road would be improved with the proposed park and additional tree planting.

8.0 Policy Considerations

8.1 National Planning Policy Framework

- 8.1.1 The proposed development would provide an attractive, high quality design, which has a strong sense of place, in keeping with the guidance set out in the NPPF and the National Design Guide. The site layout has been shaped by the initial landscape and visual baseline studies to take account of local landscape character and the surrounding built environment and landscape

setting. Views from, and the landscape setting to, the Hothe Court conservation area have been a consideration in establishing the location and extent of housing development proposed.

8.2 Local Policy

8.2.1 The proposals would be consistent with current policy that relates to landscape character and the effects on visual amenity.

8.1.2 Policy LB2 Areas of High Landscape Value

The site lies within the Blean Woods complex and the policy supporting text identifies the following:

b. "The Blean Woods AHLV identifies landscapes important to the character and setting of the Blean Wood Complex. It is an important objective of the Council and other agencies to preserve and enhance this landscape, with long term objectives to meet habitat network potential for woodland and heathland, particularly where it improves habitat connectivity of the Blean woodlands."

8.1.3 The proposals would not affect the Blean Woods 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 further screen the development and enhance the habitat connectivity required of the policy.

8.1.4 Policy LB4 Landscape Character Areas

"Proposals for development, and associated land use change or land management, should demonstrate that they are informed by, and are sympathetic to, the landscape character of the locality. In considering development proposals, the City Council will take every opportunity to reinforce, restore, conserve or improve, as appropriate, the landscape character of the area in which development is proposed."

8.1.5 The proposals, as set out in the Vision Document and concept masterplan, demonstrate the baseline assessment of the site and its environs. The site is well related to existing settlement and whilst there would be a loss of green field land to new housing the retained open land would be conserved and enhanced as public open space. Development of the site would not have a substantial adverse effect on the surrounding local landscape or its character.

8.1.6 Policy OS6 Green Gaps

Within the Green Gaps 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. Proposals for open sports and recreational uses will be permitted subject to there being no overriding conflict with other policies and the wider objectives of the Plan. Any related built development should satisfy criteria (a) and (b) above and be kept to a minimum necessary to supplement the open sports and recreation uses, and be sensitively located and of a high quality design.”

8.1.7 The supporting text particularly relevant to the Blean – Rough Common gap states:

“The green gaps have been specifically identified between built up areas, such as villages or urban areas, which are gradually expanding, particularly along the road frontages. The designations have been limited to ‘pinch points’, where settlements, often due to linear expansion, are at a particular risk of coalescence”.

8.1.8 The existing gap is specifically designated to protect the separation of Blean and Rough Common at the ‘pinch point’ on the Whitstable Road, i.e. the immediate and adjacent fields in pasture and the playing fields. The proposals maintain and enhance the fields within the gap policy area and do not affect the adjacent playing fields. The proposed development would have no effect on the gap north of the Whitstable Road and present only a marginal visual intrusion into the perception of gap to the south of the road. The landscape proposals include new tree planting to the fields adjacent to the road and to the eastern boundary of the development area. As these trees become established the views of the development are likely to reduce to views of occasional roof tops, a Negligible adverse effect on the existing gap between settlements.

8.1.9 The development area, as currently shown on the concept masterplan, would extend south the tree group at the junction of Moat Lane and footpath CB30. To reinforce the sense of separation between the development and Rough Common a further iteration of the concept masterplan will pull development back from the junction to create a small pocket park. The revised southern boundary would maintain a visual and physical link between the playing fields and paddocks which run down the western edge of Rough Common and maintain separation between settlements.

8.1.10 **Policy HE6 Conservation Areas**

“Development within a conservation area should preserve or enhance its special architectural or historic character or appearance. Development, in or adjoining a conservation area, which would enhance its character, appearance, or setting will normally be permitted. Important features or characteristics, which contribute to its special character and setting, that need to be protected, include; plan form, buildings, architectural features, built form, archaeological sites, materials, trees, streets and spaces and the relationships between these features.

Development within, affecting the setting of, or views into and out of, a conservation area, as shown on the Proposals Map and all Insets, should preserve or enhance all features that contribute positively to the area's character, appearance or setting."

- 8.1.11 The Hothe Court conservation area extends down the eastern side of the site, lying adjacent to part of the road-side field and adjacent paddock within the site. The open character of these fields would be retained in the scheme and their character enhanced with new tree and shrub planting. The proposed housing would be set back from the immediate setting to the conservation area behind the established hedgerow and trees. The views into and out of the conservation area would be largely unaffected by the proposals. Listed buildings within the conservation area, namely Moat House and Blean House are located within existing built development with playing fields associated with the college between the site and the edge of the conservation area. There would be no appreciable effect on the landscape setting to the listed buildings.

9 SUMMARY AND CONCLUSIONS

- 9.1.1 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. Where possible key existing landscape features would be retained and protected throughout the course of the development. The landscape scheme, comprises informal open space, tree planting, hedgerows, and scrub and wetland habitat creation. The landscape strategy, once established, would provide a soft landscape setting to the development. There would be no significant adverse effects on the landscape character of the local landscape and the separation between Blean and Rough Common would be maintained. The landscape setting to the Hothe Court conservation area would also be maintained.
- 9.1.2 There is a dense and regularly maintained hedgerow to the east of the development area which if left to mature to 4-5m would provide significant screening to the new development. Existing trees and hedgerows to the site would be enhanced with further tree planting which would soften the boundaries to the development and the southern edges of Blean village. New tree planting to the western boundary would reinforce the habitat connections to the Blean Woods and buffer the immediate pastoral setting to the Church Wood.
- 9.1.3 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.

HDA Control and Quality Assurance Record

Project Title: Whitstable Road Canterbury LS
 Project Reference: 2079.40
 Document Title: Initial Landscape and Visual Appraisal
 Commissioning Party: Hallam Land Management (HLM).

Issue	Description	Date of Issue	Signed
1	First draft Version 1	14.08 2022	

	Personnel	Position
Author	Brian Duckett	Director
Approved for issue	Brian Duckett	Director

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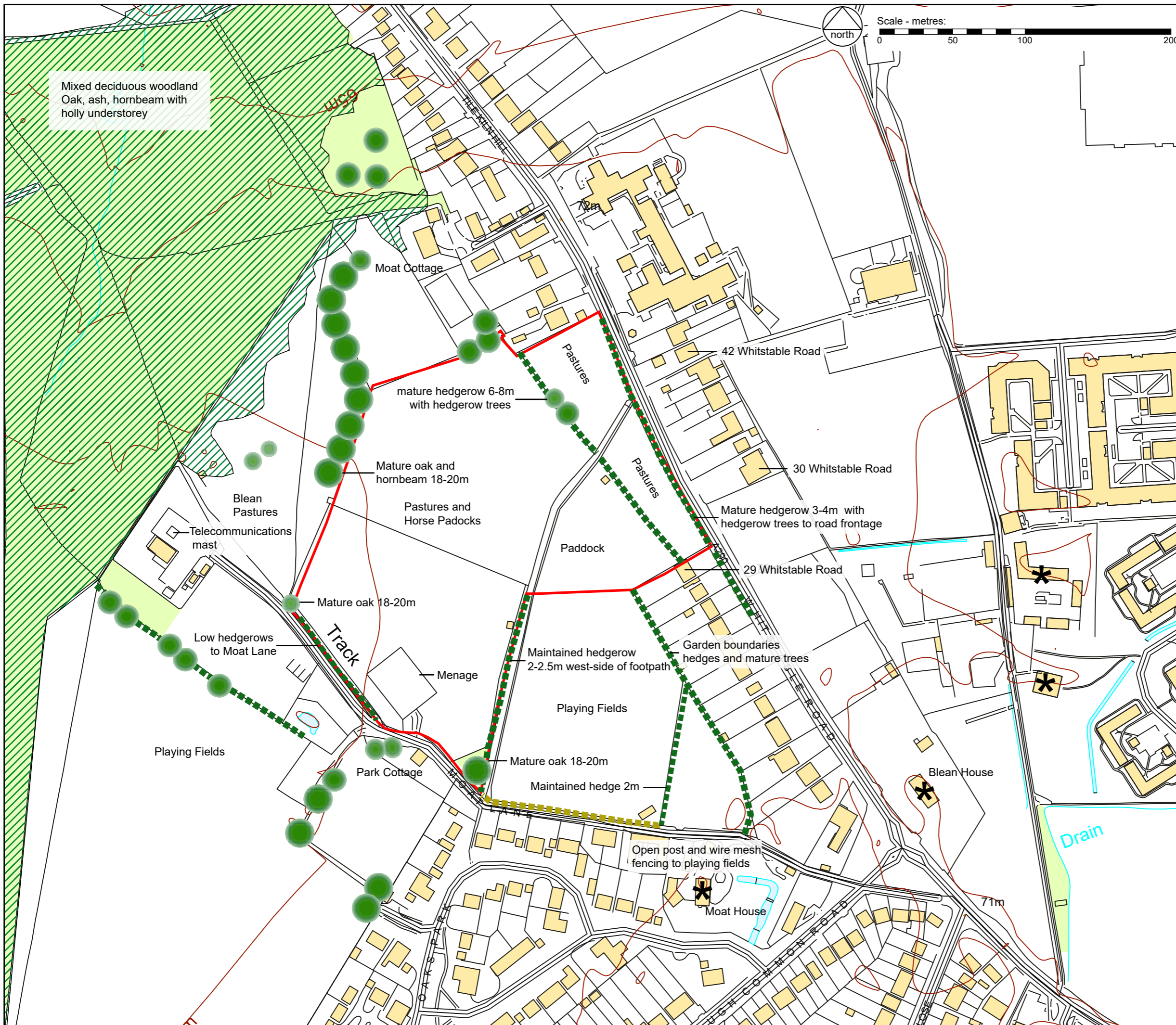
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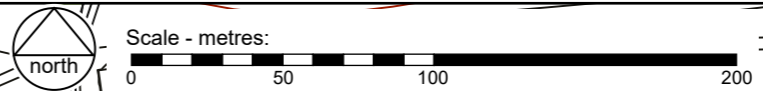
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Mixed deciduous woodland
Oak, ash, hornbeam with
holly understorey



KEY

- Site Boundary
- ✱ Listed Buildings
- Existing Hedgerow
- Existing Trees
- Existing Woodland
- Post and Wire Mesh Fencing

CLIENT:
Hallam Land Management

PROJECT:
Land west of Whitstable Road, Canterbury

TITLE:
Site Survey

SCALE AT A3:
1:2500

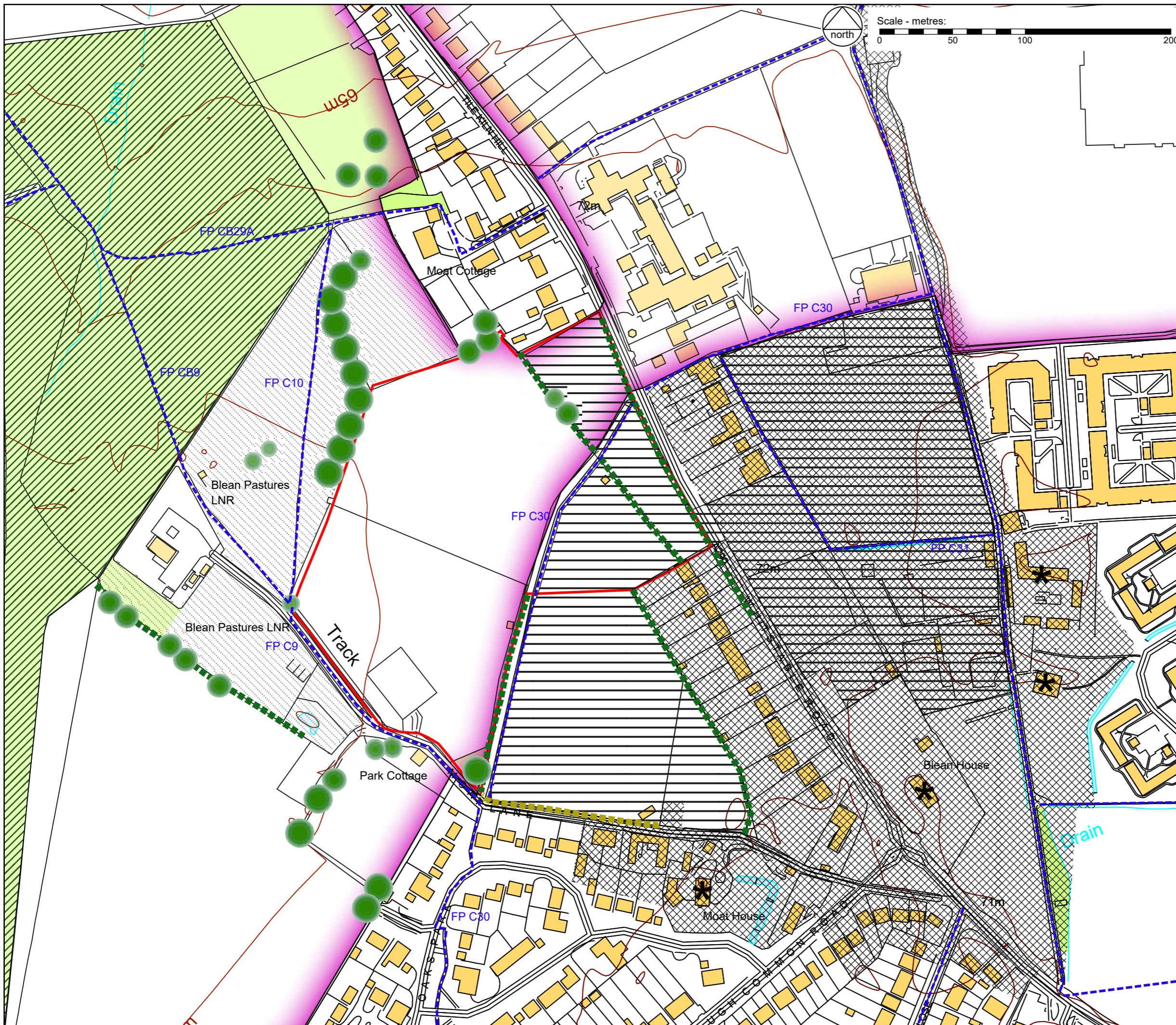
DATE:
August 2022

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Landscape Architecture
Masterplanning
Ecology



KEY

- Site Boundary
- ✱ Listed Buildings
- Existing Hedgerow
- Existing Trees
- Area of High Landscape Value - Blean Woods -

Ref: Canterbury District Local Landscape Designations - Chapter 7, Figure 7: The Blean Woods Local Landscape Designation

- Public Right of Way
- Conservation Area - Hothe Court
- Local Plan - Green Gap
- Local Wildlife Site - Blean Pastures
- Blean Woods NNR/SSSI

CLIENT:
Hallam Land Management

PROJECT:
Land west of Whitstable Road, Canterbury

TITLE:
Designations

SCALE AT A3:
1:2500

DATE:
August 2022

2079.40 / 02

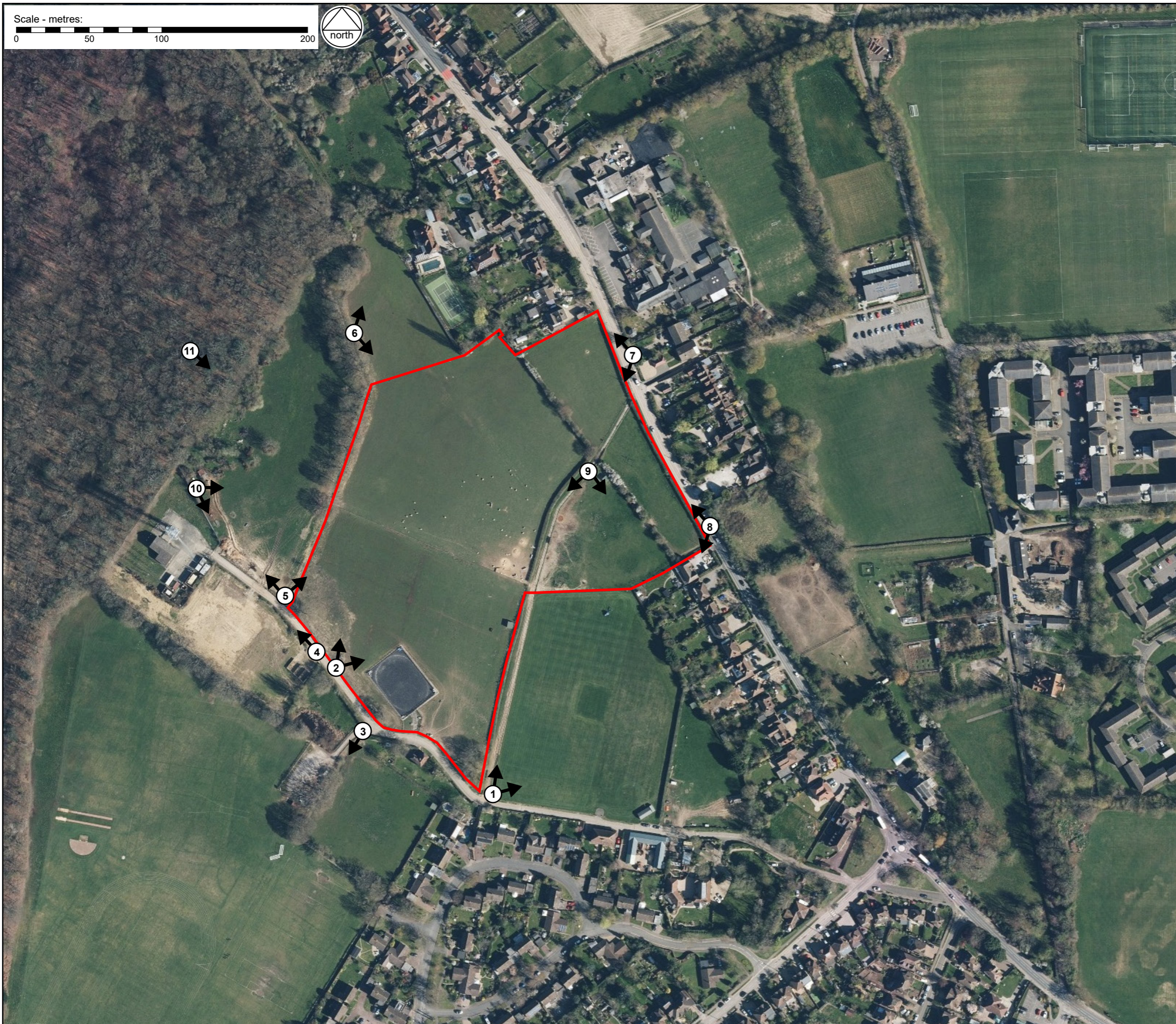
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Masterplanning
Ecology



Scale - metres:
0 50 100 200



KEY

-  Photo Location
-  Site Boundary

CLIENT:
Hallam Land Management
PROJECT:
Land west of Whitstable Road, Canterbury
TITLE:
Photo Location
SCALE AT A3:
1:2500
DATE:
August 2022

2079.40 / 03

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Ecology



Land west of Whitstable Road, Canterbury

Land west of Whitstable Road Site Photographs,
taken 04th August 2022

For

Hallam Land Management

By

Hankinson Duckett Associates
2079.40 / 04

HDA LVIA Photograph Methodology:

- Take advice from client and agree locations and directions for photographs.
- Visit site to take existing situation photographs from agreed positions.
- Photographs should be taken in accordance with the guidance from the Landscape Institute Advice Note 01/1. Although the guidance states that the use of 35mm colour film and a 50mm focal length is still valid, traditional film and associated cameras have been almost entirely supplanted by digital image processing and associated digital cameras. Therefore a digital equivalent of 50mm focal length on a 35mm film camera, should be used.
- HDA uses a Nikon D5100 camera fitted with a AF-S DX NIKKOR 18-105mm f/3.5-5.6G ED VR lens. The Nikon D5100 camera uses DX technology in its sensor which requires a x1.5 crop factor in order to replicate a traditional 35mm film camera. Therefore the Nikon D5100 should be set to 35mm focal length as the closest equivalent to a traditional 50mm lens i.e. $35\text{mm} \times 1.5 = 52.5\text{mm}$.
- Whilst on site, the Nikon D5100 is connected to a 'Solemeta Geotagger Pro2' GPS device which records the location and elevation of each photograph taken, by imbedding the GPS information into the metadata of each photograph file. As a check, the position and directions of photographs should also be noted onto a paper copy of site survey as accurately as possible by hand.
- On return from site, collate existing situation photographs and document photograph locations and directions.



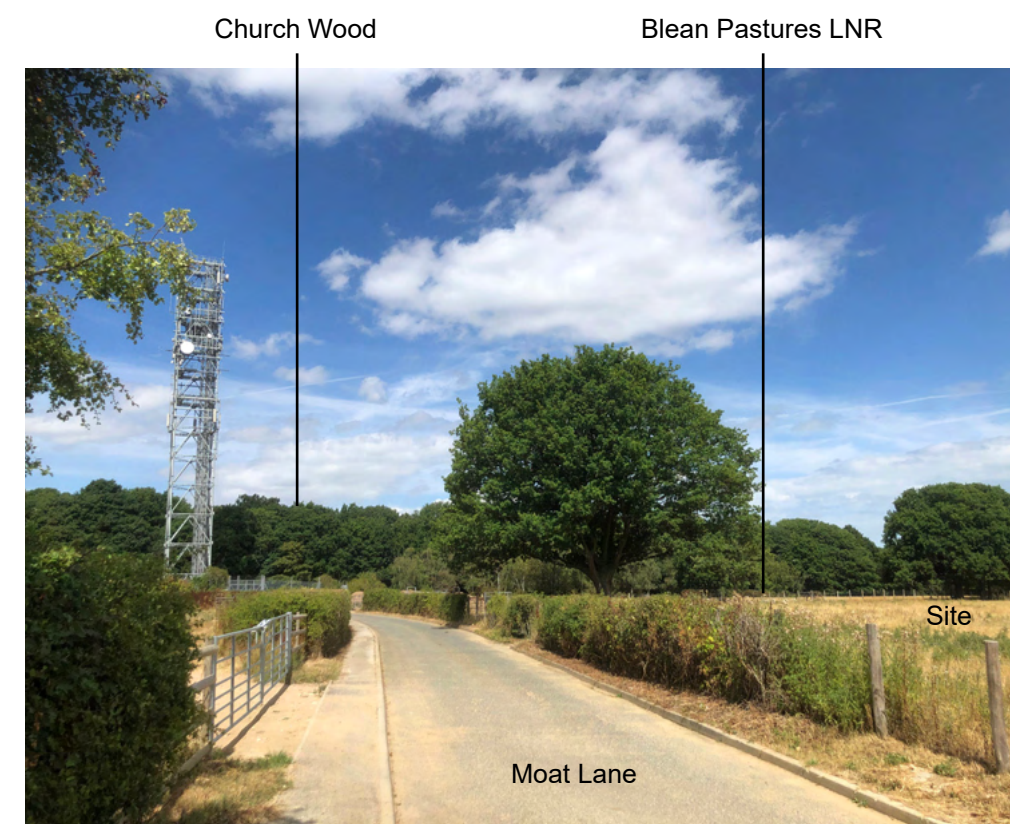
View 1: View north across Green Gap from Moat Lane towards Whitstable Road



View 3: View south from Moat Lane / PROW CB9



View 2: View across site from Moat Lane towards Whitstable Road



View 4: View north-west along Moat Lane PROW CB9 towards telecommunication mast



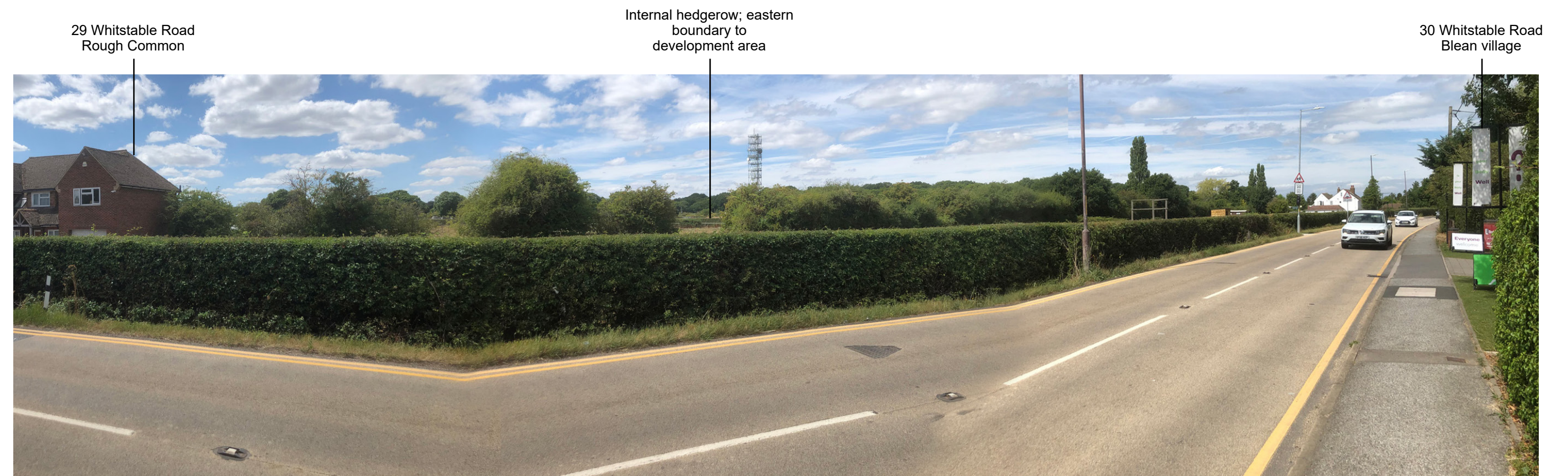
View 5: View from PROW CB9 north-east across Blean Pastures LNR



View 7: View south-west from Whitstable Road towards the site



View 6: View from PROW CB10 towards the site



View 8: View north-west from southern edge of Blean village on Whitstable Road



View 9: View south along PROW CB 30 across green gap

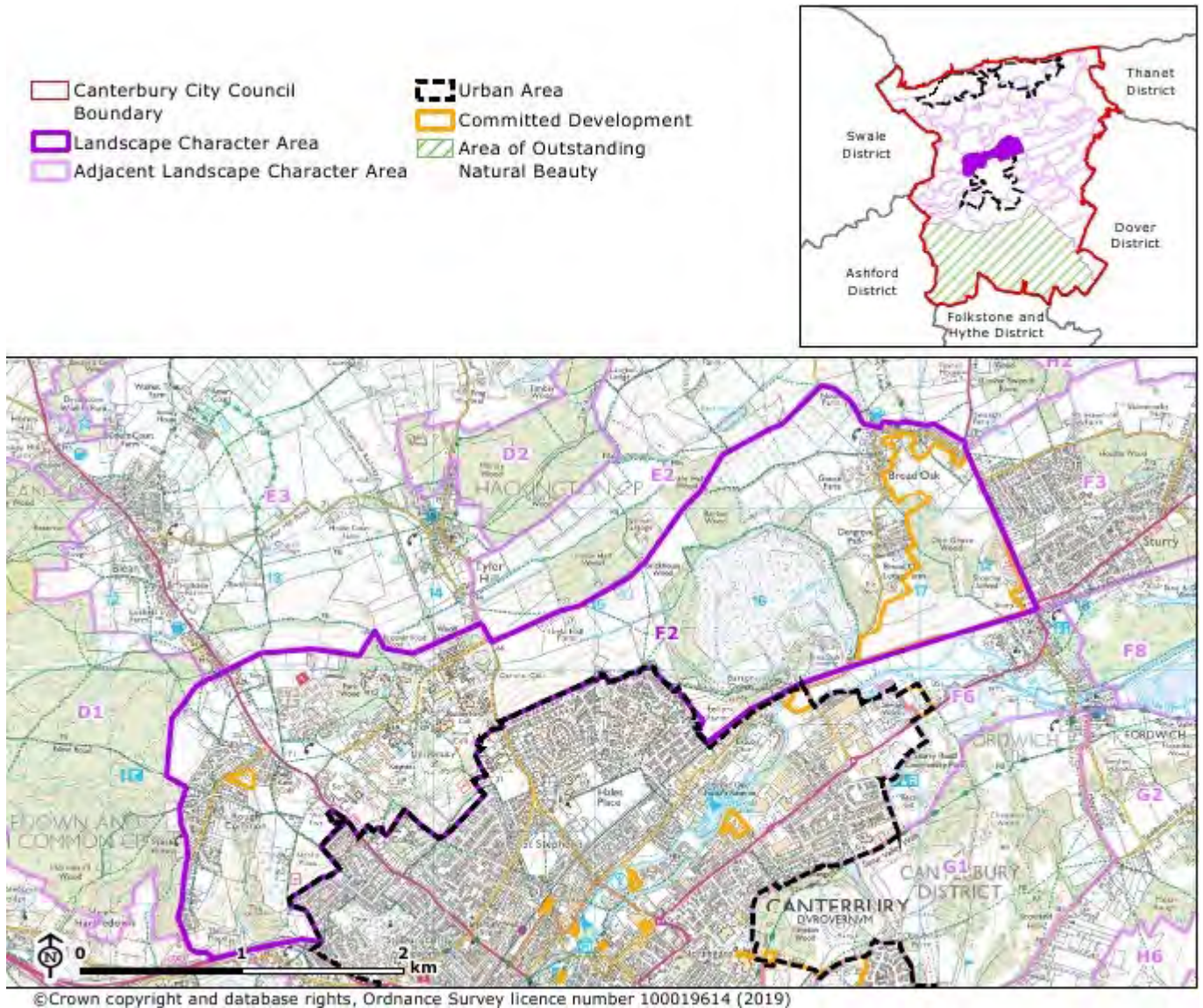


View 10: View towards the site from junction of PROWs CB 9 and 10



View 11: View towards the site from PROW 29A

F2: Stour Valley Slopes



Location and Summary

The Stour Valley Slopes LCA is characterised by slopes rising from the Stour Valley and forms a distinctive ridge north of Canterbury City. It is a mixed area of pasture, orchards and contains land used for landfill and quarrying as well as the University of Kent campus and other educational establishments. The ridgeline forms the northern boundary, with the settlement edges of Sturry and Canterbury City forming the eastern and southern boundaries while the western boundary is formed by the Blean Woods.

Representative Photographs



Orchards with post and wire fencing and pylons



Educational and recreational facilities



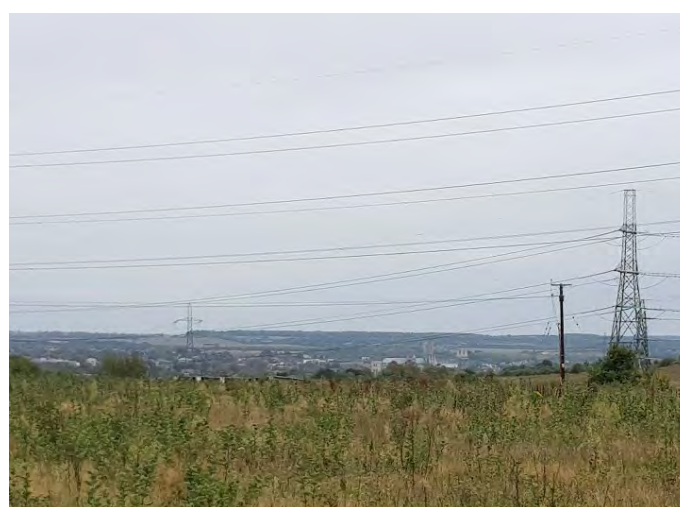
Shelford landfill and gas recovery



Den Grove Wood



Rolling grazing land with parkland character



Views across the Stour Valley to Canterbury City and the Kent Downs AONB beyond

Landscape Description

Key Characteristics

- Sloping topography underlain by a relatively complex geology, rising from 10m AOD to a distinct ridgeline in the north at 75m AOD.
- Blocks of priority habitat deciduous woodland connect to the Blean Woods to the north and north-west.
- Mixed land use including orchards, arable and sloping pasture fields plus educational establishments set within parkland and sports grounds.
- Historic field pattern including post-Medieval and Parliamentary enclosure and remnant parkland, supported by fragmented hedgerows.
- Residential development concentrated within Rough Common and Broad Oak villages, with a number of Grade II listed large farmhouses and halls, with modern infill suburban development.
- Disturbed landscape which includes the Shelford former quarry and landfill site.
- University of Kent campus creates a campus parkland landscape setting for buildings.
- Good PRoW network, which provides connections to the Blean Woods and between settlements.
- Views south to Canterbury Cathedral and the Kent Downs AONB contrast with the more contained views north-east and west from woodland cover. Skyline backdrop in views from the south providing 'setting' for the Cathedral.

Natural Influences

The Stour Valley Slopes rise above the valley and form a definite ridge north of Canterbury City. The area rises from 10m AOD in the south-east along the railway line to 75m AOD in the north-west adjacent to the Blean Woods. The area is underlain by London Clay with Woolwich and Reading beds sandstones at the base of the valley. There are deposits of river terrace gravels in the south-west around The Grove.

There are small watercourses and springs throughout the area, and the soils are seasonally waterlogged. Around Rough Common the soils form a complex pattern of flinty coarse loams over gravelly brown earths which are mostly under grass. The lower slopes towards Broad Oak have the same deep, well-drained, often stoneless soils as the fruit belts areas. These variations in soils create a mixed land cover.

Blocks of woodland occur throughout the area, many of which are ancient and priority habitat deciduous woodland. The woods are part of and connected to the adjacent extensive ancient Blean Woods. Part of the West Blean and Thornden Woods Site of Special Scientific Interest (SSSI) extends into this area, covering Barton Wood, Shelford Wood and Beecham Wood in the east. Brickhouse Wood in the north is part of the Little Hall and Kemberland Woods and Pasture Local Wildlife Site (LWS).

There are small areas of priority habitat good quality semi-improved grassland connected to the woodland, including in the north-west, designated as the Blean Pastures LWS.

The undeveloped grass slopes are in use as medium-sized pasture fields, particularly east of St Stephen's Hill. There are larger arable fields east of Shalloak Road, and small areas of traditional orchard south of Broad Oak. Hedgerows are often fragmented and only form a loose network of ecological

corridors linking the woodland blocks. Polytunnels for fruit growing are a dominant feature in the farmed landscape to the east.

Cultural Influences

This area once formed part of the Blean Woodlands and much of the woodland clearance may be the result of the thriving 9th century pottery and ceramics industry and subsequent Medieval brick and tile manufacture that relied on the use of local clay and charcoal. The brick and tile industry, which was centred on Tyler Hill, continued until the 19th century.

The landscape pattern in the area is essentially Medieval. The Kent HLC categorises much of the area as having a post-Medieval field pattern, with rectilinear wavy boundary enclosure pattern in the south-east and straight-edged Parliamentary enclosure in the centre and west. There were also large areas of orchard in the north-east.

The former Hales Place estate lies to the east of St. Stephen's Hill. It was originally built for Archbishop Stephen Langton in 1227 and was a visiting place for Archbishops until the Dissolution. The estate was bought by the Hales family in 1675 who developed the house and parkland. Hales Place has been developed for housing, however remnant parkland in the form of parkland trees is still present including a group of trees known as 'The Square' to the north of the housing area.

The former Canterbury to Whitstable railway line ran through this LCA. The Tyler Hill Railway Tunnel along the route, now within the University of Kent campus, is the world's first modern railway tunnel on a passenger steam railway and is the only Grade II* listed structure in the area. The former railway line is now in use as the popular Crab and Winkle Way cycle route.

Modern development at Rough Common and Broad Oak has grown up around the scattered Grade II listed small halls and large farmsteads. The detached and semi-detached red brick houses are generally set among mature trees, which softens their appearance. There are a number of Conservation Areas which overlap into this area: Hothe Court; Harbledown; Tyler Hill; Allcroft Grange (Hackington); and a small area of Sturry in the south-east.

The University of Kent is sited along the ridgeline initially built in the 1960s. It is a campus style development with medium to large blocks of buildings set within generous amounts of open space.

The landscape has historically been disturbed by quarrying and the Shelford landfill site in the east is a dominant feature. There is a solar farm west of Broad Oak. A number of electricity pylon routes cross the area and there is a telecommunications tower north of Rough Common, plus prominent floodlighting associated with sports pitches.

The road network was established in medieval times as drove roads to the north Kent coast, and the majority of the current roads follow this pattern. Roads are generally steep and lined by mature trees or hedgerows, although there is some fragmentation.

Perceptual Influences

There are extensive views over Canterbury City from the south facing slopes with the Cathedral as a notable focal point. The best vantage points for these views are the slopes beneath the University, Neal's Place and across the grazed pastures of St Stephen's Hill at on the slopes towards Broad Oak/Sturry. At Neal's Place the view is framed by the landform of the open space. Following the valley side towards Broad Oak, views of the historic city diminish although there are

views to across the open valley setting as well as the more industrial landscape of the Stour Valley along the Sturry Road.

Where the gradient is less steep the enclosure from woodlands and buildings restricts all but local views in and out. This occurs to the north of Rough Common and north of the University beyond the steepest part of the slope as the landform starts to level and form part of The Blean and a more rural enclosed landscape.

This LCA with its pasture slopes backed by woodland on the ridge provides containment for Canterbury City and forms a backdrop for views from the City, including the World Heritage Site, and the eastern side of the Stour Valley. The University buildings, St Edmund's school and water tower at Neal's Place are striking elements on the ridgeline in many views from within and around the City.

There has been considerable fragmentation of the landscape, as shown by the Shelford landfill site and growth and expansion of the University of Kent. In contrast, the slopes from St. Stephen's Hill to Broad Oak are largely undeveloped and hence are more rural in character.

The electricity pylons through the area are a detracting feature, particularly where they appear on the highest ground. There has been hedgerow fragmentation and replacement with post and wire fencing. This combined with an apparent lack of management lends a neglected character to some parts of the landscape, particularly around Broad Oak. There is little tranquillity within the area due to its proximity to Canterbury City and the University of Kent campus.

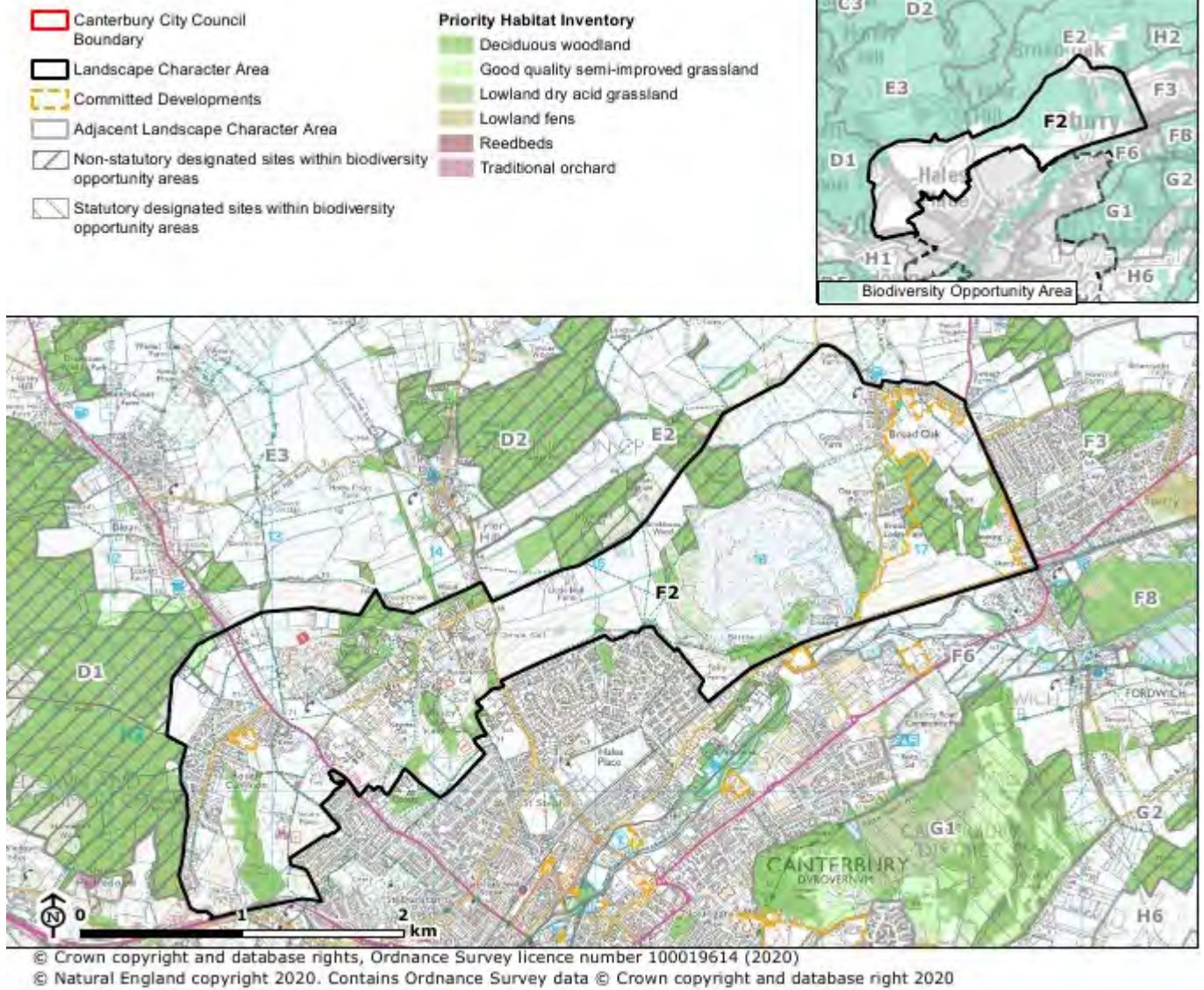
There is a good network of Public Rights of Way (PRoW) throughout the area, which provides connections to the Blean Woods to the north and north-west, as well as between surrounding settlements and Canterbury City.

Evaluation

Key Sensitivities and Values

- Distinctive sloping topography and largely undeveloped ridgeline/skyline which encloses views from, and containment for, Canterbury City – a backdrop in views over a wider area including views across the Stour Valley and the rural ridgeline setting for the Cathedral in long views from the south.
- Long views south over the Stour Valley and Canterbury City to the Kent Downs AONB with the Cathedral as a focal point. Cathedral is seen in a rural valley setting.
- Ecologically valued priority habitat deciduous woodland connected to the Blean Woods.
- Historic field pattern and remnant parkland character at Hales Place provides time depth.
- Scattered farmsteads and small halls designated nationally, and locally as listed buildings and Conservation Areas provide time depth.
- Rural landscape which provides a gap between adjacent small settlements including Rough Common, Tyler Hill, Broad Oak, Sturry and the University of Kent.
- Recreational value through a strong network of PRoW including part of the Crab and Winkle Way link to Whitstable.
- Open parkland of the University of Kent campus.
- Transition to the more rural undeveloped Blean landscape to the north.

Biodiversity Appraisal



Aim: To protect ancient and existing woodland priority habitat and to enhance woodland connectivity as part of the wider woodland network of the Blean BOA.

The east of this LCA lies partially within The Blean BOA, which sets out the following relevant key targets:

- No loss of ancient semi-natural woodland and its mosaic of associated habitats.
- Enhance and reconnect woodland to create a very extensive block of habitat, particularly through the maintenance and restoration of coppice management.
- Restore and enhance heath and acid grassland (including grazed wooded heath) as part of the woodland matrix.

- Create species-rich neutral grassland and to bring it to priority habitat Lowland Meadow quality.

Broad habitat types present within the LCA include arable and horticulture, improved grassland, neutral grassland, broadleaved, mixed, and yew woodland, Inland rock/Quarry and built up areas. Habitats of key importance within the LCA include priority habitat deciduous woodland and good quality semi improved grassland habitat.

Guidance

Landscape Guidelines and Key Habitat Opportunities

Landscape Management

- Protect and conserve ancient woodland and existing woodland priority habitat. This should include strengthening of habitat connectivity by restoring hedgerows and woodland corridors linking to the Blean Woods, and between woodlands around the University and Broad Oak. No further loss or fragmentation of ancient woodland should be permitted.
- Conserve and improve the traditional landscape pattern and structure, as well as increasing biodiversity interest, through the establishment and maintenance of hedgerows along historic field boundaries. Augment fragmented field boundary hedgerows with native species, replacing post and wire fencing where possible.
- Restore and enhance heath and acid grassland. Consider opportunities to create areas of species-rich neutral grassland y, particularly on the slopes overlooking Canterbury City.
- Conserve remnant orchards for their landscape and biodiversity value.
- Conserve and reinforce the parkland character around Hales Place, putting in place a programme of new parkland tree planting where appropriate.

Development Management

- Conserve the local distinctiveness of historic buildings and their rural setting, particularly within the Hothe Court, Harbledown, Tyler Hill and Allcroft Grange Conservation Areas.
- Conserve the rural character of the landscape ensuring that it continues to play a role in the separation of Rough Common and Blean; the University of Kent and Tyler Hill; and Sturry and Canterbury City.
- Conserve and enhance the integration of urban edges, through native wooded boundaries and mature trees to provide visual screening and reduce the impact of built development on the open and exposed landscape.
- Assess new building proposals within and adjacent to the urban area to ensure that an attractive and integrated edge is formed with the adjacent rural and open recreational landscapes. This is important for existing edges as well as proposed new strategic allocation at Sturry/Broad Oak.
- Conserve the role of the area as an essentially undeveloped backdrop and ridgeline in views framing Canterbury Cathedral and avoid unsympathetic land uses on the visually sensitive ridgelines including further tall structures, which would punctuate the skyline or overtop existing buildings.
- Conserve and enhance key views to the city and Cathedral in its valley setting across open fields from the rising valley slopes
- Ensure development at the University and educational establishments respects their open campus parkland character, with generous amenity grassland and appropriate 'parkland' tree planting and recognises the sensitive skyline locations. Seek opportunities to improve the integration of associated playing fields and sports pitches within the local landscape.
- Consider need for a landscape masterplan for the educational establishments in this area to provide a co-ordinated strategy for future development and expansion.
- Avoid extension of development on and beyond the ridgeline into the more rural Blean landscape to the north.



The Blean Woods

Chapter 7

The Blean Woods

Candidate LLD name	The Blean Woods		
Summary Information			
Relationship to existing local landscape designation	<p>The Blean Woods was designated as Special Landscape Area (SLA) in the Kent and Medway Structure Plan (2006).</p> <p><i>The Blean Woods AHLV identifies landscapes important to the character and setting of the Blean Wood Complex. It is an important objective of the Council and other agencies to preserve and enhance this landscape, with long term objectives to meet habitat network potential for woodland and heathland, particularly where it improves habitat connectivity of the Blean woodlands. (Canterbury District Local Plan, 2017)</i></p>		
Extent of area	The LLD covers the woodland and farmland on the clay hills between the city of Canterbury to the south and the coast to the north. The landscape has a unique history and a strong sense of place. It is one of the most extensive complexes of ancient woodland in the south east of England.		
Landscape character context (% coverage by the existing AHLV)	<p>C2: Chestfield Farmland (100%)</p> <p>C3: Court Lees and Millstrood Farmland (49%)</p> <p>C4: Ford and Maypole Farmland (28%)</p> <p>D1: Harbledown (100%)</p> <p>D2: Thornden (100%)</p> <p>D3: Ellenden and Victory (100%)</p> <p>D4: East Blean (100%)</p> <p>D5: Bigbury Hill (99% Canterbury AHLV)</p> <p>D6: Denstead (97%)</p> <p>E2: Sarre Pennn Valley (56%)</p> <p>E3: Amery Court (40%)</p> <p>H1: Harbledown Fruit Belt (8% Blean, 24% Canterbury)</p>		
Evaluation			
Desk review (see table 3.1 and Appendix A)	LCA	Take forward	Notes
	C2	Part	Further survey required to assess relationship with the Blean woodlands, A299 plus large solar farm suggest boundary to be drawn to the south.
	C3	Part	Further survey required to assess relationship to the Blean woodlands. A299 forms defensible boundary and excludes arable farmland rising to the edge of Whitstable.
	C4	Part	Further survey required to assess relationship to the Blean woodlands.
	D1	Y	Fully meets criteria.
	D2	Y	Fully meets criteria.
	D3	Y	Fully meets criteria.
	D4	Y	Fully meets criteria.
	E2	Y	Further survey required to assess relationship with the Blean Woodlands.
	E3	Y	Further survey required to assess relationship with the Blean Woodlands.
H1	N	Not part of Blean, potentially part of Canterbury setting – views.	
Full Evaluation	See overleaf		

<p>Boundary commentary</p>	<p>See Figure 7</p> <p>The woodland is a main feature within this area which should be retained as the Blean Woods LLD.</p> <p>Having assessed the Blean Woods landscape boundary it is concluded that potential amendments to the Blean Woods boundary could be justified to further strengthen the woodland as the main feature of this LLD. The existing boundaries encompass the entirety of the woodland blocks and include areas important to the setting of the woodland. Areas of major development have been excluded.</p> <p>The western boundary is the district boundary and the Blean Woods is a contiguous LLD within Swale Borough.</p> <p>To the north the boundary includes parts of character area C2 which forms the farmland setting to the woods excluding the development around Clapham Hill and Pean Hill. The existing boundary is considered to be appropriate as it follows Fox Cross Road and rights of way. It is proposed that the current boundary is retained, with the following amendments to the boundary to the north:</p> <ol style="list-style-type: none"> 1. The boundary is recommended to be drawn southwards along the New Thanet Way (A299) which essentially marks the valley floor with slopes ascending to the south and the woodland edge. The area north of the New Thanet Way is of value as the rural setting to Whitstable but is open arable farmland and does not have the same qualities as setting to the Blean Woods. 2. The boundary has been drawn to the south of the Thanet Way to exclude the large area of solar farm. <p>To the east the existing boundaries which follow Bullockstone Road and exclude the settlement of Herne Common and continuing to include the farmland south of Herne and along Maypole Road are appropriate, with a minor extension:</p> <ol style="list-style-type: none"> 3. To incorporate Buckwell Wood. 4. The southern boundary is more difficult and has been extended to incorporate Kemberland Wood, and Little Hall Wood on the Sarre Penn valley slopes. <p>Recommendation 5 is put forward as an option for discussion and consideration through the development of the Local Plan and could represent a significant change in the boundary.</p> <ol style="list-style-type: none"> 5. Three potential options have been put forward for more significant extensions to the existing boundary, with a fourth option to apply an alternative policy approach. The three extension options would be a departure from the existing purpose for designation of the Blean Woods AHLV, which is to recognise the high landscape value of the woodland, which is also designated a Special Area of Conservation and Site of Special Scientific Interest. <ol style="list-style-type: none"> i. Extending the LLD to include the predominantly farmland currently excluded between the University and Clowes Wood, to incorporate the Sarre Penn Valley, the Crab and Winkle Way and the distinctive church of St Cosmos and Damian in the Blean on the ancient salt road to the coast. This area includes some more intensive horticultural/orchard land uses and excludes the main settlement of Blean. The area, although not wooded, is strongly associated with 'The Blean' landscape. ii. A southern boundary along the Sarre Penn Valley (footpath): This would also extend the designation significantly south across areas of farmland, terminating along the valley that marks the rise to the Stour Valley slopes and University. It includes medieval field patterns, remains of medieval settlement, Church of St. Cosmos and Damian, and recreational routes (Crab and Winkle). It is a clear line on the ground although would divide the valley which forms a distinctive landscape unit. iii. Drawing the boundary further back along Tyler Hill Road. This would also include a wider area of the distinctive farmland extent of The Blean, with the road forming an identifiable boundary on the ground. It captures a significant area of farmland that is characteristic between the large woodland blocks at Thornden Woods, Clowes Wood and Church Wood. It would exclude features such as the church of St. Cosmos and Damien and medieval earthworks. iv. Instead of extending the LLD, this recommendation could instead be addressed by a relevant Site or Development Management policy to ensure that any development proposals in this area have regard for the special characteristics and sensitivities of the area.
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<p>Recommendations</p> <ul style="list-style-type: none"> ■ The woodland is the main feature within the area. Retain the existing AHLV as an LLD, with boundary modifications as noted above (1-4). ■ The approach to the area of land to the south of the Blean Woods LLD should be considered through the development of the Local Plan (note 5 above). It is recognised that any extension would be a departure from the previous designation, and although there is potential
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to extend the LLD into this area, the landscape qualities of the area could alternatively be addressed through Local Plan policies that require the design and form of any new development to recognise the special characteristics and sensitivities of the Blean Woods LLD.

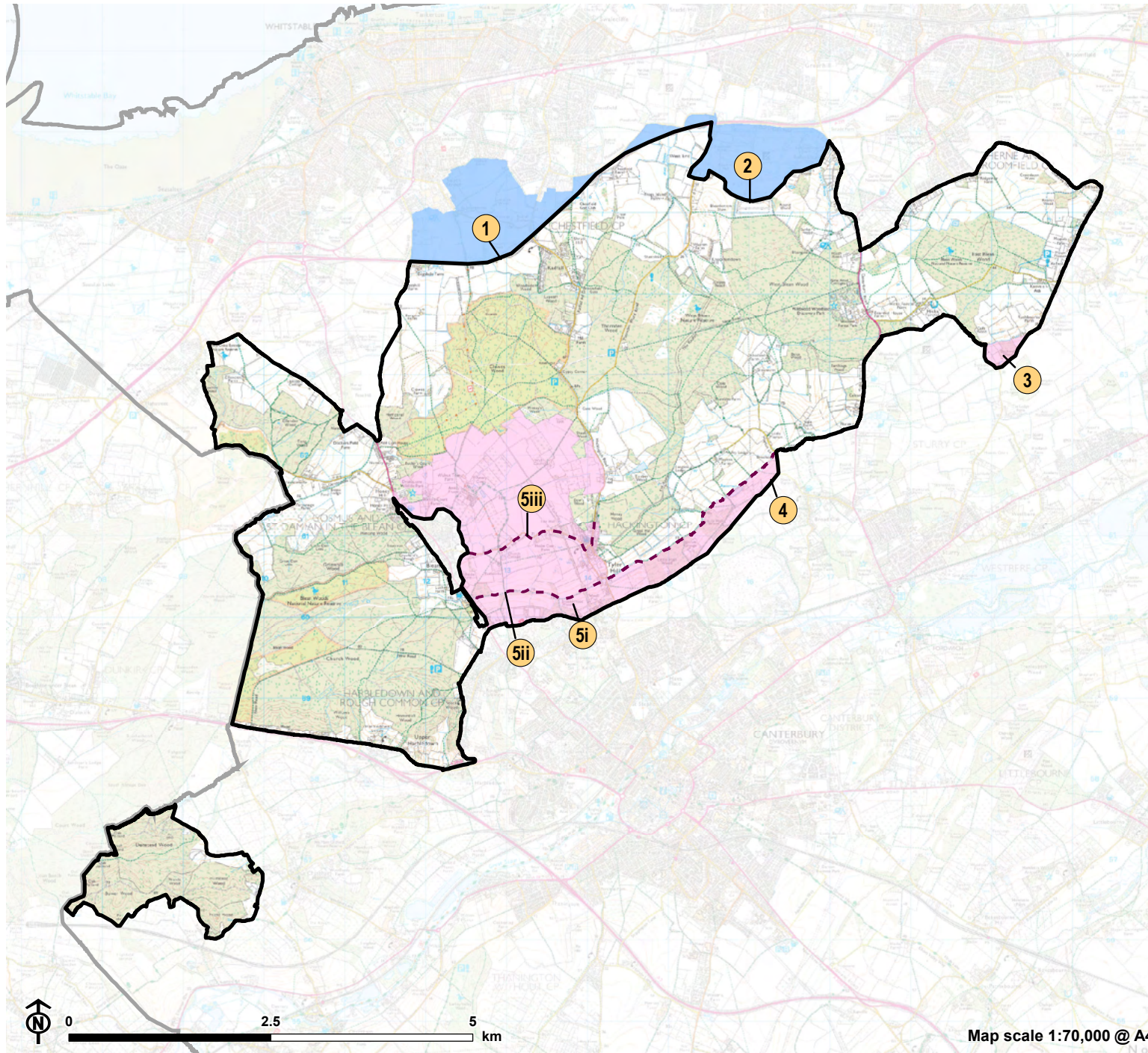
- A similar policy approach could be followed for the areas abutting the coastal settlements to the north which are part of the visual/agricultural setting of The Blean, although now not within the LLD boundary.
- The LLD recognises the special and outstanding natural, historic and cultural landscape and strong sense of place of this unique area. Continuing integrated management by the various landowners as promoted through The Blean Initiative is required.

Full Evaluation – The Blean Woods

<p>Local distinctiveness and sense of place</p>	<p>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.</p> <p>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.</p>
<p>Landscape quality</p>	<p>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.</p> <p>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.</p> <p>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.</p> <p>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 commercial area cut into the woodland at Canterbury Road.</p> <p>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.</p>
<p>Scenic qualities and perceptual aspects</p>	<p>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.</p> <p>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.</p> <p>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.</p>
<p>Natural and cultural qualities</p>	<p>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).</p> <p>The matrix of woodland grassland and heathland habitat supports the rare heath fritillary butterfly and diverse and rare woodland birds including nightingales and nightjar.</p> <p>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 pigs, while the entrances to the Blean marked by 'gates' as at Radfallgate.</p>


Recreation value	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.
Associations	A historic landscape with strong associations with the medieval period of management, which can still be read in the landscape today.

Figure 7: The Blean Woods Local Landscape Designation



 Canterbury City Council boundary

Local Landscape Designation

 The Blean Woods

Proposed Changes

 Addition

 Removal

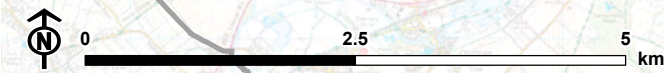
Proposed Boundary Changes

- 1** Boundary drawn southwards along New Thanet Way (A299) which essentially marks the valley floor.
- 2** Excludes the large area of solar farm.
- 3** Incorporates Buckwell Wood.
- 4** Extend to encompass Kemberland Wood, and Little Hall Wood on the Sarre Penn valley slopes.
- 5** 5i) Extend the LLD to include land between the University and Clowes Wood, incorporating the Sarre Penn Valley, the Crab and Winkle Way and the distinctive church of St Cosmos and St Damian in the Blean, on the ancient salt road to the coast.

5ii) A southern boundary along the Sarre Penn Valley (footpath)

5iii) Drawing the boundary further back along Tyler Hill Road

5iv) Instead of extending the LLD, this recommendation could instead be addressed by a relevant Site or Development Management policy to ensure that any development proposals in this area have regard for the special characteristics and sensitivities of the area.



Map scale 1:70,000 @ A4