

Our reference: HPC1360

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Re: Regulation 18 Consultation on the Draft Canterbury District Local Plan to 2045

Site: Land Adjoining Honey Hill Farmhouse, Honey Hill, Blean, CT2 9JP

Dear Planning Policy Team,

We write to you on behalf of our client, Mr Michael Kay, to Canterbury City Council's Regulation 18 Draft Local Plan consultation. Hume Planning Consultancy are providing a written representation to the emerging Plan's housing strategy, with reference to our client's interest in the above site, pursuant to its positive rating in the latest version of the Strategic Land Availability Assessment (SLAA, July 2022) which has been published by Canterbury CC.

The location and extent of the site is identified on the enclosed site plan (outlined in red). The site is in single ownership, and this will also help to simplify accelerated delivery of the development opportunity. This acceleration of delivery will also be assisted by the size of the site which, as well as providing housing choice to meet the need identified in a desirable location, will be attractive to smaller housebuilders, which is supported by national guidance and local plan policy.

These representations focus on the site and the reasons the land can be justified for development because of its locational advantages, the fact that it is unconstrained and thirdly its single ownership and ability to make a short-term impact in meeting the development requirements of the district. For these reasons, together with the Council's positive assessment of the land in the SLAA, it is asserted that the land should be allocated within the emerging Canterbury Local Plan. Additionally, it is also asserted that the proposed settlement confines of Blean are inconsistent with the SLAA assessment and LPA's decision-making on adjoining application sites and therefore should be extended to include the subject site.

Spatial Strategy

We welcome Canterbury's commitment to meeting its housing need, with Policy SS3 seeking to provide an average of 1,252 new dwellings per year, which equates to approximately 31,300 new homes over the Plan period. The ambitious level of growth proposed, and the overall spatial strategy is supported.

However, it is considered smaller size additional sites, if suitable and available, should be additionally included within the Plan (especially where high scoring in the SLAA such as this site). This is because a large proportion of the plan's growth is again being directed towards Canterbury (over 10,000 dwellings), with large extensions proposed to the east and West of Canterbury, and also at Whitstable (over 3,500 dwellings) and at Cooting Farm Garden Community (3,200 dwellings). With large strategic sites delivery rates can easily slow down during the plan period and under-deliver.

Under Policy SS3, Blean is identified as a Rural Service Centre, wherein it will play a critical role in supporting rural communities and the plan looks to ensure this function continues over the period of the Plan by supporting appropriate growth within Rural Service Centres. In comparison, under the adopted Local Plan, Policy SP4 identifies Blean as a Local Centre which holds a lower place in the settlement hierarchy. The elevated role of Blean as a Rural Service Centre within the settlement hierarchy is therefore supported.

Whilst it is acknowledged that emerging R2 'Rural Service Centres' allows for allocated development and minor infilling on appropriate sites within the settlement boundary of the designated service centre of Blean, it is noted that the proposed confines of Blean as drawn do not extend northwards to include the subject site. This directly conflicts with the SLAA, which under their assessment of Townscape and Landscape impacts of the site, stated the following:

"Townscape: The site is located within the settlement of Honey Hill".

"Landscape: The site borders open countryside to the north and north west and is contained on all other sides by existing development".

In addition, according to the recent relevant planning history (detailed below), in their assessment and subsequent approval of the applications for new dwellings adjoining the site, which also formed part of Honey Hill Farm historically, the LPA concluded that these sites are located within Blean and the location of the development is therefore in line with adopted policies SP1 and SP4.

On this basis, it is asserted that the settlement boundaries should either be extended at the northern end of Blean to include this site within the village confines. Furthermore, it is considered preferable, in order to allow more certainty for small housebuilders (for the site-specific reasons outlined below and the positive SLAA assessment compared with other land opportunities), that the site is individually allocated. We believe this will provide more certainty and accelerate housing delivery.

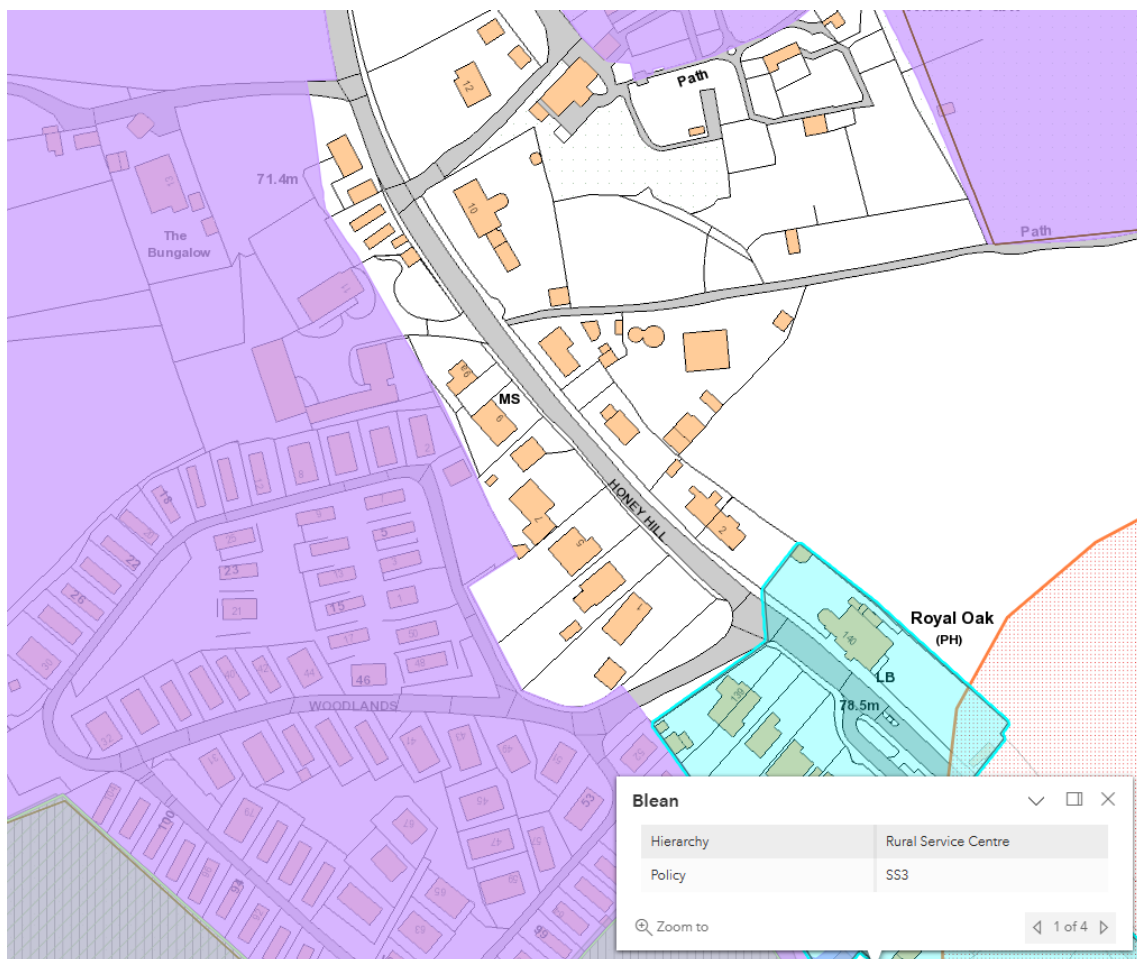


Figure 1: Extract from emerging policy map demonstrating the proposed settlement boundary in blue

The draft Local Plan includes one allocation at Blean under Policy R4 'Land at Mill Field' which has been put forward for 36 dwellings. The site is located towards the south eastern edge of the village off Tyler Hill Road and is surrounded by open countryside and sporadic residential development.

It is noted that the SLAA assessment (ref. SLAA036) concludes that the site would not be technically suitable for development due to its greenfield nature, being fully within a

conservation area and there is concern regarding landscape impact. For these reasons, the next stage of review was not undertaken. The following specific comments are made about the site in the SLAA assessment:

- Impact of development at the junction of Tyler Hill Road and Blean Common is likely to need review.
- No footway provision which may need negotiation over private land.
- The majority of the site is surrounded by open countryside and any development would impact on the landscape. Some long distance views to the north of the site could be affected. Development in this location would be a projection into the open countryside and effects on landscape would need to be carefully considered.
- The site is located in the Blean conservation area.

We would question why the Council have put forward this site as an allocation given the overall negative SLAA rating and being unsuitable for development. Nevertheless, given the size of the allocation and in light of the above constraints and pedestrian connections/ownership query, we anticipate the delivery of the site could be delayed, therefore allocating an additional smaller and unconstrained site, such as this, at the opposing end of the village would accelerate the sustainable delivery of high quality homes in Blean in the short-term.

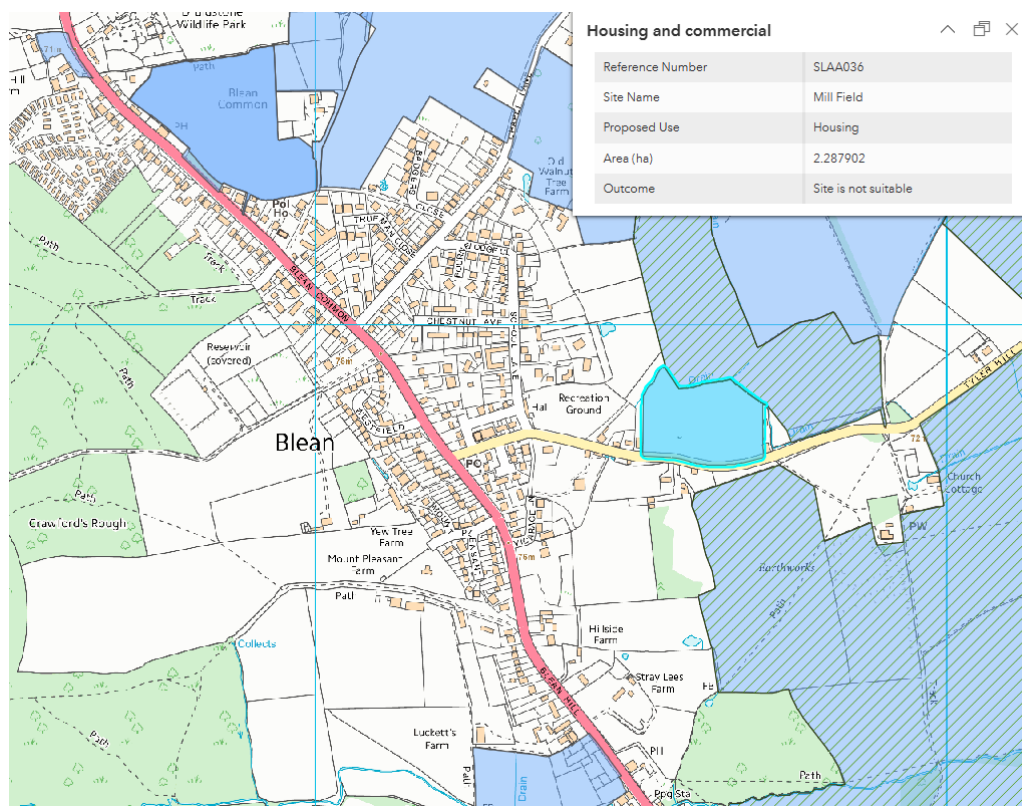


Figure 2: Proposed allocation at Mill Field under draft policy R4 highlighted in light blue

SLAA Rating

The site was submitted to the Council during the call for sites process in June 2020. The published SLAA assesses the site as follows (please refer to reference: **SLAA021**):

Recommended yield: 5 dwellings

Summary of Assessment:

- The site is located within the settlement of Blean,
- The access is considered to be achievable from Honey Hill but would need improving,
- Site is 600m to Chapel Lane leading to Crab & Winkle cycle route and 900m to village shop,
- The site is located adjacent to/within the setting of a grade 2 listed building, Honey Hill Farmhouse. It is considered that the site could be sympathetically designed to ensure that the setting of the building can be provided,
- The site borders open countryside to the north and north west and it contained on all sides by existing development,
- No incompatible land uses nearby,
- The site is technically suitable for development and suitable in terms of existing policies but identified constraints may affect yield,
- The site is considered available and achievable,
- No major issues identified which could affect viability,
- Given the location of the site within the setting of a Grade II listed building, it is considered that a yield of 5 dwellings would be appropriate.

Despite this positive SLAA rating, the site has not been carried forward as a housing allocation for Blean.

Site Background & Characteristics

The site presents an opportunity for residential development that would provide a contribution towards the housing objectives of the Council and meeting the future needs of the district in a sustainable way.

Our client is the landowner of the above site which falls under single title ownership (Land Registry Title Number TT17517), which would facilitate early delivery.

The site extends to 0.28 hectares and comprises an underutilised field which was formerly part of Honey Hill Farm and contains two single storey buildings sited towards the eastern edge of the land. Located in the southern portion of the site is the Granary and two mobile homes of which a planning application has been submitted for their redevelopment to create a single dwelling. The LPA are supportive of this application and have resolved to approve the application subject to the Stodmarsh issue being resolved.

There is existing access to the site from the south off of Honey Hill, the main road through Blean, which also serves the Farmhouse (11 Honey Hill), the adjoining Granary, The Dairy and Kentish Barn residential dwellings. The access was modified as part of earlier applications and provides suitable visibility splays in both directions, which can be confirmed by a highways consultant and highway drawings provided if the site were to be allocated or come forward as an application.

The perimeter of the site is lined with brambles, hedging and shrubs which provides some visual enclosure, and the topography of the site is flat. To the south and west, the site adjoins the properties of Honey Hill Farmhouse and Honey Pei Cottage and mobiles home and Granary building which are proposed for redevelopment to create a single dwelling under application ref. CA/21/01390 & CA/2101391. As a result of its location and being nestled within existing development, it is considered that development at the site would form a logical extension to the village. As highlighted by the Council's SLAA assessment, the site is surrounded on three sides and is of sufficient size to accommodate landscape buffers and therefore create a soft, permanent edge to the village.

The site does not lie within a conservation area. Grade II listed Honey Hill Farmhouse and curtilage listed building the Granary adjoin the site to the south. Both buildings are afforded separation from the site, by virtue of the Farmhouse in particular having a long rear garden. Detailed layout and design proposals would ensure that an appropriate setting is provided to these heritage assets. It is also considered that an enhancement to the setting of the listed building could be achieved through the tidying up of the existing land, additional landscape planting and high quality development.

The site falls within the Blean Woods Area of High Landscape Value but has no ecological designations. The site is within Flood Zone 1, an area of low flood risk.

The emerging Local Plan categorises Blean as a 'Rural Service Centre' and the site is located within 15 minute walking distance of the village services, including a shop, Blean Village Hall, the Royal Oak pub, Blean Surgery, Nature Reserves and bus stops (Triangle and No's 4, 903-

906, 913 services with multiple stops per hour). On this basis, it common ground that Blean and the subject site are regarded as a sustainable location for development. Given its location and the fact that it is surrounded by development on all sides, the site lies within the village of Blean.

The following planning history is relevant to the site, which has involved the successful redevelopment of redundant farm buildings and creation of infill dwellings at Honey Hill Farm over the past 10 years.

- **CA//13/01314:** Planning permission granted for the refurbishment and conversion of former agricultural buildings to form 2 dwellings including demolition of milking shed at Honey Hill Farm.
- **CA//15/01828:** Planning permission granted for the erection of a detached dwelling to the south of Honey Hill Farm.
- **CA//19/01495:** Planning permission granted for the erection of a two-storey detached dwelling to the south of Honey Hill Farm (adjoining the above site).
- **CA/21/01390 & CA/2101391:** Planning and listed building consent applications submitted in June 2021 for the erection of a detached dwelling incorporating granary building at Honey Hill Farm. The LPA has resolved to approve these applications subject to a solution being secured for the Stodmarsh Nutrient Neutrality issue which affects large parts of the district and it is hoped they can be formally approved imminently.



Figure 3: Planning History Context Map, with the subject site shaded red

Taking account of the SLAA assessment and these characteristics, it is estimated that the main rectangular portion of the site could accommodate a minimum of 5 dwellings. If allocated, detailed layout proposals and technical work would ensure that suitable access is provided along with a high quality and heritage-led housing development that would have a positive impact on the character of Blean and surrounding residential properties, and conserve the setting of the adjoining heritage assets, through the use of landscape buffers and sensitive design and siting.

Anticipated Timescales for Delivery

Summer 2023: Pre-Application Submission

Early 2024: Application Submission

Autumn 2024: Permission Received & Commencement of Development

Summer-Autumn 2025: Completion & Occupation of Development

There have been regular approaches from developers and housebuilders to acquire the site, and interest remains high given its attractive village location and its unconstrained nature.

In summary, there are no known impediments to the development of the site and the location represents a logical extension to the village of Blean which would deliver 5 dwellings. There are no restrictive covenants or ransom strips as demonstrated by the Title Register. There are no technical constraints that would affect delivery. Heritage and access considerations, as noted in the SLAA, can be addressed through the design process following the site allocation and it is noted that any future application would be accompanied by a heritage assessment. As such, for the purpose of supporting future housing delivery and the plan creating certainty to guide development for housebuilders and landowners and consistent with the LPA's proposed housing objectives over the plan period up to 2045, it is requested that this site, which is suitable, available and achievable, is allocated as a housing site.

Hume Planning Consultancy welcome the opportunity to comment on this stage of the Council's emerging Local Plan 2045 and would be happy to discuss the attributes of the site and its allocation in further detail, should it be of assistance.

Yours sincerely,

Hume Planning Consultancy